



Rabbit Creek Community Council

1057 W. Fireweed Ln. Ste. 100, Anchorage, AK 99503



May 17, 2016

Planning Department, Municipality of Anchorage
ATTN: Tom Davis, Senior Planner
P.O. Box 196650
Anchorage, AK 99519-6650

Re: Official Comments for the proposed Land Use Plan Map

Dear Mr. Davis,

Attached you will find Rabbit Creek Community Council's official comments on the Community Discussion Draft of the LUPM. These comments were approved unanimously by the membership of the RCCC, first in outline form in April and in final form at our recent meeting on May 12.

Please feel free to contact me with any questions or feedback. We look forward to seeing these comments incorporated and to continued discussion as the map progresses.

Sincerely,

Adam S. Lees

Adam S. Lees, Chair

CC: Jody Seitz, Jon Cecil – Planning

Thank you very much for the opportunity to comment on the Draft Land Use Plan Map and Narrative. Almost all comments are keyed to specified paragraphs in the LUPM Narrative (all three sections); a few comments also refer to the LUPM draft map. Comments are numbered sequentially. Suggested additions to the text and tables are underlined; deletions are ~~struck out~~.

SECTION 1

1. **1.2 Updating the Anchorage 2020 Comprehensive Plan** (Section 1, page 1): This is a valuable goal, but a major element should be added at the end of Item 1.2 (page 2)—Among community concerns that have arisen since 2001 are the goals of sustainability and responses to climate change.
 - The innovative approaches to growth are good. It is important that updates such as increased density of housing and businesses, and associated *respond to the impacts of ongoing climate change, which will affect every citizen, and minimize our contribution to it.* These were not part of the community dialogue when Anchorage 2020 was drafted.
2. **1.3 Community Goals Driving This Plan** (Section 1, page 2): *Revise items in this section* to add response to environmental changes (each paragraph is quoted in full, with changes indicated):
 - **Future growth.** Take a forward-looking approach to community growth and redevelopment, which seeks innovative ways to accommodate and encourage growth that is energy- and resource-efficient in housing, business, and industrial sectors.
 - **Compact development.** Use infill and redevelopment with a more compact land use pattern, which supports the efficient provision of public services, conserves energy and reduces greenhouse gases, supports public transit networks, reduces automobile dependency, and preserves open space. (The Hillside District Plan mandates the low-density character of its neighborhoods, however.)
 - **Natural open spaces and wildlife.** Preserve and enhance the network of natural open spaces throughout the community that preserves and enhances Anchorage’s scenery, its ecological functions, including natural drainage and re-charge of water systems, maintenance of its fish and wildlife habitats, their diversity and connectivity, ~~of fish and wildlife habitats,~~ and recreational opportunities. Because natural habitats and ecology cannot exist in isolation from surrounding lands, development of lands upstream must incorporate preservation of natural water flow into natural habitats. Habitat corridors for wildlife movements should likewise be maintained.
 - A major concern to the Community Council is Potter Marsh (state land that lies within our council area). 100% of its water comes from Hillside watersheds. Residential development, roads, and built drainage systems have compromised (and are compromising) the quantity of inflow to the marsh. Little Survival Creek is critical; larger creeks on the north edge of the marsh contribute less than 25% of the marsh’s water, according to ADF&G.

