

**From the Board of Directors of
Turnagain Community Council**
c/o Mark Wiggin, President
2213 Douglas Dr., Anchorage, Alaska 99517

September 16, 2005

sent via e-mail

Municipality of Anchorage Planning Department
P.O. Box 196650
Anchorage, Alaska 99519

RE: ANCHORAGE BOWL LAND USE PLAN MAP — Community Discussion Draft

Dear Planning Staff:

Thank you for the opportunity to provide input on development of the Anchorage Bowl Land Use Plan Map, an essential component of the Anchorage 2020 Comprehensive Plan. It is vital that comments submitted by the public at this early draft stage are reflected in the final version of the Land Use Map, as this map will provide current and future administrations, and appointed and elected leaders guidance on land use policy decisions for years to come.

While we support and desire achievement of all 10 Key Principles, as listed on pages 2-3 of the Land Use Plan Map Overview, The Turnagain Community Council Board (TCCB) comments at this time will largely focus on Key Principal #10: *“Parks, Natural Open Space and Ecological Functions* are conserved and enhanced to preserve the unique livability of the growing city.”

Turnagain is especially fortunate to have within and near our boundaries some high value parklands and other natural open space and coastal areas that our neighborhood as well as visitors and the community at large use and enjoy. Long-term protection of these important areas is essential as our city continues to grow, so that future generations have the opportunity to benefit from the recreational, natural open space and wildlife assets we now value as a community. (This sentiment dovetails into Key Principal #1 — *An Emphasis on the Overall, Long-Term Welfare of the Entire Community.*) Therefore, our comments are directed specifically to the Community Facilities Map Layer, which includes draft designations of Parks and Natural Resource Use areas. Of course, these comments would then apply to the General Land Use Plan Map and the Land Use Plan - Composite Map as well.

SPECIAL STUDY AREA DESIGNATIONS:

On the Community Facilities Map Layer, four areas are designated “Special Study Areas” in the west part of Anchorage. In the Overview document on page 15, the definition for a Special Study Area includes the following: “There are several public land parcels for which a specific use has yet to be identified. These areas are subject to a site-specific land use study before use

designation or development.” While this designation *category* has merit (see comments under “C. & D. Airport-Owned Land” below), the areas chosen for this designation don’t fit with the definition. Specifically, the following areas in West Anchorage are designated Special Study Areas in the draft:

- A. Municipally-owned land south of Pt. Woronzof and east of the Anchorage Water and Wastewater (AWWU) sewage treatment facility;
- B. Municipally-owned Heritage Land Bank (HLB) land west of Ted Stevens Anchorage International Airport (Airport);
- C. Airport-owned land south of Raspberry Road and adjacent to Kincaid Park;
- D. Airport-owned land covering the northern half of Connors Lake and adjacent bog and upland areas.

A Municipally-Owned Land South of Pt. Woronzof & East of the Sewage Treatment Facility: TCCB finds it hard to imagine how this small, but extremely significant piece of land could be designated as a Special Study Area. Because of its narrow east/west boundaries and incompatible land uses on both sides (Pt. Woronzof Road and the North/South Runway to the east and sewage treatment plant to the west), the entire parcel is considered by the public as a trail greenbelt for the portion of the Tony Knowles Coastal Trail (Coastal Trail) that runs through the area. The land to the east of the trail, which is sloped and wooded, serves as an essential buffer between the trail and high-impact land uses to the east. If there is one parcel that demands the designation of “Park and Natural Resource Use,” it is this parcel.

TCCB also notes that the color of this area is blue, implying that the land is part of the Airport’s “Major Transportation Facility.” This does not accurately reflect how the public is currently using this land and because it is city-owned property, this land does not fall within the Airport’s transportation facility boundary.

- **RECOMMENDATION:** TCC requests that the above described parcel of city-owned land be colored in green and designated “Parks and Natural Resource Use” on the Community Facilities Map Layer.

RATIONALE: Historically, there are several Municipal documents that reflect the intention for this land to be designated as protected open space parkland/greenbelt and support a Park and Natural Resource Use designation, including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan (1982 Comp. Plan):** The above-described parcel is designated in the 1982 Comp. Plan Parks and Open Space Plan as “Areas to Develop as Parks, Open Space and Related Facilities.” Goals listed under “Greenbelts and Open Spaces” (page 46) include a. To accommodate trails and recreation facilities; and d. To lend identity to communities and provide buffers between incompatible land use.
- **1983 The Coastal Trail Route Study:** Plan Sheet 12, 12.4 indicates this was the intended route for the Coastal Trail in this area. General goals stated on page 1 of this document include:

“Provide a greenbelt corridor linking existing and future park and open space plans.”

