

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC) A Forum for Respectful Communication & Community Relations



1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503

Platting Board and Planning Staff
Municipality of Anchorage
PO Box 195560
Anchorage, Ak 99519-6650

March 22, 2023

RE: Mills Plat, S-12713

Dear Platting Board and Municipality of Anchorage Planning Staff –

The Rabbit Creek Community Council (RCCC) received a presentation on an upcoming application to subdivide one 80-acre parcel into three tracts, from the S4 Group at the Council's December 8, 2022 meeting. Council members discussed the subsequent Mills plat, S-12713, at our February 9, 2023, meeting and voted to submit to the Municipality of Anchorage (Muni) the conditions detailed below for the proposed plat. The vote was 14 yeas, 0 nays, 2 abstentions.

Members of our Land Use & Transportation Committee appreciated the recent opportunity to meet with Muni Planner Dave Whitfield to discuss some of our recommendations, particularly relative to existing Muni plans and policy guidelines. In particular, we value Dave's patience and diplomacy and recognize his diligence in implementing Anchorage's long-range planning commitments. Understanding the intense workload that faces Planning and other Muni staff, we offer our comments in an effort to be helpful, by providing as much local knowledge and support as possible.

The subdivision of the Mills parcel provides a long-awaited opportunity to complete the Rabbit Creek Greenbelt Trail. This trail corridor has been depicted in all the adopted plans of the past 25 years: Rabbit Creek Greenbelt Plan (1987); Anchorage Area Wide Trails Plan (1997); Anchorage Bowl Park, Natural Resource and Recreation Facility Plan (2006); and the Hillside District Plan (HDP, 2010). In addition to neighborhood connectivity, the Rabbit Creek Greenbelt Trail will eventually provide a much-needed non-motorized corridor into Chugach State Park.

The plat for the Mills parcel is the last piece of a jigsaw puzzle for the Rabbit Creek Trail. Easements or public lands for the Rabbit Creek Trail already exist both upstream and downstream of the Mills parcel. In addition to the creek trail, the Mills plat is the missing piece that has the potential to provide—or to block—pedestrian connectivity to adjoining subdivisions and to existing municipal parks. Public easements dedicated in this plat can connect four municipal parks: Rabbit Creek Greenbelt (Old Rabbit Creek Park), Half Park, Section 36 Park, and Echo Canyon Park (see map at end of this letter).

RCCC requests Planning Staff and the Platting Board apply the following conditions of approval, in order to implement the required pedestrian connections shown in adopted plans and those required in Title 21.07.060 and Title 21.08.040.

1. Dedication of Rabbit Creek Trail. Dedicate a creek side public trail corridor east to west across this tract, as shown on all adopted municipal plans over the past 40 years. This will secure a missing segment of the Rabbit Creek Greenbelt Trail, a primary trail in the Hillside District Plan. Ensure that the public trail corridor will allow connection from Half Park to the existing trail easement in Canyon View Estates. The trail will need to cross the creek at least once to ensure this connectivity.

A. Alignment. The north side of the creek is shown as the trail corridor in several of the adopted plans:

- (1) The north side has more suitable terrain than the south side, where steep bluffs abut parts of the creek channel.
- (2) The north side allows more neighborhood access points.
- (3) Title 21.08.040.D.1.a requires any substitute routing for a trail in an adopted plan to be of "comparable gradient, directness, and utility, and reflect the general locations and patterns of existing or planned public access routes." A detour away from the creek onto the 140th Avenue alignment is not a substitute routing for the Rabbit Creek Trail for several reasons: out-of-direction travel; future use of the 140th alignment as a driveway or road, and spur to reach 140th Avenue alignment requires a steep climb, inconsistent with the gentle gradients of the creek trail.
- (4) Regarding possible concerns about bear concentrations along the creek, this portion of Rabbit Creek is not anadromous.

B. Width. The trail easement upstream of the Mills plat (in Canyon View Estates) is 100 feet wide; downstream there is municipal parkland which allows a well-buffered trail in a natural setting. Therefore, a trail easement in the range of 40 to 50 feet wide would be logical to provide a consistent trail setting, to allow buffering of the riparian edge, and to ensure that the trail can skirt wetlands and steep terrain. This width would also allow future re-routing of the trail occasioned by movement of the creek channel. We assume that the trail, once developed, will be similar to other segments of the Creek trail: a narrow unpaved footpath within a cleared swath about 8- to 10-foot wide, depending on the type of vegetation.

C. Bridge sites. The practicality of bridge placement should be verified in the field by a professional trail designer and the easement location adjusted to ensure a practical crossing site, before plat recording.

- (1) Bridge site near Half Park (see map). A suitable creek crossing site the north-south trail should be dedicated on the Mills plat. Half Park cannot provide a creek crossing as it does not extend south across the creek channel. Therefore, a suitable crossing point must be dedicated on Mills plat.
- (2) Bridge site near Canyon View Estates. Ensure that the pedestrian easement crosses to the south side of the creek near the eastern border of the Mills parcel, so that the trail will connect to the existing 100-foot-wide pedestrian easement in Canyon View Estates.

