

## Correspondence



### **RABBIT CREEK COMMUNITY COUNCIL (RCCC)**

A Forum for Respectful Communication & Community Relations



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

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TO: Tiffany Briggs, Executive Director, Heritage Land Bank [tiffany.briggs@anchorageak.gov](mailto:tiffany.briggs@anchorageak.gov)  
Heritage Land Bank Advisory Commissioners c/o Emma Giboney  
Emma Giboney, Land Management Officer [emma.giboney@anchorageak.gov](mailto:emma.giboney@anchorageak.gov)

RE: Comments on Heritage Land Bank 2025 Annual Work Program & 2026-2030 Five-Year Management Plan (Public Review Draft)

Thank you for the opportunity to comment on the Heritage Land Bank (HLB) 2025 Annual Work Program & 2026-2030 Five-Year Management Plan (Public Review Draft).

Rabbit Creek Community Council (RCCC) encompasses neighborhoods from DeArmoun Road south to and inclusive of Potter Valley. Over the years, RCCC have taken an active interest in assessing the potential for the HLB parcels.

At our January 9 meeting, RCCC discussed the HLB 2025 Work Program and the Five-Year Management Plan. RCCC voted to submit the following comments to HLB, by a vote of 22 yeas-1 nay-0 abstentions.

Progress Report, Page 10. RCCC thanks HLB for its action in 2024 to implement the Potter Valley Land Use Analysis (PVLUA) regarding Parcels 2-127 through 2-136. We appreciate that HLB leveraged 100 acres to help acquire 200 additional acres (through an in-kind match for federal grants, led by a non-profit partner). The resulting creation, 300-acre Potter Marsh Watershed Park, is an invaluable asset for the entire city. Well done, HLB!

Potential Disposals, Exchanges & Transfers: 2026-2030, Page 18 - 19

Parcel 2-156 9.5 acres on south Golden View. RCCC notes that HLB has issued Alaska Natural Burial a land use permit for 'due diligence' work to take place in 2025. RCCC continues to support this proposed use, subject to conditions for approval. RCCC members have voiced the concerns about minimum burial depth to prevent disinterment by wildlife and protecting the watershed from toxicity of some human remains (medications, batteries associated with implants, artificial joints, etc.). Alaska Natural Burial Ground has furnished information indicating that soils, slopes and drainage patterns should minimize those concerns. RCCC advocates coordinating parking development in order share parking with adjoining uses (Moen Park and Potter Marsh Watershed Park). RCCC requests that the Work Plan proper include the

following language (shown here in italics) “...HLB intends to dispose of this property to Alaska Natural Burial, with conditions and restrictions. *The purpose of those conditions shall be to: maintain natural terrain and native vegetation, ensure secure and sanitary burial practices, provide efficient, shared parking with adjoining park uses, and, provide for watershed conservation and public open space after the burial site reaches capacity.*”.

Parcels 2-144 A, B, C, D in upper Potter Valley near the Alaska Mountain Rugby field  
Parcel C is mentioned for possible re-zone from R-6 to R-10. RCCC has no comment on Parcel 2-144C at present; but would like to be notified directly if proposed re-zoning moves forward.

RCCC would like the Work Plan to note the potential use of Parcels A and B as trailhead locations in the next few years. There are several new trails in the Potter and Goldenview areas, but insufficient trailheads and parking for the Stewart Trail, Potter Ravine Park, and Potter Marsh Watershed Park. Trail connectivity will continue to improve in this area as tracts are subdivided and missing trail links are acquired.

Please add the following wording:

*Parcel 2-144A and 2-144B may be reviewed for trailhead development to meet the growing need for orderly trail access in the Potter Valley and Goldenview area.*

Parcel 2-146 Landlocked parcel in upper Potter Valley. RCCC currently has no comment on potential rezoning to R-10. RCCC would like to be notified directly if proposed re-zoning moves forward.

Parcel 2-147 120 acres bordering Chugach State Park, on steep alpine slopes at the head of Potter Valley.

RCCC opposes sale of this parcel, which would violate the adopted Potter Valley Land Use Analysis (PVLUA), and will submit detailed comments regarding HLB’s Agency Review of the Purchase Application under separate cover.

RCCC advocates adding to the Work Plan: “Negotiate transfer of Parcel 2-147 to Chugach State Park in accordance with the Potter Valley Land Use Analysis.” The PVLUA implementation action is: “For Parcel 2-147, designate open space/parkland and...negotiate with ADNR for transfer to Chugach State Park” and then rezoning the parcel as Watershed (PVLUA page 59). This proposed transfer to Chugach State Park is supported by the current Chugach State Park (CSP) Superintendent and the CSP Citizens Advisory Board (per written submittals to HLB, January 2025).

