

Turnagain Community Council
c/o Mark Wiggin, President
2213 Douglas Dr., Anchorage, Alaska 99517

April 14, 2006

sent via e-mail

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

**RE: ANCHORAGE BOWL LAND USE PLAN MAP
Public Hearing Draft — January 13, 2006**

Dear Planning Staff, Planning and Zoning Commission & Anchorage Assembly:

Thank you for the continuing 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 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 (TCC) 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.

A. Questions/Issues Raised at Turnagain/Sand Lake Meeting on March 30, 2006, (some being raised in our September 16, 2005, letter as well):

TCC has appreciated the ability to meet with Planning staff during this process, as well as staff, airport personnel and Sand Lake residents last month to discuss some important land use issues that must be addressed to serve the community's best interests and ensure that the Land Use Map

accurately reflects appropriate land status. As a result of this process, the following items were identified, in no particular order:

North & East Turnagain Bogs:

- An ordinance was passed by the Anchorage Assembly [AO NO. 2000-151(S-2)] on February 6, 2001, which approved the sale of Heritage Land Bank (HLB) land in Klatt Bog (Parcel #5-018) to the Ted Stevens Anchorage International Airport (ANC). Accompanying the ordinance was a map called “Illustration 2,” which depicted areas that are referenced in the ordinance. The ordinance included the following:

“Whereas, the neighborhoods surrounding ANC are experiencing increased impacts from airport development; and

“Whereas, ANC Master Plans have identified portions of Turnagain Bog as an important buffer between surrounding residential areas and incompatible airport industrial uses; and

“Whereas, 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 ANC and surrounding neighborhoods; and

“Whereas, it is the public interest that any future development of the portions of Turnagain Bog identified as “Lands Not Permitted” in green on Illustration 2 (including “Scenic Easement”) be determined pursuant to a public joint planning process between ANC and MOA.

“Now, therefore the Anchorage Assembly ordains,,,

“Section 5. Any future development of the natural portions of the Turnagain Bog identified in green on Illustration 2 (“Lands Not Permitted,” including “Scenic Easement”) shall occur only after a master plan for that area is prepared jointly by ANC and MOA and approved by the Anchorage Assembly after public hearing. The commitment of the Ted Stevens Anchorage International Airport to this process, while contractually binding on the airport for this parcel, is not a waiver of its rights or privileges with respect to other parcels under state law.”

The referenced “Lands Not Permitted” and “Scenic Easement” in Illustration 2 include a large portion of North Turnagain Bog and East Turnagain Bog, which lies directly adjacent to the Turnagain neighborhood boundary. However, the Land Use Map, Public Hearing Draft, designates these same areas as “Major Transportation Facility,” which completely contradicts the ordinance directive to protect lands that provide a critical buffer area between highly incompatible land uses. ANC may argue that this condition of the land sale was contingent on the 10-year wetland permit, which has since been revoked by the U.S. Army Corps of Engineers (Corps). However, this restriction is not spelled out as such in the ordinance. The

clear intent of both parties was to allow for the purchase and rehydration of Klatt Bog to mitigate the negative affects of long-term development at the airport in the high-value wetlands of Postmark and Turnagain Bogs — regardless what permit it occurs under. ANC’s own actions have reinforced this intent. It is using the purchase of Klatt Bog as mitigation for development projects requiring wetland fills in both Postmark and Turnagain Bogs under individual permits, not the 10-year wetland permit. The airport can’t have it both ways; if the ordinance approving the sale of Klatt Bog to ANC was solely based on development occurring under the 10-year wetland permit, then the land sale — and the use of Klatt Bog for any mitigation that has occurred at the airport under individual wetland fill permits — should be immediately revoked by the Municipality and the Corps.

RECOMMENDATION: The Land Use Map should designate the above referenced parcels of North Turnagain Bog and East Turnagain Bog as “Other Areas that Function as Park or Natural Resource.” Clearly, this is a contractually binding agreement between the Municipality and the airport that must be reflected in this map — and as indicated in the ordinance, it is the public’s interest to do so.

