

Community Councils

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Land Use Plan Map

From: Allen Kemplen <nordicity@gmail.com>
Sent: Saturday, October 15, 2016 10:20 AM
To: Land Use Plan Map; Hart, Hal H
Cc: Fairview's Finest; SJ Klein; Bunnell Kristine; Davis, Tom G.; Mayor Berkowitz; Flynn, Patrick P.; !MAS Assembly Members; info@communitycouncils.org; Coffman, Amy J.; saselkegg@alaska.edu
Subject: Fairview Community Council LUPM Comments
Attachments: FairviewCouncil_LUPM_Comments_10-14-16.pdf; Final Council Comments LUPM ver2.1.pdf

Hello,

Attached are the official comments from the Fairview Community Council on the latest public draft (September 2015) of the Anchorage Land Use Plan and Map.

Please insure these are presented to the Planning and Zoning Commission as they consider public comments.

Thank you.

Allen Kemplen



Fairview Community Council
"Where People Make the Difference!"

Fairview Community Council

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Hal Hart, Director
Planning Division
Department of Economic and Community Development
4700 Elmore Road
Anchorage, AK 99507

Re: Anchorage 2040 Land Use Plan

October 13, 2016

Dear Mr. Hart;

The Fairview Community Council is submitting official comments on the revised September Land Use Plan and Map (LUPM) presented to public September 26th, 2016. The Council wishes to express its appreciation for past Planning Division efforts to incorporate our concerns.

However, we note there are still some significant oversights, omissions, and inconsistencies relative to the Fairview Neighborhood Plan and our common vision for a prosperous community and a vibrant urban core. It is our hope that the Municipality will seriously consider the points, concerns and requests outlined in the attached comments.

Thank you for the opportunity to comment on this important policy document.

Sincerely,

Allen Kemplen, Vice President
Fairview Community Council

C.c. Mayor Berkowitz; Assemblyman Patrick Flynn; Amy Coffman, Special Assistant to Community Councils; Tom Davis, Senior Planner; Kristine Bunnell, Senior Planner; Sheila Selkregg, South Addition Community Council; Mark Butler, Federation of Community Councils

**Anchorage 2040 Land Use Plan
September 2016 Public Review Draft
Fairview Community Council - Comments**

1. Page 7, Housing Space Needs: This section states Anchorage has an identified need for 21,000 housing units to meet the needs of the 2040 market. The narrative could be improved with terms clearly delineating between “residential units”, “households” and “housing units”. Typically, it is technically more appropriate to convert future population into households by estimating average number of people per household and dividing. This estimated number of households is then converted into future number of dwelling units by adding a vacancy factor as it is rare for housing within a community to be one hundred percent occupied.
2. Assuming the numbers given are for the actual number of dwelling units (including vacancy factor) expected to be needed in the year 2040 the following table shows there is a projected shortfall of approximately

Type of Land	Potential Number of Units	Housing Demand Reduction from 21,000
Residential	9,700	11,300
Commercial	700	10,600
Re-Development	2500	8,100
Housing Gap Expected		8,100

8,100 units. The 2012 Housing Analysis concluded that in the year 2030 there would be a deficit of 8,852 units. Assuming some of the units were constructed between 2010 and 2015 thus reducing the number somewhat, there still appears to be a discrepancy between the two projections.

- a. The narrative states this shortfall will be met by the land use changes recommended in the LUPM. However, there does not appear to be adequate documentation of this statement. This appears to be an important point warranting further examination by the Municipality.
- b. For example, the Municipality has access to GIS data that could readily show the lots in the proposed Reinvestment Areas, what currently exists and what potential number of dwelling units could be built given current Title 21 restrictions and what increase could be expected if proposed changes in the regulatory framework were implemented as suggested by the LUPM Action Table.
- c. The 2012 Analysis breaks the housing market down into segments showing a forecasted deficit of 2,389 single-family units, 2,183 two-family/duplex units, 687 townhomes and 3,594 multi-family/other units. The Analysis leaves it to the LUPM to disaggregate these units

throughout the Anchorage Bowl. However, the LUPM does not appear to provide this level of disaggregation, either for the projected number of units constructed given the base assumptions (vacant land, commercial conversion, redevelopment) or for the “deficit” units needed to meet projected demand.

- d. The implication of this information gap is that the Fairview Community Council is left wondering how the proposed land use changes will impact the neighborhood. It would be very helpful if Planning could provide an estimate of how many dwelling units by category are expected, both in the base line low-growth scenario but also in the high-growth Reinvestment Area scenario.
 - e. The Fairview Neighborhood Plan establishes our collective intent to preserve, as much as possible, the remaining owner-occupied low to medium density in East and South Fairview. *We request that the Action Table include a new item to say: “Continue working with the Fairview Community Council on implementation of the Fairview Neighborhood Plan, particularly relating to housing density, overlay zone and form-based code.”*
3. **There is a concern the proposed LUPM may not adequately address the housing needs of the Anchorage Bowl in 2040.** If this is the case, then the Municipality may need to start looking at other land use solutions that acknowledge the realities of Anchorage’s housing market. It may be time for a serious discussion of what constitutes “highest and best use” for certain transportation facilities.
 4. Page 9, Community Expansion – Other Options: This discussion omits an option that is within the control of the Municipality – Relocation of Merrill Field Municipal Airport. Merrill Field was originally located on the Park Strip but community growth caused it to be re-located to its present location. As Anchorage has grown, it is perhaps time to seriously evaluate the benefits of relocating this transportation facility from what has become a densely developed part of the Anchorage Bowl to a more remote site on the periphery of the Municipality (perhaps expansion of the Campbell airstrip). The Airport Master Planning process is the appropriate functional approach to determining the optimal alternative location.
 5. Merrill Field Airport is a locally owned facility composed of 436 acres. Setting aside approximately 15% of the site for streets, parks and greenways leaves about 371 acres for some appropriate housing-oriented development. If the site were re-developed at 15 dwelling units per acre, the site could support 5,565 new residential homes. If the site re-developed at 22 dwelling units per acre, the projected 2040 housing gap would be closed. **It is requested the Action Table include: “Conduct a cost-benefit analysis for relocation of Merrill Field Airport and subsequently reuse of the land to meet the housing needs of the Anchorage Bowl.”**

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6. The “Housing Space Needs” section also states the Anchorage Bowl needs to see a net gain of 840 units per year. However, the Housing Analysis in Appendix B says the Bowl has historically experienced an annual rate of approximately 350 dwelling units per year. In order to meet projected future demand the Municipality would have to more than double the annual rate of housing construction and sustain this rate for over 20 years.
7. Such an aggressive rate of residential construction is not beyond the capacity of the market but there would need to be substantial changes in financing and development incentives.
8. While there is a discussion of total housing demand in the year 2040, there appears to be little discussion of housing demand by type or income range. A baseline approach could take the existing percentage distribution of housing units by type and apply this same percentage to the year 2040. For example:
 - a. How many units of market-rate housing units are needed to meet forecasted demand?
 - b. How many units of workforce or affordable housing are expected?
9. An ongoing concern expressed by the business community is the lack of workforce housing, especially in the Midtown area and in the urban core. The labor rates for hotel and retail employees in these areas means they are in need of options for home ownership at an “affordable” level. There is some discussion of moving forward with allowing “small-lot” development as an option. For this type of housing to be successful in Fairview, the Municipality must acknowledge the need, as stated in the 2012 Housing Analysis, to establish a “Main Street” in the area. It is requested the Action Table include: “Support efforts by the Fairview neighborhood to develop a Main Street.”
10. It is recommended the LUPM not rely so strongly on the simple mechanism of density to allocate housing units. Density without clarity creates uncertainty. Such uncertainty generates resistance from existing neighborhoods due to the lack of a more robust strategy for matching housing demand by type with geographical allocation. This is particularly important as it relates to the issue of “affordable” housing.
11. It is a normal pattern in growing urban areas that are physically constrained by topography to see land rents rise to the point where low to moderate income residents are priced out of the detached single-family market. This housing type is often supplanted by denser row or townhomes, condominiums and other similar options.
12. At some point, home ownership becomes unaffordable at a certain price point and the number of households choosing to rent increases. This is a normal occurrence and market-rate rental units tend to occupy a significant percentage of the housing stock where land rents are relatively high. As long as average household income levels rise to match the increasing land rents, the market stays in balance.

13. However, when average household incomes start to lag behind, the issue of affordable housing becomes an issue. In the past, this rental gap has been met with the use of federal and state subsidies. These subsidies are limited and in order to stretch them as far as possible, there is often a tendency to concentrate subsidized housing in areas of town where the land rents are cheapest and to develop to the highest density permitted to keep per unit costs at minimum levels. This has led to an over-concentration of subsidized high-density housing in certain parts of town, particularly older neighborhoods such as Fairview. Often to the detriment of the affected neighborhoods.
 - a. It must be noted that the United States Supreme Court, in the 2015 case titled “Texas Department of Housing and Community Affairs vs. The Inclusive Communities Project, Inc.”, found that the concentration of subsidized housing into low income neighborhoods is discriminatory and is a violation of the Fair Housing Act because of disparate impacts created by policy.
14. Thus, use by the LUPM of assigning high densities to neighborhoods struggling to maintain a sense of community without clarifying intent language on the housing type has the potential to push certain neighborhoods over the edge of civic viability. Such an occurrence would not be in the best interests of the Municipality as it would start to incur additional public safety costs and experience lower tax revenues as properties in the affected area lose their investment appeal and begin to slide toward marginality.
15. According to Table 1, page 239 of the 2012-2017 HUD Final Consolidated Plan produced by the Municipality, of the top ten Census Tracts with Median Household Income below 80% Area Median Income (AMI) three of them are in the Fairview Community Council area. It is obvious that the data clearly shows that Fairview has more than its fair share of subsidized “affordable housing”.
16. Housing is a critical cog in the economic engine of vibrant downtown areas. No housing or too much subsidized housing equates to too few people with enough disposable income to support dynamic downtowns/neighborhood shopping areas, particularly on weekends and in the evening. You need people with disposable income to support retail. **It is requested the Action Table include: “Establish policy protocols for equitable distribution of subsidized “affordable housing” to ensure a geographical balance with “workforce housing” and “market-rate housing.”**
17. The LUPM does discuss ancillary dwelling units as an alternative option for addressing the need for affordable housing. However, one cannot readily ascertain how many such units are expected to be in place by the year 2040. It is recommended the LUPM set specific quantitative goals for how many ancillary dwelling units are expected to be in place as part of a strategy to ensure “affordable housing” is distributed equitably throughout the Anchorage Bowl.

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18. The Land Use Plan should include a discussion of:
 - a. Location Efficient Mortgages whereby mortgage entities allow for a higher loan to value ratio because the unit is located where the homeowner can use mobility alternatives other than an automobile. Because transportation costs can consume up to 19 percent of household income, developing an urban form whereby the automobile is not a mandatory need can allow the market to provide more affordable housing, particularly for low to moderate income residents. **It is requested that the Action Table include: “Explore how to maximize the use of Location-Efficient Mortgages in transit corridors and reinvestment areas.”**
 - b. The Municipality should be more proactive in spurring the Alaska Housing Finance Corporation (AHFC) to implement the recent law change that allows them to develop a new mixed-use development program. Since the law was passed, the AHFC has made very little progress. This funding mechanism is critical to the success of the recommendations in the LUPM for mixed-use development. **It is requested that the Action Table include: “Work with AHFC on a prototype mixed-use development financing program.”**
 - c. An urban form supporting higher densities in strategic locations such as Primary Transit Corridors, Reinvestment Focus Areas, etc. needs a different regulatory framework. This new regulatory approach would shift from the current burdensome prescriptive Euclidean zoning approach to a more flexible design and results oriented Form Based Code (FBC) approach. **It is requested the Action Table include: “Evaluate the development of form-based codes for primary transit corridors and reinvestment focus areas.”**
 - d. Implementation of the FBC would not necessitate wholesale re-working of Title 21. The FBC could instead be implemented using the “overlay zoning” identified in the LUPM. Overlay Zones for the strategically targeted sub-areas within the Anchorage Bowl would allow for well-designed denser development to merge unobtrusively through thoughtful use of transition spaces and techniques. It is recommended the Municipality work with the Fairview Community Council to develop the first FBC overlay zone.
19. There appears to be a reluctance to discuss the role of the automobile within the 2040 Anchorage Bowl. If the intent is to create higher densities within the Anchorage Bowl, then it would be prudent to shift from the current auto-centric regulatory and design framework to one more oriented around people.
20. A more evenly balanced approach to transportation in the Land Use Plan Map would include a discussion of:
 - a. Reduction and/or elimination of Minimum Off-Street Parking Requirements within the strategically targeted areas. If the labor force is located within walking/biking/transit distance of where they live, work and play then there is little practical need to require

mandatory set asides for vehicle storage. This would reduce site development costs and allow a developer to construct more affordable market-rate housing.

