



## **Huffman/O'Malley Community Council**

**PMB 40 – 1120 Huffman Road, Suite 24  
Anchorage, AK 99515**

November 24, 2008

Planning Department  
Municipality of Anchorage  
Via: Electronic

To Whom It May Concern:

The Huffman/O'Malley Community Council (HOCC) wishes to hereby submit the following comments on the draft the Hillside District Plan (HDP). We apologize for the length, but the issues involved are complex and broad-reaching subjects that go to the heart of why we live where we do.

The HOCC represents the majority of the area referred to in the HDP as "Furrow Creek area", our council boundaries being O'Malley to DeArmoun, New Seward Highway to Birch Road. Over time we have become very familiar with the values of our constituents. The following comments are based in this familiarity, the HOCC's responsibility to accurately reflect the majority of the community's wishes, our extensive experience and knowledge of these issues, and our widespread comprehension of day-to-day land use on the hillside within the Furrow Creek area which is, and always has been, an integral part of the hillside.

The residents of the hillside purchased their properties for a variety of reasons: space, vegetation, land use options, neighborhood character, property's ability to sustain a homebased business, wildlife, lack of street lights, and rural roads. The HDP proposes to deny Furrow Creek the continued enjoyment of these attributes and to go against all

promises we had regarding the continued use of our properties. Municipal Plans such as the Trails Plan, Hillside Waste Water Management Plan, and others promised us a future on the hillside that was different than other areas of the Bowl.

We expect these attributes of the hillside to continue. The public has overwhelmingly and clearly stated this. The current design of the hillside supports many businesses, agriculture, greenhouses and nurseries, open space, and wildlife. The existing zoning should not be changed in any area of the hillside.

## Utilities and Density

- 1 **Baseline Data Wrong, Correction.** The baseline data regarding the 2020's mandated number of units to be built on the hillside are false, leading to a flawed product throughout.
  - The draft HDP quotes the 2020 Plan as requiring 4-6000 new units on the hillside. This ignores Assembly Ordinance 2002-235, the adoption and implementation the "Land Use Allocation Documentation Report, Anchorage 2020 Land Use Assumptions," prepared in October 2002 by HDP Alaska, Inc., resulting in a 9% decrease in the figures behind the 2020 Plan. This 9% decrease was necessitated by the discovery that the ISER software used in the creation of the original figures was flawed in that the software, and technology at the time, could not take into account population fluctuations and other variations that positively affected the implementation of the 2020 Plan. In fact, it was said at the time of Assembly adoption, that the 9% was seen as a very minimal reduction, the reality was expected to be closer to 14% too high. The results of this reduction is a decrease to 3640-5460 units to be constructed – based on 1998 data.
  - Given current data, the hillside, with no change to existing zoning, will meet or exceed 2020's mandates. The chart below, clearly demonstrates that the hillside is on-target with no change in zoning or density, if not exceeding the density required by the 2020 Plan. Of note, the 2,000 units constructed to date are only units constructed/permitted 2001-2008 and does not include data from 1998-2001. This figure does also not include any construction/permitting in process now, including up to 20 other developments, such as Legacy Point, as shown on Illustration on page 8-8 of the draft HDP, or in areas outside of the Building Service Area, such as Bear Valley and areas of Potter Valley (estimated in the HDP as 1/3 of the hillside study area). The following data also clearly illustrates that the hillside should not undergo any further rezoning to higher density. *We are exceeding 2020's Goal. We are now surpassing 1.5 units per acre, approaching 2 or more units per acre on average – double 2020's goal.*

<b>Original Mandate by 2020 Plan</b>	<b>Results of 9% Decrease (New 2020 Goal)</b>	<b>Progress to Date</b>	<b>Where We Are Today</b>
6,000 Units Maximum*	5,460 Units Maximum		
5,447 Acres Available*	5,447 Acres Available		
<b>.9 Units Per Acre</b>	<b>.99 Units Per Acre</b>		
		-2,000 Units**	
		-1,000 Units Minimum****	
			2,460 Units Left to Build
			3,629 Acres Available***
			<b>1.48 Units Per Acre</b>

\*Source: 2020 Plan. Note: Adopted in 2000, amended in 2003, is based on a land availability study completed by the Planning Department in 1998.