- The following reinforce our request that North and East Turnagain Bogs, as so shown on Illustration 2 of AO NO. 2000-151 (S-2), be designated as “Other Areas that Function as Parks or Natural Resource” on the Land Use Map.
 1. Historically, ANC had the wisdom to recognize that Turnagain Bog wetlands served as a necessary buffer between its continually growing development and operations and residential and recreational land uses. In the 1981 Anchorage International Airport Master Plan, the Land Use Map designates all of East Turnagain Bog as “Greenbelt and Noise Buffer.” North Turnagain Bog was designated as “Parks.” These areas were part of a larger buffer/parks area established around the entire Airport perimeter. The State of Alaska Department of Transportation officials stated to the Municipality of Anchorage Assembly on March 15, 1983, that the Master Plan-designated buffer surrounding the Airport was a major product of public input, including a citizen committee consisting of representatives of the Sand Lake, Spenard and Turnagain community councils. This was described as a compromise to protect and buffer the neighborhood from anticipated *future growth* at the airport. In essence, this effort has turned out to be a precursor to the West Anchorage District Plan called for in Anchorage 2020. We all know how extensively ANC has grown since 1981 and negative impacts associated with that growth have also substantially increased.
 2. In the currently adopted Airport Master Plan Land Use Map (November 2002), a section of Turnagain Bog is designated “Buffer.” This section starts generally north of the snow dump and goes all the way up to W. Northern Lights. It would make no sense for the Airport to designate a portion of North Turnagain Bog as buffer between development to the west and potential future GA development to the east. Clearly, the entire area should be designated “Other Areas that Function as Parks or Natural Resource” to buffer the Turnagain neighborhood from continued development to the west in North Airpark — especially since

the airport has contractually obligated itself to managing these lands as buffer, as per the ordinance referred to above.

3. As part of the process involving the airport's 10-year wetland permit, the Corps and ANC agreed to prohibit General Aviation (GA) development in East Turnagain Bog. This was to help mitigate increasing airport development and its associated negative impacts on the remaining high-value wetlands and the adjacent neighborhood. Whether this development occurs under a 10-year wetland permit or under individual permits is irrelevant when assessing impacts. Continued development occurring in both in Postmark and Turnagain Bogs will still result in cumulative, negative impacts — impacts that the Airport and Corps both acknowledged — and the conclusion was that prohibiting development in East Turnagain Bog was a necessary mitigation requirement.

4. Finally, the airport rejected GA development east of the gravel strip in East Turnagain Bog when evaluating the various alternatives for developing additional GA parking at the Lake Hood Complex. The airport's "Echo Parking Project West/North of Lake Hood Airstrip Draft Environmental Assessment, December 2005" (EA) states on page 11, "This site ["East of the gravel Strip"]...requires investment in additional infrastructure. New taxiway and road connections are required and these would be constructed partially in wetlands. Utilities would be needed, also through wetlands.

"There are impacts to the neighborhood adjacent to the area such as increased noise and loss of a visual buffer to the Strip...The noise impacts from aircraft operations on the parking area and taxiway would range from 39 to 82 dBA. This alternative involves a negative affect to the neighborhood and will likely result in an increase in noise complaints. The alternative is not acceptable to the neighborhood, it costs more than the preferred alternative [expanding the Echo parking lot] and does not eliminate wetland impacts."

Land Managed by AWWU and Land Owned By the State:

- In 1997, the HLB Work Plan stated, "Portions of the existing Coastal Trail currently cross areas owned by Anchorage Water and Wastewater Utility (AWWU) and the Alaska Department of Transportation and Public Facilities (DOT-PF). It would be in the best interest of the Municipality and the citizens of Anchorage to acquire these lands so that the entire trail would reside on Municipal land, managed by the Department of Cultural and Recreational Services." The 1986 Municipal Entitlement Agreement identified specific parcels of land to be transferred to the Municipality from the State of Alaska. On January 2, 1997, HLB formally requested DOT-PF and FAA to begin the conveyance process for two parcels included in the November 25, 1986, agreement, on which two portions of the Coastal Trail are located. These parcels are:
 - Point Woronzof (#68) ADL 223363
 - Airport North (#21) ADL 201573

To the best of our knowledge, these parcels have yet to be conveyed to the Municipality. As HLB clearly stated, these areas are being used for recreational/park purposes because of the Coastal Trail and should become parkland.