- b. The Municipality could manage the transition to such a new non-auto centric design approach by identifying land within the targeted areas for publically-owned structured parking facilities. The cost of which could be financed through revenue bonds retired by implementing a Payment in lieu of parking fee for development.
- c. The amount of land devoted to the movement and storage of automobiles within the Anchorage Bowl is significant. However, there appears to be no quantitative assessment and as a result the reader is led to conclude the automobile is sacrosanct. If the Municipality is truly serious about supporting a denser, people-oriented urban form that is vibrant and full of life then the amount of land dedicated to the automobile needs to be reduced and re-assigned to other uses.
- d. A people-oriented urban form does not need every arterial to be dedicated to the automobile. If the strategic objective is to convert 15th and DeBarr to a Primary Transit Corridor, then it must have a non-autocentric design. Such a *Complete Streets* design is already evident in the East Fairview section between Ingra Street and Orca Street.
- e. However, the Complete Streets design approach can only be implemented when the owner of the right-of-way is explicitly supportive of a more balanced approach to mobility. One cannot help but notice that most arterials in the Anchorage Bowl are owned by the DOT&PF and are designed almost exclusively for the movement of vehicles.
- f. It is noted for the record that the first successful major application of Complete Streets design on an arterial occurred when the Municipality assumed responsibility for the facility. Attempts to implement similar designs on arterials owned by the DOT&PF (i.e. I and L Street) have met with great resistance.
- g. The Municipality states it seeks to support higher density, people-oriented Live, Work and Play spaces at strategic locations within the Anchorage Bowl. Such a strategy requires the arterial roads within these reinvestment areas to be designed so that people are treated as equals to the automobile. This cannot occur as long as the arterials are owned and maintained by the DOT&PF. It is recommended the Municipality exercise more aggressive leadership on this important issue and assume ownership of the key transportation assets within the targeted reinvestment areas. **It is requested the Action Table include: "Develop a prioritization schedule for considering Municipal ownership of select arterials within the Anchorage Bowl to support implementation of Complete Streets Policy and Transit Corridors."**

21. The LUPM soft-pedals the land use issues associated with connecting the Glenn Highway and the New Seward Highway. The Fairview Community Council is on record requesting the Municipality to take a more assertive leadership role in resolving the land use uncertainties associated with this major piece of infrastructure. *As long as the land use issues are uncertain, there is a dark cloud hovering over the future of Fairview.*
22. The proposed alignment shown in the Metropolitan Transportation Plan makes it difficult for property owners and businesses in the impacted area to obtain long-term financing for re-development initiatives. This negatively impacts the greater community as increased tax revenues are foregone due to the lack of investment. Urban cores throughout the Lower 48 are experiencing new investment as the market responds to the larger societal shift of Mills and retiring Baby Boomers migrate back to city centers. Anchorage is missing out on the opportunities created by such change because of its inability to promote a positive land use vision for the entire urban core area.
23. Strategy 8: Special Study Areas/Small Area Plan on page 56 identifies the Fairview Gambell Street Corridor as an example of where a Special Study is needed. However, the Actions Map dated September 24, 2016 does not show one proposed. This omission needs to be corrected.
 - a. A key reason denser development is difficult to finance in the Anchorage area is identified on page 34 of the McDowell Group Housing Analysis. *“Anchorage lacks neighborhoods with a traditional “main street” architectural form where higher density development typically develops.”*
 - b. The Fairview Neighborhood Plan explicitly recognizes this omission in the urban fabric of Anchorage and recommends the restoration of Gambell Street to Fairview’s Main Street as a solution.
 - c. Taking the necessary land use and policy actions to move regional traffic below ground and restore Gambell and Ingra Street to two-way traffic is a required supplemental public policy initiative for the LUPM in order to support the higher market-rate residential and mixed-use densities recommended for the Fairview neighborhood.
 - d. Ignoring this important action will very likely lead to the market being non-responsive to the LUPM in the eastern core area.
 - e. As such, it is critical for the Actions Map to add a Special Study Area for the Gambell Main Street Corridor and for a new Section to be added to the LUPM narrative.
 - f. **A new # 6-6 should be added to Table 4: Actions Checklist to say “Advance a Special Study Area project for the Gambell Street corridor to support Fairview revitalization efforts.”**

24. The Council supports Goal 8 and its recommendation to add parks and greenbelt connections to offset neighborhood deficiencies and to support higher density development (page 16). However, while the LUPM has identified West Fairview and the Gambell Street Corridor for extensive new residential and mixed-use densities there is no corresponding acknowledgement of the need to provide additional parks and greenbelt connections to accommodate the increased number of residents. Fairview is already underserved per capita in terms of parks and green space and the LUPM approach will worsen this situation unless this omission is reconciled. This can be achieved by:
- a. *Inserting a new Section into the overall document so that it more closely aligns with the vision outlined in the Fairview Neighborhood Plan.*
 - b. The new Section should include narrative discussing the importance of the Highway to Highway connection, both to revitalization of the Fairview neighborhood, growth of the downtown urban core and mobility for the Anchorage Bowl and the Region.
 - c. The new Section should provide conceptual graphics illustrating how current traffic will be moved below grade and then covered over. The covers themselves will have mixed-used development with an appropriate amount of green space and park area.
 - d. The new Section should also provide conceptual graphics illustrating a new greenway connection between Chester Creek and Ship Creek along the rebuilt corridor. Such a new greenway connection would complete a green beltway around the urban center and it represents a critical infrastructure investment to support the sense of place characteristics and green amenities so highly desired by market rate housing occupants.
 - e. **The LUPM narrative should add a new GSD-Linear Feature bullet on page 47 to say “New greenway corridor connecting Chester Creek to Ship Creek through Fairview as part of any future Glenn Highway to New Seward Highway improvement.”**
 - f. **A new # 8-10 should be added to Table 4: Actions Checklist to say – “Evaluate the potential of an Urban Core Area Non-motorized Beltway by connecting Ship Creek and Chester Creek Greenbelts with a greenway through Fairview.”**
25. The Council wishes to note for the record that the 2012 Housing Analysis conducted by McDowell documents that existing higher density land has not historically been built out to what is allowed by zoning due to the lack of supporting amenities. The lack of such critical urban livability infrastructure for the eastern side of the urban core increases the

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probability that market rate development will not occur, land values will lag behind other parts of town and there will be continued pressure for non-profit social service agencies to take advantage of below-market land values to continue their placement of facilities serving the destitute, mentally-ill and other socially challenged members of the greater community.

a. Should such a scenario be realized without mitigating actions, the eastern edge of the urban core will not take advantage of revitalization forces occurring in other similarly sized cities in the Lower 48. Instead the trend for the eastern edge will be to become what could be characterized as the “slums” of Anchorage.

26. **The Council is opposed to the recommendation converting the land east of Orca Street and south of 15th from Residential to other land uses.**

The existing housing units help to anchor the sense of neighborhood for this section of Fairview and need to be retained.

a. Retention aligns with proposed LUP 10.1 “Expand and encourage partnerships with Anchorage’s anchor institutions and facilities to promote and coordinate growth and development with surrounding neighborhoods.”

27. **The Council supports the addition of a new Greenway connection between Sitka Park and Chester Creek following the existing or re-routed north fork of Chester Creek.** Such a connection would create a new circular sub-area route for bicyclists and pedestrians and provide for an improved greenway link between the Complete Streets design of 15th Avenue (Orca to Ingra) and Chester Creek.

28. The LUPM does not adequately address the need for buffering of residential land uses from industrial land uses. This is particularly evident on Orca Street as Merrill Field developed its industrial hangers. The lack of buffering creates a visually jarring environment, is not conducive establishing livable, pedestrian-friendly streetscapes and lowers the property values of residential properties. The presence of chain-link fences topped by barbed-wire in front of a long blank industrial building wall is not consistent with the goals and policies of the Anchorage Bowl Comp Plan, the Fairview Neighborhood Plan or the LUPM. **It is requested the Action Table include: “Ensure the Merrill Field Airport Master Plan includes language requiring buffering its industrial properties from adjacent residential properties.”**

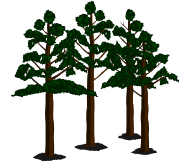
29. **The Council supports the retention of Sitka Park at its current location and is adamantly opposed to any efforts at replacing it with commercial development.**

30. The Council is disappointed in the September draft not addressing the opportunities presented by recommending moving forward with supportive land use policies associated with Innovation Districts. Knowledge based industry and intellectual commerce are anticipated to become more and more a key component of economically prosperous communities. We encourage Municipal Planning staff to reconsider this omission in the narrative of the LUPM, Actions Map and Implementation Strategies.
- a. **It is requested the following language be inserted on page 8 before the section titled “Space for Industrially Traded Sectors.”**
 - i. **“It is acknowledged the industrial needs of a 21st Century may not be similar to past industrial needs. The growing vitality of “MakerSpaces” is an example of new industries emerging from advances in 3D manufacturing and the stronger integration of creative customized product design with advanced computer technologies and industrial processes. The 2040 LUPM supports the possibility of Innovation Districts within those parts of the Anchorage Bowl already possessing or proposing to create key supportive land use elements.”**
 - b. **It is requested #9-9 of Table 4: Actions Checklist includes the language – “Support further exploration of Innovation Districts particularly in the industrial area of north Fairview.”**



Rabbit Creek Community Council

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



October 14, 2016

Planning & Zoning Commission, MOA
PO Box 196650
Anchorage, AK 99519

RE: # 2016-0127 Land Use Plan 2040—Request for Delay & Comments on PH Draft September, 2016

Dear Commissioners:

The Council discussed the LUP for nearly one hour at our October 13th meeting. About 30 people were in attendance. While some comments are submitted here, the members voted to request a delay in closing the public hearing due to the complexity of the Plan, the lack of time to thoroughly discuss this September draft and the numerous mistakes we found in our initial reading of this document and especially the maps.

Prior to our October meeting, the LUP Committee spent over 30 hours preparing discussion points and examining the available documents. Please note that all of the LUP maps were not available either on-line nor on a CD that we obtained from the Planning Department. Thus, our request for delay isn't for lack of trying to read/discuss this draft.

1. **LUP Map Growth and Change by 2040:**

A. Change the color of the HLB lands in upper Potter Valley to 'little growth' while retaining the dot pattern that indicates future re-zone. The HDP and PVLUA indicate this land as limited intensity (0 to 1 DUA). These HLB parcels are at high elevation, sloped, dependent on onsite services, and there is surrounding low density zoning.

B. Change the base color of the former Legacy Pointe and GCI lands west of Goldenview Drive as "little growth", while retaining the dot pattern that indicates future re-zone for these PLI parcels. Some of this land will likely be rezoned for residential; some may be conservation because of wetlands and tributaries. The GCI land may be zoned 1-3 DUA but if so, that is inappropriate for the terrain, wetlands, and 25% slopes.

C. Remove grid pattern on HLB land just north of hairpin curve on Potter Valley Rd. This is HLB #2-135 with SL from the PVLUA. It is not residential. A portion of it will fulfill a potential transportation realignment, with the rest remaining as open space.

2. **LUP Map BL-3, Buildable Land Supply**

This map has serious mistakes on it.