“Help protect marginal and environmentally sensitive areas from improper development.”

- **1993 Heritage Land Bank (HLB) Resource Inventory:** According to this document, this land has a Covenant/Title restriction — “Use restricted to Park, Recreation or Other Public Purposes Only.”
- **1997 Anchorage Areawide Trail Plan:** The accompanying maps to the Trails Plan validate the existence of the Coastal Trail in this area.
- **1999 Open Space Inventory for Anchorage Map:** A “Combined Community and Neighborhood Preferences for Natural Open Space” map was produced by The Great Land Trust and the Municipality of Anchorage (Municipality) in an “Open Space and Wildlife Habitat Mapping Project.” The above described parcel was included on this map as preference for natural open space and identified to have the following values:
 - Aesthetic Value
 - Recreation Value
 - Wildlife Habitat Value
 - Environmental Education Value
- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan (Anchorage 2020 Plan):** The Conceptual Natural Open Space Map (page 63) was also based on the Open Space and Wildlife Habitat Mapping Project, between The Great Land Trust and the Municipality. While it is difficult to tell the exact mapping boundaries, this area was definitely identified “Community Preference for Natural Open Space,” and most, if not all, identified as “Important Wildlife Habitat.”
- **2005 (draft) Anchorage Bowl Park, Natural Resource and Recreation Facility Plan:** Map 7 “Recreation Trails and Connections” designates this area as “Scenic/Greenbelt Trail Network Connections to Parks and Schools.”

B. Heritage Land Bank Land:

Clearly, the land encompassing city-owned HLB parcels west of the airport do not fall into the description of “a specific use has yet to be identified.” Just ask anyone who uses the section of the Coastal Trail — one of the most popular recreational assets in this city — which runs through this area. Trail users have viewed this land as de facto trail greenbelt/natural open space since the trail was built in the mid-1980s. This area also serves as an essential buffer between two incompatible land uses (passive recreation in a natural setting along our beautiful coastal area and a major transportation facility whose operations generate high and far-reaching negative impacts). Finally, this coastal, natural open space also serves as important wildlife habitat and a part of a wildlife travel corridor that connects the Kincaid Park area with Earthquake Park.

TCCB also notes that the eastern section of this area is colored blue on the map, implying that the land is part of the Airport's "Major Transportation Facility." This does not accurately reflect how the public is currently using the land and because this is Municipally-owned property, this land does not fall within the Airport's transportation facility boundary.

- **RECOMMENDATION:** TCCB requests that the entire boundary of city-owned land discussed above be colored in green and designated "Park and Natural Resource Use" in the Community Facilities Map Layer.

RATIONALE: Historically, there are several Municipal documents that reflect the intention for this land to be designated as protected open space/parkland and support a Park and Natural Resource Land Use Map designation, including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan:** Most of the land within the city-owned HLB parcels is designated in the 1982 Comp. Plan Parks and Open Space Plan as "Areas to Develop as Parks, Open Space and Related Facilities" or as "Other Open Space (Non-Municipal)". (NOTE: At that time, the State apparently owned land in this area that is now owned by the Municipality).
- **1982 Pt. Woronzof-Pt. Campbell Wetlands Master Plan:** Land within most, if not all, of the three HLB parcels fall within the Land Use Study area of this document. Chapter III Master Plan, Vehicle Access Parking section (page 31) states, "Parking areas should be provided . . . just north of the Clitheroe Center . . . This will provide more convenient access to the viewing facilities for users who do not ride bikes or walk long distances."

The Viewing Platform section (page 32) of the same document states, "Further [sic] south on the trail, just west of the potato patch, another viewing area should be provided." (NOTE: The old potato patch is in the vicinity of the Clitheroe Center.)

- **1983 The Coastal Trail Route Study:** Plan Sheet 15, between 14.5 and 15.1 discusses access to the Coastal Trail and states, "Potential coastal park with trail link to Point Woronzof Drive, parking facilities, shelters, restrooms and information signing." This area is near the Clitheroe Center.
- **1987 Revised Anchorage Coastal Management Plan:** (NOTE: This information is also included in the 1982 Comp. Plan) It is difficult to determine exact boundaries, but most, if not all, of the HLB land falls within the Anchorage Coastal Zone Management boundaries and is designated either "Preservation" or "Conservation" Environment. This land is identified as "High Hazard," "Marginal," and/or "Scenic Vistas." You may question the wisdom of advocating for parkland in geologically high-risk areas, but as residents of Anchorage, we know about earthquake zones and how to wisely manage land use in high hazard areas. Passive recreation and natural open space would likely be the highest and best use for this land because of its high hazard/marginal designations, not to mention its scenic vistas.