\*\*Source draft HDP, however, this is only permits and construction since 2001, not 1998, the baseline data timeline for the 2020 Plan.

According to HDP, approx. 1,000 have been constructed, another 1,000 are permitted but not constructed yet, since 2001.

\*\*\*Source: Draft HDP, data is unreferenced, undoubtedly a low estimate

\*\*\*\*Source: Conservative estimation of units in process and/or unaccounted for in the HDP

- 2 **HDP does not accurately reflect the desires of the community.** The HDP was to reflect the desires of the community; instead, the consultants' understanding of the HDP, approach and actions clearly said to us that their mission was to explore planning alternatives, that in no way were consultants responsible to write the HDP to reflect the community's wishes. There are several examples of this:
  - The majority of the community has clearly said that they want to see the remainder of the hillside developed at R-6 and other rural zoning designations. The community does not support an end to their rural and suburban lifestyles. However, the HDP mandates that the "Furrow Creek", an area that is presently developed to rural standards, minimum of one-acre lots and supports several hundred homebased businesses, agricultural properties, etc. This area does not wish to be served by public sewer/water. To implement the consultant's recommendation as presented would be nothing short of a taking of the properties in that area.
  - Less than 10% of respondents to the Household Survey supported commercial development on the hillside; however, the HDP recommends displacement of existing residential in favor of neighborhood commercial centers.
  - Majority of respondents to the Household Survey responded they have little to no issues with their septic systems or wells, yet the HDP recommends forcing a large number to accept public sewer/water.
  - Any increased density in this area of the hillside would require those residents to access from Huffman or O'Malley Roads. The residents have clearly said they do not want more traffic on these roads as they are now near capacity and have created some incredibly dangerous areas causing several deaths and injuries over the past few years.
- 3 **The HDP erroneously favors rezoning and dense development within the "Furrow Creek area".** This is based on the following rationale and we hereby respond to each point individually:
  - Proximity to Town Center.
    - This area is within proximity to a town center as described by the 2020 Plan – The Carrs/Huffman area; however, this concept does not work on the hillside as in other areas of town. "Proximity" as the only basis works only in areas that are pedestrian-friendly and are not transected by a limited-access, divided, major highway.
    - The area that IS within proximity to the town center is zoned at higher density, includes vacant land, and allows for redevelopment to accomplish the intent of the South Anchorage Town Center, an evolving community asset, accomplished by the private sector in response to market needs.
    - Additionally, the majority of respondents to the Household Survey responded that they expect to travel to services, as with those services comes issues we do not want to see on the hillside.
  - Proximity to Existing Public Sewer and Water.
    - While it is true that public sewer and water are within reasonable

distance, that can be said of many areas of the hillside. Just because it CAN be done, DOES NOT mean that it SHOULD be done. Extension of public sewer/water does not help most people, only pushes higher density and a significant change to land use.

- Further, public sewer/water is cost prohibitive. Septic systems are far more cost effective for residents: A new technology system costs approximately \$30,000 plus approximately \$350 per year for constant monitoring by company and maintenance. The cost of sewer is upwards of \$160,000 plus approximately \$800 per year in monthly bills.
  - In addition, AWWU cannot reliably sustain the system it has now on lower hillside. Many of these areas experience inadequate water supply.
  - As of today, the hillside is self-sustaining.
  - “Need” for Sewer Due to Existing Conditions.
    - This is a false assumption on the part of the consultants. In fact, although Anchorage ranks second within North America for well/septic density, we have had negligible problems through the past 50+ years, a fact long known, but recently proven by qualified members of the CAC.
    - Any problems we might have in the Furrow Creek area are because of old and/or unmaintained systems that should be replaced with newer technology. The newer technologies were studied during the HDP process; however, facts learned in that process seem to have been ignored when drafting the final plan.
  - Proximity to transit corridor.
    - The town center will be bus-friendly. Lake Otis has nowhere near the ridership to support a route. Many attempts have been made through the years, all have failed.
- 4 Other considerations.
- The urban/rural boundary is already decided and in place. The Hillside Waste Water Management Plan (HWWMP) is the boundary for public sewer/water services. Any amendment to this boundary has required extensive public process and it is an accurate depiction of needed public sewer/water service. In fact, many have bought their properties on this side of the HWWMP boundary on purpose and do not want public utilities. The mapping on page 2-15 is a clear illustration of the in-place urban/rural boundary that we expect to continue.
  - Protection and support of housing options.
    - The 2020 Plan and majority community support has been to protect the existence of different types of housing options available in the Bowl. The 2020 Plan advocates strongly for this, even saying that eliminating options in the Bowl will drive residents to the Mat-Su Valley. The 2020 Plan also mandates protection of the hillside. The hillside is not meant to be the same as downtown, just as downtown is not meant to be the same as Turnagain.