A. The map does not conform to the Hillside District Plan Map 5.8. Change the service perimeter (for both water and sewer) to conform to the HDP, with revisions to reflect the recent perimeter adjustment that excludes Potter Highlands, and an additional revision to exclude Villages Scenic Parkway, which is already subdivided with onsite services on large lots. There will be no public utilities in upper Potter Valley.

B. The former Legacy Pointe parcel is shown in a color that indicates 'environmentally unconstrained.' This is a mistake as the parcel contains many wetlands. Only the far eastern portion is non-wetlands. Revise.

C. The hatched parcel northwest of the former Legacy Pointe is shown both as parkland and residential. This can't be both. It is HLB's parcel #2-127, which according to the PVLUA is for parks/open space. Revise.

D. In the vicinity of Northfield Dr, Plat 87-14, notes that Tracts A and B are for open space reserve. Tract A is erroneously listed as buildable. Revise this and all other pertinent maps.

3. **LUP Map LU-2**

A. Explain legend “ UCIOA or MCH lot.”

B. The legend shows the color blue as “Public Institutional Use.” There are hundreds of parcels colored blue across SE Anchorage and this is an error. Revise.

4. **LUP Map for 2040 & Gross Density Map**

In a prior draft, the LUP maps contained a footnote that the Council had requested in early comments based on the February draft. It referred viewers to the HDP Zoning map to determine varying densities represented by the single color of “Low Density.” This footnote is not on the current draft, nor on other relevant maps in the LUP, such as the Gross Density and Zoning Map. Because maps hold disproportionate power over text, revise to reflect this earlier footnote on all pertinent LUP maps.

5. **LUP Map Zoning**

A. Storck Park’s color appears to be a ‘watershed’ given the green color on the legend. It is a dedicated park. Revise.

B. See comment 4 above requesting footnote directing viewers to the HDP.

C. The Rabbit Cr Greenbelt is a gray-green color which doesn’t appear on the legend. It is a dedicated park, as are other parklands along the creek. Correct all park colors to reflect their status.

D. The GCI land south of the former Legacy Pointe and along then north side of Potter Creek is colored as if it were multifamily zoning. The wetland, steep slopes and lack of transportation facilities are not amenable for this type of zoning. Revise.

E. South Pointe along Potter Valley Road is colored as if it is R-3. It is platted low-density. Revise.

6. **LUP Map Area Specific Plans**

The HDP is not the only adopted plan that provides specificity to SE Anchorage. Include in the legend the Potter Valley Land Use Analysis Study. It was adopted in 1999 and recently provided valuable criteria for a re-plat with details the HDP lacked.

7. **LUP Map Parks and Open Space**

A. Include the deficiencies in greenbelt corridors which are advocated in the Comprehensive Plan and the Anchorage Bowl Parks and Open Space Plan.

B. There is a colored ‘arch’ across Potter Cr; it is not a road connection. Revise.

C. Correct the issues noted in this letter under Bullet 2, LUP Map BL-3

8. **LUP Map Community Natural Assets**

A. It is unclear why only a select number of trailheads are depicted. There are numerous missing trailheads for municipal parks. Add trailheads.

B. The classified wetlands on this map don’t match the MOA classified wetlands in the HDP. Revise accordingly and review the HDP’s wetlands area for the Storck Park area southward for accuracy.

C. Watershed is conspicuously missing from this map. Watershed recharge areas and wetland detention areas (see built=green infrastructure map 2.11 of HDP) should be added to the Hillside portion of this map. Since Potter Marsh is a highly valued community asset, tributaries of Potter Marsh should be mapped.

D. There are conflicting red lines for the Rabbit Creek Greenbelt (Old RC Park) with another red line interior to the outer one (along Our Own Lane). What does the interior line mean? Review and revise.

9. LUP Map LU-1 Existing Housing Stock Inventory

It isn't clear that the legend refers to overall number of units—not units per acre. Clarify legend.

10. LUP Map CC-6 Hazard Mitigation and Resiliency

This map is not in the map gallery on the web. This map should include coastal areas subject to rising sea levels, such as Ship Creek.

11. LUP Text, Anchorage's Growth Strategy, Goal 1, Page 11

LUP1.4 changes the authority for rezoning by making the LUP the overriding authority and states it supersedes 2020's Policy 4. Rezoning must be consistent with Neighborhood/District Plans and this change gives greater authority to the LUP. The LUPM is at a greater scale than Neighborhood/District Plans and thus is subject to conflicts. The LUP is meant to implement 2020 and cannot supersede its policies. Reword so that the area-specific plans are the first authority for re-zoning decisions. 2020, Policy 4 states that the "Rezoning Map shall ultimately be amended to be consistent with the adopted Neighborhood and District Plan Maps."

12. LUP Text, Land Use Designations, Page 26

Large Lot Residential, Density: "Where delineated in the HDP, this designation also includes subdivisions with half-acre or larger sized lots with flexibility for slightly smaller size lot, at densities up to three units per gross acre."

This is confusing because we do not know of anywhere that the HDP would allow for 3 DUA in zoning on 1/2-acre or larger lots—unless the Hillside Conservation Subdivision method is being referred to here. Delete 2nd half of sentence which would allow 3 DUA densities. If designated at 1/2-acre, maintain that minimum.

13. LUP Text, Strategy 10: Systematic Monitoring and Amendment of this Plan, Page 57

If the Comp Plan and 2040 LUP are considered to be living documents that will be updated, then insert via public process in this paragraph.

14. LUP Text, Action 5-3, Develop an updatable asset inventory . . . designated for growth, Page 63

In the proposed asset inventory of Anchorage's infrastructure, include green infrastructure; riparian corridors; wetlands and other natural hydrology features that provide water recharge and water filtration; important natural habitat connections. Without this data prominently shown on maps, there will be more unilateral actions like the moose fence that DOTPF erected along Minnesota Blvd.

15. LUP Text, Action 7-5: Adopt a Hillside Conservation Subdivision Ordinance, Page 64

Agree: Adopt a Hillside Conservation Subdivision ordinance. Add: "following the criteria in the HDP."

16. LUP Text, Action 8-8: Determine which municipal parks are not . . . full dedication status"

The phrase "potential nomination to full dedicated [park] status" indicates that all parks may not be dedicated. Remove the word "potential" and state that undedicated parks will be dedicated. Park land is too difficult to get or replace. There should also be a 'no net loss of parkland' in the LUP.

Sincerely,

Adam Lees, Chair

Land Use Plan Map

From: Jeffrey Manfull <akjeff@gmail.com>
Sent: Monday, October 31, 2016 4:07 PM
To: Davis, Tom G.; Cecil, Jonathan P.; Land Use Plan Map; !MAS Assembly Members
Cc: Bonnie Harris; Mara Carnahan; Hans Thompson; John Thurber
Subject: South Addition Resolution regarding the 2040 Land Use Plan Draft
Attachments: Anchorage 2040 LUPM resolution.pdf

Please find attached a resolution passed at the 10/20/16 South Addition Community Council meeting regarding the 2040 LUP Draft.

Respectively yours.
Jeffrey Manfull
VP and acting President,
South Addition Community Council

October 20, 2016

South Addition Community Council Resolution Requesting Changes to Proposed Anchorage 2040 Land Use Plan Draft

SACC's comments were initially submitted on October 17, 2016 by SACC Land Use Committee on behalf of the Council; they are resubmitted as a Resolution without changes. The comments were adopted by the SACC at its first membership meeting after the LUP 2040 Public Hearing Draft released for public review on September 26, 2016

RESOLUTION:

The public has not been given adequate time to respond to the LUP 2040 Public Hearing Draft. It was released for public review on September 26 with public comments due by October 17. Important maps and appendices have not been available for public review as long as the narrative, and staff's issue-response summary is still not publicly available. Neither the Planning and Zoning Commission nor the Assembly should take action on the LUP 2040 until adequate time is provided for Community Councils and the public to comment.

SACC's Priority Comments:

1. **SACC opposes the addition in the 2040 LUP that would allow increased density in areas within up to a half mile from designated City Centers.** This provision's half-mile designation applies to virtually all of South Addition and contradicts or confuses many of the zoning designations. **SACC requests that this provision be omitted.**

This provision is in the Character section, sixth bullet (p 28): "To provide greater housing opportunities, areas up to a half mile from designated City Centers may allow increased density. This is subject to compatibility standards for scale, design, lot coverage, setbacks, and alley driveway access." This provision is unnecessary and potentially confusing. The land use plan clearly addresses the goals of increased density in these areas. The map of "Areas of Growth and Change by 2040" (p. 19) clearly illustrates areas of growth. Neighborhood and area specific plans clearly outline how growth and increased density should play out in particular areas. To have a blanket-statement like this, that impacts almost all of South Addition, is unnecessary as the aspects of increased housing density have already been addressed. A blanket-statement like this bullet does not recognize the unique aspects of the neighborhoods it would cover in South Addition. It gives the impression that somehow the careful planning of the LUP and the neighborhood plans may be disregarded within a half mile of designated city centers. This should be removed so it does not lead to confusion or conflict between the city, developers and residents.

At the very least, this bullet should be amended to clearly state that neighborhood plans are the guiding force for the specifics of new and re-development, and that any diversion from the neighborhood plan should only take place after a rigorous public hearing process. This is in full compliance with Action 7-4 (p64), which states “Adopt a Traditional Neighborhood Design zoning district or overlay zone for urban neighborhoods, which reflects adopted plans. “

2. **South Addition Community Council (SACC) opposes the proposal to allow ,by right, four story buildings in R2M zoned areas near designated city centers.** For the first time in the 15 year long process of developing this plan the municipality has suddenly proposed increased height to four stories in R2M and R-3 districts, well above the long-existing dimensional maximum height of 35 ft. **SACC requests that this provision be omitted.**

SACC has repeatedly objected to the proposed four stories in R3 zones. This section is objected to as well.

Compact Mixed Residential – Medium “Character” section, fourth bullet (p 29): “Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story .” In addition, Action 4-4 in the Actions Checklist (p 62) proposes to amend Title 21 “to allow compact housing on R-2M or R-3 zoned lots near designated Centers”, which “May include increased height or allowed units per lot... .”

The LUP addresses height for zoning districts and this blanket-statement should not circumvent the careful planning of the LUP and neighborhood plan. This fourth-story provision would violate the Title 21 zoning that has been worked on for years by many parties to guide appropriate development in these areas. It also suggests there is a way to “go around” this careful planning. It is particularly distressing to South Addition residents as much of the neighborhood would be impacted. If a fourth story is desired in these areas, the appropriate public process of re-zone or variance must be observed.

Additional Comments

1. LUP Goal 7. Infill development that is compatible with the valued characteristics of surrounding properties and neighborhood is a very important part of the plan. (p15). The LUP should clearly state that new Development and zoning be driven by the vision expressed in each neighborhood plan.

SACC is pleased to see that plan addresses infill as a critical component of successful growth. A Plan that increases density in a way that highlights the valued characteristics

of the neighborhood improves the quality of life and makes for a more acceptable integration of new development. This is particularly important in South Addition because of its history as one of Anchorage's earliest neighborhoods. South Addition is proud of this heritage and dedicated to preserving the unique historic character while it grows. Much of the original land use development – paved sidewalks, ample setbacks supporting landscaping and gardens, alley access for vehicles, mature trees, home scales that allow sunlight to adjacent properties – combine to make South Addition a desirable place to live and recreate. Residents from other parts of town come to South Addition to walk because of the inviting, safe, pedestrian scale of our neighborhood. Bootlegger's Cove, with its higher residential density, offers safe sidewalks and small, meandering streets that naturally slow traffic. Residents are committed to protecting the qualities that make the South Addition neighborhood a desirable place to live.

