



Additional Public Comments on Framework Alternatives - Received as of May 16, 2008

Since 1960, I have lived at 15120 Elmore Road which is a 2.5 acre lot at the northwest corner of Rabbit Creek Rd. and Elmore Rd. Prior to Statehood, this entire section was set aside by the BLM for 2.5 acre homesites. Most of the recipients of these lots built single family houses. When zoning came to the Hillside, this section was zoned R-6. A few of the lots were subdivided into two 1.25 acre lots. In the intervening years, almost all the lots have been built on with single family houses, each served by on-site septic and individual wells, which, with few exceptions, have worked well. This is a mature, fully developed residential section. It is totally inappropriate and unjustified to make it an R-1 urban residential area served by city sewer and water. We do not need them. We are getting quite nicely with on-site sewer and septic. There are no large tracts that would lend themselves to R-1 residential development and there are very few lots that have not been built on.

If the urban, R-1 area is to be extended southward, it should stop at the north side of DeArmoun Road. Much of the land to the north of DeArmoun is now R-1 and is served by Municipal sewer and water. It has developed very differently from the land to the south of DeArmoun. It is already an area of dense subdivision development in contrast to the large lot area to the south which has been built on one individual house at a time. The area to the south is a different, distinct community and, in addition, is geographically separated by Rabbit Creek and the Rabbit Creek Canyon. Keep it that way. – Ted Pease.

I am traveling and not able to make the HDP meetings. I have a fair idea of the presentation, at least the brief bit I have been following and attended the presentation Chris gave to HALO.

I live on a 1/3 acre non conforming grandfathered lot in the hillside with a large confined space horse lot up hill and a greenbelt drainage to a church well downhill. Although my job title is to work on conservation easements for the state, I am commenting as an individual, and actually have little practical experience, as I am tasked with finishing other duties at DNR.

The plan to have high density residential lots reminds me somewhat of the solar greenbelts developed in Davis California to have bike trails and a community plan that was pleasant to live in, to fit a certain lifestyle, but does it fit Alaskans, or come from outside? Are we ready? How do we get there is the question without planning ahead, well ahead I am sure is what you are tasked with.

I believe small lots will have to have very restrictive covenants; which will have to have popular support and people that are not like the typical Alaskans - divided into two groups - those willing to live green and those that want all the big boy toys and everything that life in Alaska and outside has to offer. My experience in leading public meetings on motorized vs. non-motorized trails has lead me to this conclusion, no community is ever going to agree whole heartedly one way; you have to provide for both types. There are those that should live in Wasilla without zoning, and those who should embrace civilization and agree to covenants and a vision of how we want the future to look.

I am very concerned about the commercial use aspects. Grandfathering needs to be addressed for new rules.

[I have a well and septic system and the Muni rules are not strict enough to protect my uses from those of the drainage from a barn and have nearly allowed 30 animals and commercial development to occur for riding lessons, breeding, training. I worked to get the Assembly to create rules for the large animal ordinance in 2006 and now had to get a lawyer to fight against a grandfather claim, since they were there in 1999 when they were no rules. The story is much longer but Planning and Zoning board voted 7-0 to close them down, but the police powers of zoning are not being properly applied. To make this work, the police powers must be upheld and strengthened along with the plans. The Chapel of the Cross has a public well and monitors monthly, the drain from the horse barn shows the load is too great for the system; it is not properly designed, it is an afterthought to bring in HDR to try to fix it. In other words, are you sure this will work? If you want an example to see, check out 7240 Holman Avenue as a case study (case 2007-057 of the Zoning dept or contact me). I hope this helps you move forward with the vision, it has been very painful for us and the neighbors that are suffering the nuisance of the commercial operation downwind of a test compost facility. 20 people testified against it.]

We are not only afraid of traffic and junk food and country store can't be regulated vs a Walmart, but the waste loads and teenage hangouts, etc. One thing leads to another, a gas station, then before you know it our precious water supply could be impaired.

I am not convinced the shallow rooted vegetation of spruce and aspen on slopes would be adequate greenbelts would be sufficient for the waste load finishing that you may be talking about - are we talking about two stage systems?

However, I am ready - I think we have to act, as in Katrina - to buy greenbelts around our own houses since we cannot trust the public entities to do it for us. I hope to hear more about the financing aspects. I find it intriguing and am sorry I can't find time to get more involve. It just isn't humanly possible. Our 1/3 small lot is very difficult to maintain with a small lot and incompatible uses on the adjacent lot, especially when we have limited space for uses that are incompatible.

One other comment that seems like a plan that may not last, the water line up Elmore. If services are only to be west of the main, what logic would it be to limit connects to the west? It would be practical to offer those to anyone in the proximity that wanted to connect to the east, optionally. Some may want to connect. This would reduce costs for those connecting, perhaps.

