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THE MUNICIPALITY OF ANCHORAGE A-95 CLEARINGHOUSE PROCESSINTRODUCTION

In response to the need for coordination and planning development of activities within and among the Federal, State and local levels of government, Congress has passed a number of legislative acts which would attempt to avoid duplicative and conflicting programs and policies, one of which is referred to as the A-95 Clearinghouse Process. It is derived principally from the Intergovernmental Cooperation Act of 1968 and Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. Its primary objective is for state and local government, through state and area-wide clearinghouses, to have an opportunity to assess the relationship of Federal projects or projects with Federal assistance to state, area-wide and local plans and programs. Federal agencies are to consider these assessments in deciding whether to proceed with the proposed project. The manner in which states, regions and local governments conduct this project is generally left up to the discretion of the particular governments. Again, it should be emphasized the Federal government is simply seeking the assessment of the different levels of government on proposed projects and an endorsement of such a project does not insure positive action by the Federal government nor does, on the other hand, will negative comments result in the cancellation of such a project.

THE MUNICIPALITY OF ANCHORAGE (MOA) A-95 CLEARINGHOUSE PROCESS

The procedure used by the MOA would normally commence when a federal agency or an organization with Federal assistance proposes to start a new project or program within the MOA area. The organization will send to the MOA a Notification of Intent (NOI) as early as possible. The MOA Clearinghouse will request review and comment from municipal, state and Federal agencies, along with non-profit service organizations, which they feel would have pertinent input. The MOA encourages a wide variety of input and, as a general policy, will not refuse any group comments. The MOA allows (generally) 30 days for review and comment except in unusual circumstances. After obtaining the responses from the various agencies and groups, and, if in the view of the MOA, there are no substantive negative comments, the MOA will send the comments to the agency proposing the project (they, in turn, must send these comments to the funding agency or department). However, if the MOA feels that the NOI does not adequately describe what the project or program will entail, it may request additional information before it will allow clearance. Or,

if MOA feels that there are substantive negative comments, it will act as a mediator between the two parties in hopes of alleviating their differences. If this exercise is unsuccessful, and the MOA still feels that the negative comments are justified, it will allow them to go to the Federal Regional Council (FRC)\*. The FRC will then require a response from the agency or group seeking clearance concerning the negative comments.

The potential power of this process obviously lies with the MOA. It has the discretion to forward negative comments to the FRC which could conceivably result in the delay or cancellation of a project. Hence, in many cases it may be to the agency or group's advantage to settle what differences the MOA feel are important at an early stage of the process. The effectiveness of the MOA in using this planning and coordinative role depends primarily on the Clearinghouse utilizing municipal resources and its relationship with state and Federal agencies. According to the MOA Clearinghouse Director, this occurs at a satisfactory level.

#### THE RELATIONSHIP BETWEEN THE STATE OF ALASKA AND THE MOA

##### CONCERNING THE A-95 PROCESS

The State\*\*and MOA are the only two government units in Alaska which have A-95 Clearinghouse systems. They are currently attempting to coordinate their activities where both are involved and may have similar interests, goals and objectives. The two have agreed upon a number of points in operating their Clearinghouses through an informal memorandum of understanding. According to this understanding, MOA will "assume primary responsibility for coordinating state, area-wide, and local government review of proposed federal activities. . . (that) occurs exclusively within MOA boundaries." The state, on the other hand, will "assume primary responsibility for coordinating state, area-wide and local government review of proposed Federal activities. . . (that) do not occur exclusively within the MOA boundaries." Hence, by coordinating their efforts, the two governments avoid duplicative activities. Additionally, the MOA will serve as a mediator to solve differences between parties concerning exclusively within the MOA area, where the state will carry out function concerning a project not exclusively in the MOA. The agreement also states that the body responsible for sending the final response to Federal proposals and which receives an agency or group's responses (to negative comments) to

\* the Federal Regional Council is primarily composed of the regional directors of the various federal agencies and departments.

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provide the other body a copy of such a response if it contains substantive comment by the latter body. This allows the body not primarily responsible to know what comments received by the entity making the proposal and possibly the FRC (this would, as mentioned earlier, be in the case of a Clearinghouse sending negative comments). Additionally, both parties are also obligated to respond to a request of review in a 25 day time frame (after receiving the Notification of Intent).