- **1993 Heritage Land Bank Resource Inventory:** According to the descriptions of HLB parcels 4-032, 4-033 and 4-034, whose boundaries generally conform with the city-owned land designated Special Study Areas in the Community Facilities Map Layer, these parcels have a Covenant/Title restriction — all are to be used by the Municipality for “public” and “recreation.”

- **1999 Open Space Inventory for Anchorage Map:** A “Combined Community and Neighborhood Preferences for Natural Open Space” map was produced by The Great Land Trust and the Municipality. While it is difficult to determine precise boundaries, it appears that all of the city-owned HLB land is designated as a preference for natural open space on this map and identified to have the following values:
 - Aesthetic Value
 - Recreation Value
 - Wildlife Habitat Value
 - Environmental Education Value

- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** The Conceptual Natural Open Space Map (page 63) was also based on the “Open Space and Wildlife Habitat Mapping Project,” between The Great Land Trust and the Municipality. The entire boundary of the HLB was identified as “Community Preference for Natural Open Space.” Ironically, this map identifies the eastern part of the HLB land as “Important Wildlife Habitat,” but not the western part. It is hard to imagine how the eastern part qualifies for this designation and the western part does not and this contradicts the map referred to above, which shows the entire HLB land area having habitat values. Regardless, this map was compiled from interviews with local wildlife experts and from scientific reports, and it stands to reason that both the eastern and western areas have important habitat values since they are contiguous.

C. & D. Airport-Owned Land:

As for the other two Airport-owned parcels identified as Special Study Areas on the Community Facilities Map Layer, TCCB feels that this is an appropriate designation, title-wise, but *the definition of a Special Study Area should change*. These areas as well as others listed below are being used for a specific purpose by the public as parkland and/or are important natural open space areas, but because they are owned by the Airport, obviously there is some disagreement, conflict and/or nonresolution regarding long-term use of the land.

- **RECOMMENDATION:** TCCB requests that the definition of Special Study Areas be rewritten so that it addresses the land use conflicts of Airport-owned land currently being used by the public as parkland — whether because of a formal agreement between the Municipality and the Airport or because of its value to the community as natural open space for recreation, wildlife habitat and/or trail greenbelt corridors — and that a Special Study designation is needed so that the highest and best use can be determined through a public process — regardless of ownership. (See discussion of development and implementation of the West Anchorage District Plan below.)

RATIONALE: During the development of the Comp. Plan, several major issues were identified and ultimately addressed in the final plan document. One of these major issues related to the

community and how it was being negatively impacted by growing Airport operations and development. The Comp. Plan acknowledges the impacts generated by the Airport and their effects on surrounding land uses (i.e., recreational, residential, educational, environmental) as well as land use conflicts within the Airport boundaries by dictating the following:

- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** On page 57 of the Comp. Plan, it states, “In response to airport growth, community growth surrounding the airport, recreational uses on the airport, and related airport impacts to the surrounding community, **Anchorage 2020** creates the West Anchorage Planning Area [also referred to as the West Anchorage District Plan.] Along with related strategies, this planning district serves as a mechanism to formally identify, address, and resolve land use conflicts within and near the airport.”

➤ **RECOMMENDATION:** In addition to the already referenced Airport-owned properties (see page 2) identified as Special Study Areas in the Community Facilities Map Layer, TCCB requests that the following Airport-owned parcels be identified as Special Study Areas (as per TCCB’s rewritten definition) as well:

- E. Land west of Earthquake Park that runs along the coast and up to the boundary of the Anchorage Coastal Wildlife Refuge at Pt. Woronzof^{1 2}
- F. Land at Pt. Woronzof, down to the northern boundary of AWWU sewage treatment facility^{1 2}
- G. Land along the coast south of Pt. Woronzof Park^{1 2}
- H. Land west of the East/West Runway^{1 2}
- I. Land in the Little Campbell Lake area²
- J. Land directly west and adjacent to Kincaid Elementary School
- K. Spenard Beach Park along Lake Shore Drive
- L. Lions Club Picnic area along Lake Shore Drive
- M. All remaining areas of Turnagain Bog and associated uplands, with priority for special study on the land directly adjacent to the Turnagain residential boundary
- N. All lands currently zoned “Transitional,” as defined in the current Title 21, Land Use Planning, Anchorage Municipal Code (Title 21).