Thanks. Doreen Sullivan

Comments on “Hillside District Plan ALTERNATIVES –

A Framework for Public Discussion,” April 2008

General comments:

Kudos to the Consultants and Citizen Advisory Committee for doing an excellent job of framing the many difficult issues facing current land use, transportation, etc. on the Hillside and options for future growth, no-growth, etc. As a nearly 23-year resident of the Hillside, I heartily concur with the overall goal for the Hillside District Plan (Plan), and with the goals expressed for each issue (p. 19). The Plan thoroughly acknowledges the qualities that make the Hillside special and addresses residents, including my, strong beliefs that we need to maintain these qualities (e.g., p. 13 last para – p. 14 para 1) – but the difficulty will be in the details and in ensuring the plan is institutionalized with teeth that are followed by the Muni’s Planning and Zoning and Platting Commissions. One huge problem is already in-progress and platted developments that are contrary to the goals expressed in this plan (e.g., Legacy Pointe).

Other comments:

There should be a chapter on Parks/Open Space/Wildlife as these are such important attributes to the Hillside. Maintenance of Open Space and Wildlife habitats/corridors, and provision of Parks and green belts/(unpaved) trails are critical to achieving the goal of the overall plan.

Protection of Potter Marsh, a State Refuge and Critical Habitat area should also be a goal of the plan. Approximately half the water of the Marsh comes off currently undeveloped lands owned by Heritage Land Bank and the proposed Legacy Pointe developers. We need to ensure we maintain water quality and quantity in the Potter Marsh watershed. Potter Marsh is undergoing a multi-million dollar upgrade in visitor and education facilities and is a jewel for Anchorage and thousands of resident and non-resident visitors. In addition to the aesthetic, positive mental health, birding, and recreation values it offers, there are innumerable economic benefits from tour buses and other visitors drawn to this area.

Land Use:

Moderate increases to Lower Hillside may be warranted in limited areas bordering main roads as long as a buffer of new, larger lots borders existing larger-lot neighborhoods to better retain the area’s rural character. I could support the Controlled Growth alternative but with a lower ultimate number of homes – perhaps no more than 700-1000.

I agree with the proposal to reduce residential densities in the R1-A area of potter Valley – the R1-A density never should have been approved years ago! It did not account for the area’s steep slopes, need to protect important watersheds, and rural area with its existing high wildlife and watershed values.

I agree with the built/green infrastructure option as this should better maintain the waterways, greenways, naturally-vegetated buffers, and wildlife that make the Hillside the special place it is. Again, there needs to be transitions between larger lot areas and any new smaller lot areas so that the new development areas include naturally vegetated buffers and larger lots adjacent to existing larger lots. There should be restrictions on house sizes relative to lot sizes – so many huge houses have been built on the Hillside, it’s time to provide more opportunities for smaller homes – particularly where

lots may be smaller – smaller homes will be less expensive to heat and more in keeping with current smaller family sizes, and will undoubtedly attract more people. They can be just as attractive (and possibly even more attractive) than the McMansions that are sprouting on the Hillside.

Conservation subdivisions are a great concept! The plan should include possible incentives for encouraging these – perhaps a break on taxes in the areas set aside? Such incentives should also be provided for subdivisions with narrower roads and fewer impervious surfaces.

For the Southeast Hillside, note should be made that our high winds seem to be increasing in frequency as one aspect of global climate change.

I support the Green Infrastructure alternative as a viable approach for maintaining the Potter Marsh watershed and corridors and open spaces essential to the wildlife that are a particularly special feature of the Hillside. In addition to decreasing housing density in Potter Valley, the plan should recommend that as other large tracts are proposed for development, incentives for retaining more natural vegetation and ensuring open spaces, parks, riparian buffers are included in any project. Apparently the 100-acre Legacy Pointe property is or will soon be for sale again – this is a prime opportunity to reevaluate development plans there and institute a lower-density plat as preferred by area residents.

Suggested new development standards (pp 33-34) should become requirements for in-progress and future Hillside developments. Additional policies should include a requirement to retain pedestrian access-ways between adjoining neighborhoods, and recognition that such trails do not have to be paved – this will enhance neighborhood connectivity and provide needed connections for kids and people walking or biking.