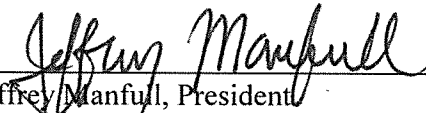
2. South Addition has little vacant land. It is imperative that new development in South Addition look to the South Addition neighborhood plan to guide them. The South Addition community is in the process of completing their neighborhood plan, and it is the express desire of the SACC that no new large developments or dramatic changes occur to zoning/land use within South Addition until the neighborhood plan is finalized. It is expected to be completed in 2017.
3. South Addition provides some housing for the downtown employment center, but that housing must be compatible with the existing character of SA. Downtown core housing opportunities should not be displaced to South Addition. Thriving downtowns are sustained and strengthened by a vibrant residential housing presence in their core. There is a great need to locate residential housing in Anchorage's downtown core, and the LUP and the city should work to ensure that residential units are constructed there. The area east and southeast of the downtown core is also ripe for redevelopment. It has stable seismic reports, fabulous views, available land, and a Fairview neighborhood plan committed to higher density residential revitalization.
4. Walkability is one of the most valued aspects of South Addition. Many residents walk or bike daily for recreation or as a primary mode of transportation to and from work. It is equally important to note that most residents own vehicles. It is necessary to ensure that there are appropriate parking requirements for all new residential construction. The recent employer and employee Housing survey conducted by Live, Work, Play showed that 79% of respondents wanted a garage as part of their housing.
5. SACC supports the Shared Design Principles delineated in the plan (p24/25). Thoughtful design is crucial to successful growth. Particular importance should be paid to design for northern climates, access to sunlight, walkability during winter, snow storage, year-round sidewalk maintenance, etc.

6. South Addition offers many greenbelts and parks. The Delaney Park Strip, Westchester Lagoon, the Tony Knowles Coastal and Chester creek trails are treasured by residents city-wide. SACC supports the LUP's Goal 8 - to maintain, improve and strategically expand parks, greenbelts and trail corridors. (p16).
7. Immediate measures are needed to protect year round sunlight on the Delaney Park Strip. As density increases along the Park Strip, the city needs to ensure that there are height limits on the south side of the Park Strip to prevent shading of this treasured community resource. Developments of even 30 feet cast a shadow on the Park Strip for at least 6 months of the year.
8. SACC supports community-minded efforts to reduce barriers to appropriate infill development and redevelopment. (p11). It is imperative that any new or re-developments are guided by the area and neighborhood plans. Neighborhood plans are painstakingly crafted by residents and stakeholders to foster new, thoughtful development that will integrate with the neighborhood to produce thriving communities. Flexibility with developers and deviation from the LUP or neighborhood plans should require public involvement.
9. SACC approves the LUP's goal to encourage corridors to evolve into mixed use, pedestrian-oriented and transit friendly environments. (p12). South Addition has several major corridors moving autos, commercial trucks, pedestrians and bikes to and from downtown. Traffic speed is a major concern for South Addition residents. Residents would like to see measures to slow this traffic through the neighborhood, to improve safety for pedestrians and bikers, and make these corridors safer all users. Traffic calming strategies such as narrower roads, trees adjacent to the street, etc., should be incorporated into all future road projects, maintenance and development.
10. We are pleased to see that transit is listed among transportation services, and want to see strong language, making transit a full partner in supporting desired infill and redevelopment with its pedestrian friendly streets. Transit is needed to remove even a small percent of drive alone auto trips from arterials now filled with high speed traffic that dominate parts of the neighborhood and make it unsafe to cross the street to get to a bus stop. Targeted transit service to and from employment centers will generate more demand for safe, walkable corridors and will help transform high speed arterials into streets that are desirable for both high quality housing and commercial uses.
11. Small scale, compact housing development would be consistent with South Addition's character. (p13). Encouraging compact housing, cottages, etc., would invite an increase

in density with multiple homes on one lot, without a dramatic change in the character of the existing neighborhood.

12. SACC supports the LUP's commitment to improving access to transit and trails as a critical component of successful growth. (p15). More frequent, predictable public transit and safe, enjoyable passages for bike and pedestrians will allow for reduced road congestion as South Addition residents walk, bike, and ride buses when possible. This nicely supports the valued characteristic of "walkability" in South Addition.
13. The Anchorage Downtown Comprehensive Plan adopted in 2007 directed that a viewshed plan be adopted within 1-2 years (p 99 and Action item UD-1, p136, Anchorage Downtown Comprehensive Plan), but that never happened. The 2040 LUP should include a viewshed plan, and take steps to protect the viewshed for downtown buildings. Building heights in South Addition will greatly impact downtown viewsheds.

PASSED AND APPROVED by the South Addition Community Council this 20th day of October, 2016 by a vote of 18 in favor; 0 opposed; and 12 abstentions.



Jeffrey Manfull, President
South Addition Community Council

TURNAGAIN COMMUNITY COUNCIL COMMENTS ON THE
2040 ANCHORAGE BOWL LAND USE PLAN — PUBLIC HEARING DRAFT
 TO THE PLANNING & ZONING COMMISSION — October 17, 2016

TCC submitted extensive comments on the Community Review Draft of the Anchorage Land Use Plan and Map, which are attached to this letter. Please refer to these comments on the below items as well as other components of the Draft Plan. Also attached is **AO 2000-151 (S-2) regarding Turnagain Bog**, and our **2005 comment letter on the initial attempt by the Planning Dept. to update the 1982 Anchorage Bowl Land Use Plan**, as these contain addition information to provide rationale for TCC's long-held positions on Municipal and Airport parcel land uses in our council area.

HIGH-DENSITY GREENWAY SUPPORTED-DEVELOPMENT ALONG FISH CREEK

- **TCC SUPPORTS THE CONCEPT BUT OPPOSES THE PLAN NARRATIVE**
 TCC's support of the Greenway-Supported Development is contingent on some *substantial* changes to the Plan language, in order to address concerns we have identified. These are outlined on page 3 in our September 9, 2016, comment letter.

POINT WORONZOF PARK, AWWU-OWNED 'PARCEL 6', PORTION OF HLB LAND WEST OF AIRPORT

- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF POINT WORONZOF PARK AS "AIRPORT EXPANSION ALTERNATIVE"**
 The Planning Dept. changed the Community Review Draft designation of Point Woronzof Park from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 3-4 in our September 9, 2016, comment letter.
- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF AWWU-OWNED 'PARCEL 6' AS "AIRPORT EXPANSION ALTERNATIVE"**
 The Planning Dept. changed the Community Review Draft designation of AWWU-owned Parcel 6 from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 4 in our September 9, 2016, comment letter.
- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF A PORTION OF HLB LAND WEST OF THE AIRPORT AS "AIRPORT EXPANSION ALTERNATIVE"**
 The Planning Dept. changed the Community Review Draft designation of a portion of HLB land from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 5 in our September 9, 2016, comment letter.

TURNAGAIN BOG

- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF A PORTION OF TURNAGAIN BOG AS "AIRPORT, RAILROAD OR PORT FACILITY" AND A PORTION OF TURNAGAIN BOG AS "AIRPORT, RAILROAD OR PORT FACILITY WITH GREENWAY SUPPORTED DEVELOPMENT"**
 The Planning Dept. changed the Community Review Draft designation of a portion of Turnagain Bog from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. The Public Hearing Draft has also changed a portion of Turnagain Bog to "Greenway Supported Development." No development should take place in these Class A, high-value wetlands directly adjacent to the Turnagain residential area — TCC has long opposed the development of a trail in this area. TCC's rationale for opposing the designation and plan narrative is outlined on page 5-7 in our September 9, 2016, comment letter.

ANCHORAGE COASTAL WILDLIFE REFUGE

- **TCC REQUESTS MORE ACCURATE IDENTIFICATION FOR THE ANCHORAGE COASTAL WILDLIFE REFUGE ON THE MAP**
 There should be additional identification for the ACWR near Point Woronzof, as this is the northern boundary of the refuge. TCC's rationale is outlined on page 7 in our September 9, 2016, comment letter.

TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils
1057 West Fireweed Lane, Suite 100
Anchorage, Alaska 99503

Sent via email

September 9, 2016

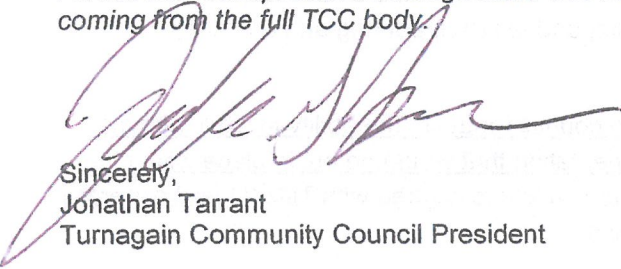
Municipality of Anchorage Community Development Department
Planning Division
P.O. Box 196650
Anchorage, AK 99519-6650

RE: TURNAGAIN COMMUNITY COMMENTS ON THE
ANCHORGE BOWL LAND USE PLAN MAP UPDATE — COMMUNITY DISCUSSION DRAFT

Dear Planning Dept. Staff:

The letter below (with a few minor edits) — which was originally sent by the Turnagain Community Council (TCC) Land Use Plan Map Committee Co-Chairs Anna Brawley and Cathy Gleason in June — was presented for affirmation to the TCC members at our September 8, 2016, meeting; the vote to do so passed, 17 Yes, 0 No.

Please now except this Anchorage Land Use Plan Map Update — Community Discussion Draft comment letter as coming from the full TCC body.



Sincerely,
Jonathan Tarrant
Turnagain Community Council President

May 27, 2016

Sent via email

Municipality of Anchorage Community Development Department
Planning Division
P.O. Box 196650
Anchorage, AK 99519-6650

RE: ANCHORGE BOWL LAND USE PLAN MAP UPDATE — COMMUNITY DISCUSSION DRAFT

Dear Planning Dept. Staff:

Thank you for the opportunity to provide input on the Anchorage Bowl Land Use Plan Map (LUPM) Community Discussion Draft. The Turnagain Community Council (TCC) recognizes the importance of weighing in on the development of this community-based plan that will set the direction for positive land use and development in our city for the next 25 years. As you are aware, TCC previously submitted comments on the 2006 update draft (attached to this letter), and our comments on the current draft Map generally support our input and positions on the previous version.

The TCC LUPM Update Committee, which was formed to follow the public involvement process for this planning document, presented initial recommendations at our TCC May 5, 2016, general meeting, which received broad support. A briefing was also presented to the council at our June 2, 2016, meeting. In order to submit comments in a timely manner, TCC is submitting these recommendations now, and they will be presented at our September 1, 2016, general meeting for formal affirmation.

LUPM Map — Overall Designations within the TCC Boundaries

- WITH SOME SIGNIFICANT EXCEPTIONS, TCC GENERALLY SUPPORTS the Draft LUPM Map RE: DESIGNATIONS WITHIN THE TURNAGAIN BOUNDARIES

Located in the northwestern area of Anchorage along the coast, Turnagain is a primarily residential neighborhood, with popular parks/trails/natural open space, and limited commercial areas. TCC supports protection of our established coastal neighborhood by its mainly Residential and Park or Natural Area designations in the LUPM Map. TCC also supports the LUPM Map's proposed density in the Turnagain neighborhood, which reflects existing zoning density, and allows for infill of similar type housing (single family, duplex, and multi-family).

A large portion of land within the TCC boundary to the west contains Ted Stevens Anchorage International Airport (Airport) land as well as natural open space within and outside of Airport property. TCC recognizes the Airport is a vital public facility, serving not only Anchorage, but also the entire state of Alaska. With the exception of important Turnagain areas described below (see pages 3-8), TCC supports the designation of the current boundaries of the Airport as "Airport, Railroad or Port Facility."

LUPM Map & Plan (page 36) — Turnagain Traditional Neighborhood Design Proposal:

- TCC SUPPORTS the Draft LUPM Map & Plan RE: A SIGNIFICANT AREA OF SOUTH TURNAGAIN DESIGNATED FOR A 'TRADITIONAL NEIGHBORHOOD DESIGN' OVERLAY

A significant portion of the Turnagain residential neighborhood south of W. Northern Lights Blvd. is designated for possible implementation of "Traditional Neighborhood Design" in the Draft Map, which would facilitate compact design and allow for and encourage sidewalks, and different parking and driveway standards.

While TCC supports the concept of this design designation, the council requests the ability to work with the Municipality on specific design guidelines and details of implementation that would be put in place within the Turnagain neighborhood. TCC would also like to be assured the concept is aligned with Title 21 and generally acceptable to private developers, to ensure viable implementation.