- Wildlife movements are facilitated by stream and wetland setbacks, preservation of natural vegetation on large lots, and avoidance of fences and other barriers in critical areas. (These measures also keep conflicts with wildlife to a minimum.)
 - **Strong, resilient community.** Limit and adapt development in areas of high natural hazards, in order to minimize exposure to life safety, property, and economic risks from natural hazards, including emerging hazards from climate change.
 - **Mobility and Access.** Develop a transportation system, based on land use, that moves people and goods safely with low impact on surrounding uses and the environment, and that maximizes choices and alternative travel modes like walking, bicycling, or public transit.
- 3. 1.3 Community Goals Driving This Plan, Compatible Development** (Section 1, page 2) and **Harmony with Natural Setting** (Section 1, page 3): We strongly *support* these concepts.
- 4. 1.3 Community Goals Driving This Plan** (Section 1, pages 2-4): **Add a new Goal.** This goal is important enough to be expressed in its own paragraph, as well as incorporated into some others (previous comment).
- **Minimize contribution to climate change, and adapt to its impacts.** Evaluate land use decisions and transportation investments with the intent to minimize and adapt to climate change, by: increasing density of housing in appropriate areas, increasing energy efficiency, reducing vehicular dependency, protecting natural hydrology systems, considering micro-climate effects, and improving resilience to erratic weather events.
- 5. 1.7 Updating and Amending this Plan** (Section 1, page 6): The fourth paragraph is a broad invitation to re-zone, even when inconsistent with the LUPM. **Amend this paragraph** to emphasize LUPM goals.
- *Add to end of the fourth paragraph*, following “an amendment may be appropriate”: Such a rezoning should also demonstrate consistency with the goals of the LUPM and should not set precedents or pose long-term effects that run contrary to the LUPM, unless a major amendment process is followed.
- 6. 1.10 Supplementary Policy Guidance, LU-7 Targeted Infrastructure Investment** (Section 1, page 13): This seems open-ended, with little regard for neighborhood zoning or characteristics. Add a sentence at end of this item to clarify LUPM’s intent:
- . . . Invest in public infrastructure (i.e. parks, trails, schools, sidewalks, streetscapes, utilities) to catalyze reinvestment in priority focus areas. Avoid subsidizing sprawl or intensified development in limited service areas.
- 7. 1.10 Supplementary Policy Guidance, LU-8 Planning Data Updates** (Section 1, page 13): *Watershed management and transportation planning* are inextricably bound to land use planning. *Add a commitment to obtain data on these planning concerns*, in a sentence following “and restore the environment”:

Collect and analyze environmental data, and incorporate it into land use planning. Data are needed on: (a) drainage problems; (b) water quality and watershed plans, especially in areas where runoff feeds major wildlife habitats; and (c) transportation data, including safety, availability, and service levels.

8. 1.10 Supplementary Policy Guidance, LU-11 Reducing Barriers to Core Sector Growth

(Section 1, page 13): The Narrative's text *does not define the "core sector and growth industries"* that Anchorage should assist. Does this mean oil companies, big box retailers, Outside real estate investors, marijuana, or . . . ? Also, there might be noxious growth industries that the public should not support. It might be a better return on investment to support smaller-scale local entrepreneurs.

- Revise title of item **LU-11: Reducing Barriers to ~~Core Sector~~ Employment Growth**
- Revise text of **LU-11**: Assist Anchorage's ~~core sector and growth industry~~ employers and entrepreneurs, to resolve land use constraints so they can ~~continue to grow~~, expand job opportunities, and provide a diverse, stable economic base.

SECTION 2

9. 2.2 Land Use Designations–Neighborhoods–Large-lot Neighborhood, paragraph 5 (Section 2, page 5): *This is misleading*; it implies that *the five zoning districts mentioned here are optional* throughout the Large-lot area in the HDP area.

- *Add a sentence* at end of paragraph with more complete information: Because the LUPM map legend does not differentiate these large lot zoning districts, it defers to the Hillside District Plan Zoning Districts (HDP Map 1.2), and the associated HDP policies, for large lot residential zones within the HDP boundaries.
- *Clarify this further* by moving or repeating *in this paragraph* the statement in LUPM Policy C-11, Section 2, page 11: "Maintain the same land use designations and zoning in this area as were established prior to the beginning of this plan; and by the HDP zoning map 1.2 on page 1-5."

10. Land Use Plan Map, Hillside Area: Consistent with the changes in the preceding comment, modify the LUPM Map to give better information about zoning districts that are mandated in the HDP:

- The draft LUPM uses a single color to depict densities on the Hillside from 1/3 acre to 5-acre lots, and 1 to several housing units per lot.
- *Add to LUPM legend item:* "0-1 dwellings per acre (refer to Hillside District Plan Map 1.2, Zoning Districts)"
- *Consider a new larger-scale LUPM for the Hillside area*, which would allow useful depiction of zoning districts in this area.
- The larger-scale map should use more colors that show specific zoning densities on the Hillside. This will allow readers to visualize the proposed zones without the necessity of referring back and forth between the LUMP, the Narrative, and the HDP. Such a procedure is confusing and leads to errors.