While the photos of a charming country store and suggestion that we'll reduce the number of 10-mile roundtrips to get a forgotten item at the store are intriguing, I am skeptical that we need the two suggested neighborhood commercial projects. Parking associated with either is likely to be an ugly eyesore and add to congestion. I believe most of us visit our neighbors when we run out of milk or realize we're missing an ingredient on an in-progress meal – thereby preventing any trips to a store, near or far (and this situation is not likely to change with increased gas prices that are unlikely to be reversed). Additionally, nearly every household travels out past commercial areas while heading to school or work every weekday which affords ample opportunity to stop by a store for needed items. I also fear we would end up with a “convenience store” stocked with the typical sodas and chips and other fast-food items that result in trashy wrappers in adjacent parking and road areas. John Weddleton's photo essay and accompanying text on this subject provides an excellent analysis of the subject. The plan should also include an upper limit on the size of a non-residential use – for example – we do not need any larger churches than already exist, otherwise the associated parking and traffic will be too great for the residential neighborhoods in which they occur.

Overall, I oppose the Bear Valley site for commercial development. Further discussions and careful planning might result in an appropriately small, very tightly controlled commercial development at Rabbit Creek and Old Seward, if the following caveats are included: (1) use the existing B1-A site currently For Sale there (Chuck's Backhoe); and (2) convert at least half of that site to a neighborhood park with playground equipment and revegetation. A small coffee shop with some fresh foods or possibly bike rentals might be a viable option – if a trail is provided along Old Seward behind Potter Marsh (see Transportation comments). But this option will need a lot more discussion

before it should be approved. If this does occur, there will probably be need to add a signal at Rabbit Creek and Old Seward Highway.

Drainage:

The HDP needs to recognize the importance of Potter Marsh and that any drainage aspects of the HDP and subsequent area developments need to account for the importance of Hillside waterways such as Little Survival Creek and Rabbit Creek to the Potter Marsh watershed. Potter Marsh is a state critical refuge and habitat and is appreciated and enjoyed by thousands of Anchorage residents and visitors. It provides habitats to fish, birds, and wildlife that are enjoyed by thousands of people and are an important part of the ecosystem and what is special about Anchorage, and in particular the Hillside.

The Watershed Planning Approach is the best alternative regarding this issue. The Municipality is beginning to develop watershed management plans for other waterways in the Municipality and these are excellent models for what is needed for Hillside waterways (e.g., see the recent Little Campbell Creek Watershed Plan). I concur with the proposal to create a new service area or district utility to manage drainage on the Hillside and this entity needs to be able to make enforceable rules for developers. Developments should not be platted or permitted unless they include a plan for protecting waterways and not negatively affecting existing neighborhoods.

There have been significant problems and long-standing homeowners have unnecessarily suffered as newer, poorly designed developments have exceeded the carrying capacity of the Hillside slopes and other natural features. For example, homeowners just north of Prominence Point have had septic systems back up, and flooding and glaciation occurred just south of Goldenview Park when those newer, denser developments were built and appropriate planning was not in place. It seems obvious that these newer developments exceeded the area's carrying capacity as the Hillside's slopes and other natural features do not lend themselves to developments denser than R6. Where problems like these have occurred, the Municipality should not continue to give permits to those developers and those developers should be fully liable for fixing the downstream and downslope problems they have caused – better yet, the HDP needs to ensure the Hillside remains at low density.

This chapter includes many good ideas (e.g., p. 47, Runoff Controls and p. 48, Watershed-based Drainage Planning). However mechanisms for paying for needed culvert replacements, ditch rehabilitation, and construction of storm water detention ponds need to be better explored and discussed. Regarding the need for a drainage system along 164th Ave, the developer of Goldenview Park should be held accountable for this issue and made to pay for the fix! Note, not all Hillside areas have been fully mapped for their waterways and wetlands – for example, wetlands had not been mapped in detail until the proposed Legacy Point development was fairly well along and neighbors had repeatedly testified about the area's wetlands and springs.

Regarding the discussion of Rate Studies (p. 50, item 4), it is important to put the burden on the careless developers to fix the problems they have created!

Onsite Systems:

Onsite water and wastewater systems continue to be a viable option for much of the Hillside and as such, support the need for R6 or larger lot developments.

Public Water & Sewer:

Before additional developments are added to the public water and sewer services in the lower Hillside, the Muni needs to ensure the system can handle this additional burden, or upgrades need to be made and supported by the developments which require them. Many folks notice the smell of sewage near the Rabbit Creek/Old Seward Highway pump station, so it seems doubtful the current system can support much additional use without appropriate upgrades.

Transportation, including Trails:

The plan has adequately recognized the importance of existing, low use dirt roads as “trails” used by area residents for exercise and to get out and enjoy the outdoors. Consequently, these roads are particularly important in an area where trails are so limited.