Because the Traditional Neighborhood Design designated area on the Map covers multiple neighborhoods (including neighborhoods in Turnagain, Spenard, South Addition, Fairview and Downtown), TCC feels there may be a need to split up the boundary of any future overlay districts into smaller areas. Each neighborhood may have slightly different ideas on the look and implementation of the Traditional Neighborhood Design that would best suit and enhance its area.

LUPM Map & Plan (pages 35-36) — Greenway-Supported Development

- TCC SUPPORTS the Draft LUPM MAP CONCEPT RE: HIGH-DENSITY GREENWAY SUPPORTED-DEVELOPMENT ALONG FISH CREEK

The Draft Map shows Greenway-Supported Development along the Fish Creek corridor, starting at Minnesota Dr. and going east, to support better trail connections between western neighborhoods and Midtown. While TCC would want to work with the Planning Dept. to determine the exact location(s) for the western connecting points for trails along Fish Creek, we recommend the Greenway-Supported Corridor be extended west past Minnesota Dr., including possible redevelopment of housing in the neighborhood between Spenard and Tudor Roads, and connect with the existing Fish Creek Trail network. It is difficult and unsafe to travel on bike east from Turnagain and Spenard across Minnesota Dr., and even less safe to travel to Midtown; this corridor would significantly improve safety and quality of bike routes from our part of town.

However, TCC's support of the Greenway-Supported Development is contingent on some substantial changes to the Plan language, in order to address concerns we have identified.

• **TCC OPPOSES the Draft LUPM PLAN DESCRIPTION RE: GREENWAY SUPPORTED DEVELOPMENT ALONG ANCHORAGE CREEKS**

While uncovering or revitalizing existing creeks sections or natural functions as part of this redevelopment concept would be a very positive component of Greenway-Supported Development, TCC has serious concerns that would need to be addressed before implementation of this concept, as currently described in the Draft Plan:

- Title 21 would need to be rewritten, to enlarge the minimum creek setback width — *before any development under this proposal occurs* — to ensure natural greenbelt areas are preserved.
- Development close to creeks could negatively impact water quality and wildlife use and habitat — and set the stage for more potentially dangerous human/wildlife encounters.
- Higher density development along Fish Creek could have negative impacts on Fish Creek/Turnagain neighborhood downstream.
- TCC specifically does not support the Plan image of creek channelization with little or no greenbelt (page 35); nor do we support the Plan language description RE: “Urban greenways may be incorporated into development in various ways: as a newly constructed stream channel threaded between existing building or future buildings, streets, or parking lots...” (page 36) We recognize that this concept has been successfully executed in other places, and can be made an attractive amenity. However, the quality and function of our creeks, and the water bodies they drain into, rely on preserving natural banks, minimizing pollutants seeping into the water system, and preventing barriers to water flow, such as trash or debris building up in the creek channel. The channelized portion of Fish Creek under Spenard Rd. is a ‘good’ example of how this concept creates more problems than benefits in Anchorage. TCC would not want to see more of this type of development along currently underground portions of Fish Creek.
- TCC requests Plan language specifically reference — and the development concept incorporate — scientifically-supported practices for riparian management as an integral component of any Greenway-Supported Development, to ensure appropriate compatibility and environmental protection of Anchorage’s waterways within these higher-density areas.

LUPM Map & Plan — Public Facility/Natural Area Designation for Point Woronzof Park

• **TCC OPPOSES the Draft LUPM MAP & PLAN RE: DESCRIPTION OF POINT WORONZOF PARK AS “PUBLIC FACILITY/NATURAL AREA”**

Point Woronzof Park, Municipal dedicated parkland since 1994, is west of the Airport where a beautiful, naturally-wooded section of the Tony Knowles Coastal Trail and a portion of the Anchorage Coastal Wildlife Refuge is located. This area is depicted as “Important Wildlife Habitat” in the Anchorage 2020 Comprehensive Plan, and contains a significant Native archeological site.

TCC opposed the “Major Transportation Overlay” on this park during the development of the West Anchorage District Plan (WADP); TCC reiterates this position with our opposition to Point Woronzof Park designated as “Public Facility/Natural Area” on the Draft Map. Point Woronzof Park should be designated “Park or Natural Area” in the Anchorage Bowl Land Use Plan Map, which would reflect broad community support for this land to remain Municipal dedicated parkland and override the WADP by giving the park its proper designation.

The Draft Plan provides language in numerous locations that justifies this position (page 2, 10, 11) including the language that defines Park or Natural Area (page 26): “The Park or Natural Area designation provides for active and passive outdoor recreation needs, conservation of natural areas and greenbelts, and trail connections. These open spaces are municipally owned...”

Conversely, the Draft Plan provides only vague language in a failed attempt to justify the “Public Facilities/Natural Area” designation for Point Woronzof Park (page 27): “This designation applies to several municipal parcels identified as part of a conceptual, long-term resolution of International Airport area land use conflicts.” TCC opposed any comprehensive land trade with the Airport that would include Airport acquisition

of Point Woronzof Park and fought to keep this concept out of the WADP — our position opposing a comprehensive land trade has not changed.

In its most recent Master Plan Update (finalized December 2014) — intended to project future needs at the facility for the next 20 years — the Airport has not convincingly demonstrated the need for a fourth runway or other aviation/industrial development in this area for the foreseeable future — and the only “land use, ownership and open space conflicts” (page 28) that would exist for Point Woronzof Park is if the Airport is allowed to acquire the park parcel without showing any actual need for it. Airport ownership of Point Woronzof Park could result in fencing off public access, extensive vegetation clearing and other environmental degradations of wildlife habitat, and realignment of the Coastal Trail — without any Municipal authority to override these actions.

As stated in the Draft Plan (page 43), the LUPM can be amended in the future if the Airport ever demonstrates a legitimate need to acquire Point Woronzof Park and develop it for aviation purposes. In the meantime, TCC requests that Point Woronzof Park’s designation in the Land Use Plan Map reflect its 22-year status as “permanent” dedicated parkland and be shown as “Park or Natural Area.”

LUPM Map — Public Facility/Natural Area Designation for ‘Parcel 6’ Municipally-Owned Land Adjacent to the Coastal Trail Between the AWWU Sewage Treatment Plant and the Airport

- **TCC OPPOSES Draft LUPM MAP RE: DESCRIPTION OF MUNICIPALLY-OWNED COASTAL TRAIL GREENBELT BETWEEN AWWU SEWAGE TREATMENT PLANT AND THE AIRPORT AS “PUBLIC FACILITY/NATURAL AREA”**

A beautiful, narrow natural open space area of Municipal land (identified as ‘Parcel 6’ in the WADP) directly east of the Anchorage Water and Wastewater Utility (AWWU) sewage treatment plant, and directly east of the Coastal Trail, serves as an essential greenbelt buffer and wildlife corridor between the trail and high-impact north/south runway operations on Airport property nearby to the east.

The demarcation of this land on the Draft Map as “Public Facility/Natural Area” — and its indication by color that it lies within the Airport boundary — is *inaccurate and inappropriate*. The Airport does not own this land, nor has it demonstrated any legitimate need to acquire this Municipally-owned land through a conceptual comprehensive land trade scenario proposed during the development of the WADP — a proposal TCC opposed.

There is no basis to show Parcel 6 as anything but “Park or Natural Area” on the Land Use Plan Map. This would appropriately reflect how the community has used this land since the Coastal Trail was built in the 1980s, and it is a critical section of greenbelt/buffer that protects the integrity and user experience of the Coastal Trail through this area. Under other circumstances, locating a trail between two highly incompatible uses (sewage treatment plant to the west and Airport runway to the east) would be highly problematic. But because of careful planning and placement of the trail, and the retention of this important greenbelt area that buffers the trail, it works — and the community has long been the beneficiary.

For many years, TCC has advocated for the transfer of this land to the Parks and Recreation Dept. for parkland dedication. TCC requests ‘Parcel 6’ land be show in light green — to accurately reflect Municipal ownership — and be designated as “Park or Natural Area” in the Land Use Plan Map. This would serve to reflect the long-established, highest and best community use of this land — and would provide the Municipality Parks and Recreation Department with direction to request the transfer of this land to the Parks Dept., for formal dedication of this essential Coastal Trail greenbelt buffer.

LUPM Map — Parks or Natural Area Designation for Municipally-Owned Land West of Airport

- **TCC SUPPORTS Draft LUPM MAP & PLAN RE: DESCRIPTION OF MUNICIPALLY-OWNED LAND WEST OF AIRPORT AS “PARK OR NATURAL AREA”**

A portion of Municipal land currently managed by the Heritage Land Bank (HLB) along the coastal bluff is shown on the Draft Map as “Park or Natural Area.” A section of the Coastal Trail and a portion of the Sisson Loop Trail system — both highly popular recreation trails — are located in this beautiful, natural open space area. It is part of an important wildlife corridor, and identified as “Community Preference for Natural Open Spaces” in the Anchorage 2020 Comprehensive Plan.

For many years, TCC has advocated for the transfer of this Municipal land (as well as other HLB Municipally-owned uplands and tidelands in this area not currently leased or otherwise encumbered) to the Parks and Recreation Dept. and dedication as parkland. This would permanently protect the highest and best long-standing community and environmental use of this area. Designating HLB parcels in this area as “Park or Natural Area” in the LUPM Map will provide direction to the Parks and Recreation Dept. to finally make this happen.

LUPM Map — Public Facility/Natural Area Designation for Municipally-Owned Land West of Airport

- **TCC OPPOSES Draft LUPM MAP & PLAN DESCRIPTION OF MUNICIPALLY-OWNED LAND WEST OF AIRPORT AS “PUBLIC FACILITY/NATURAL AREA”**

A portion of Municipal land currently managed by the HLB (directly east of the above discussed area) is shown on the Draft Map as “Public Facility/Natural Open Space.” It has long been considered by the public as an essential greenbelt buffer between the Coastal Trail and high impact Airport operations and development to the east, as it is directly adjacent to Airport land that has been cleared of virtually all vegetation. In addition to serving as an important Coastal Trail greenbelt buffer, it’s also a popular recreational area, as a portion of the Sisson Loop Trail is located on this land. And the Anchorage 2020 Comprehensive Plan identifies it as “Important Wildlife Habitat.”

During the development of the WADP, this HLB area was proposed to be segregated from the connecting HLB land along the coast and included in a proposed comprehensive land trade between the Municipality and the Airport. *However, 1) the dividing line of the HLB parcel on a map was completely arbitrary and not based on any public discussion or input; 2) the Airport has publically stated that this land is of low value to them; and 3) the Airport does not show any proposed development for this Municipal land in their 20-year Master Plan Update.*

This Municipal land may be of low value to the Airport, but it is of high value to the community as an important trail greenbelt buffer and wildlife corridor (see Draft Plan page references under the Point Woronzof Park section of our letter [page 3] for re-enforcement of this position, including page 10, which states, “New parks and greenbelts are added...to function as buffers between incompatible developments.” For many years, TCC has advocated for the transfer of this land to the Parks and Recreation Dept. for permanent parkland dedication.

TCC requests this parcel be designated as “Park or Natural Area” in the Land Use Plan Map, which would reflect the highest and best community use of this land — and would provide the Municipality Parks and Recreation Department with direction to transfer this land to its department for parkland dedication status.

LUPM Map & Plan — Public Facility/Natural Area Designation for Portion of Turnagain Bog on Airport Land Adjacent to Turnagain Neighborhood

- **TCC OPPOSES Draft LUPM MAP RE: SIZE OF TURNAGAIN BOG AREA DESGNATED AS “PUBLIC FACILITY/NATURA AREA**

The Draft Map depicts a narrow strip of Turnagain Bog on Airport property directly adjacent to the Turnagain neighborhood as “Public Facility/Natural Area.” The Draft Map should identify a much larger area of Turnagain Bog for “Public Facility/Natural Area” designation, accurately reflecting the Assembly’s action via a portion of Turnagain Bog identified in AO 2001-151 (S-2) (Illustration 2) (attached) and described in the ordinance as, “It is in the public interest that the portions of Turnagain Bog identified as “Lands Not Permitted” in green on

Illustration 2 (including "Scenic Easement") remain as a natural buffer between the ANC and surrounding neighborhoods."