#### NON-FEDERAL ASSISTED PROGRAMS WHICH MAY GO THROUGH THE A-95

##### REVIEW AND COMMENT PROCESS

The existence of a structurally sound review and comment framework allows the MOA to use it for non-Federal assisted activities which they feel need to pass through a similar process. This often includes, but not limited to, actions and activities such as:

- I. The Alaska Division of Land permits
- II. Corps of Engineers projects
- III. Review of proposed state and Federal regulations

##### A-95 FUNDING

The MOA does not receive direct Federal funds for their A-95 program, the staff salary is either funded by the MOA or CETA. Funding is available for A-95 activities through the Public Works and Economic Development Amendments of 1974 and the Economic Development Administration and HUD Comprehensive Planning Program (701). Given the numerous requirements for the various funds, however, the MOA has declined to seek them.

A growing problem in Anchorage as well as other cities has been the funding for staff time of the agencies monitoring the different projects. This increasing demand for this activity has posed budgetary and manpower strains on the MOA. In light of the fact that the A-95 program was initiated by the Federal government, many officials have expressed the desire for Federal aid for different aspects of the process. However, to date, no such allocation of funds has occurred.

#### THE MOA AND STATE RELATIONSHIP WITH THE ALASKA COASTAL MANAGEMENT

##### PROGRAM (ACMP)

In addition to the A-95 agreement between the state and the MOA, the two have an understanding concerning the Alaska Coastal Management Program which has many goals and objectives very similar to that of the A-95 Process. The principle

difference between the two processes is that the state has the final say over the ACM's comments. The MOA is obligated to conduct and coordinate the the area-wide and local government review of proposed Federal activity within the MOA area as to its consistency with the MOA's district Coastal Management plan contained in the ACMP. If the MOA finds a proposed activity to be controversial, it may request the state to hold a public hearing in Anchorage. In the event that the MOA determines that the Federal project is inconsistent with its district coastal management plan, the MOA shall specifically describe the inconsistency and suggest alternatives which would alleviate them. If, in the event the state will send comments that are contrary to the feelings of the MOA, the state will initiate discussions with the MOA in order to resolve any disagreements. The state, however, will have the final word concerning impact by Federal proposed activities on the Coastal Management Program. Not surprisingly, the MOA is seeking more say in the process.

LC:jjd

*see A.C.M.P.*  
August 28, 1979

## THE MUNICIPALITY OF ANCHORAGE A-95 CLEARINGHOUSE PROCESS

### INTRODUCTION

In response to the need for coordination and planning development of activities within and among the Federal, State and local levels of government, Congress has passed legislation which would attempt to avoid duplicative and conflicting programs and policies, one of which is referred to as the A-95 Clearinghouse Process. It is derived principally from the Intergovernmental Cooperation Act of 1968 and Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. Its primary objective is for state and local government, through state and area-wide clearinghouses, an opportunity to assess the relationship of Federal projects or projects with Federal assistance to state, area-wide and local plans and programs. Federal agencies are to consider these assessments in deciding whether to proceed with the proposed project. The manner in which states, regions and local governments conduct this project is generally left up to the discretion of the particular governments. Again, it should be emphasized the Federal government is simply seeking the assessment of the different levels of government on proposed projects and an endorsement of such a project does not insure positive action by the Federal government nor does, on the other hand, will negative comments result in the cancellation of such a project.

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A growing problem in Anchorage as well as other cities has been the funding for staff time of the agencies monitoring the different projects. This increasing demand for this activity has posed budgetary and manpower strains on the MOA. In light of the fact that the A-95 program was initiated by the Federal government, many officials have expressed the desire for Federal aid for different aspects of the process. However, to date, no such allocation of funds has occurred.

