



Highway to Highway Agency Scoping Comments: July 11, 2008- October 8, 2008

As of October 8, 2008, at the close of the 90-day scoping comment period, written or verbal responses had been received from 18 agencies and tribal entities. While most agencies submitted responses to accept or refuse the invitation to become a participating agency¹, some agencies did not provide specific scoping comments. Agencies that provided specific scoping comments and the date of their correspondence are listed below. These comments are summarized in the following table.

Agency	Comment Date	Comment Format
Advisory Council on Historic Preservation	August 6, 2008	Letter
Federal Aviation Administration	August 21, 2008	One-on-one meeting
Federal Transit Administration	August 20, 2008	Phone
National Marine Fisheries Services, Protected Resource Division	August 18, 2008	Scoping meeting
National Park Service	August 18, 2008	Scoping meeting
U.S. Army Corps of Engineers	August 26, 2008	Letter
U.S. Department of Housing and Urban Development	August 18, 2008 October 8, 2008	Scoping meeting E-mail
U.S. Environmental Protection Agency	August 18, 2008 August 21, 2008	Scoping meeting Letter
U.S. Fish & Wildlife Service	August 18, 2008 August 18, 2008	Letter Scoping meeting
Alaska Department of Corrections	none	
Alaska Department of Environmental Conservation	none	
Alaska Department of Fish and Game	August 13, 2008	Letter
Alaska Department of Health and Social Services	August 18, 2008 August 28, 2008	Scoping meeting Letter
Alaska Department of Natural Resources, Division of Coastal and Ocean Management	none	
Alaska Department of Natural Resources, Office of State Historic Preservation	August 14, 2008 August 18, 2008	Letter Scoping meeting
Alaska Housing Finance Corporation	August 27, 2008	E-mail
Alaska Railroad Corporation	August 26, 2008 August 27, 2008	One-on-one meeting Letter
Knik Arm Bridge and Toll Authority	August 13, 2008 August 15, 2008 August 18, 2008	Letter Letter Scoping Meeting
Municipality of Anchorage	September 22, 2008	Municipality meeting
Knik Tribal Council	none	
Native Village of Eklutna	August 20, 2008	E-mail

¹ Congress passed a federal transportation bill in 2005 called SAFETEA-LU (Safe, Accountable, Flexible and Efficient Transportation Equity Act: A Legacy for Users). SAFETEA-LU created new categories of agencies – participating and/or cooperating agencies – to participate in the environmental review process for Environmental Impact Statements.



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Agency Scoping Comments Summary Table

