Turnagain Community Council c/o Cathy L. Gleason, Board Member 4211 Bridle Circle, Anchorage, AK 99517

February 4, 2010

Heritage Land Bank Municipality of Anchorage 632 W. 6th Ave, Suite 160 Anchorage, Alaska 99501

RE: Draft 2010 HLB Annual Work Program and 2011-2015 Five-Year Management Plan

Dear HLB Director Mehner, HLB Staff, and HLB Advisory Commissioners,

Please accept the following comments with regard to the 2010 HLB Annual Work Program and the 2011-2015 Five-Year Management Plan on behalf of the Turnagain Community Council (TCC).

2010 HLB ANNUAL WORK PROGRAM:

<u>Chapter 2, Page 10 — The Heritage Land Bank Fund & Page 22 — HLB Advisory Commission Resolutions:</u>

TSAIA 7R/25L Runway Extension Revenue — TCC notes that anticipated revenue to HLB from the Ted Stevens Anchorage International Airport (TSAIA) east/west runway extension project will be \$1,002,400. This will be for easement disposal of portions of HLB Parcel 4-033A and 4-034 for an approach lighting system, aviation and hazard easement and right-of-way. It would be highly appropriate for funds from this revenue source to benefit the community in the same area and be used for acquisition of TSAIA property north of the Municipally-owned HLB parcels, so that a permanently protected, contiguous greenbelt/buffer for the Tony Knowles Coastal Trail would span from these HLB parcels north to Pt. Woronzof Park. This land should then be transferred to the Department of Parks and Recreation as dedicated parkland to be added to Pt. Woronzof Park.

Municipal acquisition and permanent protection of a Coastal Trail greenbelt/buffer currently under TSAIA's jurisdiction in this area would protect some of the most important attributes about Anchorage, expressed by the community during the development of the 2020 Anchorage Comprehensive Plan (page 36-37), including:

- Natural beauty and setting
- Trails/parks/greenbelts/open space

- Outdoor recreational opportunities
- Accessibility to the wilderness

It would also meet the following stated goals in the 2020 Anchorage Comprehensive Plan on page 39:

- Natural Open Space: A network of natural open spaces throughout the community that preserves and enhances Anchorage's scenic vistas, fish, wildlife, and plant habitats and their ecological functions and values;
- Wildlife: A wide diversity of fish, wildlife and habitats throughout the Municipality that thrives and flourishes in harmony with the community;
- Parks, Trails, and Recreation: A sustainable and accessible system of recreation facilities, parks, trails, and open spaces that meets year-round neighborhood and community-wide needs.

Also, this specific area where the Coastal Trail transverses TSAIA property was identified in the 2020 Anchorage Comprehensive Plan (page 63) as containing important wildlife habitat and being identified by the community as a preference for Natural Open Space.

HLB should initiate a Municipal/TSAIA/community working group as a subcommittee of the West Anchorage District Plan (WADP) Planning Group to determine the feasibility of this proposal and to determine the exact acreage/ boundary of the property to be purchased.

⇒ TCC requests that the 2010 HLB Work Program under B. 2010 ACUISITIONS include the proposal to purchase TSAIA land in the location described above with revenue generated by TSAIA's runway extension project; boundaries to be determined by a subcommittee of the WADP Planning Group.

Chapter 2, Page 17 — D. PROJECTS:

Anchorage Detox Facility (HLB Parcel #4-033, Clitheroe Center) — TCC supports HLB working to extend the Salvation Army's lease for the Clitheroe detoxification facility. This is an appropriate location for a center of this nature, as there would likely be concerns raised if the facility were relocated to other areas of the city. TCC reiterates our comments we have previously submitted regarding our desire to see HLB work with the Salvation Army to upgrade/improve this facility, considering a substantial amount of federal money was spent upgrading the sewer line to the site to serve this facility in the 1990s.

If the center relocates after the end of a potential lease extension, an alternative would be to lease it to another nonprofit institution. TCC would also support discussions with the Parks and Recreation Department and the public to see if the facility could be transformed into a recreational facility — rather than see it remain on site as is and potentially become a public nuisance area.

Also, the long-term future of this land and what should be done with this HLB property will likely be discussed during the West Anchorage District Planning process and this should be so noted. TCC continues to suspect that, rather than potential airport security requirements dictating airport control and acquisition of this land, as cited in the draft Work Program, the airport will attempt to acquire this parcel to expand their cargorelated development, as they have hauled a massive amount of fill adjacent to this area in anticipation of developing "West Airpark." Expanding cargo-related development is one of the major airport operations creating high negative impacts to West Anchorage neighborhoods and recreational use of this area. The Coastal Trail is located in close proximity to the Clitheroe Center site and it is our understanding that there is an easement on HLB 4-033 for access to the trail from Pt. Woronzof Road, which has never been developed. The integrity of the trail and future opportunities for public use and access would be highly compromised if the airport acquired this parcel from the Municipality and fenced it off.