- 11. 2.2 Land Use Designations–Neighborhoods–Large-lot Neighborhood, paragraph 6** (Section 2, page 5): The first sentence of this paragraph refers imprecisely to the HDP. It also predetermines that clustered Conservation Subdivisions would be suitable in all Hillside areas. *Change as follows:* “. . . half-acre or larger sized lots with flexibility for slightly smaller size lots when in a clustered type ~~development~~ Hillside Conservation Subdivision, at densities up to three units per gross acre, where appropriate for site conditions.”
- 12. 2.2 Land Use Designations–Neighborhoods–Large-lot Neighborhood** (Section 2, page 5, paragraph 6): *Eliminate a sentence that prematurely endorses re-zoning the Legacy Pointe tract* at the south end of Golden View Drive to R-3 (3 homes per acre). Legacy Pointe is currently zoned PLI and the owners will apply for a rezoning before subdividing it. Let the regular zoning process consider suitable density, through public input at Planning and Zoning Commission hearings. A Conservation Subdivision might be unsuitable for the Legacy Pointe area, with its poor soil and value for the watershed.
- *Paragraph 6 of “Large-lot Neighborhood” should be revised, with a sentence deleted:* “. . . at densities up to three units per gross acre ~~The Legacy Pointe Tracts may also be developed to these densities if developed as a conservation subdivision.~~ Zoning in these areas includes . . .”
 - The Legacy Pointe tract has shallow bedrock and moderately steep slopes.
 - It has value for wetlands mitigation and watershed protection, with many small tributaries that help maintain Potter Marsh.
 - Dense development would pose traffic impacts to the area’s substandard roads.
 - A previous attempt to re-zone to R-7 (2 homes per acre) failed because of site conditions.
- 13. 2.2 Land Use–Open Spaces–Public Facility or Natural Area** (Section 2, page 15, and LUPM Map): *Retain the “park or natural area” depiction* for municipal lands that include the Coastal Trail, at the northwest edge of Ted Stevens Anchorage International Airport. *Remove the overlay* that proposes these recreational lands as “public facility/natural area.”
- The “Public Facility” option would allow airport industrial development there, or a fourth runway that has been rejected twice.
 - These two areas are *municipal* lands, not airport.
 - **Point Woronzof Park** has been *dedicated* as a municipal park, in a compromise that gave the airport other lands for industrial use.
 - The other tract (on Coastal Trail south of Point Woronzof Park, between park and the extended centerline of Runway 7-25) provides current and future value to the Coastal trail. It should not be predetermined as future airport land.

SECTION 3

14. COUNCIL SUPPORT FOR ITEMS in Section 3, Table 5, Actions Checklist: *We support the Action Items listed immediately below. (Suggestions for modifications of action items follow this list.)*

- **II. Infill and Redevelopment, Item II-1** (page 49): Ensure that multimodal projects found in transportation plans support Reinvestment Focus Areas.
- **III. Centers and Corridors, Item III-4** (page 49): Focus redevelopment assistance efforts on designated catalytic sites within centers and RFAs.
- **V. Coordinated and Focused Public Investment, Item V-2** (page 51): Develop a method for estimating and including Return on Investment (ROI) in CIP criteria.
- **V. Coordinated and Focused Public Investment, Item V-3** (page 51): Apply the CIP criteria and ROI model to public investments on private projects.
- **VI. Transportation Coordination** (page 52), *General comment:* We support infrastructure that promotes infill and redevelopment, gives a high, long-term return on public investment, and *ensures a sustainable, healthy natural setting.*
- **III. Compatible Land Use, Item VIII-6** (page 54): We support planning studies to evaluate and maintain the value of the scenic viewsheds.
- **IX. Open Space and Greenbelts, Item IX-2** (page 54): Pursue State and Federal grants . . . to fund restoration or acquisition of creek corridors and wetlands . . .
 - This is consistent with several Anchorage 2020 policies: 69 - preserve important wetlands; 70 – protect and restore ecological and functions of Anchorage’s aquatic resources; use wetlands to manage drainage and improve water quality
 - Consistent with HDP policies to provide a built/green infrastructure with natural drainage ways, which are kept connected across property lines, and natural runoff into wetlands
 - Consistent with several Parks Plan policies to protect or acquire creek greenbelts, specifically along Rabbit Creek, Little Rabbit Creek, Little Survival Creek and Potter Creek
 - Should include rehabilitation of streamside and wetland vegetation, if compromised, to improve habitats, water retention, and filtration
- **IX. Open Space and Greenbelts, IX-5** (page 54). Analyze and remedy deficiencies of parks and natural areas in under-served neighborhoods.
- **IX. Open Space and Greenbelts, Item IX-4** (page 54): *We support the housekeeping measure of rezoning dedicated parks that still have a residential or other zoning. Some dedicated parks should be rezoned PR district, and some T-zoned lands to PLI.*
 - The rezoning of parks is consistent with the intent to manage them for parks.
 - If these parks retain other zoning, the lot-line setbacks, building guidelines, and other elements of that other zoning will still apply.
 - If not rezoned according to actual use, the parks may be targeted for a “land grab” for another use.

