RABBIT CREEK COMMUNITY COUNCIL (RCCC)
A Forum for Respectful Communication & Community Relations
1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503

April 20, 2021

Platting Board, Municipality of Anchorage
c/o Corliss Kimmel
PO Box 196650
Anchorage, AK 99519

Subject: Platting Case S12607 - Palaterra Subdivision

The Rabbit Creek Community Council (RCCC) has reviewed the plat application for Palaterra Subdivision: S12607. The applicant presented this proposal at a community meeting as well as our March 10, 2021 publicly-noticed regular monthly meeting, both held via Zoom. The matter was discussed again at the RCCC's April 8, 2021 public meeting.

At its public meetings, the RCCC heard various concerns from the community: inadequate data on soils and hydrology; drainage, steep slopes, the need for trail connectivity, and an intersection that requires a variance. The RCCC is especially concerned about the steep bluff along the south side of this subdivision, with an elevation change exceeding 100 vertical feet and gradients over 50%. These slopes are currently forested. The slopes are highly susceptible to erosion and possible slope failure if the natural vegetation is removed. Therefore, RCCC requests the following additional data and conditions of approval, which may necessitate adjustment to some of the lot boundaries:

1. <u>The Council requests current data and engineering analysis of the groundwater and the slope stability along the southern side of the subdivision prior to a Platting Board decision on this plat</u>.
    a. The application lacks engineering studies of the subsurface materials and their physical properties. Borehole logs compiled by S4 Group and documented in their Municipality of Anchorage (MOA) Application for Preliminary Plat suggest the subsurface conditions consist of silty sand to silty sand with gravel; however, there were no samples collected and no laboratory testing was performed on the material.
    b. There is no current groundwater data within the area of the proposed development. The applicant relies on well logs from the mid-1970s to speculate on water tables, but development and climate change may have rendered those logs inaccurate. The RCCC requests a water balance study be conducted to evaluate the current groundwater levels on a monthly basis with calculations documenting how the groundwater level will change with the proposed development. This should include the increased runoff and input from proposed septic drain fields. This information is most pertinent at the top of the steep slope where an increase in groundwater can cause slope failure.
    c. The slope stability analysis should couple both the engineering/strength properties of the subsurface and the water balance study to accurately measure the risk of slope failure. An increase in the groundwater table will reduce the increase the risk of large-scale slope failure or land sliding.

2. Retain natural vegetation to control drainage. Given that the parcel's south-west sloping contours drain toward the steep bluffs, the plat should require natural vegetation retention zones on all the lots to minimize changes in the rate and volume of runoff. Natural drainage ways should also be identified and protected through vegetation retention. This is important for slope stability as well as maintenance of the water quality, volume and periodicity of discharge to nearby Rabbit Creek.
    a. *The Hillside District Plan (HDP)*, Policy 8A on Drainage Management, includes the directive to "Maintain native vegetation based on lot size and slope for individual parcels and based on drainage and greenbelt continuity for larger tracts of land."
    b. HDP Policy 8-E calls for "no net increase in run-off beyond existing peak flows for up to the 10-year event unless regional [drainage] facilities are in place".
    c. Anchorage Municipal Code (AMC) 21.07.040 (A)(1)(c) states, "Good drainage design incorporates the effectiveness of natural systems rather than negating, replacing, redirecting or ignoring them. The features, capacity and function of the existing natural system shall be considered and utilized."

3. Steep slope conditions of approval. Three lots (numbered 5, 6, and 7) are primarily located on very steep slopes. These slopes are particularly susceptible to potential erosion, slope instability, and/or drainage impacts on down-gradient properties. Our community council area has witnessed slope failures on the same slope less than ¼ mile away (see **Figure 1** at the end of this letter) from the proposed development, and spectacular "blowouts" of groundwater during subdivision development, including at Prominence Pointe (**Figure 2** at the end of this letter) and in Potter Creek. The AMC 21.07.020(C) requires non-disturbance zones for these slopes; yet this can be hard to enforce on private property as shown in **Figure 1**. Violations can cause irreversible damage that is very difficult to fix. The RCCC suggests two possible solutions to ensure stability of the slopes in the proposed subdivision:
    a. Re-draw the lot boundaries for lots 5, 6, and 7 to end at the crest of the slope and create a green belt to encompass the slope. This could be a common open space zone.
    b. Designate the steeply sloped area within lots 4, 5, 6, and 7 as natural undisturbed zones and depict these areas on the plat and through plat notes. Require field marking of this zone prior to, and through, construction.

4. Align a sustainable trail connection from the internal subdivision road to Our Own Lane, in consultation with the non-motorized transportation coordinator and a professional trail designer. This trail will provide a much-needed north-south neighborhood connection because the Rabbit Creek bluff creates a vertical barrier with no north-south connections from DeArmoun neighborhoods to the creek bottom. The Hillside District Plan shows a primary trail corridor in the Rabbit Creek Valley bottom (Map 4.6 of the HDP), roughly following Our Own Lane at the toe of this subdivision. The connection to Rabbit Creek Greenbelt will enhance property values in Palaterra subdivision. The trail may need to traverse the bluff at a gradual angle and be narrow, similar to trails within the Greenbelt. A sustainable trail connection was built down the bluff approximately 1 mile south, at Griffin Street, within the Rabbit Creek Greenbelt Park, so this can be done.

5. Request for variance to 21.08.030.F.5 for intersection centerline separation:

The RCCC has no objection to the variance to allow the proposed entry road 60 feet west of Saunders Road and 315 feet west of Hillside Drive. The applicant has made a credible case that this is the safest location, compared to the steep grade and poor sight lines at the original intended entry road at Buena Vista Drive.

If you have any questions, please feel free to contact us.

Sincerely,

Ann Rappoport, Co-chair
Rabbit Creek Community Council

Carl Johnson, Co-chair
Rabbit Creek Community Council

cc: Dave Whitfield
Greg Soule

Figure 1. *Slope failure on a section of the Rabbit Creek bluff as a result of a property owner clearing and developing steep slopes in violation of Title 21.07.020- (Natural Resource Protection, Section C on steep slope development).*

Figure 2*. Slope failure near Prominence Pointe on developed slope.*