⇒ TCC supports the extension of Salvation Army 's lease for the Clitheroe Center and requests that this action item be included into the 2010 Work Program under C. Current and Continuing Projects. Reference to the WADP and the Planning Group's discussion regarding its long-term land use should be noted.

Chapter 3, Page 25 — B. 2010 ACQUISITIONS

West High/Romig Middle School — As TCC stated in our comment letter on the 2009 HLB Work Program, we support the concept of developing a Master Plan for the West/Romig campuses. However, because the Master Plan has yet to be completed, we think it is premature for HLB to ask for state funding in 2010 for acquisition of several properties, as stated in the draft, until the Master Plan has finished its public process review and is finalized. On the project's Web site, Options A and B retain existing vehicle access, requiring no property acquisition, and Option C shows two different vehicle access options leading out to W. Northern Lights, each requiring different parcels owned by different entities. Only until the Master Plan is completed and has identified what, if any, adjacent property may be needed should HLB initiate pursing funding for property acquisition.

⇒ TCC requests that this item be moved out of the 2010 Work Program and into the 2011-2015 Five-Year Management Plan.

Chapter 3, Page 27-28 — C. CURRENT AND CONTINUING PROJECTS

West Anchorage District Plan — TCC appreciates the acknowledgement of the West Anchorage District Plan in the 2010 Work Program, as it is an important planning document currently being developed. However, the last sentence, which states that, "HLB continues to negotiate with TSAIA regarding this and other lands in the airport area..." is inappropriate and implies that this is being done outside of the WADP public process. The Planning Group, which includes TSAIA and community representation, is

currently looking at parcels of land in and around the airport with the goal to include potential resolutions in the WADP. It is appropriate for HLB to work with the Planning Group to resolve land issues in the airport area.

⇒ TCC requests that the last sentence in this section be deleted from the plan.

Chapter 3, Page 28 — C. CURRENT AND CONTINUING PROJECTS

Compensatory Mitigation Program/Wetland Evaluation — As TCC has stated while commenting on previous HLB Planning documents, the development of a Compensatory Mitigation Program may provide for conservation easements on our Municipally-owned HLB wetlands to permanently protect them or allow developers to pay an in-lieu-fee to the Bank, but it is in the public's best interest that this proposed program not be used by developers to make little or no attempt to avoid or minimize wetland development, or mitigate on or near site, if they can turn to a city-sponsored Mitigation Program that offers credits for "easy" wetlands destruction. This program should be carefully monitored and we support the establishment of an open meeting process, so that the public is aware of each Mitigation Bank proposal before any final decisions are made.

⇒ TCC requests that the HLB 2010 Work Program establish an Compensatory Mitigation Program open meeting policy, so that the public is notified and can attend meetings between HLB and the Corps when Mitigation Bank proposals are discussed.

Chapter 3, Page 29 — C. CURRENT AND CONTINUING PROJECTS

Acquiring Municipal Entitlement Lands — TCC supports the Municipality of Anchorage's efforts to continue to work with the State of Alaska to resolve any remaining land entitlement issues, as outlined in the Agreement for the Conveyance of Lands of the State of Alaska to the Municipality of Anchorage and Settlement of Land-Related Issues dated November 25, 1986, and provided for under AS 29.65.010.

TCC again thanks the HLB for specifically referencing Parcel #68 Point Woronzof (ADL 223363) and Parcel #21 Airport North (ADL 201573) as parcels needing to be conveyed to the city by the state. It has been a long-standing position of TCC that these parcels should become Municipal land, as they have long been used by the public as important recreational areas in West Anchorage and the popular and widely-praised Tony Knowles Coastal Trail is routed through both of these parcels.

Chapter 3 — E. TRANSFERS OF MANAGEMENT AUTHORITY

TCC notes that there is a section under the 2011-2015 HLB Management Plan (page 39) that discusses land management authority. However, TCC would like to see this section added to the 2010 Work Program as well. Specifically, this additional section should

include the transfer of land management authority of HLB Parcels 4-032, 4-033 and 4-034 to the MOA Parks and Recreation Department, for the permanent protection of important municipal lands currently being used by the public for park, recreation and natural open space purposes.

4-032 is tidal land, providing important habitat and coastal watershed functions. It is to the west of and contiguous to the tidal lands within Pt. Woronzof Park and it makes sense for Parcel 4-032 to be added to this municipal parkland to ensure permanent protection.

The portions of 4-033 and 4-034 not being leased or otherwise encumbered by easements and right-of-ways should become permanently dedicated parkland due to the location of the Tony Knowles Coastal Trail as well as other ski trails within the parcel boundaries. The naturally wooded areas remaining in these two parcels are serving as de facto parkland and the natural open space provides essential buffering from high impacts generated by TSAIA operations to the east. This buffering will only increase in value to the community if the airport's West Airpark is fully developed with high-impact cargo operations adjacent to this municipal land. This land also contains marginal soils; if there is ever a need to relocate the Coastal Trail inland due to erosion, the Parks and Recreation Department will already have the permanently protected land under its management authority to build a new trail.

