

TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils
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Sent via email

May 27, 2016

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

RE: ANCHORAGE 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 Plan 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 Rezonings

- **TCC SUPPORTS the Draft LUPM PLAN RE: Targeted Area Rezonings 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