



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 745-9833 • Fax (907) 745-9876

planning@matsugov.us

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Ms. Edrie Vinson
Environmental Project Manager
Alaska Division of the FHWA
P.O. Box 21648
Juneau, Alaska 99802-1648

Mr. Dale Paulson, Director of Regulatory
and Environmental Affairs
KABATA
550 West 7th Avenue, Suite 1850
Anchorage, Alaska 99501

Re: Preliminary Draft EIS Comments

Dear Ms. Vinson and Mr. Paulson:

Please accept the following as our initial comments on the Knik Arm Crossing Preliminary DEIS. It is our understanding that the Cumulative Impacts Section and 4f Section are being revised and we will need additional time to review those sections. The review of this document has been a massive undertaking and in general the PDEIS only goes into limited detail. Direct impacts are limited to the construction impacts. This is a narrow interpretation. The population shift of some 30,000 additional people by 2030 as a direct result of the bridge into the area of impact as portrayed on Figure 4.2 Southwest Mat Su Population points to the need to expand the definition of direct impacts to include economic and fiscal impacts, land use concerns, and public facility requirements.

1. Reviewing the Purpose and Need Statement in the PDEIS, the MSB found that earlier concerns raised by the MSB about the “rosy” picture of the transportation network on the MSB side were not addressed in the PDEIS. Page 1-2 second full paragraph describes the connection of Point MacKenzie Road via Knik Goose Bay Road and alternatively to Burma Road to the Parks Highway. This description fails to point out the condition of Point MacKenzie Road or the fact that its connection, Parks Highway via Knik Goose Bay Road, will deposit traffic to the most congested intersection in the MSB and that Burma Road is nothing more than a cat trail. An unknowing reader could take this to mean that these roads are currently built to NHS standards and provide a safe, efficient and effective connection to the Parks Highway. A more realistic description of these routes should be provided in this section. These comments were provided earlier as part,

when the purpose and need statement was being developed, but apparently were not considered.

There needs to be a clear explanation as to why the intersection of Point MacKenzie Road and Burma Road was selected as the logical terminus on the MSB side and that it meets the independent utility requirement.

2. Section 3.1.1.3 Existing zoning. This discussion is in error. The Matanuska-Susitna Borough has several area wide zoning requirements in place dealing with building set backs, water body setbacks, junk and trash, gravel extraction, etc. A review of Title 17 is in order. This discussion may lead the reader or a developer to believe that there are no land use requirements in the MSB.
3. Section 3.1.2.1.1 Matanuska-Susitna Borough-wide Comprehensive Plan. This plan has been updated in late 2005. The title should reflect Matanuska-Susitna Borough-wide Comprehensive Plan 2005 Update. The discussion should be modified slightly to reflect this update.
4. Section 3.1.2.1.2 Core Area Plan (2003). 2003 represents the beginning of an update to the Core Area Plan. This discussion of the Core Area Plan does not define its location as being the unincorporated area between the cities of Palmer and Wasilla. The Core Area is located 40 miles from the project area yet the PDEIS refers to it often. Using the Core Area Plan in the manner that the PDEIS does to justify the project or to state that the KAC is not in conflict with the Core Area Plan is not always appropriate. An specific example is provided later in these comments
5. Section 3.2.2.1.1 Mat Su road system. This section only alludes to the condition of the road system in the study area. The Purpose and Need section indicates that there is an existing viable connection to the Parks Highway via Burma Road and South Big Lake. There needs to be a realistic assessment of the existing condition of the roads in the study area and the massive capital improvement needs to make the road system on the Mat Su side viable to support KAC as a regional transportation facility. There should also be a discussion as to how funding KAC's attendant transportation improvements beyond the bridge and its approaches will be in direct competition with other needed transportation improvements in the populated center of the MSB.

The Burma Road discussion glosses over its actual condition. The South Big Lake Road discussion does not mention the need to realign this narrow two lane road.

The planned road way system discussion does not reflect the enormity of the need to upgrade several major arterials along the Parks Highway corridor and in the Core Area of the MSB. There is a need to create a new Parks Highway alternative south of Wasilla to accommodate the project traffic demand. The KAC does little to relieve the traffic demand in Wasilla and the populated core area of the borough. If a new Parks Highway connection at Big Lake is not funded in support of the KAC, the regional connectivity purpose and need for this project is not valid. Without a new Parks Highway connection at Big Lake, the KAC traffic will be deposited on the Knik Goose Bay Road worsening the traffic problems on this route and its intersection with the Parks Highway in Wasilla.