Q. What is the status of the Municipality’s request to the State regarding the two cited parcels? Does the city intend to pursue the transfer of these two parcels?

RECOMMENDATION: The city should pursue this transfer and, once retained by the Municipality, they should become designated “Parks and Natural Resource” on the Land Use Map.

Q. What is the status of acquiring the land east of the AWWU Sewage Treatment Plant where the Coastal Trail runs through and transferring it to the Parks Dept.? Does the city intend to pursue the transfer of this parcel?

Q. Why is the land east of the AWWU Sewage Treatment Plant identified as a “Special Study Area?”

RECOMMENDATION: This parcel is small and what little land there is east of the actual trail serves as a critical buffer between the trail and high-impact airport operations. As HLB has pointed out, this area should be managed by the Parks Dept. As such, it should be identified on the Land Use Map as “Other Areas that Function as Park or Natural Resource” — and should be changed to “Parks and Natural Resource” once the transfer from AWWU to the Parks Dept. is completed. The “Special Study Area” designation should be removed, as a very specific use has been identified by the Municipality.

Little Campbell Lake Area:

- The 1986 Municipal Entitlement Agreement also included land in the Little Campbell Lake area to be transferred to the Municipality. To the best of our knowledge, this parcel has yet to be conveyed to the city. This area is clearly used for recreational/park purposes.

Q. What is the status of this parcel transfer to the Municipality? Does the city intend to pursue this transfer?

RECOMMENDATION: The city should pursue this transfer and, once retained by the Municipality, it should become designated “Parks and Natural Resource” on the Land Use Map.

Municipally-Owned Land West of the Airport:

- The western portions of Municipally-owned land west of the airport are designated “Parks and Natural Resource” on the Land Use Map.

Q. Has this land formally been transferred from HLB to the Parks Dept. and is this land formally dedicated parkland? If so, when did this occur?

RECOMMENDATION: Depending on the answer to the above question, if this transfer has not occurred, these lands should be designated “Other Areas that Function as Parks or Natural Resource” until such time as the transfer and park dedication occurs.

- When the city leased the above-discussed parcels west of the airport from the Department of Natural Resources (DNR), the restricted use was “public” and “recreation.” The Planning Dept. has told us that the Municipality has since acquired these lands and they are now owned by the city.

Q. Has the Municipality determined if the restricted uses of “public” and “recreation” under the DNR lease agreement still apply to this land since the city has taken ownership?

RECOMMENDATION: If the city determines that these restricted uses still apply, the entire parcels should be designated on the Land Use Map (excluding lands currently leased to the Clitheroe Center and the Composting Facility) as “Other Areas that Function as Parks or Natural Resource” — or, if the western portion is already dedicated parkland, that portion should be designated “Parks and Natural Resource.” All of the land should then be redesignated “Parks and Natural Resource” once this land is transferred to the Parks Dept. and becomes dedicated parkland.

- The Planning Department indicated that they have not communicated directly with the Federal Aviation Administration (FAA) with regard to its regulations regarding land ownership and allowable land uses in the Runway Protection Zones (RPZ) of the airport’s East/West and North/South runways.

RECOMMENDATION: Unless the Municipality receives a directive straight from FAA that states the city should transfer eastern portions of Municipally-owned land west of the airport to ANC because it is in the RPZ, the Land Use Map should identify the entire parcels in this area (excluding lands currently leased to the Clitheroe Center and the Composting Facility) as “Other Areas that Function as Park or Natural Resource,” (rather than parts identified as “Special Study Areas”) because the Coastal Trail runs through these parcels and the areas are viewed as parkland/buffer from airport impacts by the public. After the appropriate public process, this land should be transferred to the Parks Dept. and be redesignated “Park and Natural Resource” on the Land Use Map.

