

REPLY TO
ATTENTION OF:DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898**MAY 31 2005**Regulatory Branch
South SectionMs. Edrie Vinson, Environmental Project Manager
Federal Highway Administration
Alaska Division
709 West Ninth Street Room 851
Post Office Box 21648
Juneau, Alaska 99802-1648

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 May 11, 2005. All of the proposed alignment segments would impact wetlands or waters of the United States, regulated under Section 404 (b) 1, 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.

While most of our specific comments on the scoping meeting are listed below, in general, I found a tendency to under-estimate the alternatives. I found that the individual reports on the various alternatives presented exhibited a marked bias, and it appeared that in some cases that little research went into the findings.

Of the alternatives presented the various bridge designs were dealt with most thoroughly. Yet even here a marked preference for a causeway was demonstrated. While I understand that when considering practicable alternatives cost is often the driving factor, if your processes are so limited that only one design is truly considered, it might be disastrous for your project if that design is found to have unacceptable impacts to the environment.

While the propose and need for the proposed project has been considerably reworded, it seems that you are not yet to the point you need to be. The problems with defining the purpose and need point out there may not be one. While using it only as a screening criteria for the purpose and need, meeting the intent of the Alaska Legislature to support the economic welfare of the State through development of upper Cook Inlet transportation systems, may not be your best choice as a listed item in the purpose and need statement. This type of statement gives the impression of building to satisfy political programs instead of specific solutions to existing and pressing problems.

Federal Highway
Administration

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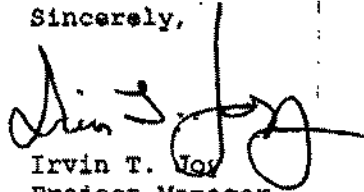
Juneau, Alaska

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Once again I must question the real need to build this structure to provide connectivity between the two ports. While I see it as a possible side benefit to the structure itself, neither port has expressed a need, or even any real desire to be connected to the other port via a land connection. Ports by their very definition handle large volumes of freight by using shipping, and even with the bridge in place that would still be the most efficient way to transfer large amounts of commodities from one port to another. This connection should certainly be explored in the EIS, but I wonder how much it adds to the purpose and need.

I believe the interaction with the Alaska Railroad Corporation was quite beneficial to the process. It demonstrated a willingness to look at other alternatives besides a strictly vehicular bridge.

Sincerely,



Irvin T. Joy
Project Manager
South Section

Enclosure