

ADVOCATES FOR SAFE ALASKA HIGHWAYS

<https://safealaskahighways.org>

April 24, 2024

Dear Borough Assembly members:

The Advocates for Safe Alaska Highways (ASAH) requests the Borough Assembly to approve the original Planning Commission Resolution 2024-13, and to reject Mayor Ward's proposed substitute resolution.

Both local transportation planning organizations (FAST Planning and the FNSB Planning Commission) have rejected DOTPF's proposal because it does not meet local transportation needs and is not in compliance with either the FNSB Regional Comprehensive Plan or the Salcha-Badger Road Area Plan. The Assembly should support the expertise and work of these agencies and their recommendation to deny approval of the DOTPF plan as meeting local needs and plans.

A bit of background may be useful. DOTPF is allowing Kinross Gold to run 162,000-pound, 16-axle double Long Combination Vehicles (LCV) across the northbound Chena Flood Control bridge while at the same time saying the bridge has multiple issues and must be replaced on an expedited schedule. DOTPF failed to follow the required steps and public process needed to include this bridge replacement in its STIP. Thus, federal dollars are not available for the replacement project. But even a state-funded project requires local approval and a public process that DOTPF has tried to avoid.

DOTPF first requested approval of a project to replace the Northbound Chena Flood Control Bridge, #1364, Project NFHWY00782. Then DOTPF added the southbound bridge over the Chena Flood Control project, #1866, to its project 782, just before the Planning Commission meeting. The new bridge proposed is a poor replacement for the two bridges we currently have. And procedurally, DOTPF needs to follow the proper steps for approval from the local population, stop trying to break the rules, and stop trying to eliminate public participation and public comment on its proposals.

A Single Bridge is a Poor Substitute for Two Existing Bridges

This proposal, to replace two bridges with one bridge, is a very poor alternative and should be rejected.

What we have now is two bridges, one northbound and one southbound. They both are in service and handling current traffic, although we worry about the Kinross loads being allowed across the northbound bridge. If there were to be a problem with one of the bridges, having the other bridge provides security, as it could be used as a one-laned link going both north and south in case of emergency. Reducing two bridges into one bridge means that if there is a problem with that one bridge, all traffic might be halted, and the road link between Fairbanks and communities to the east, and to the Lower 48, would be severed. Any trouble, traffic, or accident on the one remaining bridge would

cut off communities to the east from the Fairbanks hospital, airport, medical services, stores, and supplies available in Fairbanks.

Putting all traffic on one bridge is more dangerous. The proposal would put oncoming traffic on the same bridge span. This is a dangerous alternative. The distance between the opposing travel lanes is proposed as 8 feet, with a concrete barrier of 2 feet. This distance and a short concrete barrier will not protect oncoming traffic from a 162,000-pound, 95' LCV double, particularly if it travels the speed limit of 60-65 mph, and loses control. This could easily happen as bridges ice over more quickly than road pavement. This design and concrete barrier must be crash-tested using 162,000-pound, double LCVs. We doubt the concrete barrier will stop such a heavy vehicle from crossing into oncoming traffic. Yet the new bridge is being designed for such heavy traffic.

DOTPF never considered the many other alternatives to this one bridge proposal. They should be considered now, before any bridges are compromised or torn down. For example, the reasons for replacing the two bridges should be explained, and the data and calculations behind the conclusions should be shared. DOTPF has mentioned "scouring" and flood events. Seldom is there ever any running water at the base of the bridges. I have seen water there twice in the past 50 years. Another example: DOTPF has seismic concerns. Why not share the data? We doubt that it would have included the Southbound bridge, when DOTPF's RFP for seismic services only covered the Northbound bridge. Salcha has numerous tremors and earthquakes. Why has this become an emergency that needs to by-pass normal planning processes? DOTPF should share its information and justify this project beyond calling the existing bridges "yucky" and "old".