BACKGROUND: With the passage of AO 2001-151 (S-2), the Assembly approved Airport use of Municipally-owned areas of Klatt Bog wetlands in south Anchorage, to be used to mitigate Airport-related development in other areas of Turnagain Bog wetlands. The Airport has argued that this ordinance is not binding, as it was conceived as part of a speculative 10-year wetland fill permit application by the Airport that was never approved by the Corps of Engineers. However, 1) nowhere in the ordinance does it stipulate that this agreement was contingent upon approval of the 10-year fill permit application; and 2) over time, the Airport has used Klatt Bog wetland credits approved in the above referenced ordinance to mitigate Airport-related development in Turnagain Bog under individual fill permits.

Following TCC discussions with the Planning Department during the development of the 2006 draft Land Use Plan Map, the draft accurately reflected the boundaries delineated in Illustration 2. And during the development of the WADP, TCC strongly advocated for this Municipal planning document to acknowledge and implement the intent and actual language of this ordinance. As a result, AO 2001-151(S) is included in the WADP (Appendix A-7).

TCC assumes the narrow strip of Turnagain Bog identified as "Public Facility/Natural Area" in the current Draft Map is meant to represent the "Scenic Easement" on the Illustration 2 ordinance map. However: 1) the Draft Map area designated as "Public Facility/Natural Area" hugging the Turnagain residential boundary is much smaller than the Conceptual width of the Scenic Easement on Illustration 2 of the ordinance; and 2) Appendix I of the ordinance, titled "Conceptual Paper" is just that — conceptual — actual size of the "Scenic Easement" has never been agreed to by any of the involved parties, including TCC.

Regardless, the "Scenic Easement" does not represent the entire Turnagain Bog area identified in Illustration 2. As the ordinance language states, this larger wetland/associated uplands serves as an essential buffer between Airport development and high-impact operations and the Turnagain residential area to the east. These wetlands are designated "Class A" wetlands in the Anchorage Wetlands Management Plan, which reflects their high value to the community, including water quality/pollutant filtration, hydrology regulation for waterways and residential development in Turnagain, wildlife habitat, noise buffering and aesthetics.

Based on the above information, data the Planning Dept. used to designate the "Public Facility/Natural Area" boundaries next to the Turnagain neighborhood on the Draft Map is incorrect.

Properly depicting the appropriate size of this important buffer area next to our neighborhood in the Land Use Plan Map — as identified in AO 2001-51 (S-2) Illustration 2 — would also adhere to the 2020 Comprehensive Plan's General Land Use Policy #7 (page 72 in the Comp Plan): "Avoid incompatible uses adjoining one another." It would also support language in the Draft Land Use Plan (page 10): "This strategy also addresses transitions and buffers between different land use designations, such as between major airport facilities or industrial use and residential neighborhoods" and (page 27): "The Public Facility/Natural Area designation addresses undeveloped lands on public facility and institutional campuses, where there is community interest to preserve natural habitat, buffers, greenbelt and trail connections, scenic values, or recreational uses."

The Airport has benefited from the Assembly's decision to provide wetland fill credits to them over the last 15 years — yet, *the community has yet to see tangible action by the Municipality to see that a significant portion of Turnagain Bog "remain as a natural buffer between the ANC and surrounding neighborhoods."* By appropriately depicting all of the Turnagain Bog wetlands/associated uplands shown on the AO 2001-151(S) Illustration 2 map as "Public Facility/Natural Area" in the Land Use Plan Map, *the Municipality would be taking a big step forward in its commitment to provide an essential buffer between Airport development and operations and the Turnagain neighborhood.*

TCC requests that the size of the Turnagain Bog wetlands and associated uplands on Airport property west of the Turnagain neighborhood designated as "Public Facility/Natural Area" be substantially enlarged, to

appropriately reflect the AO 2001-151(S) Illustration 2 Turnagain Bog boundaries deserving of this designation.

LUPM Map — Public Facility/Natural Area Designations for Portions of Airport Land Currently Used for Community Park/Recreation:

- **TCC SUPPORTS the Draft LUPM Map RE: THOSE AREAS BEING USED BY THE COMMUNITY FOR PARK AND RECREATION PURPOSES WITHIN THE AIRPORT BOUNDARIES DESIGNATED AS PUBLIC FACILITY/NATURAL AREA**

As with the portions of Turnagain Bog on Airport property discussed above, it is appropriate to designate areas long-used by the public for park and recreational purposes, or that serve as essential buffering between the Airport and adjacent residential areas, as “Public Facility/Natural Area” on the Land Use Plan Map. These popular community-use areas include: north areas of Connors Bog and De Long Lake, Little Campbell Lake Park, sections of Coastal Trail/Greenbelt buffering, and Point Woronzof Overlook.

This designation reflects the dual land uses for these natural areas: they are located within the Airport boundaries, but used by the public for park, recreational and land use buffering purposes. And FAA Grant Assurances allow for land within Airport boundaries to be used for community purposes: “The contribution of the airport property enhances public acceptance of the airport in a community in the immediate area of the airport; the property is put to general public use desired by the local community; and the public use does not adversely affect the capacity, security, safety or operations of the airport.” (199 Federal Register, page 7721, VII.D.

LUPM Map & Plan — Identification/Acknowledgement of Anchorage Coastal Wildlife Refuge Boundaries and Overlap of Municipal Land Within the ACWR Boundaries:

MAP: The Anchorage Coastal Wildlife Refuge (ACWR) is identified with wording in two areas of the Draft Map — both south of Pt. Campbell — but the Draft Map does not show the actual boundary of the refuge. The Draft Plan language states, “The Plan Area Boundary depicts the extent of the land use planning area of the Plan Map.” (page 39) Since numerous parcels of Municipally-owned land falls within the refuge boundary, these areas should be demarcated on the Plan Map.

Because some of the city-owned parcels are located within our council boundaries (Point Woronzof Park tidelands and tidelands located within various HLB parcels), TCC requests that the actual boundaries of the refuge be shown on the Land Use Plan Map, to better visually indicate its location in relationship to the city’s upland western coastline and Municipal land that falls within the ACWR boundaries. At the very least, TCC requests adding “Anchorage Coastal Wildlife Refuge” wording in the water on the Land Use Map, between Pt. Campbell and Pt. Woronzof — to better represent the northern portion of the refuge, which extends to Pt. Woronzof. We have noticed other map layers (including the Community Natural Assets map) depict the ACWR boundaries, so this seems like a simple — but important — amendment to the Land Use Plan Map.

PLAN: As stated above, numerous parcels of Municipal land fall within the ACWR boundaries. The LUPM should acknowledge this not only in the Land Use Plan Map, but also in the text of the Plan narrative, as the city has the authority to manage Municipal land within the ACWR boundaries.

TCC requests that the second graph in the Land Use Plan Area Boundary section (page 39) be amended as follows, to better reflect the Memorandum of Understanding updated last year between the Municipality and the Alaska Department of Fish & Game (ADF&G) (AO 2015-72, Appendix A): “Joint Base Elmendorf-Richardson, Chugach State Park, Fire Island, and portions of the Anchorage Coastal Wildlife Refuge are not subject to the Anchorage Bowl Land Use Plan Map. While a 2015 Memorandum of Understanding between the MOA and the Alaska Dept. of Fish and Game allows for ADF&G to manage Municipal land within the ACRW, this agreement allows for the Municipality to “assist, where appropriate, in maintenance and development of refuge access points on the subject municipal lands, both within and abutting the refuge...”

LUPM Plan — Public Facility/Natural Area Language

- **TCC OPPOSES the Draft LUPM PLAN RE: “PUBLIC FACILITY/NATURAL AREA” SECTION REFERENCES TO USE OF MUNICIPAL PARCELS IN A CONCEPTUAL LAND TRADE WITH THE AIRPORT**

The following language is included in the Draft Plan “Public Facility/Natural Area” section, “This designation also applies to several municipal parcels identified as part of a conceptual, long-term resolution of International Airport area land use conflicts.” (Page 27), and “Specific tracts in and around the Ted Stevens Anchorage International Airport are opportunity parcels for a possible land exchange or other mechanism to resolve land use and ownership conflicts. These include Airport tracts, municipal park and Heritage Land Bank lots, and portions of AWWU land.” (page 28).

As already stated, TCC strongly opposed the idea of a comprehensive land trade with the Airport when this idea came up as part of the development of the WADP, because of the select municipal parcels chosen to potentially be acquired by the Airport. These parcels included Point Woronzof Park, ‘Parcel 6’ Coastal Trail greenbelt/buffer, and AWWU sewage treatment plant expansion reserve land — all vital city-owned land that should be retained by the Municipality because of its long-term, high value use by the community.

The Airport has never demonstrated a real need for any of this Municipal land — and the need for a fourth runway or other aviation-related development west of its current boundaries is highly unlikely during the 25-year span of this LUPM Update. But as already pointed out, the Draft Plan’s own language states that the LUPM can be amended in the future, IF the Airport every demonstrates a legitimate need for these Municipal parcels (page 6).

Conversely, as stated on page 6 of our letter, FAA Grant Assurances allow for Airport land to be used by the public for community purposes: “Making airport property available at less than fair market rental value for public recreation and other community uses, for the purpose of maintaining positive airport-community relations, can be a legitimate function of an airport proprietor in operating the airport.” (1999 Federal Register, (p. 7721.Vii.D) This legitimizes the Airport’s many-years allowance of land within its boundaries being used for park, recreation, buffer and other purposes that benefit the community at-large (including Spenard Beach Park, Little Campbell Lake Park, sections of the Coastal Trail, the snow dump near Connors Bog, etc.) — and precludes the impression that there are land use conflicts that need to be resolved with a comprehensive land trade.

TCC was very supportive of Mayor Berkowitz’s decision in fall 2015 to withdraw a proposed ordinance by the previous administration, which would have supported the land exchange, and would have placed un-dedication of Point Woronzof Park on the Municipal ballot for a public vote by 2017.

Based on all of the above rationale and the current administration’s position, TCC requests language referring to Municipal land potentially being included in a land trade with the Airport in the Public Facility/Natural Area section be deleted from the Land Use Plan.

LUPM Plan — Supplementary Policy Guidance Language

- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-5: Consistency of Area-specific, Functional, and Facility Plans**

Proposed new policy recommendations to be incorporated into the 2020 Comprehensive Plan includes LU-5 (page 12), which states, “The Comprehensive Plan shall be the Municipality’s lead and overall policy guide for growth and development in the Anchorage Bowl.” It goes on to state that, “Revisions and updates to other municipal plans...shall be in conformance with the Comprehensive Plan.”

TCC supports this land use policy and recognizes it as a way to override narrative and Implementation Actions that our council opposed in the WADP — including the concept of a comprehensive land exchange with the Airport.

- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-7: Targeted Infrastructure Investment**

TCC feels it is important to “invest in public infrastructure (i.e., parks, trails, schools, sidewalks, streetscapes, utilities) to catalyze reinvestment in priority focus areas,” as stated in LU-7 (page 12). These important community amenities enhance our city by providing a better quality of life for residents. By investing in these amenity improvements, it will provide incentives for residents to locate in mixed-use districts and other areas of Anchorage, defined in the 2020 Comprehensive Plan.

- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-10: Conserving, Enhancing, Revitalizing Neighborhoods — with Amended Language**

As housing density increases in Anchorage, TCC supports the Planning Dept.’s recognition that higher density needs to be balanced with protection of what makes Anchorage a special place to live — including protection of the environmental assets this city is fortunate to have. While it’s important for the Land Use Plan to emphasize the restoration of environmental areas that have been compromised or degraded, it’s also important to *protect* these special environmental areas in the first place.

TCC requests that the LU-10 policy statement be amended by adding the underlined text (page 12): “Balance the need to increase the housing supply and expand neighborhood commerce with the parallel need to protect and enhance neighborhood character, preserve historic resources, and protect and restore the environment.”

