

Comments on the Hillside District Plan, Public Hearing Draft of May, 2009  
Submitted by HALO, Inc, June 4, 2009

HDP is a citizen-driven land use plan whose purpose is to provide detailed conditions to implement 2020's goals/policies for the Hillside & shall be an Overlay, independent of all other codes/plans:

1. accommodate growth quotas (2020:59)
2. maintain low density (2020:60): (accomplish through appropriate development criteria/standards)
3. retain vegetation for sustainable development (2020:61) (in development standards/drainage)
4. address slope development criteria (2020:61)
5. limited density & sewer revisions when practical & cost effective (2020:47,61)
6. address land use, including open space, public facilities (2020:98): (in parks chapter & via HLB)
7. determine 'potential' commercial site (2020:50)
8. address drainage issues (2020:98)
9. address transportation issues, including public safety access (2020:47)
10. maintain onsite utilities (2020:66): (accomplish through scientific, sub-Arctic tested criteria)
11. wildfire hazard reduction (2020:61): (accomplished in part via transportation—safety access)
  12. urban/rural boundary determination (2020:56) (satisfied in HDP 2-15 sidebar)
  13. provide direction to Heritage Land Bank for specific land management decisions (2020:97)

#### HDP Introduction Chapter 1

The residential growth quotas set by 2020 can be met with current zoning. Reference this throughout the HDP.

Map 1.2 shows many zones in different colors. All the park lands are not shown or either they are not quite correct. Amend.

The LUPM 2.2 does not have the quantity of colors to sort out the various lower density areas like Map 1.2 does. This will cause confusion. Show the lower density zones for Map 2.2 more clearly with more colors.

The HDP should include the 2020 requirement for providing direction to HLB for their land management decisions in the HDP area. Include this requirement.

#### HDP Land, Chapter 2

Policy 2-C, pgs 2-5,-24,-25,-26, 6-33:

- Disallow 15% density increase bonus for Conservation Subdivisions--
  - . there will be less infrastructure to build and therefore a bonus of less cost to developer
  - . consideration should be given to reduce traffic impacts low by keeping to current zoning
  - . building with clustered septic systems is another bonus as it is less costly than sewers
  - . certain Hillside lands cannot be developed even to the current density let alone an increase

Title 21, sidebars on pg 1-22 & 2-22:

- . Title 21 is code not law; this reference should be removed.
- . It should be clarified that Title 21 does not supercede the overlying policies and concepts of the HDP
- . in events of conflict, the HDP should prevail (2020: ).
- . the reference to buried volkswagons, presumably for a drainfield, should be removed it is outdated, nonproductive and prejudicial

Language mandating that an issue be revisited; pg 2-6 sidebar and pg 2-20, Para 4 (and many other places in the HDP) should be removed:

- . the BLM lots are not recommended for higher density
- . the public has stated very emphatically that an expansion of the Potter Marsh 'commercial' area should not be allowed
- . all parts of the HDP will be revisited together in the future

Map 2.7 Hillside District Regions should be amended to correspond to the text. Show the Lower Hillside region as only that area that actually is higher density and which actually has public utilities. Adjust the southern boundary to DeArmoun Rd.

Appendix B, pg 5, Goal 1-F, Commercial:

- . the resident public does not want an expansion of the commercial area here
- . public sewer tie-in should be presented as an option not a mandated action
- otherwise only large businesses will be able to operate here.

Pg 2-17 to 21: Hillside commercial section should be modified to reflect the public's repeated comments over the past 1.5 yrs.:

- . conditions for businesses are generally good to comply with a 'residential' appearance
  - . remove any mention of the Bear Valley Country Store
  - . do not require sewer hook up as it would keep small businesses out
  - . do not list specific types of businesses that might be operate here
  - . list businesses the public does not want to see operate here-gas, auto, liquor, 7-11s
  - . keep the area to those currently zoned commercial only
  - . do not call this a commercial area; call it simply Potter Marsh District
  - . this area should be covered with a separate Overlay
  - . the Old Seward Hwy in this area must be rebuilt to a 'country lane' status with separated trails in order for the commercial area to be viable
  - . a theme to compliment Potter Marsh should be part of the conditions 'Natural History'

Increased Density in the Furrow Creek Area should not be promoted as an HDP policy:

- . it is not needed to fulfill the required residential quotas set by 2020
- . anecdotal information on septic system problems is not definitively documented
- . the septic soils issue has been purposely exploited without proof
- . there have been no septic issues in the area for a number of years
- . new high technology septic systems work very well in the area
- . increased traffic will promote congestion which the area's road system cannot support
  - . increased density will create drainage issues which the area cannot handle
  - . drainage issues will likely contaminate Furrow Creek
  - . increased density will definitely affect the abundant wildlife in the area

- . there is no demand for small lots in this area

#### **HDP Transportation, Chapter 4**

This chapter has not included the DOT roads and the problems they bring to the overall problems on the Hillside. They should have been included so their upgrades could be prioritized for future funding requests.

