

## CORRESPONDENCE



**RABBIT CREEK COMMUNITY COUNCIL (RCCC)**  
A Forum for Respectful Communication & Community Relations



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

Planning Department  
Municipality of Anchorage  
PO Box 196650  
Anchorage, Ak 99519-6650

November 27, 2019

Dear Planning Department –

Thank you for this opportunity to comment on the proposed plat, Case S12420, Spruce Terraces Subdivision, Twigga, LLC, Petitioner. The proposal to subdivide a 40-acre parcel, two lots, into 27 lots includes a request for a variance to allow for a cul-de-sac exceeding 900 feet. It also includes a variance request for two lots that are narrower than the allowed 3:1 lot depth to width ration (AMC 21.08.030.K.2).

The Rabbit Creek Community Council (RCCC) seeks to support those projects that are compatible with the Hillside District Plan (HDP) and Anchorage 2020, and especially those projects that provide neighborhood connectivity, safe routes to schools, attention to fire risk, and sustainability. Consequently, we have the following concerns and comments on this proposed plat:

- 1) There is a long-standing, well-documented need for secondary access in the Hillside area, and in particular the specific area of the proposed subdivision, to relieve egress concerns on Golden View (see the HDP Special Transportation Study Area B requirements, attached map 4.1, page 4-3 from HDP). This past year, RCCC has been working with the Anchorage Fire Department, other Municipal departments, and the University to address our concerns, and identify options, for secondary access as part of our resilience initiative.
- 2) RCCC discourages the use of variances in subdivision planning and believes the developer's variance requests in S12420 are not essential to develop these lots. The Council discussed the conditions for granting a variance and found that they are not met: 1. There are no special conditions that thwart strict application of Code. The slopes are not extreme, and there are other practical alignments for roadways. 2. The variance poses public welfare concerns in that the proposed long cul-de-sac poses a life-and-safety concern for emergency access and connectivity as reiterated in our resilience initiative. 3. Nullifying or weakening the intent of Title 21 and the HDP: the extra-long cul-de-sac does not contribute to the intent of the HDP, as the developer claims, by minimizing ground disturbance. Instead, it allows the maximum density of lots, for which the developer offers no conditions to retain natural grades, drainage, or vegetation. The approval of extra-long cul-de-sacs solely for developing the maximum allowed number of lots sets a poor precedent. 4. There is no undue hardship, because the entire tract is developable, and other configurations of lots are practical.
- 3) RCCC supports proposed trail connectivity as found in the plat as being consistent with objectives in the HDP and Anchorage Comprehensive Plan. We suggest this right-of-way be marked or developed on the ground to ensure prospective buyers are informed about it.

These comments were approved at our November 14, 2019, RCCC monthly meeting by a vote of **32 in favor, none opposed, and three abstentions**. If you have any questions about our comments, please let us know.

Sincerely,



Ann Rappoport, Co-chair  
Rabbit Creek Community Council

Ky Holland, Co-chair  
Rabbit Creek Community Council

November 27, 2019

Thank you for the opportunity to comment on the proposed plat, Case 212420, for a variance to allow for a cul-de-sac exceeding 800 feet. It also includes a variance request for two lots that are narrower than the allowed 341 foot depth to width ratio (AMC 21.08.030.A.3).

The Rabbit Creek Community Council (RCCC) seeks to support those projects that are compatible with the Hillside District Plan (HDP) and Anchorage 2030, and especially those projects that provide neighborhood connectivity, safe routes to schools, attention to fire risk and sustainability. Consequently, we have the following concerns and comments on this proposed plat:

1) There is a long standing, well-documented need for connectivity across in the Hillside area, and in particular the specific area of the proposed subdivision, to relieve stress concerns on Goforth Ave (see the HDP Special Transportation Study, Area B requirements, attached map 4.1, page 4-3 from HDP). This past year, RCCC has been working with the Anchorage Fire Department, other municipal departments, and the University to address our concerns, and identify options for secondary access as part of our resilience initiative.

2) RCCC discourages the use of variances in subdivision planning and believes the developer's variance requests in 212420 are not essential to develop these lots. The Council discussed the conditions for granting a variance and found that they do not meet 1. There are no special conditions that allow strict application of Code. The slopes are not extreme, and there are other practical alignments for roadways. 2. The variance poses public welfare concerns in that the proposed long cul-de-sac poses a life-and-safety concern for emergency access and connectivity as restricted in our resilience initiative. 3. Reliance on weakening the intent of the HDP, as the HDP and the HDP's extra-long cul-de-sac does not contribute to the intent of the HDP, as the developer claims, by minimizing ground disturbance. Instead, it allows the maximum density of lots, for which the developer offers no conditions to retain natural grasses, drainage, or vegetation. The approval of extra-long cul-de-sacs solely for developing the maximum allowed number of lots sets a poor precedent. 4. There is no public benefit, because the entire lot is developable, and other configurations of lots are practical.

3) RCCC supports proposed trail connectivity as found in the plat as being consistent with objectives in the HDP and Anchorage Comprehensive Plan. We suggest the right-of-way for



Map 4.1

Roadway Connections

