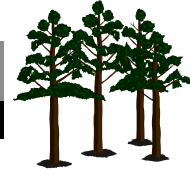




## Rabbit Creek Community Council

1057 West Fireweed Lane, Suite 100, Anchorage AK 99503



May 23, 2017

Anchorage Assembly  
Municipality of Anchorage

Re: AR 2017-192, approving the Heritage Land Bank Annual Work Program and Five-Year Work Plan

Dear Assembly:

Rabbit Creek Community Council submits the following comments in response to the Heritage Land Bank's letter on the Weddleton-LaFrance amendments to AR 2017-192.

### **Proposed Amendment 1 – Parcels 2-128 through 2-134**

#### A. MOA Parks is the appropriate land manager for municipal conservation lands, not HLB.

The responsibility for conservation is specifically assigned to Parks in the Anchorage Bowl Park, Natural Resources, and Recreation Facility Plan. Page 90, District Recommendations for Southeast Anchorage:

- Protect key drainages of Potter Marsh watershed.
- Continue to acquire, enhance, and develop greenbelts along Rabbit Creek, Potter Creek, Little Survival Creek, and Little Rabbit Creek.

#### B. HLB retention of these lands hinders the municipal goal of watershed protection for Potter Marsh.

- These parcels aren't "safe" with HLB. Municipal open space parcels that are not dedicated can easily be developed. This happened in the last few years when undedicated Rabbit Creek Park was chosen for a fire station site.
- HLB's letter of May 22, 2017 avoids commitment to over half the acreage in these combined parcels, by stating "watershed protection can be achieved by retaining the functions and values of Parcels 2-128 – 2-134" (see third section of the HLB letter). This precludes HLB's commitment to conserving parcels 2-135

and 2-136, which cover 55 acres, including tributary stream channels.

- HLB ownership will diminish opportunities for conservation funding. Conservation funding depends on connectivity to larger conservation units. These HLB parcels are “bridge parcels” that connect surrounding private wetlands and tributaries to Potter Marsh. Unless HLB parcels have conservation status, they will block efforts to protect vulnerable adjoining private wetlands and streams.

C. It is typical for public initiative to precede agency initiative in conservation efforts. MOA Parks focuses its resources on developed facilities and therefore has not actively sought to acquire conservation parcels.

Historically, public initiative has been a driving force behind municipal conservation goals. Anchorage citizens—not agencies-- have initiated many of the best parks and open spaces.

- Chester Creek Bike Trail - initiated by Lanie Fleisher and friends
- Cuddy Family Midtown Park - initiated by Helen Nienhauser and friends
- Town Square Park - saved by Ruth Moulton and friends
- Baxter Bog – thanks to Alisha Aiden and friends
- North Fork Chester Creek park - saved by Muldoon residents
- World-class nordic ski trails, ski jumps, ski-jor and single-track bike trails - initiated and funded by citizens at locations from Beach Lake to Girdwood
- Waldron Lake - citizen-supported acquisition
- Section 36 park - 640 acres including wetlands protected via citizens' lawsuit
- Campbell Creek estuary - citizens supported acquisition and conservation despite the opposition of the then-Mayor
- Rabbit Creek Greenbelt - our own Community Council members wrote grants and hired a crew and built 2 miles of trails

D. Action is overdue. These lands have been recommended for conservation status for 18 years (since the Potter Valley Land Use Analysis in 1999). The HLB Five Year Plan is a reasonable time frame that will be compatible with other projects .

E. 2012 MOA Wetlands study and 2010 Hillside District Plan confirmed the conservation values of these HLB parcels. The expiration of the Coastal Zone Management Plan is irrelevant to the documented ecological values of these parcels.

- MOA Wetlands Prioritization Map shows most of these parcels to have a level 2 “relative ecological value” (REV 2) based on acreage, onsite values, and connection to conservation lands
- Hillside District Plan Land Use Plan Map 2.1 shows these lands as “other areas that function as Park and Natural Resource Areas”.
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## **Proposed Amendment #2 Parcels 2-152 and 2-139**

Allow a range of solutions for access to Chugach State Park. HLB has worded their work plan to require a land exchange and thus it forecloses interagency use agreements or easements for trails.

A land exchange is probably prohibitively expensive and complex.

## **Proposed Amendment #3 – Parcel 2-156**

Retain Parcel 2-156 until surrounding development is known.

- MOA Wetlands Prioritization Map shows that Parcel 2-156 is surrounded by private lands with many tributary streams. Delay disposal of this parcel until it can be developed jointly with private lands to encourage clustered development and shared access, with conservation of stream corridors.
- Parcel 2-156 contains some acreage with Level 2 Relative Ecological Value.

Several municipal land use plans call for the protection of Potter Marsh watershed and for the development of public access to Chugach State Park. HLB parcels are part of this long-range vision. The proposed amendments to the HLB Work Plan and Program will ensure progress toward protection and use of these public lands, after decades of stasis.

Sincerely,  
 Nancy Pease, RC Transportation and Land Use Committee Chair,  
 on behalf of  
 Adam Lees, Council Chair