Title 21 and the Design Criteria Manual should not dictate HDP standards. These must be developed through a (local) citizens' committee to make sure any standard fulfills the HDP goals.

The Long Range Transportation Plan calls for a collector road through what is now known as Legacy Pointe. Its (re)design (as a collector) should be done in order to provide access/egress for a large portion of the Hillside and as an expeditious route off the Hillside in case of emergencies.

pgs 4-2+, do not impose MOA road standards for the HDP area (paving, C/G).

- . curb and gutter will adversely impact drainage problems
- . DOT roads do not have curb/gutter
- . leave road standards flexible
- . many roads should not be paved as they are very steep with poor bases
- . improving some Hillside roads in preparation for paving would severely impact drainage problems that lie just beneath the surface

Map 4.1, pg 4-9 incorrectly shows 104th street connecting between Elmore and Our road.

- . this has been a horse, bike and pedestrian trail for 60 years
- . the neighborhood is essentially built out and will see no increased traffic
- . the topography is very steep on the Our road end and would be a winter hazard
- . road connectivity is not important to nor wanted by the neighborhood
- . the connection would impair the quiet, rural lifestyle of the area
- . 104th should not be extended between Our road and Elmore

#### **Trails, Parks, Open Space (Chapters 2 and 4):**

The HDP lacks a chapter devoted to trails/open space/parks and is deficient in that regard.

Map 4.4 Trails: it is highly questionable whether this map can or should become the new SE Anchorage Trails Plan.

- . the scale of the map is difficult to read and it lacks accompanying text
- . the map does not appear to be complete and lacks data from a number of sources
- . it is not clear that residents prefer separated, narrow, off road trails, not always along roads, although both are needed for different purposes
- . it is not possible to predict future plat designs
- . requesting trail connections on this map will never completely remove the need to continue using the 2020 policy for acquiring/requiring connections in all plats

MOA's trail standards should be left flexible for the HDP area as narrower and more primitive trails are likely to be in the HDP area; also steep areas (section lines too) need different design methods.

Reconsider the statement that utility easements can/should be used for trails

Replace the Moen Trail in its original position

Future parks and trails plans should not be adopted into the HDP unless they have been developed and approved by a local citizens' committee to ensure they comply with HDP goals

#### **HDP Water and Wastewater, Chapter 5**

pgs 5-1 & -3, Well Water Protection Program is improperly identified as Water Well Protection Program. Correct this.

pgs 5-1, 5-10 (Policy 13-A), -12, and pgs 5 & 8 of Appendix B: Maximum perimeter of public sewerage:

- . this boundary should encompass only those subdivisions currently served.
- . remove recommendation against allowing neighborhood onsite systems within AWWU's certificated area; these systems must be allowed in these areas otherwise the density will be increased due to the need to request higher density rezoning to cover costs
- . further expansion of the perimeter will promote increased density which does not support 2020's goal for lower density in this area.
- . increased density in these areas creates greater traffic impacts where there are few options to remedy congestion
- . extension of sewer creates great financial impact and is uneconomical in most hillside areas
- . expansion of public sewers is not supported by many points in 2020 nor HDP goals.
- . Hillside has steep slopes and soils where sewers and their accompanying higher density could create unsafe situations and adverse drainage impacts (as already seen at Prominence Pointe and Goldenview Park subdivisions).

Onsite Services Section, pgs 5-10 & 11(Policies 13-F,G,H,I,J,K & L) and Appendix B, pg 8 (Goal 13),

- . should be transferred back under the Dept of Health and Human Services in order to better fulfill the programs the HDP recommends.
- . HDP references many times that 'public health' is a reason for creating the HDP and codes and policies. This justifies putting Onsite Services back under DHHS.
- . the above referenced sections promote an aggressive program of health and environment protection.
- . these programs are to be administered by the Onsite Services Section
- . with the growth projected for the Hillside, the increments of these programs are warranted and needed
- . currently the Onsite Services Section is under Development Services which is primarily a permitting entity.
- . the Development Services is a revenue funded department under Public Works.
- . this organization is not involved with public health issues.
- . the onsite program promoted by the HDP cannot be paid for by permit revenues alone.
- . Onsite services originated under the Dept of Health & Human Services which is more in tune with health concerns.
- . DHHS has a different funding mechanism.

- . the HDP suggests a fee basis for supporting these programs on the hillside-- grants are also available.
- . the DHHS is better suited to administer and fund these programs.