SUGGESTIONS FOR MODIFICATIONS OF ITEMS in Section 3, Table 5, Actions Checklist: We support many of the following items if modified to reflect concerns and problems in our area or throughout the city. We also suggest three new Action Items.

- 15. IV. Housing and Neighborhoods, Item IV-1** (page 50): We support this item, *with the following modification*: “Conserve residential lands by restricting rezoning from residential to other development types or conversion of housing to other uses.” (Note: there may be some residential-zoned marginal lands that should be *rezoned as parks or natural areas*, for conservation of natural habitats or water flow.)
- 16. IV. Housing and Neighborhoods** (page 50-51): **Add new Action Item**: In rezoning of Legacy Pointe (south Hillside) to Residential, require large lots, and include a Special Limitation for a Master Plan that demonstrates how developers will maintain natural wetlands, water flow, natural connections of watercourses, and natural drainage.

 - Much of the Legacy Pointe tract is wetland, and its water (ground water, overland flow, and small creeks) is an important water source for Potter Marsh.
- 17. V. Coordinated and Focused Public Investment, Item V-6** (page 51): *This item should be modified*: “Evaluate the parameters and feasibility of a municipal storm water utility to address extreme runoff events; however, any system should not export normal water flows outside of natural watersheds.”

 - There are serious water-related problems on the Hillside with potentially conflicting solutions.
 - We support the concept of this item, *if it addresses extreme runoff events*. However, a storm water system must be designed to maintain *natural water flows* insofar as practical, and to maintain water inputs to wildlife habitats, *especially the Potter Marsh wildlife refuge*.
 - The HDP calls for a Hillside drainage plan. However, the same section also calls for *protecting existing stream and wetland functions, development of watershed plans for the Hillside (Policy 8-B), and development of green infrastructure to ameliorate drainage problems*.
- 18. VIII. Compatible Land Use, Item VIII-5** (page 54): We support this item, *with the following modifications*: “Conduct a valuation, watershed, and ecological study studies to determine current watershed and wetland protection, economic value, and land use development impacts.
- 19. VIII. Compatible Land Use, Item VIII-7** (page 54): *We support this item, with the following addition*: “Identify development standards and incentives to mitigate impacts to wildlife near wildlife habitat, including Watershed Plans to inform design of residential and infrastructure development”.

 - This item implements Anchorage 2020 Policies 66, “Address fish, wildlife and habitat protection methods in land use planning,” and 69-70, “Watershed management plans.”

- It also implements Hillside District Plan policy 6-B, “Protection of key drainages to the Potter Marsh watershed”
- It is especially important for protecting wetlands from further loss of water, and for reducing bear-human interactions.

20. VIII. Compatible Land Use, Item VIII-8 (page 54): *We support* development of a Hillside Conservation Subdivision ordinance.

- This is the intent of Hillside District Plan Policy 14-L, but it can’t be applied until it is adopted as part of Title 21.
- A Conservation Subdivision encourages clustering of homes and setting aside common or public tracts to provide public benefits such as wetlands and stream protection, habitat, or public open space.

21. VIII. Compatible Land Use (page 53): ***Add new Action Item:*** Development of standards for subdivisions, parcels and lots, and ridge tops in upper elevations or steep slope areas of the Hillside.