Other alternatives could include an industrial route separate from public highways. Fort Knox is almost directly north of the Chena Flood Control Project. A direct industrial route would make our public highways safer and make our air in the serious non-attainment area cleaner than the current plan to send large-scale, industrial traffic directly through downtown North Pole and Fairbanks, and over the three local bridges that should not have such heavy, industrial traffic: the Chena Flood Control Bridges, the Chena River bridge, and the Chena Hot Springs Overpass bridge.

There is no provision in DOTPF's new bridge plan for pedestrian traffic or bicycles. This alone violates the Borough's plans for more bicycle lanes and safe lanes for pedestrians and bicycles. They are very much needed, as this route is taken by local cyclers every summer. It is the route for bicyclers traveling from the southern tip of South America to the end of the Dalton Highway. The life of the new bridge is expected to be 75 years. Without safe bicycle lanes, it will be obsolete as soon as it is built. DOTPF's proposal cannot be approved without bicycle lanes, pedestrian and 4-wheeler/snowmachine traffic lanes included in any replacement bridge design.

Why not keep one of the existing bridges for bicycles and emergency use? Why not build off- and on-ramps for the northbound lanes and keep the gravel bypass road for

heavy and oversized traffic to use in both directions? If heavy industrial traffic were re-routed to the by-pass, would there be any need to replace bridges built in 1975?

There has been no discussion of the future traffic needs of the military or companies other than Kinross in the DOTPF plans. Military convoys have increased and tensions with China, Russia and North Korea remain. At least one North Slope developer has plans to bring large loads through Canada to the North Slope, using the Alaska-Richardson-Dalton route. Would those loads be able to cross the proposed one bridge on their way to the North Slope? Before building any new bridge, these issues should be researched and incorporated into the DOTPF's plans.

DOTPF Has Failed to Provide Proper Public Notice and Failed to Follow Proper Procedure

State law (AS 35.30.020) requires DOTPF to comply with local planning and zoning ordinances and other regulations in the same manner and to the same extent as other landowners. Please require DOTPF to provide proper public notice of the exact projects under consideration, when an additional project – like a second bridge replacement - is added to the first bridge replacement project.

As we pointed out to the Planning Commission, the only notice DOTPF gave to the public regarding Project NFHWY00782 concerned the replacement of the Northbound Chena Flood Control Bridge, #1364, Project. In the packet of information sent to the Planning Commission, all public notices concerned the “NB” or Northbound Lanes. At some point, DOTPF added the replacement of the separate bridge #1866, the Southbound Lanes, to Project 782. But the public did not have proper notice that bridge #1866 was included in Project 782.

Please also require the DOTPF to follow the proper procedure for obtaining approval of a transportation project. The Borough Assembly should not encourage any proponent, including DOTPF, to ignore the proper procedures for obtaining local approval of a project. DOTPF should not have by-passed the FAST Planning organization process, should have given proper public notice of its proposal, and should have followed the public meeting requirements of state and federal law. It has failed to do so with this project. Please require DOTPF to take the proper steps and follow proper procedure for replacing two major transportation bridges. Just as you would require any landowner to complete all steps required by statute and ordinance, require the same of the DOTPF before you approve this project as complying with local ordinances.

Please follow the decisions of the two local transportation planning agencies in rejecting the DOTPF's proposal and the Mayor's substitute resolution. Support the Planning Commission's findings that DOTPF's proposal does not meet the FNSB Regional Comprehensive Plan, the DOTPF's design and planning process did not follow Metropolitan Planning Organization requirements, and the single span concept is flawed. It presents a potentially significant single point of failure, and DOTPF has not answered concerns about the safety rating of the barrier for high-speed head-on

collisions with the industrial trucking expected on the road in the coming years. Please adopt the Planning Commission's original resolution rejecting the DOTPF's proposal.

Thank you.

Sincerely,

ADVOCATES FOR SAFE ALASKA HIGHWAYS

Barbara Schuhmann, Spokesperson