#### THE MOA AND STATE RELATIONSHIP WITH THE ALASKA COASTAL MANAGEMENT PROGRAM (ACMP)

In addition to the A-95 agreement between the state and the MOA, the two have an understanding concerning the Alaska Coastal Management Program which has many goals and objectives very similar to that of the A-95 Process. The principle

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THIS IS STILL  
AN INFORMAL  
AGREEMENT  
— LAMAR

**DRAFT** # 2

MEMORANDUM OF UNDERSTANDING

between the

MUNICIPALITY OF ANCHORAGE

and the

DIVISION OF POLICY DEVELOPMENT AND PLANNING

implementing the

OMB CIRCULAR A-95 (as revised)

and

SECTION 307 of the

COASTAL ZONE MANAGEMENT ACT of 1972 (as amended)

The Municipality of Anchorage (MOA) and the Division of Policy Development and Planning (DPDP), Office of the Governor, State of Alaska wish to establish procedures for coordinating plans and programs at federal, state, areawide, and local levels.

The authority to enter into this Memorandum of Understanding is based upon the Office of Management and Budget (OMB) Circular A-95, Parts I and II (as revised on January 2, 1976) and upon Section 307 of the Coastal Zone Management Act of 1972, as amended (P.L. 92-583 and P.L. 94-370) and the regulations published pursuant to 307 of the Federal Act (15 CFR 930).

The purpose of this agreement is to coordinate the state and Municipality of Anchorage review of proposed federal activities which may affect the plans and programs of both the state and the MOA. The notification and review process described in the OMB Circular A-95 facilitate required federal agency consultation with the Governor, state and areawide clearinghouses, and local elected officials to assure that proposed federal programs, projects and uses of federal lands and resources (subject to coverage in paragraph 3, OMB Circular A-95) are, to the maximum extent possible, consistent with local, areawide and state plans. This Memorandum of Understanding outlines the procedures to be used to coordinate the state and MOA review process under the OMB Circular A-95. The process will also provide for the coordinated review of the proposed federal activities subject to the consistency requirements of the Coastal Zone Management Act of 1972, as amended, and which may also affect the MOA.

It is Mutually Assumed That:

- (1) Both DPDP and the MOA are interested in the appropriate and timely exchange of information, evaluation, and review of proposed federal activities subject to coverage under the OMB Circular A-95 which may affect the plans, programs, and policies of state, areawide, and local agencies; and,
- (2) Both DPDP and the MOA are interested in avoiding duplication of effort in their respective clearinghouse review processes; and,
- (3) both DPDP and the MOA are interested in implementing the Alaska Coastal Management Act (AS 46.40), which provides for the coordinated and rational use of coastal resources.

THE FOLLOWING PROCEDURES WILL BE EMPLOYED:

I. In Relation to OMB Circular A-95:

A. THE MUNICIPALITY OF ANCHORAGE AGREES TO DO THE FOLLOWING:

- (1) Assume primary responsibility for coordinating the state, areawide, and local government review of proposed federal activities, subject to OMB Circular A-95 coverage, when such

activities are proposed to occur exclusively within the MOA boundaries. The MOA will distribute those plans, policies, and environmental assessments provided by federal agencies on such activities to the appropriate state, areawide, and local governments. The subsequent review will focus on the relationship of the proposals to state, areawide, and local plans and programs and upon potential environmental affects. The MOA, in addition, will provide a copy of proposals which may impact state plans, programs, and policies along with their corresponding distribution lists to DPDP. DPDP will retain the option of circulating such proposals to reviewers not included on MOA's distribution lists.

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(2) Request DPDP to comment on federal proposals distributed by the MOA according to the following time frames:

(a) at the earliest practicable time not to exceed 25 days after date on cover letter for a notification of intent by an applicant applying for federal assistance.

(b) at the earliest practicable time not to exceed 25 days after date on cover letter for a completed application that has been preceded by a notification of intent from an applicant applying for federal assistance. If a completed application is submitted to the MOA during the first 25 days after a notification of intent has been submitted, DPDP will have 25 days plus the number of days remaining in the initial 25-day notification period to complete its review.

(c) at the earliest practicable time not to exceed 50 days after date on cover letter for a completed application that has not been preceded by a notification of intent from an applicant applying for federal assistance.

(d) at the earliest practicable time not to exceed 50 days after date on cover letter for a notification of intent accompanying a comprehensive description of a proposed direct federal activity or development project.

