



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-6898

Regulatory Branch
South Section

Ms. Edrie Vinson, Environmental Project Manager
Federal Highway Administration
Alaska Division
709 West Ninth Street Room 851
Post Office Box 21648
Juneau, Alaska 99802

Dear Ms. Vinson:

This letter is prepared in our capacity as cooperating agency for the Knik Arm Crossing, Anchorage, Alaska, Federal Highway Administration project No. ACSTP-0001 (277). At this time we are specifically commenting on the scoping meeting of March 29, 2005. All of the proposed alignment segments would impact wetlands or waters of the United States, regulated under Section 404, of the Clean Water Act, and the areas subject to the ebb and flow of the tide, are subject to Section 10 of the Rivers and Harbors Act of 1899.

In general, we found the meeting provided the beginnings of a full and fair disclosure of all elements to be considered under the National Environmental Policy Act (NEPA). However, there were important areas brought forward in the meeting that we believe need further work. It is clear that with the high level of public interest and concern, that we must work especially hard to be sure that the selected alignment and bridge design avoids and minimizes losses of wetlands, or waters of the U.S., wherever practicable, and that the resulting bridge offers advantages to the community that warrant any unavoidable environmental losses.

We recommend exploring a three dimensional modeling of Knik Arm, to better investigate the impacts of the bridge on the local environment. The current proposed mathematical modeling is considered adequate for theoretical design considerations, but lacks the tools to give us specific information needed to evaluate the long-term impacts of the proposed designs.

While most of our specific comments on the scoping meeting are listed below, we found, in general, a tendency for under-reporting of the problems associated with this project as proposed.

The most apparent inadequacy occurs in the addressing of the purpose and need for this project. Five points were brought forward under that heading.

1. Efficient surface and freight and goods movement needs between the port of Anchorage/Ship Creek industrial area and the and Port MacKenzie Port District
2. Alaska military support for intermodal military deployment and resupply associated with their critical homeland security infrastructure and military mission
3. Safety and redundant overland routes connecting area airports, military bases, ports, and hospitals for emergency response and evacuation needs.
4. Inadequate existing transportation infrastructure to meet existing and projected population and economic growth forecasts for the Upper Cook Inlet region.
5. Conventional funding for the Knik Arm Crossing project has historically been beyond the capabilities of state and local governments.

Item number (1.), The efficient movement of freight and goods between ports: Representatives of both ports disagreed with this need. Since both ports handle much different types of cargo, and will do so into the foreseeable future, a surface link does not seem realistic. They can transfer goods by water-surface transport (barge, ship, etcetera), in greater bulk, and with less handling than the proposed bridge would allow. The distance by road between the two ports (80 miles) was mentioned several times. It seems unlikely that freight would be hauled one truck at a time over the road system when water-borne transport would be more efficient.

Item number (2.), Alaska Military operations support: The military have stated on more than one occasion, that the bridge plays no part in their deployment plans. In fact the construction of the bridge may inhibit their movements, and interfere with their mission in other ways depending on the final configuration and alignment.

Item number (3.), Safety of redundant routes: There is some merit to this concept, however to realize the potential of this advantage a massive building of infrastructure on the north side of Knik arm must take place. This development will need to be fully addressed as indirect and secondary impacts to any of the bridge alignments considered.

Item number (4.), Inadequate existing transportation infrastructure: The existing infrastructure appears to be adequate at the present time, and the proposed location of the bridge would not relieve a significant amount of the existing traffic congestion. The bulk of the current commuters from the valley would still find the existing route shorter and faster for them to use instead of driving to Point MacKenzie, paying a toll, then being channeled into the very congested downtown area of Anchorage. The future population of the valley will have a decreasing percentage of workers making the commute into Anchorage, although the overall numbers will increase. The building of the bridge would open an area for development that would otherwise remain mostly wilderness for many years to come. Those that build close to the bridge would use it as a means of commuting to Anchorage, while those that live in Wasilla and Palmer would continue to use the existing routes. This opening of the area for development will need to be addressed as a secondary impact of the project, regardless of the configuration or alignment that is chosen for final design.

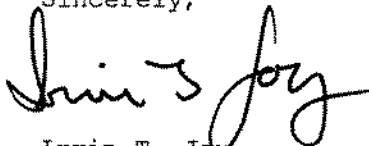
Item Number (5), Conventional funding for the Kink Arm Crossing: This item cannot be considered under purpose and need. Funding to build a project is part of the solution to a specifically identified problem not the reason for the proposed project.

References have been made to the bridge being part of a regional supply route to the interior. If this is the case the possibility of opening a transportation corridor from Port MacKenzie to connect with the Parks Highway somewhere near Houston should be considered. However, if this corridor is to be considered to fortify the purpose and need for the project, it will need to be evaluated as a secondary impact of the proposed project. This would involve the mapping and detailed discussion of the resources impacted by the development of this corridor.

The lack of participation by the Alaska Railroad in this project greatly limits the purpose and need. Any discussion of the movement of large amounts of freight and people between Anchorage and the interior must include the largest carrier in the state. The bridge not being designed to at least accommodate future rail transport is a major design flaw.

I have noticed a lack of alternatives, both in design, and location. There are two possible bridge alignments considered, and three approaches on the south side. I would encourage the consideration of other alternatives, especially in regard to the design of the bridge itself. Both of the alignments and all the approach routes presented to date have shown very large amounts of fill used in the approaches. We encourage the consideration of alternative designs, which minimize fill amounts.

Sincerely,



Irvin T. Joy
Project Manager
South Section