Map 5.6, pg 5-20 should be deleted in it's entirety:

- . the map title is very prejudicial and misleading
- . the legend states some of the data are 'antidotal,' not scientific
- . the map scale is too small to delineate specifics
- . the legend does not indicate any soils which are good for septic
- . the map does not recognize the thousands of good performing septic systems
- . it implies that the whole hillside has soils with limited capacity for septic
- . it serves no useful purpose for implementation of the HDP
- . it is biased towards public sewers and has no place in a section that should be based on hard evidence and science

Policy 13-L Recommended Code Changes comments:

pg 5-26, 15.65.050 Septic tanks, para 1 - the minimum watertight riser should be 18" diameter instead of 24"

- . this would allow the use of currently available high-quality polyethylene septic tanks
- . the reduction from 24" would not impair the functionality and would be cheaper

pg 5-26, 15.65.050, para 2 - do not change tanks from two compartments to one

- . this would result in reduced effectiveness for separating solids from fluids
- . the addition of an outlet filter would then require another manhole riser
- . the filter would require increased maintenance and periodic replacement
- . this would be difficult in the winter and more expensive
- . the current system works well in our climate, no need to change

pg 5-27, 15.65.060.J.1, pressure dosing of all drainfields--this recommendation should be deleted in it's entirety.

- . there would be zero benefit in most instances
- . this would not increase the life expectancy of the system
- . this would add \$4000 to \$5000 to the system cost
- . there are situations when this design is warranted/needed
- . the decision to use this alternative should be an engineering one base upon the specific soil conditions of the site

pg 5-27, para 6 - delete this paragraph

- . this was not based on northern climate design standards
- . the local septic system engineers do not agree with the conclusions
- . the increased cost estimate is understated

pg 5-18, Policy 13-E, para 4 - Neighborhood System service area overlap with AWWU service areas can work and should be allowed.

- . understandably, AWWU is concerned about a construed liability issue if the neighborhood system were to fail
- . properly worded service area certifications should rectify that problem
- . neighborhood systems allow economical development in difficult areas
- . these systems support the HDP's and 2020's goals for low density development

#### HDP Implementation, Chapter 6

pg 6-8, Policy 14-A, HRD TSA funding and management entity:

- . HRD TSA should not be established until the area residents have approved the funding
- . the entity must be guided and controlled by a board of local residents..
- . the driving concept should be "local control of local dollars for local priorities"

pg 6-16, Policy 14-C, Chugach State Park Access funding should be a Municipality wide endeavor

- . the park is a resource used and enjoyed by all citizens of the Muni and state plus visitors
- . revenue for funding should not be derived from local property taxes

pg 6-17, Policy 14-D, Well Water Protection Program funding should initially come from the hillside unless other areas elect to participate

- . the HDP has proposed this program for the hillside to maintain groundwater quality
- . the HDP does not have the authority to encumber the rest of the MOA areas
- . other areas utilizing onsite utilities may want to participate
- . those areas would have to do so by local referendum
- . delete the word "entire" in the last sentence of background paragraph

pg 6-22, Policy Summary

- . Policy 14-I should read: "Establish a new.....for new subdivisions....."  
standards should not be retroactive
- . Policy 14-J should read: "Establish a new .....for new construction on....."  
standards should not be retroactive

- . appropriate changes should be made in the policy discussions on pgs 6-28 and 6-31

Policy 14-I, pg 6-29, bullet 2 (and elsewhere in HDP)- Protection of watercourses - Setbacks should be maintained at the current 65 feet

- . this stream setback was established by AO 84-23 in 1984 and has functioned well
- . don't go backwards in stream protection now

pg 6-38, Policy 14-N Lighting Standards, bullet number 2:

- . change/add wording to "Street lighting, particularly at "collector" intersections, "may" be necessary.....".

#### HDP Appendices

pg 2, Appendix A:, para 1 - Supporting Documents - needs some wording changes and additions;

- . Sentence no. 1: The following documents were prepared to provide supporting material for the HDP, but are not incorporated as a part of the HDP.
- . there are disagreements on many issues covered in the "white papers" within the

CAC.

- . generally the HDP has not utilized areas of disagreement with the exception of some issues mentioned in these comments

pgs 4 to 10, Appendix B - Summary of Implementation Actions - issues have been addressed in the comments above.

pgs 11 to 17, Appendix C – LUPM

- . there is confusion as to the role of the LUPM in relation to the HDP, clarify that the HDP directs the LUPM.
- . the LUPM indicates there shall be a neighborhood commercial area because it is on another adopted plan. This is inaccurate. See above comments and remove statement.
- . the LUPM lists uses for various 'designations' that appear to be allowed by-right. Many of these uses are not appropriate for the HDP area such as 'sports facilities,' 'golf courses.'
- . LUPM lists the PLI zoning as implementing various uses many which are not appropriate in the HDP area. These issues must be resolved.