The summary (p. 52) does a good job of recognizing the need: for trails in the hillside, to improve the connectivity in the area (but not at the expense of existing neighborhoods), and to establish new standards specific to the Hillside (e.g., in limited areas it may be reasonable to have roads steeper than the desired code due to the natural topography, but these need to be low use roads). Additionally, new developments need to provide pedestrian links to adjacent neighbors to maximize connectivity of neighbors and for kids walking and riding bikes to and from schools. Using a green infrastructure approach to plan trails and roads in coordination with protection of natural waterways and habitat corridors is essential!

Where transportation congestion is a concern, only at limited times of the day (e.g., tied to school traffic), we do not need major new roads to alleviate the problem. What we do need is for commuters to alter their schedules by 20 minutes, thereby relieving the congestion, and we do not to add an elementary school a mile down Goldenview where the road is already overly congested and there are few practical alternatives for alleviating traffic.

I agree that public transit is likely not an easy option for much of the Hillside. However providing convenient “Park and Ride” areas at both the Huffman Carrs center and at the Abbot Loop commercial district, along with increased buses to and from mid-town and downtown, could be an attractive alternative with the huge increases in gasoline prices that have occurred and are likely to continue for some time.

I support the idea that roads and drainage be managed separately. We live in a lower Hillside area south of Rabbit Creek road where our neighborhood arranges and pays for road maintenance and it works great! Our roads are often plowed before Municipality roads and our share of the cost is quite reasonable.

Regarding who should fund and be responsible for acquisition, development, management and maintenance of an improved trails system – the State should be primarily responsible for access to Chugach State Park and the Muni should be responsible for access to local trails with developers sharing in the cost as new developments need to provide for trails and access to open areas. This will only increase the value of these new developments. The Anchorage Bowl New Service Area may be the best of the suggested options, as long as the State is a fully involved and contributing partner as Chugach State Park is a State jewel and it and other parts of the Hillside are enjoyed by so many from around the Muni and State.

Attention should be given to maintaining the Moen Homestead Trail in its current location and NOT removing it as currently shown in Map II. 3C. Relocating the Moen trail was opposed by nearly everyone who spoke at hearings on the proposed Legacy Pointe development – the Moen trail is well established, widely used by walkers, x-country skiers, horse riders, and mountain bikers and is ideally situated for the area terrain, soils, and vegetation.

Note – one important trail connection that is lacking from the HDP is the need to develop a trail along Old Seward Highway, behind Potter Marsh. This area is heavily used by walkers and joggers in the winter, and by bikers as well once the snow melts. Yet because it lacks shoulders and is hilly, there are numerous blind spots that make it extremely dangerous for the bikers and drivers who cannot see them until it may be too late. This is a fabulous route for exercise, views, and access (Potter Marsh parking areas provide parking for bikers; and the area is easily accessible to Hillside residents!).

Also note, transportation maps available at public meetings on the HDP include some erroneous roads that either do not exist or are completely illogical for increased use. Feodosia and Betty (south of Rabbit Creek and west of Goldenview) are narrow, hilly roads that service only a few houses and as such cannot be widened and cannot support increased use beyond what they now do. Any notion of using these roads to access potential new developments in these areas needs to be eliminated! Moreover, using Tideview as a connection to any potential new development and crossing Heritage Land Bank-designated open space is another idea that should be dropped. And finally, 172nd ends at Belarde – to the west is a powerline easement that is much too steep to support any traffic. Unfortunately, some older maps of Anchorage incorrectly show this as an existing connection to Feodosia. This connection needs to be removed from Muni maps!

To: Hillside District Plan

Agnew Beck Consulting, LLC

Municipality of Anchorage

From: Katie Nolan

Re: Comments, Hillside District Plan Alternatives Framework and Executive Summary

Date: May 12, 2008

Thank you for the opportunity to comment on the HDP Alternatives Framework and Executive Summary. I would also like to comment on the questions offered in the Household Survey, their distribution, and their results, as well as several items in the Executive Summary.

I am disappointed in both documents, which seem in many instances to directly oppose both the values of Hillside residents and the protection of those values. While lip service appears to be made to the fact that the overwhelming majority of property owners enjoy their chosen homes and wish to preserve their large lot neighborhoods, little is done to conserve these protections for the future. I am most especially dismayed at the suggestion of radical change for areas of Hillside that are already almost completely built out and the suggestion that redevelopment to a higher density needs to occur. This is diametrically opposed to the opinion of most residents, who want to protect the large lot, single family residential areas established throughout their neighborhoods.

I. Household Survey.

The simple fact that the Household Survey was mailed to the entirety of the area from the New Seward Highway eastward skews the results of that Survey.

