DRAFT LETTER for discussion at RCCC on April 8, 2021

Subject: Platting Case S12607 - Palaterra Subdivision

Rabbit Creek Community Council (RCCC) has reviewed the plat application for Palaterra Subdivision: S12607. The applicant presented his proposal at a community meeting as well as our March 10 Council meeting.

We heard various concerns from the community:, inadequate data on soils and hydrology; drainage, steep slopes, the need for trail connectivity, and an intersection that requires a variance. The Council is especially concerned about the steep bluff along the south side of this subdivision, with an elevation change exceeding 100 vertical feet and gradients over 50%. These slopes are currently forested. They slopes are highly susceptible to erosion and possible slope failure if the natural vegetation is removed.

- A. The Council requests current data and engineering analysis of the groundwater and the slope stability along the southern side of the subdivision.
 - a. The application lacks engineering studies of the subsurface materials and properties. Borehole logs compiled by S4 Group and documented in their Municipality of Anchorage (MOA) Application for Preliminary Plat suggest the subsurface conditions consist of silty sand to silty sand with gravel.
 - b. There is no current groundwater data within the area of the proposed development. Well logs from the mid 1970s are used to speculate on water tables, but development and climate change may have rendered those logs inaccurate.
- B. Drainage control through vegetation. Given the south sloping contours of the parcel, leading to very steep bluffs, the plat should require natural vegetation retention zones on all of the lots to minimize changes in the rate and volume of runoff. Green infrastructure is cited as a preferred method of drainage control in the Hillside District Plan. *Cite Title 21 and HDP*.
- C. Steep slope conditions of approval. Three lots (numbered 5, 6, and 7) are primarily located on very steep slopes.. These lots are particularly susceptible to potential erosion, slope instability, and/or drainage impacts on down-gradient properties. Our Council area has witnessed spectacular "blowouts" of groundwater during subdivision development, including at Prominence Pointe and in Potter Creek. Title 21.07.020-(Natural Resource Protection, Section C on steep slope development) requires non-disturbance zones for these slopes: yet,this can be hard to enforce on private property.. Violations can cause irreversible damage. RCCC suggests two possible solutions to ensure stability of these slopes:
 - Re-draw the lot boundaries for lots 5, 6, and 7 to end at the crest of the slope and create a green belt to encompass the slope. This could be a common open space zone.

- Designate the steeply-sloped area within lots 4, 5, 6, and 7 as natural undisturbed zones and depict these areas on the plat and through plat notes. Require field marking of this zone prior to, and through, construction.
- D. Align a sustainable trail connection from the internal subdivision road to Our Own Lane, in consultation with the non-motorized transportation coordinator and a professional trail designer. This is an important neighborhood connection because the Rabbit Creek bluff creates a "superblock" with few north-south connections. The Hillside District Plan shows a primary trail corridor in the Rabbit Creek Vallley bottom (Map 4.6 of the HDP), for which better neighborhood connection is needed. A sustainable trail connection was built down the bluff approximately ³/₄ miles south, at Griffin Street, within the Rabbit Creek Greenbelt Park, so this can be done. The connection to Rabbit Creek Greenbelt will enhance property values in Palaterra subdivision. The trail may need to traverse the bluff at a gradual angle and be narrow, similar to trails within the Greenbelt.

E. Request for variance to 21.08.030.F.5 for intersection centerline separation: The Council has no objection to the variance to allow the proposed entry road 60 feet west of Saunders Road and 315 feet west of Hillside Drive. The applicant has made a credible case that this is the safest location, compared to the steep grade and poor sight lines at the original intended entry road at Buena Vista Drive.