The EIS needs to state clearly the enormity of the transportation needs in the MSB and show that KAC does not mitigate existing or future traffic needs in the existing populated Core Area of the Borough. There is a misconception that the KAC will solve many of the traffic issues in the Wasilla and the populated Core Area of the borough. This needs to be dispelled.

6. Section 4.3.2 Build Alternatives: Mat Su Side.

This section describes an MOA signed by KABATA, ADOT&PF and the MSB relative to the funding, maintenance, and upgrade of 13.6 miles of Point MacKenzie Road to National Highway Standards, initially as a two lane facility and ultimately to a four lane facility as traffic warrants in the future. The estimated cost in this agreement for the initial two-lane was \$42.0 million dollars and was to be funded with KABATA funds. Shortly after this agreement was signed, KABATA went to the State Legislature and had \$15.0 million dollars in State General Funds placed in the FY'07 State Capital Budget to pave the existing gravel road. It is unclear if the roadway will be upgraded to National Highway Standards with this \$15.0 million and it appears that if funded, this project is outside the scope of this EIS and funds are not within the context of the \$600,000,000 estimated for the bridge construction. It is not clear how this project fits into the terms of the MOA.

7. Section 4.4 Economic Impacts

This section is limited in scope and does not address the important question as to whether or not sufficient long term commercial and industrial activity will occur to offset the costs of public infrastructure needed to support the residential expansion on the Mat Su side. If the growth on the Mat Su side is mostly residential, then the tax revenues from residential development will not be sufficient to offset the public infrastructure costs. Residential development typical provides \$.65 to \$.70 in revenue for every dollar in services provided by the local government. Page 4-99 points out that most of the higher value department stores, bank headquarters, home centers, other specialized professional services will remain in Anchorage with only neighborhood commercial activities located on the Mat Su side. This discussion supports the concern that there may be a net cost to the MSB as a result of the KAC. To put it another way it creates a deficit tax situation where the MSB is saddled with providing services without collecting sufficient revenues to pay for them. This analysis needs to be provided in the Economic Impact Section with proposed mitigation measures. Again, the MSB considers this a direct impact of the project and requires mitigation. The current economic impact section contained in the PDEIS is insufficient in view of the enormity of the impacts that the KAC will cause to the Mat Su region.

8. The PDEIS often refers to the 2003 MSB Core Area Plan. This plan is still being updated and what is being referenced can only be considered a draft inventory. The MSB is concerned with the extent that this document is being use as a reference and the fact that it deals with the unincorporated areas between the Cities of Palmer and Wasilla some 40 miles from the crossing site.

For example, Page 4-254 Cumulative Impacts Build Alternatives: Mat-Su Approach Alternatives: The Mat-Su approach alternatives and the Southern alignment bridge alternatives (within the Mat-Su) have not been identified as directly conflicting with the Matanuska-Susitna Borough's Core Area Plan or community-based SpUDs and LRTP. The updated Core Area Plan will identify needed transportation improvements within the populated core of the MSB. When published, it is likely that there will be conflicts between the recommendations of the Core Area Plan and the KAC and/or its attendant transportation improvements needed to make it a true regional facilities. An example of an attendant KAC facility is the upgrade of the Burma Road/South Big Lake/Big Lake Corridor that is being funded outside the scope of the KAC project with General Fund dollars. These funds could be used to fund needed transportation improvements within the populated Core Area of the MSB. Consequently, the KAC and its attendant projects are in conflict with the Core Area Plan and its recommendations.

This discussion points to the general issue with the impacts to the MSB caused by the bridge construction. The focus of the MSB has been the current areas of growth. The Bridge will redirect that growth and have a significant impact on the MSB being able to provide services to both the populate core area and the Point MacKenzie area. The PDEIS does not address this impact at all. It's only recommended mitigation is to provide a modest amount of funding for planning purposes and to support efforts to secure grant funds through the EPA.

The greatest concerns to the MSB are the direct, cumulative and secondary impacts and the proposed mitigation of these impacts within the MSB. The MSB will be the recipient of both benefits and impacts caused by this project. The proposed mitigation measures are very limited and do not address the economic and fiscal impacts of a potential deficit revenue situation whereby public services cost more than revenues collected. This document needs additional work to appropriately address the impacts and measures needed to mitigate these impacts on the Mat Su side.

The MSB will review the latest version of section 4.9 cumulative impacts and provide comments as soon as practicable. We will also provide some more technical comments relative to Chapter 3 along with our Section 4.9 comments.

Thank you.

Sincerely,

M. Murph O'Brien,
Director of Planning and Land Use

cc John Duffy, Borough Manager