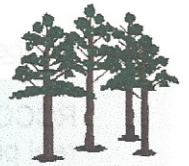
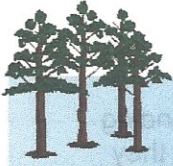


Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC)

A Forum for Respectful Communication & Community Relations

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Shelley Rowton, Land Management Officer
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Municipality of Anchorage
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December 22, 2021

Dear Ms. Rowton:

The Rabbit Creek Community Council (RCCC) greatly appreciates your time and the information you shared at our recent monthly meeting to review and answer questions about the Draft Heritage Land Bank (HLB) 2022 Annual Work Program (Work Program), particularly in reference to our Community Council area. These comments were approved unanimously at our December 9, 2021 meeting.

Overall, we appreciate the attention that you and the HLB have paid to our comments in recent years. The organization and clarity of the Annual Work Program have improved and the new mapping tool that accompanies the document provides additional helpful tools and references for our review. We have some general comments on this 2022 Work Program and several specific ones that we hope can be incorporated in the final document.

General Comments

Further explanations needed for proposed land disposals

The chart of Parcel Activity in Chapter 4 provides a good overview of each HLB parcel. However, this draft differs from previous Programs by not fully explaining the reasons for all disposals of interest proposed for 2022.

HLB is charged with managing public lands for the benefit of current and future generations of the public, as well as achieving the goals of the Anchorage Comprehensive Plan. While the Work Program includes an intention to “enhance community trust and support for HLB functions and activities by ensuring a transparent, accountable process for proposals. . .” (page 15), it does not provide enough transparency and accountability regarding proposed disposals. Transparency about disposals is important to ensure that HLB meets their fiduciary responsibility when disposing of interest in a parcel for which they are currently responsible.

Therefore, RCCC requests that HLB expand Chapter 3, in the section titled “Potential Disposals, Exchanges & Transfers” by adding an objective summary of each parcel proposed for a disposal of interest. This summary should include: parcel attributes; public values of the parcel, especially those identified in the Comprehensive Plan; possible future public use; which

organizations and agencies commented; and reasons for the timing of the disposals. Previous annual work programs have provided some of this information.

Concern about Code change to allow direct sales without competitive bid

RCCC is concerned about the “proposed code change to allow party [sic] with long-standing real property interest (easement, lease, etc.) to directly purchase the property in which they have an interest.” This could create an end-run around the fiduciary responsibility of HLB to manage its inventory for the public benefit and for current and future residents.

A long-standing use is not always a high-value future use. For example, a hilltop parcel that now hosts a communication tower might have a higher future public value for a water reservoir tank or a wind turbine, and therefore the hilltop should not be sold by default to the communication firm. The standard practice for disposal of parcels should be through competitive bid, regardless of an existing user. There should be an objective, deliberative process for any non-competitive sale. RCCC requests that, if the Code is revised to allow non-competitive sales, then the new Code should *require* HLB to make the following findings:

- the existing use is long-standing and beneficial to the public,
- the existing user has demonstrated that this will be a long-continuing use;
- there is no higher public use, nor any potential public benefit from the property in the future;
- the property is vital to the existing use and there are no alternatives; and
- public comments from affected Community Councils and public organizations were solicited and addressed.

Specific Comments

Pg. 13, para 2. RCCC supports this task to work on Fire Fuels Reduction as it is in keeping with the work of our Resilience Committee and area residents to mitigate fire danger and improve the ability of our residents to respond to the threat of wildfires.

Based on our review of the proposed management for parcels in the vicinity of the RCCC, we have the following specific comments and recommendations for several parcels. Each recommendation is followed with a supporting explanation.

Parcel 2-158. Retain pedestrian access easement.

RCCC members have an ongoing interest in the larger area of Bear Valley because of the community-wide need for additional recreation access to both Section 36 Park and Chugach State Park. Parcel 2-158 is currently slated for “responsive management,” but such management is not defined. If HLB pursues a replat of 2-158, the existing pedestrian easement on the west side of the parcel should be preserved for connectivity, even though the purchase terms of the new parcel preclude development of trailhead parking on 2-158. This pedestrian access should be preserved because it leads to Parcel 2-152 which has potential public values with its location adjacent to Chugach State Park.

Parcel 2-156. Retain in HLB ownership: do not sell in 2022.

This 9.63-acre parcel near the south end of Golden View Drive should be retained in the HLB inventory, and should NOT be disposed of in 2022. As RCCC has noted in previous years, Municipality of Anchorage wetlands Prioritization Map shows that Parcel 2-156 is surrounded by private lands with many tributary streams and contains some acreage with Level 2 Relative Ecological Value. This parcel contributes to the recharge of the south end of Potter Marsh. RCCC recommends delaying disposal of parcel 2-156 until it can be developed collaboratively with surrounding tracts in a manner that coordinates infrastructure and protects stream and watershed values, perhaps through clustered development. A conservation-minded approach will increase the values of this parcel as studies document how real estate values are enhanced near a greenbelt or park.