- Roads and Drainage
  - The HOCC is supportive of the concept of a community operated road board similar to CBERRSA. This should be the entity responsible for the re-write of standards and going forward with any implementation of a plan, after they and the community write and map a plan.
  - Another flaw in the draft HDP is an attempt to impose urban and suburban construction standards. In many areas of the hillside, implementation of these standards would mean a total destruction of the character of the neighborhood.
- Economics.
  - Most residents within the Furrow Creek area are working class, retired, and/or on fixed incomes. Most of these people have little excess funds over what they are already expending to support their property. Any increase in costs will force people from their properties and/or significantly impact our financial situations.
  - If public water/sewer is extended into this area, all of the property taxes will increase due to the availability of that water/sewer and potential development value of the property, i.e. 10 acres of R-6 property now can sustain 8 homes; after availability of sewer, this same 10 acre property can be rezoned to accommodate approximately 66 homes.
- Safety.
  - The hillside is a hazard area for wildfire. Evacuation is already a significant issue for us, an impossibility for many residents of the hillside because of congestion on rural roads and other considerations.
- Implementation of HDP as drafted will result in reduction of overall open space.
  - The HDP, other MOA Plans and the community put great weight on the retention of the natural characteristics of the hillside, including our vegetation. As currently zoned, most hillside properties are limited to 30% lot coverage, leaving 70% open space. If the HDP is implemented as drafted, the hillside's character will suffer dramatically and overall open space will be significantly decreased.
  - While conservation subdivisions may be a viable option, and a definite improvement over some of the engineering now in place, given the hillside's exceeding of the 2020 density goals, the value that the 70% open space these properties now give to the community, and the economic damage done to the community in the extension of public sewer/water, existing zoning should stay in place.
- Draft HDP goes against 2020 Policies.
  - The draft HDP is against several 2020 Policies, including 5, 6, 7, 13, 14, 16, 57, 65, 68, 70, 71, 72, 76, 80, 91, and 92.

- Wildlife.
  - The hillside is home to a diverse wildlife population (regularly seen as far west as Lake Otis): bears (black and brown), moose, fox, lynx, coyote, rabbits, squirrels, wolves, porcupines, ermine, wolverines, and we support a huge population of birds, some rarely seen in other parts of the Bowl such as Great Horned Owls, Peregrin Falcons, Bald Eagles, Goshawks, and Sparrow Hawks. The habitat boundary of this wildlife is already been pushed to an area east of Lake Otis.
- Protection of watershed.
  - Higher density within the Furrow Creek watershed will only further deteriorate the conditions of this watershed, already seriously hampered.
  - Having said that, a proposed 50' setback from Furrow Creek is unattainable and unnecessary. The underlying issue in this area is flood plain areas that should not be developed within, and the disturbance over many, many years, of the natural drainage system. With technical assistance to the community and a solid drainage improvement plan, best management practices and basic engineering concepts can be implemented to address these issues – with existing zoning in place, little cost to the property owners, and nonobtrusively.
- Issues CAC disagreed with, as referenced in the HDP.
  - Page 1-23, “Furrow Creek watershed rezoning” – Of course there is no agreement on this issue. To increase the density in this area would be wrong for all of the reasons stated herein.
  - Page 1-25, “Potter Marsh/Old Seward Highway commercial” – Of course there is no agreement on this issue. It would be going against over 90% of the residents’ wishes to NOT have commercial.
  - Page 1-29, “Recommended Changes in the “Maximum Perimeter of Public Sewerage” – Again, this recommendation goes against the residents’ wishes, common sense, economical feasibility, and all the other reasons we have discussed herein.