- **Amend the Draft LUPM PLAN RE: Land Use Policy-11: Reducing Barriers to Core Sector Growth**

TCC feels the language to describe LU-11 is too vague and does not provide a caveat that protects the existing land uses from potential incompatible uses and/or negative impacts due to inappropriate industry expansion. An excellent example of this is referenced on page 7 of our letter, with regard to Airport expansion into the Turnagain Bog wetlands/uplands buffer adjacent to the Turnagain neighborhood; or Airport expansion that would destroy dedicated parkland and popular sections of recreational trails to the west of its current boundaries.

TCC requests that the LU-11 statement be amended by adding the underlined text (page 12): “Assist Anchorage’s core sector and growth industry employers, by resolving land use constraints, where appropriate and compatible with existing and surrounding land uses, so they can continue to grow, expand job opportunities, and provide a diverse, stable economic base.”

- **Amend the Draft LUPM PLAN RE: Land Use Policy-12: Coordinating Institutional Growth**

Similar to our comments above on LU-11, the LU-12 policy statement should include additional language in the Land Use Plan that qualifies advocating for expansion of Anchorage’s large institutional facilities, to ensure appropriate growth and land use compatibility occurs. Unconstrained growth in these areas can cause additional traffic, noise, loss of natural open space, etc., which would have negative impacts on the surrounding areas.

TCC requests that LU-12 be amended by adding the underlined text (page 12): “Expand and encourage partnerships among Anchorage’s large educational, research and medical institutions to coordinate future growth and development of these institutions, where appropriate and compatible with surrounding land uses and neighborhoods.”

LUPM Plan — Land Use Designations/Growth Supporting Features and Landscaping/Natural Area Preservation

- **Amend the Draft LUPM PLAN RE: Higher Density, Development in General & Landscaping Standards**

Within the various 2.2 Land Use Designations and 2.3 Growth Supporting Features sections of the Draft Plan, higher density housing in select areas is presented as a way to provide more housing within the Anchorage

Bowl, to accommodate projected future city growth. And additional commercial and industrial development will be needed to continue providing necessary goods and services to our community.

However, the Land Use Plan needs to include stronger language and better examples of development than some of those in the Draft Plan, to emphasize the need to balance high-density housing on smaller lots (with limited front and side-yard setbacks), and commercial development (very close to sidewalks and streets) with appropriate space for aesthetic landscaping and preservation of wooded areas that provide aesthetics and buffering. Unfortunately, the Draft Plan includes more bad examples, than good:

Good examples (where landscaping is integrated into the development): Photo 4 on page 18; Photo 5 on page 19; Photo 20 on page 30.

Bad examples (where little or no landscaping is visible): Photo 11 on page 23; Photo 12 on page 24; Photo 13 on page 25; Photo 19 on page 29; Photo 24 on page 31; Photos 26, 27 & 28 on page 32; Photo 30 on page 35; Photo 35 on page 38.

Clearly, implementation of higher density, smaller lots, and more compact development should not occur until Title 21 landscaping/preservation of natural wooded areas requirements are strengthened, to avoid more development like the examples all too often depicted in the Draft Plan — and currently found throughout our city.

While TCC generally supports the Land Use Designation and Growth Supporting Features, we request that the Land Use Plan include language throughout these sections that more strongly emphasizes the need to provide appropriate landscaping setbacks and higher landscaping/natural area protection standards (with accompanying better photo examples) within high density housing and other developed areas in our community. And strengthening landscaping requirements should be included as an Action Plan in the Land Use Plan.

A specific example of amended language to better emphasize the above points: TCC requests that language in the Industrial Land Use Designation statement be amended by adding the underlined text (page 32): "Greater buffering and screening should [MAY] be required to enhance public rights of way and improve land use compatibility."

LUPM Plan — City Center Land Use Designation and Retail Businesses

- **Amend the Draft LUPM PLAN RE: City Center Location Criteria**

As Midtown has developed over the last several years, more office and non-retail development has occurred within this general area. While there are still numerous retail shopping opportunities in Midtown for those living in the surrounding residential areas, including Turnagain, TCC requests that language in the City Center Location Criteria (last bullet) be amended by adding the underlined text (page 24): "Not to expand at the loss of residential and retail." This will ensure that long-term development of the Midtown area retains a balance of residential, retail and office development.

LUPM Plan — Lakes and Streams Land Use Designation

- **Amend the Draft LUPM PLAN RE: Lakes and Streams Protection Language**

The Lakes and Streams Land Use Designation (page 39) states, "The Plan is not intended for use in determining the location of streams or stream protections setbacks." As we stated on page 2 (Greenway Supported Development), Title 21 stream setback requirements need to be enlarged, in order to properly protect riparian habitat along Anchorage streams. While TCC understands the limitations of mapping all the waterways within the Anchorage Bowl, TCC requests inclusion of the following sentence as the last sentence of this section (page 39): "The Plan recognizes that proper setback protection for waterbodies is an important component of land use for Anchorage and will be addressed in Title 21." This serves as an important acknowledgement of water resource protection in this section of the Land Use Plan.

LUPM Plan — Targeted Area Rezoning

- **TCC SUPPORTS** the Draft LUPM PLAN RE: Targeted Area Rezoning Language & Parkland Dedication

The Targeted Area Rezoning section (page 46) states, "Individual rezonings will occur over time, as growth and the need arises." TCC see this as an opportunity for the community to 'target'/identify parks currently under designated status, and formally dedicate these parks, as part of a targeted area rezoning effort. This action should simultaneously incorporate the rezoning of these dedicated parkland parcels to PR District.

As more development occurs to accommodate population growth, it is important that parkland/natural open space within our community that provides a high quality of life are given the highest level of protection.

TCC has already worked with the Parks and Recreation Dept. staff to identify all designated parkland within our boundaries long enjoyed by Turnagain residents and the community-at-large, and passed a resolution (March 2015) supporting formal park dedication and rezone of these parcels. TCC hopes to work with the Parks Dept., the Parks and Recreation Commission, and the Assembly to accomplish this in the near future.

LUPM Plan (pages 54-55) — Table 5: Action Checklist

- **Draft LUPM PLAN RE: Table 5 Action Checklist:**

- **PAGE 54 — INDUSTRIAL LAND PRIORITIZATION ACTION ITEM VII-12: Support application of Foreign Trade Zone (FTZ) on TSAIA lands.**

- Development in Foreign Trade Zones within the TSAIA boundaries areas should be carefully placed, in order to minimize potentially negative impacts on surrounding land uses (noise, pollution, traffic through adjacent neighborhoods, clearing of natural open space buffer areas, development on high value wetlands/natural wildlife areas, etc.).

TCC requests more information/details on the criteria/process for choosing specific areas located within TSAIA boundaries that could be designated as FTZs — and what development/operations would be allowed to occur within those FTZ designated areas.

- **PAGE 54 — COMPATIBLE LAND USE ACTION ITEM VIII-1: Include neighborhood buffering standards in TSAIA Targeted Area Rezone in Action VII-1**

- This action item should not be limited to Sand Lake residential areas along Raspberry Road. Appropriate buffering areas on Airport land should be designated for all adjacent neighborhoods and other land uses surrounding the Airport — not just those areas designated as Targeted Area Rezone areas along Raspberry Rd. As stated earlier in our comment letter (pages 5-6), the size of Turnagain Bog wetlands/associated uplands designated as a buffer needs to be significantly enlarged than what is shown on the Draft Map.

TCC conceptually supports neighborhood buffering standards, but needs more information on the details. Our council would want to be part of a group involved in the development of these neighborhood buffering standards, to ensure protection of quality of life, and consistent application and land use compatibility around the Airport.

- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-5: Conduct a valuation study of the natural economy of Anchorage's ecosystem to determine current watershed and wetland protection, economic value, and land use development impacts.**

TCC SUPPORTS this Action Item — it is important to assess the intrinsic value of our natural waterbodies as Anchorage grows and moves forward with higher density housing and other development. This information will be very useful to ensure proper protection to the city's watersheds and remaining wetlands/natural areas.

- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-6: Conduct scenic viewshed assessment for Bowl and determine strategies for viewshed protection.**

TCC SUPPORTS this Action Item — as with Anchorage’s watersheds and wetlands, it is important to identify and protect high value viewsheds in our city. Scenic viewsheds enhance our quality of life, provide greater economic property assessments, and elevate the visitor experience while in our city.

- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-7: Identify development standards and incentives to mitigate impacts to wildlife near wildlife habitats.**

TCC SUPPORTS this Action Item — but requests the Action Item be amended as follows: “Identify development standards and incentives to protect and mitigate impacts to wildlife near wildlife habitats.”

Any proposed development near wildlife habitats should first be evaluated for adherence to wildlife *protection* standards, so that impacts to can be prevented, rather than mitigated.

- **PAGE 55 — IX OPEN SPACE AND GREENBELTS ACTION ITEMS**

TCC GENERALLY SUPPORTS these all of these Action Item, but has a specific amendment for Action Item IX-4, as follows:

TCC SUPPORTS Action Item IX-4 — but requests the Action Item be amended as follows: “Conduct housekeeping to dedicate parks currently classified as designated parks, followed by rezoning [REZONE] of dedicated parks to PR District, and some T zoned lands to PLI.”

As stated on page 10 of our letter, TCC has already collaborated with the Parks and Recreation Dept. to identify all designated parks within our boundaries, and has passed a resolution for dedication and rezone of these parks to the PR District. This should be done throughout the city, to ensure the highest level of protection for these public facilities.

- **PAGE 55 — ANCHOR INSTITUTIONS AND FACILITIES X-5: Develop TSAIA, Merrill Field and JBER interface compatibility overlay zone.**

During the development of the WADP, TCC (and Spenard CC) opposed the concept of “Airport Influence Overlays” as well as the “Airport Disclosure through Plat Notes” proposal (page 133 of WADP). These requirements would put all the burden, which could have financial consequences, on owners of property that would fall into these overlay boundaries — and no action required by the Airport to minimize noise and other negative impacts on the nearby neighborhoods.

A “Compatibility Overlay Zone” proposed in the Draft Plan sounds very similar to what was proposed in the WADP. TCC requests more information as to how these overlay zones would be determined, what criteria would be used, what the potential negative ramifications could be to property that falls within these zones, etc. before the Municipality considers moving forward with this Action Item.

- **PAGE 55 — ANCHOR INSTITUTIONS AND FACILITIES X-6: Resolve land use, ownership, and open space conflicts around TSAIA through a land exchange.**

TCC OPPOSES Action Item X-6. As expressed earlier in our comments, TCC continues to be strongly opposed to the concept of a land exchange that would presumably “resolve conflicts,” just as we did during the development of the WADP. Only if Municipal land long used by this community as parkland, natural open space and recreational areas is traded to the Airport will there be major conflicts — and these conflicts will not be able to be realistically

resolved if this land, including dedicated parkland, is developed for aviation purposes.
TCC requests this Action Item be deleted from the Land Use Plan.

LUPM Supporting Maps

TCC also found some errors on some of supporting maps posted on the Land Use Plan Map website. TCC requests an opportunity to meet with Planning Dept. staff to discuss the specifics, to ensure the LUPM is based on accurate data.

Once again, TCC appreciates the opportunity to provide detailed comments on the Draft Land Use Plan Map Update and accompanying Plan narrative. We are an active council who has dealt with many of the land use items discussed above for many years. TCC hopes that our input during this important LUPM Update process — and our continuing dialogue with the Municipal Planning Dept. — result in a positive outcome for the Turnagain neighborhood and our community.

Sincerely,

Anna Brawley & Cathy Gleason
Turnagain Community Council Land Use Plan Map Committee Co-chairs

Attachments:

9-16-2005 Turnagain Community Council Comment Letter on Land Use Plan Map Draft
AO 2001-151 (S-2) Illustration 2 Map



**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 (Spenard 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

Land Use Plan Map

From: Cathy Gleason <cathy.gleasantcc@yahoo.com>
Sent: Tuesday, November 1, 2016 3:49 PM
To: Land Use Plan Map
Cc: Anna Brawley; Gloria Manni; Kennis Brady; tccpresident@yahoo.com
Subject: 2040 LUP - Turnagain CC Comment Addendum
Attachments: 2016-11-1 TCC Addendum Land Use Plan Map Public Hearing Draft.pdf;
10-31-2016 Isaacs Forest Park Dr. rezone comments.pdf

Tom and the Planning Staff,

Please accept the attached Turnagain Community Council comment addendum on the 2040 Land Use Plan Public Hearing Draft. This letter specifically addresses the proposed designation for two areas of residential parcels within the TCC boundaries that we did not address in our previously submitted comments. Also attached is Marie and Jon Issacs October 31, 2016, Memorandum, which is referenced in our letter.