RATIONALE: As noted in the footnote section below and elsewhere in this letter, the Coastal Trail runs through a number of these parcels. Throughout the years — since the Coastal Trail was built — various city officials as well as residents have expressed the need for the trail to run through a permanently protected greenbelt area in nonMunicipally-owned lands. Ideally, this should occur by the city acquiring trail greenbelt and dedicating it as parkland. An alternative is to ensure permanently platted easements sufficient enough to protect not only the trail footprint itself, but an adjacent area wide enough to buffer it from incompatible, high-impact land uses, such as those generated by the Airport.

¹ The Coastal Trail runs through this area.

² This area is striped green (Park and Natural Resource Use) and blue (Major Transportation Facility) on the Community Facilities Map Layer. The Community Facilities Map Layer legend does not explain these dual and contradictory designations.

Footnote #2 indicates there are a number of parcels whose land use designations on the draft map are contradictory. Clearly, their final designation needs to be Parks and Natural Resource Use, based on the documentation listed below, and a Special Study public process via the West Anchorage District Plan can ultimately resolve this.

Other parcels listed above, particularly Little Campbell Lake Park, Spenard Beach Park, and the Lions Club Picnic Area, have historically been used by the public as parkland for many years because the city has leased these lands and identified them as public parkland with signage. The Airport continues to threaten to shut down these parks and restrict public access. The public deserves a permanent resolution to these land use conflicts. Designating them Special Study Areas is appropriate and can move a public process forward to bring about that permanent resolution.

Historically, there are several Municipal documents that reflect the intention for the above listed Airport-owned parcels (including the ones listed on page 2) to be designated as protected open space/parkland and would ultimately support a Park and Natural Resource Land Use Map designation through a Special Study public process; they including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan:** All of the above listed parcels are designated in the 1982 Comp. Plan Parks and Open Space Plan as either “Existing Municipal Parks and Open Space” or “Other Open Space (Non-Municipal).”
- **1983 The Coastal Trail Route Study:** Plan Sheets 9-12, indicate this was the intended route for the Coastal Trail, from Earthquake Park to Pt. Woronzof. On page 45, it states, “One of the important routing considerations was to keep the trail away from the edge of the bluff to avoid additional erosion of the highly unstable slopes.” Protecting a buffer of land along the length of trail and dedicating it as permanent trail greenbelt is critical to ensure the viability of the trail (which a portion has already had to be moved inland because of erosion) for many years to come.

Plan Sheet 12 12.2 notes, “Pt. Woronzof scenic area views, parking facilities, trail access to water, shelters, restrooms.” This area is now widely used by the community and visitors as a scenic viewing area and parking area for Coastal Trail user access.

Plan Sheet 15 validates that the Coastal Trail was intended to run through this area and be used for recreational purposes, regardless of land ownership.

Plan Sheets 16-18 It is difficult to determine exactly where the Airport property boundaries are on these drawings, but the Coastal Trail Route Study clearly validates the Coastal Trail running through this area, regardless of ownership.

- **1987 Revised Anchorage Coastal Management Plan:** (NOTE: This information is also included in the 1982 Comp. Plan) All the parcels listed above where the Coastal Trail is routed fall within the Anchorage Coastal Zone Management boundaries and is designated

either “Preservation” or “Conservation” Environment. This land is identified as “High Hazard,” “Marginal,” and/or “Scenic Vistas.”

A large portion of Turnagain Bog, including the wetlands directly adjacent to the Turnagain residential boundaries, falls within the Preservation Environment and identified as “Preservation Wetlands.” A significant portion of Turnagain Bog is labeled as Conservation Environment and identified as “Marginal” and “Scenic Vistas.”

Most, if not all, land zoned “Transitional” falls within the Anchorage Coastal Zone Management Boundaries and identified as “Preservation” or “Conservation” in the Management Plan.

- **1996 Anchorage Wetlands Management Plan:** With the exception of the extreme south end of Turnagain Bog north of Lake Shore Drive, all of Turnagain Bog is designated as “A” Preservation wetlands and ranks high in Hydrology, Habitat and Species Occurrence.

Wetlands in the northern Connors Lake/Bog area are designated “A” Preservation in the Wetland Plan.

- **1997 Anchorage Areawide Trail Plan:** The accompanying maps to the Trails Plan validate the existence of the Coastal Trail through the applicable land parcels (#1 Footnote).