MEDIATOR  
BETWEEN  
STATE  
AGENCIES

(3) Serve to facilitate communication, and, if necessary, attempt resolution of differences between the federal agency (and applicant, if appropriate) contemplating a proposed federal activity to occur exclusively within MOA boundaries and the state, areawide, and local agencies that have plans, policies, or projects which may be affected by the proposed activity.

(4) Provide DPDP with the final MOA response to federal proposals when such a response contains substantive DPDP comments.

(5) Provide DPDP with the federal agency response to the comments generated by the MOA review when such a review contains substantive DPDP comments.

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(6) In the event that DPDP is the primary coordinator of the state, areawide, and local review of federal proposals and requests MOA review of such proposals, the MOA will provide DPDP with information on the consistency and relationship of proposed federal activities to areawide and local plans, policies, and programs, according to the time frames prescribed by DPDP.

(7) In the event that DPDP is the primary coordinator of the state, areawide, and local review of federal proposals and written MOA comments on such proposals will likely arrive after the review deadline, the MOA will transmit substantive comments to DPDP verbally or request an extension.

(8) Should the MOA be unable to attend a meeting of mutual interest to both the MOA and DPDP as it relates to the review of federal proposals subject to coverage under the OMB Circular A-95, it may request DPDP to represent its concerns on a case-by-case basis.

B. THE DIVISION OF POLICY DEVELOPMENT AND PLANNING AGREES TO DO THE FOLLOWING:

DPDP

(1) Assume primary responsibility for coordinating the state, areawide, and local government review of proposed federal activities, subject to OMB Circular A-95 coverage, when such proposed activities may affect the MOA but do not occur exclusively within the boundaries of the MOA. DPDP will distribute those plans, policies, and environmental assessments provided by federal agencies on such activities to the appropriate state, areawide, and local governments. The subsequent review will focus on the relationship of the proposals to state, areawide, and local plans and programs and upon potential environmental affects. DPDP, in addition, will provide a copy of proposals which may affect the MOA along with their corresponding distribution lists to the MOA. The MOA will retain the option of circulating such proposals to reviewers not included on DPDP's distribution lists.

(2) Allow the MOA to comment on federal proposals distributed by DPDP according to the following time frames:

(a) at the earliest practicable time not to exceed 25 days after date on cover letter for a notification of intent by an applicant applying for federal assistance.

(b) at the earliest practicable time not to exceed 25 days after date on cover letter for a completed application that has been preceded by a notification of intent from an applicant applying for federal assistance. If a completed application is submitted to the MOA during the first 25 days after a notification of intent has been submitted, DPDP will have 25 days plus the number of days remaining in the initial 25-day notification period to complete its review.

(c) at the earliest practicable time not to exceed 50 days after date on cover letter for a completed application that has not been preceded by a notification of intent from an applicant applying for federal assistance.

(d) at the earliest practicable time not to exceed 50 days after date on cover letter for a notification of intent accompanying a comprehensive description of a proposed direct federal activity or development project.

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[ (3) Serve to facilitate communication, and if necessary, attempt resolution of differences between the federal agency (and applicant, if appropriate) contemplating a proposed federal activity and the state, areawide, and local agencies that have plans, policies, or projects which may be affected by the proposed activity.

[ (4) Provide the MOA with the final DPDP response to federal proposals when such a response contains substantive MOA comments.

(5) Provide the MOA with the federal agency response to the comments generated by the DPDP review when such a review contains substantive MOA comments.

(6) In the event that the MOA is the primary coordinator of the state, areawide, and local review of federal proposals and requests DPDP review of such proposals, DPDP will provide the MOA with information on the consistency and relationship of proposed federal activities to state and areawide plans, policies, and programs, according to the time frames prescribed by the MOA.

(7) In the event that the MOA is the primary coordinator of the state, areawide, and local review of federal proposals and written DPDP comments on such proposals will likely arrive after the review deadline, DPDP will transmit substantive comments to the MOA verbally or request an extension.

(8) Should DPDP be unable to attend a meeting of mutual interest to both DPDP and the MOA as it relates to the review of federal proposals subject to coverage under the OMB Circular A-95, it may request the MOA to represent its concerns on a case-by-case basis.