Item 10 of the Survey asks "Please check the box that best describes your perception of your neighborhood." 15% of the survey respondents state that their area is 'urban'. However, this survey was mailed to neighborhoods that are "flatlanders", ie, high density residential areas on city services along Lake Otis and extending to the Seward Highway. These areas are, indeed, urban, and residents there have self-selected that designation. In areas A and G, 75% of the respondents chose 'urban'. Elsewhere, only 2 to 11% chose 'urban'. The inclusion of these flatland areas skewed the results. In addition, the appropriate zoning designation for R-6 is, by Code, 'suburban', a designation not offered in the Survey. This fact alone undermines the entirety of the survey. The result is that most respondents chose 'more rural than urban', as they were not offered the legally correct option.

By the same token, areas A and G were the most likely to agree with incursion of AWWU and most likely to agree with requirements for amenities such as curbs, gutters and sidewalks. These already exist in their neighborhoods.

The Household Survey appears problematic in several specific areas, and its use as a basis for the "Alternatives - A Framework for Public Discussion" and the "Executive Summary" is building on uneven ground. Several areas of the Survey cause concern, especially concerning Density (see Item II).

Question 8 of the Household Survey asks for satisfaction of public transportation opportunities. I am very dissatisfied with public transportation, as the frequent busses I see on Hillside roads contain few, if any, riders. We have school busses galore, but high school students like my next door

neighbor refuse to ride them, terming them "loser cruisers". Instead, the parking lot of SAHS is full, and we have high traffic at 7 to 7:30 AM, 10:22 AM (lunch hour) and 1:30 PM every day, and evening periods of high traffic for sports events. I am dissatisfied with public transportation, but this is due to the fact that we are paying for too much of it without doing anything to increase ridership. Yet my answer was grouped in with those who dissatisfied because they wish more busses and routes.

Question 9 of the survey asks if new residential development on Hillside is a problem. Nowhere on the survey questioned whether new non-residential development was a problem, leaving this real problem unaddressed. Large developments that are not primarily residential cause great consternation in our neighborhoods, as does the suggestion of large multi-family development.

Several of the questions were weighted for desired results, including the four pro-commercial and one non-commercial, and multiple questions about "mix" with only one for "no mix", without including the definition of the word "mix".

One interesting fact arising from the Survey is that 76% of the residents feel they have little or no real input into decisions about the future of Hillside. 85% are neutral or displeased with these processes.

Conclusion: Separate the survey results from the Lake Otis Corridor and delete from summary. Do not use these results for Alternatives Framework or Executive Summary. Do not use questions open to interpretation to base results upon.

II. Density

I am saddened with both the "Alternatives - A framework for Public Discussion" and the Executive Summary of the Hillside District Plan. The interpretation of the Survey appears flawed at best, and fails to reflect what I believe the strongly held community vision.

It appears that the original Household Survey was severely flawed, and is now being used to support a conclusion that is against the wishes of the majority of Hillside residents. For example, two questions in the Household Survey were especially problematic:

"New development on Hillside should provide...A mix of housing types, styles and costs."

"A mix of housing types in new developments...Is needed..., appropriate..., a good idea..."

Upon first reading of this question, I considered my neighborhood. Homes were built years ago by private individuals, and each reflect the unique character of the builder and the times. They are all of different types and styles, from simple single story ranch to cedar sided multi-level homes, from historic log cabins and original homestead residences to upscale modern homes. They are built at a variety of setbacks from the road, and all show individualism and character. Contrast this to newer subdivisions like Little Brook, where the homes are virtually identical in type, style, color, and size. These neighborhoods, to my eye, are quite boring. The first inclination is that such a "mix" of housing types, styles and costs is a good thing. Allowing housing such as modular homes on large lots provides affordable housing opportunities.

The Executive Summary of Hillside Issues, Goals and Choices reaches an entirely different conclusion by adding a simple term. This document states "Residents are divided on mixed density housing development..." I verified, and there was absolutely no reference to mixed density housing anywhere in the Household Survey. The proverbial apples have suddenly become oranges.

It appears that either the household survey was deliberately misleading, was only able to be read and understood by an experienced planner, or that the Executive Summary reflects the goals of someone other than Hillside residents. To use this new conclusion as a basis for any document or future plan is to undermine the strongly held feelings of virtually the entire Hillside, and creates a false basic theory upon which to build these documents. I have yet to meet one person who desires high density housing anywhere on Hillside. Every opinion I am aware of is that Hillside wants to maintain and protect our current R-6 1.25 acre single family residential zoning designation.

In addition, the Executive Summary in its first paragraph ignores the entire idea that this plan is necessary to guide new subdivisions and future growth with minimal revision of existing zoning. The purpose of the HDP is not only to guide decisions regarding future development, but also to protect existing development. The idea of protection of our existing large lot lifestyles is nowhere to be found in the Executive Summary or the Alternatives Framework documents. Executive Summary 1-10 states that the HDP will result in a land use plan that will determine housing densities and locations. The wishes of the community overwhelmingly support protecting existing R-6 zoning and other large lot zoning designations in every location except Potter Heights.