## **Transportation**

### 5 Overview.

- Generally, the HDP accurately depicts the status of the transportation system in the Hillside area. Many recommendations are made in the HDP to upgrade/redesign/reengineer/construct selected roads; however, the HDP fails to recognize the importance of incorporating the MOA Executive Order for Context Sensitive Design and Solutions. This new Executive Order directs the MOA to implement context sensitive tools on all department projects as per the principles endorsed by the Federal Highway Administration, American Association of State Highway and



Transportation Officials, and the International Association of Transportation Engineers. Its essence is that a proposed transportation project must be planned not only for its physical aspects as a facility serving specific transportation objectives, but also for its effects on the aesthetic, social, economic, and environmental values, needs, constraints, and opportunities in a larger community setting. The Huffman/O'Malley Community Council (HOCC) endorsed the Executive Order via resolution dated March 18, 2004.

- In addition, the HDP should incorporate by reference the MOA's policy on changing out existing streetlights with more energy-saving and community-friendly LCD lighting.
- The HDP Public Review Draft recommends the formation of an "integrated roads, trails, and management entity." HOCC agrees that such an authority ought to be formed and should conform to the existing Chugiak-Birchwood-Eagle River Rural Road Service Area.

## **6 Specific Comments re: Transportation.**

- Page 4-1: Provide the definitions of "connectivity" and "built/green infrastructure" somewhere on the page and/or reference, after using the term(s), where the definitions are in the body of the main report.
- Page 4-4: Modify the first bulleted Road System goal to read: *Improve the system of the Hillside roads to respond to current use and expected growth while implementing the MOA's Executive Order for Context Sensitive Design and Solutions.* Modify the first bulleted Transit goal to read: *Promote transit service throughout the Hillside where feasible, especially west of Elmore Road.*
- Page 4-6, Map 4.1 Proposed Roadway Connections: The HOCC, other Community Councils, and the community have consistently opposed punching Elmore Road through to O'Malley Road; Huffman Road through to Hillside Drive; and Elmore Road to Rabbit Creek, as to do so would destroy the rural setting of the neighboring communities.
- Page 4-7, Paragraph 2, last sentence: Modify sentence to read: *However, design and permitting requirements, and input from the neighboring/affected communities and community council are likely to change some of the routes.*
- Page 4-9. Figure 4.2 is not referenced in the text.
- Page 4-10. Summary of General Standards for New Roads. The text accurately states that selected roads are State owned and the design standards applied to these streets are determined by the State. However, no mention is made as to how to coordinate the transportation goals of the HDP with those of the State. This disconnect with the State is a fatal flaw and the HDP should identify alternatives as to how to coordinate with the State to avoid potential design conflicts.
- Pages 4-12 and 4-13: Figures 4.4 and 4.5 are included in the report but not mentioned in the text.
- Page 4-15, Paragraph 1: The reference to Map 4.5 should be corrected to

read Map 4.6.

**Commercial Development**

- 7 The community has clearly said ‘no commercial’.
- We believe commercial as it exists currently should be continued as is with no corner store or retail business as the draft HDP is promoting.
  - Less than 10% of surveyed households wanted any type of commercial properties on the hillside.  
The majority of the households surveyed expect to travel to go get milk.
  - The recommendation on page 2-33 and in the implementation strategies should be removed as it is clear in current code how to address home based businesses. We support current code and methodology.
  - We don't expect commercial to extend further than where it exists currently along the frontage road/Brayton. Those businesses are not retail in nature but recreational i.e. H2Oasis, indoor golf, golf course & miniature golf.

Please also find attached our comments regarding the implementation strategies.

Thank you for the opportunity to comment. We look forward to the next draft.

Sincerely,

*Christine Monette*

Christine Monette  
Chair, Huffman/O'Malley Community Council