## II. In Relation to the Alaska Coastal Management Program:

### A. THE MUNICIPALITY OF ANCHORAGE AGREES TO DO THE FOLLOWING:

(1) Upon receiving from DPDP a statement on the consistency of a proposed federal activity or action with the ACMP to be conducted in the MOA, the MOA will conduct and coordinate the areawide and local government review of the proposed federal activity or action. Such review will focus on the consistency of the proposed activity or action with the MOA's district coastal management plan contained in the ACMP and will be conducted within the time frames prescribed by DPDP. In addition if the MOA finds a proposed activity to be controversial during the course of the MOA's consistency review, the MOA may request DPDP to hold a public hearing in Anchorage.

(2) In the event that the MOA determines a federal proposal is inconsistent with the MOA's district coastal management plan, the MOA will respond to DPDP describing (1) how the proposed activity will be inconsistent with specific elements of the district coastal management program, and (2) alternative measures (if they exist) which, if adopted by the federal agency, would allow the activity to proceed in a manner consistent to the maximum extent practicable with the district coastal management program.

B. THE DIVISION OF POLICY DEVELOPMENT AND PLANNING AGREES TO DO THE FOLLOWING:

(1) Provide the MOA with a copy of any federal proposals requiring a consistency finding with the ACMP and which occur in the Anchorage, Mat-Su, or Kenai Peninsula boroughs.

(2) Request the MOA to comment on federal proposals distributed by DPDP according to the following time frames:

(a) at the earliest possible time not to exceed 30 days after date on cover letter for direct federal activities/development projects.

(b) at the earliest possible time not to exceed 30 days after date on cover letter for federal license and permit activities.

(c) at the earliest possible time not to exceed 30 days after date on cover letter for federal license and permit activities described in detail in Outer Continental Shelf (OCS) plans.

(d) at the earliest possible time not to exceed 30 days after date on cover letter for review of federally-assisted projects.

Time may be shortened or lengthened by mutual agreement.

(3) Consider the MOA comments and recommendations on the relationship of proposed federal activities to the MOA coastal management district plan in DPDP's consistency finding.

(4) Upon realizing that DPDP will likely issue a consistency finding contrary to MOA's recommendation, DPDP will initiate discussions with the MOA in order to resolve any serious disagreements. If necessary, DPDP will request a time extension for review from the federal agency to facilitate such discussion with the MOA.

(5) Provide the MOA with the option of joining in the informal and formal mediation procedures between DPDP and a federal agency in the event that DPDP and a federal agency have serious disagreement concerning the consistency of a proposed federal activity with the ACMP, and the MOA supports DPDP's position.

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DPDP if  
MOA dis.  
w/ Fed Proj  
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? in re MOA.

It is Mutually Agreed That;

- (1) Failure to provide comments on proposed federal activities within the appropriate time periods above implies tacit agreement with those proposed activities, unless a time extension is mutually agreed upon or additional information at a later date substantially changes the impact of the proposed activities.
- (2) In the course of a joint review, if either DPDP or MOA is of the opinion that the comments generated by a joint review warrant objection or intervention by the lead party in the review and there is not agreement between DPDP and MOA as to the course of action that should be taken, the party requesting official action will have the option of operating as an independent clearinghouse and may pursue the course it deems appropriate.
- (3) Time periods may be shortened or extended by mutual agreement.
- (4) This agreement will be reviewed annually or as required to determine the adequacy of the review process.
- (5) Nothing herein will be construed as obligating the MOA or DPDP to violate existing laws or regulations.
- (6) The agreement will become effective on \_\_\_\_\_ as evidenced by the signatures below. This agreement will remain in effect until revised in writing or until 30 days after notice of termination.

THIS AGREEMENT WAS REVIEWED AND REAFFIRMED BY THE PARTIES SHOWN BELOW:

Division of Policy Development  
and Planning  
Frances A. Ulmer

Municipality of Anchorage

Office of the Governor  
Division of Policy Development  
and Planning  
State of Alaska

Municipality of Anchorage

**DRAFT**

By: \_\_\_\_\_

By: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_