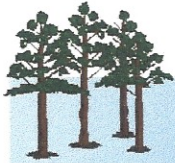


## Correspondence



### 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

December 5, 2020

Dear Ms. Ward –

Thank you for this opportunity to comment on the Heritage Land Bank's (HLB) 'Draft 2021 HLB Annual Work Program & 2022-26 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 are consistent with comments we have made on previous HLB Work Programs and 5-year Management Plans. These comments were approved at our November 12, 2020, Zoom RCCC monthly meeting by a vote of **32 in favor, none opposed, and two abstained.**

Our Council seeks to support those projects that are compatible with the Hillside District Plan and Anchorage Comprehensive Plan, 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 us.

Sincerely,

Ann Rappoport, Co-chair  
Rabbit Creek Community Council

Ky Holland, Co-chair  
Rabbit Creek Community Council

cc: Shelley Rowton, Land Management Officer

Attachment

## ATTACHMENT

### **Rabbit Creek Community Council Comments on HLB 2021 Annual Work Program and 2022-2026 Five-Year-Management Plan**

One overall suggestion is that a chart be added, as was included in previous HLB plans, listing each HLB parcel and the recommended management plan (e.g., transfer to Parks or other, maintain as open space, dispose, exchange, undetermined, etc.), and timeframe (e.g., current year plan, 5-year program, or out years).

Page 17, last paragraph, Potential Heritage Land Bank Umbrella Mitigation Bank Sites:  
The Rabbit Creek Community Council (RCCC) is pleased to see that parcels 2-125 and 2-126, the southern part of Section 36, are “no longer being viewed by staff or the Corps of Engineers as the best option for a [mitigation] bank site” as we had previously discussed in meeting with Heritage Land Bank (HLB) staff in 2019. Because these parcels are already set aside for local park use, they are not threatened by development and thus do not qualify as a mitigation site for development elsewhere. Moreover, there may be higher value or more vulnerable private wetlands suitable for Corps wetlands conservation funds that do not have the basic protection of public ownership of wetlands as those that are already owned by HLB.

We appreciate that clarifying language recommended in RCCC comments on the HLB 2020 Work Program and 2021-25 Management Plan was added to the discussion on these parcels.

Page 21, HLB Parcel 2-127:

The second sentence under this section, referring to the Hillside District Plan’s Special Study Area D and a potential future road, should be deleted from this paragraph and moved two paragraphs down. The sentence applies to Parcel 2-135 and the southeast corner of Parcel 2-136, as outlined in the Potter Valley Land Use Analysis (1999) adopted by AO 99-144.

Page 21, HLB Parcels 2-128 through 2-136:

RCCC concurs with the description of the proposed management plan for these parcels. Please note however that this reference should be to Parcels 2-128 through 2-134. Parcels 2-135 & 2-136 have an access issue that is more appropriately addressed in the next paragraph on Page 21 and our comment, below.

Page 21, HLB Parcels 2-135 & 2-136:

Insert after the first sentence, “The road connectivity issues noted in the Hillside District Plan (Special Study Area D) will be considered as part of a decision for the timing and conditions of the disposal.” As noted above, the draft plan incorrectly applied this language to the paragraph on Parcel 2-127.



Page 24, Paragraph 1:

RCCC supports efforts to improve access and trail connections to Chugach State Park by working with adjacent land owners and considering trades, easement agreements, or other creative options involving HLB parcels, and as described here. Particularly during our current pandemic we are seeing more and more need for safe access to our open spaces that is sensitive to adjacent private uses but accommodates increasing pressures for more access points. These are essential to support social distancing and mental, physical, and emotional needs for people to connect with the outdoors.

Pages 24-25 regarding HLB's general plans and goals for future work activities:

RCCC again recommends that the HLB plan acknowledge current and looming impacts of climate change, in accord with the Municipality's 2019 Climate Action Plan by adding the statement:

"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 Municipality of Anchorage goals for efficient transportation and development patterns."

Such a goal is vital to HLB's mission of serving current and future public needs. For example:

- 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.