D. Professional design. Require consultation with a professional trail designer to determine that the final trail alignment can be sustainably developed, and that practical locations are chosen for any creek crossings.

E. Type of dedication. Title 21.08.040.D advises, for parcels at or near the boundary of Chugach State Park, that

- (3) For pedestrian access, a right-of-way dedication is the preferred method of providing access, but the platting authority may instead approve a public use easement dedication or an access tract where appropriate.
- (4) A right-of-way would simplify future development and management of this corridor by giving the Municipality a clear role. Most existing segments of the Rabbit Creek Trail are located on public land or in a public ROW.
- (5) If the easement is limited to 40 feet wide, consider dedicating it as a floating easement located within 60 feet of the streambank, with the final easement to be surveyed at time of construction. This would give the trail designers and Municipal staff the opportunity to see the field conditions after the snow melts, in order to identify an easement alignment that optimizes sustainable trail design, stream protection, public access, and privacy for future property owners.

2. Neighborhood north-south connection to Section 36 regional park. Dedicate a north-south non-motorized easement connecting the Lakonia Drive neighborhood and Half Park to Section 36 Park. This easement should include suitable terrain for bridge placement on the north and south sides of the creek. This easement is in accordance with Title 21.07 and 21.08 and the HDP as cited below. This path will connect neighborhoods to Half Park and Section 36 Park and, via 140th Avenue ROW westward, will connect to a trailhead in the Rabbit Creek Greenbelt (Old Rabbit Creek Park). There are no vehicular trailheads for any of these parks: walking access is the cheapest, healthiest, most universal form of access and creates least impacts to surrounding neighborhoods.

21.07.060.D.3.c.i: re connectivity with community and regional parks.

“Vehicular and/or pedestrian connections to adjacent municipal parks or municipal lands designated as parks shall be required unless waived by the director of the parks and recreation department.”

21.08.040.D.1.a: *“Access to Community Use Areas and Natural Resource Use Area . . . The platting authority shall require the dedication of public pedestrian access for a trail designated on adopted municipal plans, and for connectivity with a trail or access point to a large Community Use Area or Natural Resource Use Area (as defined in the Anchorage Bowl Park, Natural Resource, and Recreation Facility Plan).”*

Alignment: It appears that a ROW exists on the east edge of Half Park: Muni staff should verify this. The north-south easement on the western boundary of the Mills parcel would need to begin just north of the creek and extend south to Section 36 Park. The easement on the Mills parcel should provide a suitable bridge location.

Width: Given the steep terrain south of the creek, this pedestrian connection will need to be aligned so that it traverses the slope, either by angling across the slope within the southwest

corner of the tract, or by switchbacks if the easement follows the western property line. A trail that makes a single traverse across the southwest corner could be built within a 25- or 30-foot-wide easement, assuming a narrow unpaved rustic trail. The switchback option would require a minimum 50-foot-wide easement or ROW to allow construction of sustainable switchbacks, according to a professional trail designer we consulted. A narrower easement would necessitate trail structures such as box steps which are expensive to build and maintain and are difficult for some users.

“HDP Map 4.: notes that the map does not show all neighborhood access points to trail systems, greenbelts or Chugach State Park. The map refers to the HDP text, which has Goal 10: Design the trail system so that it links neighborhoods and connects to schools, parks, area destinations, access points to Chugach State Park and the citywide trails system.

HDP Page 4-20: “The trail system recognizes the desire for both roadside and natural setting trails.”

HDP Page 4-23: “it is clear that there are local trails that may be needed within or between adjoining neighborhoods: these are not shown on the trails map . . . but may be identified at the time of development.”

3. Dedicate Bonnielane Road as a public ROW to ensure north-south access from Upper Canyon Road neighborhoods to the creek side trail and to Section 36 Park, in accordance with 21.08.040.D.1.a, “Access to Community Use Areas and Natural Resource Use Area” as quoted above. The Council has heard conflicting information on whether parts of Bonnielaine include a Section Line Easement.

4. Signage at the time of platting. Require installation of permanent signage identifying public trail easements at the proposed termini of the easements, so that current and future property owners are aware of public access. This is especially important where the easement is near residential subdivisions, such as Rabbit Hill Drive, and Lakonia Drive. RCCC had a recent example of the importance of trail easement signage in River Hills Estates: a construction crew was not aware of the trail easement, and the sign helped a neighbor to convince them on the spot.

If the MOA requires surveying as a plat condition for any of the ROW or trail easements, require durable field markings such as through blazes or stakes. This will ensure that trail users stay on the public easement.

5. No further development of trails at this time. There does not seem to be a rational nexus for the plat applicant to brush or construct the trails or construct bridges, given that the Mills plat has only three lots and does not require any other infrastructure improvements. Deferred trail development should not be taken as precedent for most future subdivisions, in which road and trail infrastructure development is usually under plat conditions of approval.

Thank you for your attention to our recommendations. We would be happy to meet and discuss these if that would be helpful.

Sincerely,



Ann Rappoport, Co-chair



John Riley, Co-chair

cc: S4 Group
Emma Giboney, Heritage Land Bank



This map (red lines) depicts the approximate location of recommended trail connections.
TH = Existing Trailheads