Date	Agency	Agency Comment
08/6/08 (letter)	Advisory Council on Historic Preservation (ACHP)	ACHP does not anticipate attending meetings or providing formal comments at environmental review milestones. However, ACHP would appreciate being kept informed of progress, and we may decide to become more actively involved in the future, as warranted.
08/6/08 (letter)	ACHP	ACHP can provide Federal Highway Administration (FHWA) with technical assistance at any time on matters related to historic preservation and Section 106 of the National Historic Preservation Act.
08/6/08 (letter)	ACHP	ACHP encourages FHWA to coordinate the Section 106 process with National Environmental Policy Act (NEPA) compliance by notifying the appropriate State Historic Preservation Office (SHPO), Indian tribes, and other consulting parties pursuant to our regulations, "Protection of Historic Properties" (36 CFR Part 800).
08/6/08 (letter)	ACHP	FHWA should continue consultation with the appropriate SHPO/THPO, Indian tribes, and other consulting parties to identify and evaluate historic properties and to assess any potential adverse effects on those historic properties.
08/6/08 (letter)	ACHP	If FHWA determines through consultation with the consulting parties that the undertaking will adversely affect historic properties, or that the development of a programmatic agreement is necessary, the agency must notify the ACHP and provide the documentation detailed at 36 CFR §800.11(e).
08/21/08 (meeting)	Federal Aviation Administration (FAA)	Due to the proximity to Merrill Field, FAA would have a regulatory interest, especially if an intertie or something similar were to be constructed that could impact Part 77 airspace issues. FAA also said the MOA has an ordinance in place for Part 77.
08/21/08 (meeting)	FAA	If the impacts to Merrill Field are controversial enough, then an FAA environmental analysis could be warranted. Hypothetically speaking, if the project were to require changes to the airport design, then FAA would have to conduct an environmental study.
08/21/08 (meeting)	FAA	FAA would have an issue if the project would impact infrastructure that was built under the federal Airport Improvements Program.
08/20/08 (phone)	Federal Transit Administration (FTA)	It is the preference of the FTA to function as a Co-lead agency if reasonable alternatives include transit segments that may be eligible for funding through an FHWA program. FTA agrees to supply information regarding the New Starts process and other differences in compliance (i.e. noise).
08/18/08 (meeting)	National Marine Fisheries (NMFS)	Alternate transportation modes, such as pathways and hiking trails, should be considered. The pathway along Elmore Road is a good example that has been well received by the public.
08/18/08 (meeting)	NMFS	NMFS asked if changed driving habits are factored into the traffic modeling.
08/18/08 (meeting)	U.S. Dept. of the Interior (DOI), National Park Service (NPS), Alaska Region	NPS would like to be included in any Section 4(f) workshops/field trips.
08/18/08 (meeting)	NPS	NPS requested the description of the NPS jurisdiction in the Coordination Plan to be revised slightly.
08/26/08 (letter)	U.S. Army Corps of Engineers (USACE)	At a minimum, the proposed project is likely to impact Chester Creek; any fill discharged into Chester Creek would require authorization from this office.
08/18/08 (meeting)	U.S. Dept. of Housing and Urban Development (HUD)	HUD is interested in knowing how many housing units are impacted in the corridor, once the corridor has been selected.
08/18/08 (meeting)	HUD	HUD asked if pedestrian crossing is considered in the forecasting. HUD stated that pedestrian numbers should be considered because there are likely many pedestrians in the corridor.
10/8/08 (e-mail)	HUD	HUD does not issue permits for projects such as this, nor does it have any formal approving role. However, HUD would like to emphasize that the project will have an impact on the living environment and commercial vitality of the neighborhoods surrounding the highways in connection. HUD's primary clientele are low- and moderate-income residents of Alaska. The neighborhoods surrounding the proposed route are overly represented by these residents.