Conclusion: Protect existing large lot R-6 residential zoning throughout document. Remove results based on "density", a term not addressed in the Household Survey.

III. Onsite Services.

I am disappointed that the Framework ignores the strongly held wishes of Hillside residents regarding public services. Our well water is of much higher quality than public water, containing no smelly chlorine or added chemicals. Our current regulations regarding septic systems keep us safe, and the few existing problems easily solved by modern technology. By far the majority of Hillside residents wish to keep the existing AWWU water and wastewater line intact, without further incursion into our area. The deliberate mating of the chapter on onsite services with AWWU is misleading, and these two items must be separated.

Page 64 Alternatives Framework discusses the fact that few Hillside residents wish public water and sewer extended. Phrasing of this as "few wish" is far gentler than the more accurate statement: Most Hillside residents are adamantly opposed to extension of public water and sewer. This is especially true when the data is studied with the urban areas along the Lake Otis Corridor removed.

Page 66 discusses the fact that there are problem areas, but fails to mention that modern technology is currently available to resolve the issues associated with small lots and/or physical site constraints.

Discussion of the fact that some areas of Hillside are marginal for use of onsite systems must also include the fact that there are some areas which simply do not support construction, period.

Discussion of public water and sewer connections must include all the facts regarding hook ups. Missing information includes what constitutes "the majority" of property owners in a potential assessment area; estimated costs to individual areas based on difficulty of construction; and a far better discussion of choosing not to connect to the system including potential ramifications.

Conclusion: Shift the emphasis to onsite. Remove results from areas along existing AWWU boundaries (Lake Otis Corridor) from conclusions.

IV. Framework Map and Boundaries.

The map on page 17 needs to be revised, as it does not correctly group existing land use patterns. The line designating Lower Hillside needs to be moved to correctly reflect existing higher density and commercial patterns along the area served by AWWU. The edge of Lower Hillside belongs along Lake Otis to DeArmoun Road, with the few existing incursions of higher density zoning. This is the boundary of AWWU water/wastewater, and more truly reflects Lower Hillside. The Hillside District Plan must define and protect this boundary, something the community has long asked and the driving force behind the HDP.

Central Hillside extends on all areas currently served through on-site, where large lot zoning dominates, a fact not addressed in the Framework. The portion of Central Hillside mistakenly placed in the Lower Hillside designation divides this existing and very real boundary.

The Alternatives, page 24, verifies that the Lower Hillside is made up of two distinctively different districts. Higher residential densities and commercial exist along the Lake Otis line, currently served by AWWU. By far the greatest majority of those areas above this boundary are large lot R-6 zoning served by onsite.

Both the "Lower Hillside Base Case" and "Central Hillside" summary (Alternatives Framework page 30) are the correct solutions, as most of this area is already built out. Rezoning to higher densities is not appropriate. This is stated on page 16 of the Alternatives Framework: "The land use pattern of Central Hillside (including the portion Alternatives terms 'Lower Hillside') is likely to remain stable into the foreseeable future because much of the area has already been subdivided."

Central Hillside is the appropriate designation for the areas above the Lake Otis Corridor. The majority of private property in this area is already subdivided at low densities (page 30 Alternatives Framework), and the majority of residents are satisfied with their onsite services. Those few areas with poor soil conditions should solve those issues with modern technology. No changes in zoning should occur, most especially the rezoning suggested in the Framework.

This common sense solution addresses the issue on page 24 of the Alternatives Framework. Moving this line to the appropriate location separates the areas zoned R-1 or R-1SL (high density) and R-6 (large lot low density) as well as the few R-5 and R-7 areas. It also resolves the question of extending the Maximum Perimeter of Public Sewerage (page 66).

Conclusion: Lower Hillside is the area currently served by AWWU. This higher density and commercial zoning area are completely different in nature with the area outside the existing AWWU boundary. The boundary for Lower Hillside must be set along those lines.

Central Hillside is the accurate designation for those existing areas utilizing onsite, the vast majority of which are already zoned R-6 large lot, with stable neighborhoods.

One major reason for the need of the HDP is due to the fact that residents want to protect and preserve this existing boundary.

V. Zoning Designations.

Existing zoning designations must be left in place in all areas but Potter Valley. This is in concordance with the 2020 Comprehensive Plan, already approved. Community character in these locations mandates large lots. This is not adequately expressed in the Framework. There should be no downsize zoning allowed. Furthermore, the growth planned 2020 is almost complete in most areas of Hillside, and current zoning capable of handling the increase of homes allocated in 2020.