RCCC opposes sale of this parcel for the following reasons:

- The physical characteristics of this parcel create high unsuitability for development. The entire lot has steep slopes, with over half of the acreage exceeding 46% slopes. The area has shallow bedrock, subalpine and alpine elevations, and extreme high winds.

- The parcel is isolated from the infrastructure necessary for development. The Steamboat Drive approach would require about two miles of road construction including wetland crossings. The Potter Heights Drive approach would require over one mile of substantial upgrade and new road construction, including streamside development. Both approaches are constrained by private parcel ownership, with gaps or insufficiencies in the rights-of-way.
- If sold, this parcel would likely be held speculatively (given the cost of development, and also the lack of developed trails in adjoining parts of CSP). This would usurp the purpose of the Heritage Land Bank to hold land for future public benefit.
- If sold, this parcel could become a barrier to public access both immediately and in the long term. Social trails across this parcel to Chugach State Park could be blocked, as has happened on nearby parcels. Future public trail development would be constrained.
- If developed in the near term by a “deep pockets” developer, a surge in recreation could precipitate resource damage to adjoining lands in Chugach State Park where there are only minimal social trails and no park improvements.

Parcel 2-139 on Brewster’s Road and bordering CSP, currently lacks legal ROW access.

RCCC supports acquisition of a right of way (ROW) as well as HLB action to improve access to Chugach State Park via Parcel 2-139. Add to the Work Plan:

*“HLB Parcel 2-139 – access needs to be established through a private parcel. Future trail and trailhead access to the ridgetop needs to be coordinated with CSP, the Municipality, and neighboring landowners.”*

Demand continues to grow for a better trailhead to access the Bear Valley trail to McHugh Peak. The current Honey Bear trailhead in Bear Valley accommodates only five cars and the trail from that access point is badly eroded and excessively steep.

Parcels 2-158 and 2-152 Honey Bear Lane and ridgetop overlooking Rabbit Creek, in Bear Valley.

The draft Work Plan calls for MOA Project Management and Engineering to design access improvements. There is strong public interest in potential future uses. Therefore, add the following language:

*“Coordinate with MOA Parks, CSP, and the public to determine recreation access potential to several nearby parklands, and to produce a context sensitive design for access improvements.”*

Parcel 2-125 adjoining Bear Valley Elementary School. RCCC looks forward to supporting a connector trail to link neighborhoods to the school. There may be efficiencies if this trail approval progresses concurrently with proposed trail development in nearby parts of Section 36. *“...Coordinate the timing of the trail approval with proposed trail development in nearby parts of Section 36 that are under Parks and Recreation’s management.”*

Parcels 2-116 through 2-122 Greenbelt parcels along Little Campbell Creek, near Golf course/ Section 30 Park. RCCC supports the intent of the draft Work Plan to transfer management to Parks and Recreation Department. These parcels are part of the Little Campbell Creek Greenbelt. The Hillside District Plan advocates for riparian greenbelt acquisitions (Policy 5-C) and the Anchorage Bowl Park Plan supports acquisition of greenbelts on all Hillside creeks.

Parcels 4-032, 4-033 A-F, and 4-034 Public Access to the Tony Knowles Coastal Trail through HLB land.

Add language to the draft Work Plan to ensure broader community-wide outreach when and if new access and trail buffers are contemplated. The Tony Knowles Coastal Trail is a citywide asset. Municipal trail user studies confirm that approximately 80 percent of residents have used the Coastal Trail.

Additional language (in italics)

“...Public access to the Tony Knowles Coastal Trail through HLB land may be considered if/when development of the parcel(s) are proposed. Additionally, HLB will *reach out to all Community Councils* and will *specifically* work with the Turnagain Community Council, the Parks and Recreation Department, and other interested parties *and Community Councils* to determine appropriate boundaries for a trail and natural space buffer...”

Girdwood parcels: In disposing of land to private parties, HLB should reserve trail rights-of-way (ROW) rather than trail easements, per 21.08.040.D which reads, “For pedestrian access, a right-of-way dedication is the preferred method of providing access...” In our Council’s recent experience, easements on private land have raised concerns of liability and maintenance. HLB should reserve non-motorized ROWs rather than just easements, especially for the Iditarod Trail, riparian trails, and main connecting trails.

Thank you for this opportunity to comment. If you have any questions, please contact me.

Signed,



Tim Alderson, Chair

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