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10/8/08 (e-mail)	HUD	<p>The project purpose statement clearly focuses on the simpler subject of connecting one highway to another. The purpose statement makes no mention of concern for improving movement to and from the neighborhoods surrounding these two highways, much less improving the commercial and residential vitality of these neighborhoods. HUD understands these issues are addressed somewhat in the Needs section, but HUD also believes the project would be well-served to craft a purpose statement that averts having to dedicate so much time explaining the project's true purpose despite what the statement says, indeed, what the name of the project implies ("highway to highway").</p> <ul style="list-style-type: none"> - Here is some text to illustrate another emphasis that could be added to the statement: - "The purpose of the project is to improve the connection between the Seward Highway and Glenn Highway in Anchorage, Alaska such that it improves surrounding residential and commercial vitality and facilitates safer and more convenient local movement in the neighborhoods through which it passes." - Clearly some such statement would require additional "wordsmithing", but the point is that the statement should acknowledge the broader task at hand.
08/18/08 (meeting)	U.S. Environmental Protection Agency (USEPA)	USEPA asked that future agency letters be more specific on comment deadlines, as the July agency letter was unclear.
08/18/08 (meeting)	USEPA	USEPA requested the description of the USEPA jurisdiction in the Coordination Plan to be revised. Section 402 stormwater should be added to EPA's agency role.
08/18/08 (meeting)	USEPA	USEPA asked that 'tribal governments' be defined in the Coordination Plan.
08/21/08 (letter)	USEPA	As a participating agency, USEPA would appreciate opportunities to participate in meetings, site visits, and document reviews as appropriate. USEPA particularly appreciates involvement opportunities during transportation planning stages prior to preparation of the NEPA document, as well as during early project development and planning stages of NEPA document preparation.
08/18/08 (letter)	U.S. Department of the Interior, Fish and Wildlife Service (USFWS), Alaska Region	USFWS agrees that infill and re-development of some, as yet unspecified, corridor through the Anchorage bowl are appropriate methods of highway development for the project. Conversely, development of a highway connection through outlying undeveloped natural resource areas beyond the boundaries of the developed anchorage Bowl would likely result in significantly greater impacts to fish and wildlife resources (e.g. habitat fragmentation, wetland loss and degradation, etc.).
08/18/08 (letter)	USFWS	Development of the project should avoid and minimize impacts to fish and wildlife and their habitat. Furthermore, we suggest that you seek and take advantage of opportunities to restore degraded habitat and existing blocks to fish passage.
08/18/08 (letter)	USFWS	The USFWS currently occupies an office building that may prove to be within the project corridor. This may or may not directly impact the USFWS, and such impacts may be positive, negative or neutral – we only mention it as a point of fact at this time.
08/18/08 (letter)	USFWS	USFWS supports the inclusion of development of public transportation alternatives in the project plans.
08/18/08 (letter)	USFWS	USFWS is not providing any substantive comments on project purpose and need. No information on route alternatives has yet been made available to us.
8/18/08 (letter)	USFWS	USFWS received the Draft Coordination Plan on August 14, 2008, and does not have sufficient staff time to provide comments.
8/13/08 (letter)	State of Alaska Department of Fish and Game (ADF&G), Division of Habitat	The Division of Habitat has no comments regarding the purpose and need statement.
8/13/08 (letter)	ADF&G	Because of the lack of information available regarding the alternatives being considered, the Division of Habitat cannot provide scoping comments on the range of alternatives at this time.
8/13/08 (letter)	ADF&G	ADF&G is concerned with the existing 84-inch diameter culvert located under the Seward highway in Chester Creek. According to the ADF&G Fish Passage Inventory Database, this culvert is assumed to be inadequate for fish passage. The Division of Habitat requests that a bridge be installed over Chester Creek as part of the project alternatives. The bridge should be designed to accommodate both fish passage and wildlife movement.