Conclusion: 2020 goals can be met through protecting existing zoning with the exception of Potter Valley.

VI. Commercial.

Existing commercial zoning exists, and should be protected, not increased or decreased. The Frameworks plan shows a large increase in B-1. The majority of residents agree with the Commercial Development Base Case (Alternatives Framework page 36). In addition, primarily non-residential uses need to be addressed, either through demanding CUP's instead of SPR's or some other true community input process.

Conclusion: Protect existing commercial zoning with no increases or decreases.

VII. Controlled Growth Alternative.

As has already been shown, Hillside can easily accommodate the growth patterns suggested in 2020 through existing zoning. There is no need for rezoning to higher densities. The very idea of rezoning, whether of 5 or 500 acres, is abhorrent to the majority of the residents. Changing this to build the coffers of a handful of developers is not the purpose of the HDP.

Conclusion: Do not rezone any existing R-6 area to higher densities.

VIII. AWWU Incursion.

The suggestion of moving the AWWU Maximum Perimeter of Public Sewerage east to Elmore Road, as mentioned in page 27 of the Alternatives Framework, has greatly angered the numerous residents of this area. Those that have held property in this area for a long time have questioned the statement that this area is even within the certified water service line. Research and statements from individual land purchasers who have lived in this area for numerous years indicate that these properties are outside of the certified water service line.

Removing the areas along the Lake Otis Corridor, currently served by AWWU, from the survey responses would greatly increase the positive results mentioned on page 64. Page 64/65 states that marginal conditions for onsite exist without offering the modern technical solutions available.

Page 66 discussion of areas where onsite systems are associated with a history of challenges again fails to mention modern technical solutions available. Instead, it focuses on expanding AWWU and rezoning to higher density.

Page 72 appears to push for high densities and extending AWWU instead of protecting successful zoning.

Conclusion: Protect and preserve existing AWWU service with no further incursions. Mention modern technical solutions to wastewater issues.

IX. Transportation.

Page 56 of the Alternatives Framework discusses the effects of added density on Lower Hillside. Again, the designation 'Lower Hillside' must be moved to correctly represent the portion of Hillside that currently contains higher densities and public services.

Conclusion: Move line of 'Lower Hillside' to Lake Otis Corridor.

X. Introduction - The "Good Old Days"

While it is obvious that planners abhor existing Hillside neighborhoods, the fact is that people have deliberately chosen to purchase property and live here. We like Hillside, including our large lots, onsite services, and being a bit away from Carr's. To ignore this truth is to ignore what the community has asked to be done with the HDP: maintain existing development with a few minor tweaks and improve new development to avoid negative impact on existing development.

Conclusion: Mention the positive that brought this area to popularity and the need to protect this positive.

XI. No "Next Step" Offered

When official publications like the "Alternatives Framework" appear, it would be nice to have a summary of the next steps forward in this process. For example, who will be making these decisions? What is the process? Time frame? Will the property owners be able to directly vote on any of these decisions? While some are quite familiar with this project, others are not, or would like to play catch up. Including this information in each publication would create ease in following the process.

XII. HDP Origins.

While it is a relatively small matter, the fact is that work on the Hillside District Plan did not begin either last year or with the Municipality. Residents of Hillside have been working on the HDP since approximately 2002, although most or all of this work, including results of several well attended public meetings, has been completely disregarded by the Muni's HDP process.

Conclusion: All HDP participants need to use the work product gained through well attended HDP meetings prior to the Muni involvement.

Mr. Birch and members of the Hillside planning team:

I would like to add my comments for the recently published Hillside Plan

I note that the authors have plans for the Stolle -- Grandview platted sub-divisions in Bear valley.

The plans are specific in the desire to create additional trail heads for park access in these sub-divisions.

I need to know why a trail head is planned for a sub-division that was platted more than 22 years ago? Gotta be that old ---my house is that old.

I need to know why roads like Kings Way (currently decorated with 10" deep pot holes) and Snow Bear Drive (currently embellished with 3 areas of water failure and blocked culverts) are designated PRIMARY Roads .

Now, please understand, these are roads served by the Bear Valley LRSA. Please take a ride up and see for yourself what the roads, designated, as PRIMARY Roads in the document look like.

I mention the LRSA and the failing roads because our roads in the Stolle Grandview are NOT part of any LRSA. The Stolle and Grandview home and lot owners plow and grade and take care of the ditches and roads in the sub-division. We do this and our roads are not failing and the cost to us is less than the 1.5 mils the Bear Valley LRSA members pay. We do this for the predicted residential traffic.