Please don't hesitate to contact me or Anna Brawley, if you have any questions or need more information. As stated in the letter, these comments will be presented for ratification by the TCC body-as-a-whole at our general meeting this Thursday, November 3rd.

Sincerely,
Cathy
248-0442

TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils
1057 West Fireweed Lane, Suite 100
Anchorage, Alaska 99503

Sent via email

November 1, 2016

Municipality of Anchorage Community Development Department
Planning Division
P.O. Box 196650
Anchorage, AK 99519-6650

RE: **ADDENDUM TO PREVIOUS TURNAGAIN COMMUNITY COUNCIL COMMENTS
ANCHORAGE 2040 LAND USE PLAN - PUBLIC HEARING DRAFT**

Dear Planning & Zoning Commission and Planning Dept. Staff:

Thank you for the opportunity to provide additional input on the 2040 Anchorage Land Use Plan (2040 LUP) Public Hearing Draft with the extension of the comment deadline. The below comments provide [input on items not previously addressed in our October 17th handout or May 27th/September 9th comments](#). In order to submit comments by the extended November 1st deadline, the Turnagain Community Council (TCC) Land Use, License & Permit Review Committee is submitting this input now; this letter will be presented at our November 3, 2016, general meeting for formal ratification.

[2040 LUP Map — Designation of Parcels West of Forest Park Dr.](#)

- **TCC OPPOSES the Draft 2040 LUP Map RE: DESIGNATION OF SPECIFIC PARCELS WEST OF FOREST PARK DR. AS “NEIGHBORHOOD – COMPACT MIXED RESIDENTIAL – LOW”**

TCC thanks Commissioner Spring for bringing this particular item to our attention at the October 17th hearing. After discussing this with active TCC members who have a home located within the parcel area proposed to be designated “Neighborhood - Compact Mixed Residential - Low (Compact Mixed Res.),” and seeing what kind of development this designation would allow (page 28 of the Draft Plan), TCC does not support the proposed designation.

Instead — *excluding the two most southern parcels located within the proposed Compact Mixed Res. designation* — TCC requests that the parcels located directly along the west side of Forest Park Dr. be designated “Neighborhood – Single Family and Two Family” on the 2040 LUP Map.

- *Reasons for this request include:*
 - As the “Areas of Growth and Change” map (page 19 of the Draft Plan) indicates, the proposed land use designation for these parcels along Forest Park Dr. would change uses currently allowed by existing zoning, which is R-2D. This zoning was specifically requested (and approved) by homeowners in 1979, to protect the existing single and two-family homes vulnerable to higher-density development under the R-2 zoning that was in place at that time.
 - The existing single and two-family homes are consistent with the development density of other homes in the Forest Park Dr. area to the east and north.
 - Potential higher-density development would likely increase traffic on Forest Park Dr., which has a Local Street designation. There are no sidewalks or bike paths along this street, yet it is regularly used by pedestrians, joggers and bicyclists; more traffic would create a greater safety risk for these non-motorized users.

- Higher density housing should be avoided in this area, as these parcels fall under the “High Seismically Induced Ground Failure Hazard” in the Hazard Mitigation and Resiliency Map (CC-6).
- Even though the West Anchorage District Plan Land Use Map (page 73 of that plan) designates these parcels along Forest Park Dr. as “Low/Medium Intensity (>8-15 units per gross acre), which is consistent with a Compact Mixed Residential - Low designation, **TCC sees development of the 2040 LUP as an opportunity to override that inappropriate designation — and ensure that the parcels directly west of Forest Park Dr. in the Turnagain area have the proper designation of “Neighborhood – Single Family and Two Family” on the finalized 2040 Land Use Plan Map.**

Please see additional rationale for TCC’s designation request in comments submitted October 31, 2016, by Marnie and Jon Issacs, long-time residents who live in this area along Forest Park Dr. (Their comments are attached to our comments as well.)

Parcel Designation Along La Honda Dr.: In hindsight, the parcels along La Honda Dr. (west of Forest Park Dr.) should probably not have been built on — or built at a lower density — due to their location within the “High Seismically Induced Ground Failure Hazard” in the Hazard Mitigation and Resiliency Map (CC-6) and the Fish Creek floodplain. But because they are already developed at a higher-than-single/two-family density, TCC’s designation request for “Neighborhood – Single and Two Family” does not include these parcels.

2040 LUP Map — Designation of the Mobile Home Park along Hillcrest Dr.

- **TCC UNCERTAIN RE: DESIGNATION OF MOBILE HOME PARK ON HILLCREAST DR. AS “NEIGHBORHOOD – COMPACT MIXED RESIDENTIAL – LOW”**

Again, TCC thanks Commissioner Spring for bringing this particular item to our attention at the October 17th hearing. After review of this land use designation proposal, TCC submits the following for consideration by the Planning & Zoning Commission, as we have mixed feelings about this proposal:

- Unlike TCC’s strong position stated above with regard to supporting a change to the WADP Land Use Map, TCC is uncertain whether this would be a wise change for this area of the Turnagain residential neighborhood.
 - First and foremost, has the owner of the mobile home park land been contacted by the Planning Dept. regarding this proposed land use designation change — and, if so, what was the response?
 - As the “Areas of Growth and Change” map (page 19 of the Draft Plan) indicates, the proposed land use designation for the mobile home park parcel along Hillcrest Dr. would not only change the use currently allowed by existing zoning, but would also change the land use designation in the West Anchorage District Plan (page 73 of that plan), which is “Low Density – Attached and Detached” (< 5-8 units per gross acre).
 - The residential density provided by the mobile home park, which has been in this location for many years, has provided relatively low density, compatible homes adjacent to the surrounding residential areas north, west and south of the development (West High School is to the east).
 - The proposed designation of “Compact Mixed Residential – Low” would allow a higher density development of 8 to 15 units per gross acre. This increased density would likely created more traffic on Hillcrest Dr., which is a high-use street for both vehicle traffic and student pedestrian and bicyclers to the West/Romig campus. While the TCC Safe Routes To Schools Committee identified the need for a sidewalk along the south side of Hillcrest Dr. from Forest Park Dr. to the campus (and TCC has included this project in its CIP list), currently, no sidewalk or bike path exists.
 - While mobile home parks may not provide an ideal housing option for many Anchorage residents, the remaining mobile home parks in our city have been providing affordable

housing for many years. Neighbors who reside in mobile home parks may not be able to afford other forms of housing, such as apartments. And most apartments provide little or no yard for pets, gardens, storage, etc., which the mobile home park on Hillcrest Dr. does offer its residents.

Once again, TCC appreciates the opportunity to provide additional comments on the Anchorage 2040 Land Use Plan Public Hearing Draft. This comment addendum — along with our previously submitted comments — reflect long-held positions and proposals we hope will be incorporated into this important land use document for our city. TCC hopes that our input — and our continuing dialogue with the Municipal Planning Dept. — result in a positive outcome for the Turnagain neighborhood and our community.

Sincerely,

Anna Brawley & Cathy Gleason
Turnagain Community Council Land Use, License & Permit Review Committee Co-chairs

CC: Turnagain Community Council President Jonathan Tarrant
Turnagain Community Council Treasurer Gloria Manni
Turnagain Community Council Board Member-at large Kennis Brady

Attachment:
10-31-2016 Memorandum from Marnie and Jon Issacs

MEMORANDUM

TO: Mr. Tom Davis, Senior Planner
Municipality of Anchorage

Commissioners, Planning and Zoning Commission
Municipality of Anchorage

FROM: Marnie and Jon Isaacs
2418 Forest Park Drive

RE: Public Comments
Draft Anchorage 2040 Land Use Plan

DATE: October 31, 2016

We have reviewed the draft Anchorage 2040 Land Use Plan and offer the following comments. These comments are restricted to the proposed land use designations contained on the map found on page 19 of the draft and only address the proposed changes as they apply to the west side of Forest Park Drive.

BACKGROUND: We have lived at the current address since 1978, and have been pleased to be part of this diverse and integrated neighborhood. The proposed changes presented on the land use map appear to recommend a land use designation of Compact Mixed Residential Low for a section of Forest Park Drive. This would allow “single family, attached single family and small lot housing. Townhouse and smaller multifamily are also considered as long as the areas scale and density are maintained.” This designation would likely be vigorously opposed by residents in the area.

In 1979 homeowners along the west side of Forest Park Drive requested and received approval of a re-zone from R-2 to lower density R-2D to protect the residential character of the neighborhood’s single family homes and duplexes. The older housing stock on some lots was vulnerable to high density re-development, including ours. The area’s homeowners believed the protection offered by R-2D zoning over time would allow improvements and/or replacement of these older homes with newer single family or duplex structures while also protecting the area’s quiet neighborhood characteristics. An additional consideration was avoiding an increase in traffic volume associated with higher density development in an area used by joggers, bicyclists and pedestrians. Since that time, new single family homes have been constructed in this specific area and substantial improvements have been made to existing single family and duplex residences, enhancing the Forest Park Drive neighborhood as a desirable area to live.

BASIS FOR ARGUMENT: The proposed land use designation of Compact Mixed Residential Low is inappropriate on the west side of Forest Park Drive specifically because:

- Higher density residential is not compatible with this residential area;
 - Existing inventory is 1-2 stories, not three
 - Existing inventory is largely single family/duplex, anything larger would overwhelm the “area’s scale”;
 - There are no vacant lots or abandoned buildings in this area so higher density would require destruction of current housing.
- The lots in this area are narrow, long and drop off steeply to the Fish Creek floodplain which limits the actual square footage available for higher unit development.
 - The area is in seismic zone 4
 - Seeps and springs in the slope bordering Fish Creek create unstable soils
 - The designated floodplain boundary prohibits development and location of the required parking areas.
- Higher density residential development will add traffic and create unsafe access/egress conditions

Due to the extremely compressed public comment period for citizens to review the final draft of this plan, not all of the area’s property owners could be contacted. The attached petition reflects unanimous opposition by those homeowners that could be contacted, including nearby homeowners accessing Forest Park Drive from Huntington Park.

CONCLUSION: We request the designation of Compact Mixed Residential Low in the Draft 2040 Land Use Plan be removed from the Forest Park Drive properties and that they remain designated for Single Family and Two Family structures. This would be in keeping with the area’s existing land use and maintain the quality and character of the neighborhood.

Land Use Plan Map

From: paulrstang@gmail.com
Sent: Friday, October 7, 2016 12:21 AM
To: Land Use Plan Map
Cc: Mayor Berkowitz; cshutte@anchoragedowntown.org
Subject: Comment on the Land Use Plan Map from the UACC
Attachments: Comment to Anchorage P&Z.docx; ATT00001.txt

Please consider the attached comment from the University Area Community Council.

October 6, 2016

The University Area Community Council (UACC) has reviewed the Anchorage Bowl Land Use Plan Map. While we are generally supportive, we have a major concern - housing.

We believe that the Muni's Plan does not have adequate provisions to assure that housing is given a high priority in real estate development in the UMED area.

The Muni needs to take the lead in assuring more housing capacity, especially as a mix of commercial development and housing. Rezoning must be done in conformance with the Land Use Plan Map. For instance, requests for rezoning from R-3 to R-O seem too often leads to new office space, but no associated housing. This results in more vehicular traffic, more parking lots and more commuting. If associated housing were a part of a commercial office development, people could walk or bike to work, diminishing the need for parking and commuting, making for more environmentally sound neighborhoods. This is a strong trend in most cities, but unfortunately not in Anchorage. The Muni should take steps to promote developments that contain a combination of office space and housing at every opportunity.

The UACC would support a change to commercial use zoning if the development includes at least a minimum number of dwelling units per acre attached to the new zoning designation.

The UACC requests a response to the above comment.

Thank you.

Paul Stang,
President,
University Area Community Council