- These development standards are outlined in the *Hillside District Plan* (Policies 14-I, 14-J, 14-P) but cannot be applied until adopted into Title 21.
- Pressure to develop marginal lands will increase as the Anchorage Bowl continues to infill.
- *Steep and high-elevation land needs to be developed carefully*, to avoid off-site impacts that are a public concern; these include erosion, run-off, groundwater re-charge, visual degradation, degradation of wildlife habitats, etc.
- Title 21 contains limitations for steep slopes; however, ridge-top standards are not in Title 21.

22. IX. Open Space and Greenbelts (page 54): ***Add new Action Item:*** Study ways to protect critical wildlife habitats that are private “Other Open Space” within the Anchorage Coastal Wildlife Refuge, such as a Conservation Overlay or partnerships with NGOs or other government agencies.

- Three tracts of “Other Open Space,” as depicted on the LUPM map, lie in the intertidal zone between Kincaid Park and Johns Park: (1) the entire upper intertidal between Kincaid Park and the Campbell Creek Estuary Nature Area; (2) a smaller tract just southeast of Campbell Creek; and (3) a smaller tract south of Klatt Road.
- These areas are part of the Coastal Refuge’s most critical wildlife habitat. All species that breed in the refuge (from mice and frogs to geese and cranes) make their nests in the upper-intertidal near the bluff, and many also depend on moving through it.
- These “Other Open Spaces” are managed by ADF&G as part of the refuge, under an MOA approved by the Assembly in 2015 (the Community Council testified in favor).
- The tracts are permanently under 1-2 feet of semi-fresh water, and there is almost no public access, so they are currently occupied by diverse wildlife.

- Nevertheless, *these tracts are zoned Residential*. Therefore they have no legal protection from future filling and development, which would constitute a fairly catastrophic loss of Refuge habitat.

23. Section 3, Table 5, Actions Checklist (pages 49-54): We suggest that you please use all-Arabic numerals to designate Items, rather than a mix of Roman and Arabic. Some people find the mixed format hard to read. (We have referred to items as you formatted them, however.)

CONCERNS OR OPPOSITION REGARDING ITEMS IN SECTION 3, TABLE 5: The following Actions seem to contradict important community goals.

24. IV. Housing and Neighborhoods, Item IV-9 (page 51): *Delete* this item: ~~Develop new programs by which AWWU may provide infrastructure ahead of development.~~ **OR** *add* after “development”: in Reinvestment Focus Areas and infill areas.

- Under the draft wording, AWWU could be authorized to extend infrastructure into outlying areas of the Hillside where other services are lacking, with no public return on investment such as affordable housing.
- The HDP specifies that most Hillside areas will not have municipal sewer or water.

25. VII. Industrial Land Prioritization, Item VII-2: *Delete this item.* ~~Facilitate a targeted rezoning of selected south C Street land from I-2 to B-3 and I-1.~~

- These re-zones would exacerbate the sprawl of retail/business uses across south Anchorage. It will result in increasing traffic and parking demands.
- Opportunities would be lost for true commercial centers that can be accessed by transit and pedestrians.
- There are numerous existing retail/commercial nodes that should be encouraged to infill and/or redevelop with synergistic uses—Huffman Town Center, O’Malley Center, Dimond/Old Seward, and the Target-Cabella’s area. That’s enough.

26. IX, Open Space and Greenbelts, Item IX-1: *Delete this item.* ~~“Create a municipal wetlands bank employing conservation easements.”~~

- The MOA has the ability to protect muni-owned wetlands unilaterally, without collecting incentive money from the COE wetlands mitigation program.
- An MOA wetlands mitigation bank could easily result in fewer acres of protected wetlands than unilateral protection of MOA wetlands. An HLB wetlands “bank” would compete with private owners of wetlands who are considering development. If HLB outbids private wetland owners, the private wetlands will be developed.

27. X, Anchor Institutions and Facilities, Item X-6: *Delete this item.* ~~“Resolve land use, ownership and open space conflicts around TSAIA through a land exchange.”~~

- Land exchanges between Municipality and airport have been debated for years (i.e., trade Woronzof Park and HLB coastal lands for a snow dump and dog park). These proposals have not succeeded so far, due to strenuous opposition from the public.
- Foreseeable expansion of the Airport does not require the Municipal coastal lands. (Two TSAIA plans for a 4th runway there have been rejected.)
- Loss of the Coastal Trail and coastal open space would be a serious detriment to quality of life and our tourism economy.