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08/18/08 (meeting)	Department of Health and Social Services (DHSS)	DHSS wants to strongly encourage the public to do more walking for health by supporting pedestrian-friendly designs throughout the city and state. DHSS asked that this be considered.
8/28/08 (letter)	DHSS	DHSS suggests an amendment to Table 1 in the Coordination Plan. Please list the agency as the Department of Health and Social Services (rather than Division of Family, community and Integrated Services). Also the text under Jurisdiction/Interest should include reference to the "Built Environment".
8/14/08 (letter)	State of Alaska Department of Natural Resources, Office of History and Archaeology (SHPO)	SHPO recommends that Section 106 consultation start immediately with all consulting parties to avoid project delays.
8/14/08 (letter)	SHPO	SHPO recommends that all potential effects are considered when determining your Area of Potential Effects (APE). The neighborhoods in Anchorage that may be impacted by this project hold a variety of resources that must be adequately identified to make sound decisions during the Section 106 process.
08/18/08 (meeting)	SHPO	SHPO suggested the Coordination Plan show where Section 106 consultation will occur.
08/18/08 (meeting)	SHPO	SHPO indicated that they may want to be involved in the development of the Environmental Justice and Socioeconomics methodology paper.
8/18/08 (SHPO meeting minutes)	SHPO	SHPO recommended starting with the history of the community. SHPO would like to see "property types" identified early on. SHPO said it would be less time intensive to evaluate property types in context rather than individual buildings.
8/18/08 (SHPO meeting minutes)	SHPO	SHPO commented that the APE needs to be identified up front in the process. SHPO staff would like to be involved as the context and methodology scopes are developed.
8/18/08 (SHPO meeting minutes)	SHPO	SHPO reiterated the importance of establishing "property types," such as industrial, residential etc. Then "styles" can be identified such as ranch, bungalow, etc. This initial identification will help clarify how properties should be elevated
8/27/08 (e-mail)	Alaska Housing Finance Corporation (AHFC)	AHFC would like to be identified as a participating agency for the project. Please include the following AHFC contact for your distribution lists for future meetings involving participating agencies: Pamela Stontorf pstantor@ahfc.state.ak.us .
8/26/08 (meeting)	Alaska Railroad Corporation (ARRC)	ARRC indicated that commuter rail is not an alternative that could replace the need for the highway connection.
8/26/08 (meeting)	ARRC	A connection to the ARRC yard/terminal would benefit all modes and travelers. Any impact of another project on the ARRC yard would be of concern to the ARRC. Detailed lease identification work was done on the Knik Arm Crossing project and that could be useful for the highway to highway (H2H) project.
8/26/08 (meeting)	ARRC	If the project crosses the ARRC, a permit will be needed. The ARRC generally prefers that the highway go over the railroad [elevated].
8/26/08 (meeting)	ARRC	Construction impacts are of a concern to the ARRC. The ARRC cannot stop running trains for two years and it is not easy to just create a short train bypass during construction for 6 month like can be done with roadways.
8/27/08 (letter)	ARRC	The ARRC is pleased to accept your invitation to become a participating agency on the H2H project. We are currently in the process of reviewing the scope and project purpose and will return our comments in a timely manner.
8/13/08 (letter)	Knik Arm Bridge and Toll Authority (KABATA)	KABATA requests the FHWA to designate KABATA as a Cooperating Agency for the H2H project.



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8/13/08 (letter)	KABATA	The environmental impact statement for the project must take into consideration and evaluate the impacts of all Anchorage Metropolitan Area Transportation Solutions (AMATS)' Long Range Transportation (LRTP) projects of which Knik Arm Crossing is second only in size to the H2H project.
8/15/08 (letter)	State of Alaska Knik Arm Bridge and Toll Authority (KABATA)	The H2H Purpose and Need closely parallels the Knik Arm Crossing Purpose and Need Statement. However, the H2H project Purpose and Need Statement should recognize the Knik Arm Crossing Project and consider the Knik Arm Crossing/H2H connection during the development of the H2H Environmental Impact Statement.
08/18/08 (meeting)	KABATA	KABATA wants to participate since they have jurisdiction and interest in the project due to the Ingra-Gambell connection portion of the Knik Arm Crossing Project.
09/22/08 (Meeting)	Municipality of Anchorage (MOA), Office of the Mayor	The concept of a H2H connection as illustrated in the Anchorage LRTP is great. That concept should be your guide to the future design and context sensitive approach if a freeway type connection is the recommended alternative as a result of the environmental process.
09/22/08 (Meeting)	MOA	The concept of "forward thinking" as presented today is excellent, looking beyond 20 years for a project of this magnitude is important. How will that be accomplished? The Planning Department would like to be involved in that process.
09/22/08 (Meeting)	MOA	Recommend that a presentation be made to the Merrill Field Commission; they meet the 1st Thursday of the Month.
8/20/08 (e-mail)	Knik Tribal Council	Jim Fall (Knik Tribal Council) would like to be involved with coordinating educational opportunities for signs and documentation of the Dena'ina history of the Cook Inlet. There are some signs downtown that could use improvement in terms of providing historically accurate information – one is downtown near 3 rd and F (part of the downtown walking tour).
8/20/08 (e-mail)	Native Village of Eklutna	No comment received to date.
08/18/08 (meeting)	unspecified	More effort should go into clarifying that this project is multimodal.