Q. What are FAA requirements with regard to land ownership and allowable land uses in PRZ?

RECOMMENDATION: The city should ask for clarification directly from FAA with regard to allowable land uses and ownership within RPZ. TCC has been told that passive recreational facilities, including the Coastal Trail, are allowable land uses in RPZ and that FAA does not require the airport to own the land that falls within a RPZ, as long as the RPZ is a plat restriction on the land title (which it is in the case of the land west of the east/west runways).

- A cross-country ski trail system falls within Kincaid Park, then travels north into Airport-owned land, and then farther north into Municipally-owned land west of the east/west runways. This obvious use of land for recreational purposes should be designated as such on the Land Use Map.

RECOMMENDATION: This just provides more justification that Municipally-owned land west of the Airport should be designated either “Parks and Natural Resource,” if this land has been dedicated as parkland, or “Other Areas that Function as Parks or Natural Resource,” because of the recreational trail system within this land. The Special Study Area designation should be removed, as a specific use for this land has been identified by recreational skiers, and hikers in the summer.

Spenard Beach Park & Lions Club Picnic Area:

- At the time the TCC Board submitted comments on the Land Use Plan last September, the airport had not released its General Aviation Master Plan draft Preferred Alternative map/project list. However, since that time, the draft of this 20-year plan does acknowledge the long-standing, popular public use of both the Spenard Beach Park and Lions Club Picnic areas. As such, the GA Master Plan has recommended that these areas continue to be used for recreational use.

RECOMMENDATION: While this GA Master Plan has not received final approval, TCC’s involvement in that planning process has given us assurance that the airport will stand by its commitment to designate these two parks as recreational areas that will remain open to the public for the long-term. Therefore, the Municipality should feel confident in designating these two areas as “Other Areas that Function as Parks or Natural Resource” in the Land Use Map.

B. Comments Submitted Under the Title 21 Comment Period, But Now Also Submitted Under the Land Use Map Public Process:

W. Northern Lights:

- There are errors on the recommended changes map and all the maps in relation to W. Northern Lights Blvd from Forest Park Drive to Turnagain Parkway / Wisconsin. The land on the north side of the road from Forest Park Drive to just before Turnagain Parkway is parkland owned by the Municipality (except for the railroad right of way). This needs to be checked. The zoning that is indicated on the maps is the zoning in place prior to the widening of W. Northern Lights Blvd. in this section. The land on the south side of W. Northern Lights Blvd. from Fish Creek to the southeast corner of Turnagain Street and W. Northern Lights Blvd. is Municipal parkland. Again the zoning shown on the maps is the zoning prior to the widening of W. Northern Lights Blvd. The southwest corner of this intersection would be the best location for any neighborhood business. This used to be a service station and the lot immediately to the west is used as R-O at the current time and has been for the past 35 years. The southeast corner of Wisconsin Street and W. Northern Lights is municipal parkland and has utility structures located on it. It is small and not a good site for any kind of business.

RECOMMENDATION: We ask that the Planning Dept. reexamine these parcels and make changes on the Land Use Map where appropriate.

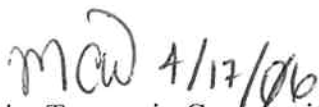
C. Summary:

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 and using the West Anchorage District Plan planning process to facilitate long-term protection of these important areas, our community will be assured that high-value areas are preserved for future generations.

Thank you, again, for the opportunity to submit comments and discuss land use issues that are critical to the long-term well being of West Anchorage and to the greater community. As we have all found out through this process, land use designations can be complicated and prior land use restrictions and commitments can get lost, if the public and the Municipality don't work together to ensure an accurate and appropriate Land Use Map is developed that will serve our community well for years to come.

As always, please feel free to contact the Turnagain Community Council with any questions, clarifications or documentation we reference in this comment letter.

Sincerely,

Handwritten signature of Mark Wiggin in black ink, including the date 4/17/06.

Mark Wiggin, Turnagain Community Council President
Cathy L. Gleason, Vice President

Breck Tostevin, Interim Secretary/Treasurer

Bob Durst, Board Member

Deborah O'Leary

Pat Redmond, Board Member