- **1999 Open Space Inventory for Anchorage Map:** A “Combined Community and Neighborhood Preferences for Natural Open Space” map was produced by The Great Land Trust and the Municipality. With the exception of the land directly west of Kincaid Elementary School, every Airport-owned parcel of land TCCB recommends to be identified as Special Study Areas are shown as preference for natural open space on this map and are identified to have one or more of the following values:

- Aesthetic Value
- Recreation Value
- Wildlife Habitat Value
- Access Value
- Environmental Education Value
- Other Values

- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** The Conceptual Natural Open Space Map (page 63) was also based on the “Open Space and Wildlife Habitat Mapping Project,” between The Great Land Trust and the Municipality. Most of the Airport-owned land TCCB is requesting to be identified as Special Study Areas are identified as one or more of the following

- Community Preference for Natural Open Space
- Important Wildlife Habitats
- Existing Municipal Parklands (Spennard Beach Park & Lions Club Picnic Area)

- **Currently adopted Title 21:** A significant portion of Airport-owned land is zoned “T” Transitional, including but not limited to, the Turnagain Bog area. According to Title 21 of the Anchorage Municipal Code, “This district is intended to include suburban and rural areas that, because of location in relationship to other development, topography or soil conditions, are not developing and are not expected to develop in the immediate future along definitive lines. The permitted uses in these districts are intended to be as flexible as possible consistent with protection from noxious, injurious, hazardous or incompatible uses.” It goes on to state, **“As development patterns start to emerge within these areas and the sophistication of their protection becomes more critical to the general public interest, it is anticipated that such lands within the T districts will be proposed for more restrictive zoning classifications.”** (TCCB emphasis)

Clearly, circumstances have changed and “development patterns are emerging.” The Airport has already built a large General Aviation (GA) parking area (Echo Parking) in Turnagain Bog, with plans for expansion. It also proposes to develop additional GA-related projects “along definitive lines” that would not be compatible with other existing land uses to the east and north, and would allow for “noxious, injurious and hazardous uses.” (See Draft Lake Hood and ANC General Aviation Master Plan, Chapter 4, Alternatives C and D.)

The Land Use Mapping public process now in progress must evaluate the need to rezone this land to a more restricted designation, which would definitely be in the general public’s best interest. This area should formally be zoned so that it becomes a permanently protected buffer, helping to protect the surrounding area from airport-generated impacts in proposed “Major Transportation Facilities” on Airport property. This rezoning would occur in conjunction with the development of the West Anchorage District Plan.

Section 21.40.240 of Title 21 specifically describes prohibited uses of land zoned “T”: E.1: “Noxious, injurious or hazardous uses, which are defined as any use that may be noxious, injurious or hazardous to surrounding property or persons by reason of production or emission of dust, smoke, refuse matter, odor, gas fumes, noise, vibration or similar substances or conditions, or the production or storage of explosive materials.” E.2.: “Any use or structure which is likely to be incompatible with established permanent uses within the area to be affected by the proposed use or structure.”

By nature of what occurs during normal operations at GA parking lot /lease lot areas, noise, odors and fumes are routinely produced and emitted. Aviation fuel can be categorized as an “explosive material,” and is routinely stored in these areas. Because Municipal code specifically lists these as prohibited under T-zoned land, even if the land were not rezoned to a more restrictive designation, under T zoning, development of GA projects would be in direct violation of city land use laws and regulations.

Under “21.40.240 M. *Land contiguous to land zoned for less intensive use,*” it states, “No building or land use permit shall be issued in a T zone except for a permitted use. Land zoned T lying contiguous to residential-zoned land shall be permitted to be used only in accordance with provisions and standards less intense or equal to provisions and standards allowed under this title for the least intensive land use zone within a 1,000-foot radius of the

boundary of existing T-zoned property for which a building permit or land use permit has been requested.”

The Airport has developed “T” zoned lands throughout the years since the current Title 21 was written, with no regard to Municipal code adherence. It is imperative that all T-zoned land be designated Special Study and become part of the West Anchorage District Plan, so that conflicts and incompatible land use issues can be resolved.

CONCLUSION:

Because of our West Anchorage location, Turnagain residents and our community council have a long history of dealing with parkland, Coastal Trail, wetland, and natural open issues and are all too familiar with land use conflicts and impacts regarding the Airport. The Community Facilities Map Layer — and ultimately the Generalized Land Use Plan Map and the Land Use Plan - Composite Map — need to reflect historical intent and public use of important parkland/natural open spaces remaining in our area. By appropriately designating the above discussed parcels of land on these maps as “Parks and Natural Resource Use,” and using the West Anchorage District Plan planning process to facilitate final designations on Special Study Areas (per our requested new definition of this designation), long-term protection of these important areas to our community will be ensured.

Sincerely,

Mark Wiggin, Turnagain Community Council President
Cathy L. Gleason, Vice President
Breck Tostevin, Interim Secretary/Treasurer
Bob Durst, Board Member
Kelly Smith, Board Member
Pat Redmond, Board Member

Mark Wiggin for
TCC Board
Sept. 16, 2005