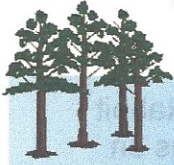
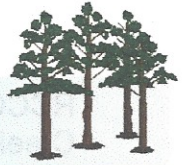


Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC)

A Forum for Respectful Communication & Community Relations



1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503

Robin Ward, Executive Director
Real Estate Department
Municipality of Anchorage
PO Box 196650
Anchorage, Ak 99519-6650

November 29, 2019

Dear Ms. Ward –

Thank you for this opportunity to comment on the Heritage Land Bank's (HLB) 'Draft 2020 HLB Annual Work Program & 2021-25 5-year Management Plan.' As you know the Rabbit Creek Community Council (RCCC) area includes several important and large HLB parcels and we have consistently commented over the years on how management of those parcels should support the values and guidelines included in the Hillside District Plan and Anchorage Comprehensive Plan.

The RCCC greatly appreciates the attention HLB has given to our past comments. Our attached comments on the current draft Work Program and Management Plan are consistent with comments we have made on previous HLB Work Programs and 5-year Management Plans. These comments were approved at our November 14, 2019, RCCC monthly meeting by a vote of **33 in favor, none opposed, and one abstention.**

Our Council seeks to support those projects that are compatible with the Hillside District Plan and Anchorage 2020, and especially those projects that provide neighborhood connectivity, safe routes to schools, attention to fire risk, and sustainability.

If you have any questions about these comments, please do not hesitate to contact me.

Sincerely,

Ann Rappoport, Co-chair
Rabbit Creek Community Council

cc: Shelley Rowton, Land Management Officer

Attachment

ATTACHMENT

Rabbit Creek Community Council Comments on HLB 2020 Annual Work Program and 2012-2025 Five-Year-Management Plan

RCCC concurs with the language on page 20 of the Five-Year Plan regarding Rabbit Creek and Bear Valley parcels as the proposed language ensures that decisions on management and disposals will include public and Council comments and will be compatible with adopted plans.

For the following comments, quotation marks enclose language from the HLB proposed plan; *discussion points are in italics*, and new language to be inserted into the HLB document is underlined.

Page 9, last paragraph:

"Land management decisions will be consistent with the AMC, all adopted comprehensive plans and area plans, and implementation items. Public comments on consistency with adopted plans will be given due consideration. If it is unclear whether a proposed management or disposal action is consistent with adopted plans, HLB shall complete a site-specific land use study prior to a final management or disposal decision.

This language should be added because the public has often had a role in drafting plans, and knows the background more intimately than staff.

Page 14:

"HLB Parcel 2-139 Access needs to be established through a private parcel prior to platting and/or sale."

This statement should be removed because it is vague and misleading. The Potter Valley Land Use Analysis (PVLUA) documents the "extreme slopes and avalanche vulnerability" in what was then called Subarea B (now Parcel 2-139), and recommends Parcel 2-139 for open space/parkland designation and transfer to Chugach State Park (see PVLUA page 59). HLB can implement the adopted management action from the PVLUA without prior determination of public road access.

Page 16, paragraph 2, line 7:

"...HLB developed the MOA Wetlands Prioritization Project to be used as a tool for selection of highest value municipally-owned wetlands for preservation in the HLB Mitigation Bank."

Add the words "municipally-owned". HLB is competing with private wetlands owners for USACE wetlands conservation funds. It should be clear that there may be higher value or more-vulnerable private wetlands that do not have the basic protection of public ownership of wetlands that are already owned by HLB.

Page 16, paragraph 3, line 4:

“...Trail easements or access through the wetlands areas will need to be defined and mapped and approved as part of the conservation easement to ensure connectivity for public use and access from Storck Park and Bear Valley School in accordance with the Section 36 Park Master Plan (2010). HLB intends to transfer management authority of HLB [sic] to Parks following execution of a conservation easement (Figure 3). “

This language should be added so that Parks or the public isn't burdened by trying to get permits for trails that are already indicated in the Park Master Plan. Unless trail alignments are specifically identified and allowed as part of the conservation easement, HLB's proposed conservation restrictions could negate the existing adopted park plan. HLB's future conservation deal should not de facto amend the Park Master Plan by limiting or causing extra costs for trail connections.

Please clarify and correct the typo regarding future management authority. Is HLB planning to transfer the conservation easement to Parks? This should not be the case, as it would impose extra costs on Parks. In other instances of HLB wetlands conservation easements, HLB has stated that “Any conservation easement placed on the property will be managed by HLB.” (See page 21, parcel 6-003B for this example.)

Page 23, last paragraph, line 3:

“... Where such needs are identified, the affected agency will apply to the HLB that will then be processed to a final decision.”

Grammar and meaning of this sentence should be clarified.

Page 24:

Given the current and looming impacts of climate change, as acknowledged in the Municipality's recent Climate Action Plan, add an item to page 24 to the following effect: HLB land assessments and disposal decisions will take into account the latest models of near-term and long-term climate change impacts and mitigation measures. These include, but are not limited to: sea level rise; wildfire danger; effects on hydrology, groundwater wells, and wetlands; and MOA goals for efficient transportation and development patterns.

This is vital to HLB's mission of serving current and future public needs. For examples:

- *HLB can refrain from seeking cash conservation easements on wetlands near tideline (such as near-sea-level parcels in Girdwood) that will be fully inundated by sea level rise, and instead preserve wetlands that appear to have longevity.*
- *HLB can retain public land at the perimeter of the Bowl where a firebreak is needed.*
- *HLB might retain very steep lands in their natural state, especially in alpine areas, rather than develop them and exacerbate rapid run-off from more extreme precipitation events.*
- *HLB might retain wildlife corridors for habitat connectivity to improve ecosystem resilience.*