This area is shown in the Hillside District Plan (HDP) as a special study area for connectivity because of the need for coordinated access development. This area encompasses shallow bedrock, steep slopes, wetlands, and peat areas. It would be premature from both ecological and economic perspectives to sell Parcel 2-156 in 2022. Instead, innovative development or conservation of this parcel should be part of the 5-year work plan.

Parcels 2-127 through 2-136. Initiate conservation strategies.

Previous Annual Work Programs noted that these parcels are recommended for open space and managed for watershed and wildlife values in compliance with the Potter Valley Land Use Analysis (1997). HLB's previous 5-year plans have noted that conservation is the management intent of these parcels and RCCC has repeatedly endorsed this recommendation over the years. RCCC requests HLB begin active long-term conservation efforts for these parcels in the 2022 Work Program. The following language is modified from the 2019-2024 Five -year plan, and should be added to the 2022 Annual Work Program:

“HLB is currently managing these properties as open space for the protection of water quality and habitat, consistent with the adopted Potter Valley Land Use Analysis (PVLUA) (AO 00-144). ~~Any future actions on HLB will actively work on strategies for long term conservation of these parcels will be consistent with the Hillside District Plan, PVLUA, and other adopted plans.~~ HLB will meet with Rabbit Creek Community Council, ADF&G, and other interested parties to ensure that future actions involving these parcels support the adjoining Coastal Wildlife refuge and long-term public values.”

Parcel 2-147. We support the proposed transfer to Chugach State Park.

RCCC supports HLB's intended transfer of parcel 2-147 to Chugach State Park. “Official transfer to Chugach State Park” was recommended in the 1997 Potter Valley Land Use Analysis (page 60). We appreciate the work to finally implement this transfer, and herein follow with a description of the parcel and potential uses that clearly justify the transfer.

HLB Parcel 2-147 is not suited for residential development. The parcel starts at brush line and extends steeply above treeline to the ridge top above 3,000 feet elevation. Most of the parcel lies within avalanche hazard areas according to Municipality of Anchorage GIS mapping. This is also a high wind zone, subject to extreme Turnagain Arm winds and high elevation winds. The PVLUA notes: “Extreme environmental conditions would likely only lead to chronic problems to infrastructure and future residential development in these areas and would only tax the community's ability to maintain such development” (PVLUA page 59).

This parcel's highest values are for viewshed and recreation, and these values are best managed by transferring this parcel to Chugach State Park. This parcel is a prominent part of the panoramic view of McHugh Peak, seen from all across the Anchorage Bowl.

- The HDP (2010) includes a goal to "Protect views, both looking out from the Hillside and views of the Hillside as see from the rest of Anchorage" (Goal 7).
- The HDP acknowledges the visual value of ridge tops and recommends avoiding development on or straddling ridge tops (see Map 6.8 and Policies 7-B and 14-P).
- In addition, public management of this parcel would avoiding future conflicts between recreation on the ridgetop and private uses (HDP Goal 7).

This parcel may also contribute to future access, as outlined in the HDP and Chugach State Park Access Plan.

- There is high demand for additional access to the alpine zone of the Chugach front-range. The existing alpine parking areas at Glen Alps, Upper Canyon Road, and Bear Valley are notoriously over-capacity. Trailhead crowding diminishes the quality of recreation and tourism, and limits those important sectors of the local economy.
- The HDP shows a potential primary trailhead in upper Potter Valley, with access across this parcel (HDP Map 4.5). The Chugach Access Plan also depicts a developed trailhead in upper Potter Valley. Transfer of this land to CSP would present a much-needed access option.
- The Council notes that a robust and thorough process of public involvement and road and trail upgrades would be needed as part of any trailhead design and approval.

In summary, the most valuable use of parcel 2-147 is to incorporate it into Chugach State Park to maintain the scenic landscape, provide potential new recreation access, and avoid residential construction on hazardous terrain. RCCC supports transfer of this parcel to CSP in 2022.

Parcel 2-139. RCCC supports acquiring road access to this parcel.

RCCC supports the action under the Work Program highlights (page 10) that "Access needs to be established through a private parcel." Parcel 2-139 abuts Chugach State Park and part of it may be suitable for a developed trailhead, after a robust public planning process and context sensitive design. Improved access to Chugach State Park has been pledged for several years in the HLB Five-Year Work Plan: this action is timely.

In closing, RCCC greatly appreciates your assistance and coordination, as well as the opportunity to provide these comments to the HLB. We would be happy to discuss our comments with you, or answer any questions.

Sincerely,



Ann Rappoport, Co-chair
Rabbit Creek Community Council



Carl Johnson, Co-chair
Rabbit Creek Community Council

cc: John Weddleton, Anchorage Assembly
Bear Valley Community Council Chair
Ben Corwin, Chugach State Park Superintendent

Suzanne LaFrance Anchorage Assembly
Glen Alps Community Council Chair