The same rationale provided on pages 1 and 2 of this letter for the purchase of TSAIA land north of this area can be applied to the transfer of this municipal land to the Parks and Recreation Department: permanent protection of a Coastal Trail greenbelt/buffer would protect some of the most important attributes about Anchorage, expressed by the community during the development of the 2020 Anchorage Comprehensive Plan (page 36-37), including:

- Natural beauty and setting
- Trails/parks/greenbelts/open space
- Outdoor recreational opportunities
- Accessibility to the wilderness

It would also meet the following stated goals in the 2020 Anchorage Comprehensive Plan on page 39:

- Natural Open Space: A network of natural open spaces throughout the community that preserves and enhances Anchorage's scenic vistas, fish, wildlife, and plant habitats and their ecological functions and values;
- Wildlife: A wide diversity of fish, wildlife and habitats throughout the Municipality that thrives and flourishes in harmony with the community;
- Parks, Trails, and Recreation: A sustainable and accessible system of recreation facilities, parks, trails, and open spaces that meets year-round neighborhood and community-wide needs.

Also, the land in these parcels was identified in the 2020 Anchorage Comprehensive Plan (page 63) as containing important wildlife habitat and being identified by the community as a preference for Natural Open Space.

On December 4, 1997, TCC passed a resolution in support of transfer of title and management authority of Parcels 4-032, 4-033 and 4-044 from HLB to the Parks and Recreation Dept. We reiterated our position by passing another resolution making the same request on December 2, 1999. TCC sees no justifiable reason to delay this action any longer and it should take place in 2010, to ensure permanent protection of high value land used by a multitude of park and trail users along our scenic coast.

⇒ TCC requests that a "Transfers of Management Authority" section be added to the 2010 HLB Work Program and that it include transfer of title and land management authority of HLB Parcels 4-032, 4-033 and 4-034 to the MOA Parks and Recreation Department, with the intent that it become permanently dedicated parkland, with detailed ordinance language to be written with community and agency input to ensure all easements, plat notes and restrictions are appropriately included in the land transfer.

HLB 2011-2015 FIVE-YEAR MANAGEMENT PLAN:

Chapter 4. Page 33 — Acquiring State Entitlement Lands

TCC reiterates our comments made on pages 3-4 with regard to:

- 1) supporting HLB's efforts regarding parcels to be transferred from the state to the city under the 1986 Entitlement Act; and
- 2) objecting to HLB negotiating with the State of Alaska/TSAIA on potential land trades outside of the West Anchorage District Plan public process. We appreciate HLB's concern regarding protection of access to the Coastal Trail and safeguarding other trails and recreation sites. This effort should be done inclusively in the land use discussions of the WADP public process as well as through the purchase of land where the Coastal Trail transverses the airport north of HLB Parcel 4-033 (see page 3 of our letter).
- ⇒ TCC requests that the second paragraph in this section of the 2011-2015 HLB Work Plan be deleted.

Chapter 4, Page 39 — Other Issues, 2011-2015

HLB Parcel 4-033 — TCC reiterates its comments previously discussed in our letter regarding Parcel 4-033 and the Clitheroe Center lease (see pages 2-3). We, again, emphasize our request as stated on pages 4-5 to transfer Parcel 4-033 to the Parks and Recreation Department (pages 4-6). No portion of this parcel should be any part of land exchange with the airport. The viewshed to the west, the Coastal Trail, and its important land buffer to the east are currently being used as parkland. It should remain in Municipal ownership and become permanently protected parkland. No high-impact airport development should be allowed on any of this land that would compromise the integrity of current land uses.

⇒ TCC requests that the language in this section be rewritten as follows, "HLB Parcel #4-033 — The Salvation Army has a lease with the Municipality of Anchorage for the Clitheroe Center, which expires at the end of 2009, but HLB is working to extend the lease at least two years, as stated in the 2010 HLB Work Program. Current levels of airport security continue to allow access to this area. Turnagain Community Council has consistently requested this parcel of land (excluding land leased to the Salvation Army) be transferred to the Department of Parks and Recreation, due to its high value to the community as park/natural open space/recreation land. The Tony Knowles Coastal Trail is located on this parcel. This transfer would be consistent with the 2020 Anchorage Comprehensive Plan goals and would provide permanent protection of this municipal land."

Thank you for the opportunity to comment on these important Heritage Land Bank planning documents. With citizen input, appropriate planning and management of our public land is vital to the long-term future of our city.

Sincerely,

Cathy L. Gleason, Board Member
On behalf of the Turnagain Community Council President