So while on the surface the Hillside plan is good for the Hillside especially planning the for septic carrying capacity, it is very obviously been written in places to cater to special interests and not to established home/property owners.

Before I sign off though I also saw a trail being proposed adjacent land through Stolle Block 3 Lots 6 and 7, I believe. The only reason to create this trail would be to legitimize the chronic trespass of 1 or 2 individuals. And the Newell Homestead folks may not like it either and neither will the Wyatt's.

And are you really going to change our zoning? I hope not.

You see this sub division has been in place for 22 years and I don't believe government should change it to provide a vocal minority access. Park users are really a minority but criticizing them is seen as being anti apple pie and stuff.

The platting of the Grandview sub-division allocated park access and parking for 5 cars. It was a compromise solution. The users defile our roads, don't read signs and can't count to five

They park on the wrong roads, urinate in our cul-de-sacs and permit their dogs untethered access to our lots as well as the park. And there is -0- enforcement. Not from APD and not from the Rangers. So much for apple pie.

Please no Glen Alps in Bear Valley. Remember Miller v. the State of AK determined there is no legal access to public lands through private lands.

Every one of the Hillside Plan options increases my taxes, destroys my property values and ruins the privacy and solitude which is why I originally chose this location. – Daniel B. Toomey

PS here are some points our neighborhood association feel are pertinent.

- There is currently no legal access to the HLP property where the trailhead is identified.
- The trailhead could only become a reality if they purchased an existing lot or secured an easement to construct a road through a lot which is currently zoned as R-10 residential only.
- The recorded Declaration of Covenants, Conditions and Restrictions (CCR's) for the subdivision, and the lot in question, do not allow this type of development
- The trailhead has never been identified as an existing, or historical, access point on the Chugach Park Access Inventory, the Anchorage Trails Plan, or any such planning documents.
- We accept the need for neighborhood access points but our neighborhood bares our fair share of the park access burden from the existing trail access point and that it is inappropriate to develop a major trail head in and through, an existing neighborhood. The additional traffic, noise, and potentially thousands of strangers this would attract to upper Bear Valley is also a negative for everyone along the route from Kings Way up.
- Honey Bear Lane and Honey Bear Circle specifically must be removed from the HDP for "Primary Road" designations. Honey Bear Circle is a platted subdivision road with a current daily traffic of approximately 5 cars. The designation to a primary road was designed specifically to facilitate it's use for hundreds of cars a day to access the trailhead and is inappropriate

May 12, 2008

To: Heather Stewart, planner

From: Nancy Pease, Commissioner
Planning & Zoning Commission

Re: Comments on April 2008 draft Hillside District Plan Alternatives: a Framework for Public Discussion

Attached are the remainder of my specific comments on the Hillside District Plan Alternatives: Framework for Public Discussion.

LAND USE SECTION

GENERAL COMMENT

Conservation subdivisions are an option that doesn't require rezoning. The current draft of the HDP attempts to achieve higher density through rezoning and what are called conservation subdivisions, but are in reality PUDs. (Under Title 21, PUDs allow twice the surrounding density, while conservation subdivisions allow clustering but no additional overall density compared to the surrounding residential zone.) The HDP should acknowledge this difference. Conservation subdivisions save costs for the developer because less infrastructure is required than a traditional layout. Conservation subdivisions offer a meaningful preservation of open space and a chance for on-site drainage, well, and septic to serve both the development and the neighbors, because the average density is not increased. True conservation subdivisions (without increased overall density) seems the best alternative for developing difficult terrain on the Hillside. The patchwork rezoning and de-facto spot rezoning or PUDs proposed in this HDP pose high potential financial and physical impacts on surrounding neighborhoods and parcels.

P 26 and elsewhere

Is the increased density a public benefit? It is not explained *why* the MOA advocates double- to quadruple- density options for the currently-drawn Lower Hillside district. Explain whether this implements the Comp Plan intention of efficient patterns of development, which specifies infill and redevelopment of the major employment centers, town centers, and transit corridors. Will this be a competing thrust that will draw public and private investments away from intended centers of development. These Hillside areas do not appear to be situated or designed as community centers. A recent Atlantic magazine talks about the devaluation of mid-density suburbs with large houses on small lots that don't have walkable centers and yet are too dense to allow the peace and privacy of large lots. . The Hillside has current zoning that meets the growth allocation of the 2020 Comp Plan, so it is not clear that there is a need or a public benefit from catalyzing significantly higher density (2x to 8x) in areas that are developed and valuable at current densities.

P 32 and throughout this section: "green infrastructure" is a vague promise. To make sure it delivers benefits, the HDP must identify where there should be green infrastructure (e.g. creek corridors and wetlands). It must propose measurable standards for green infrastructure in subdivisions

P 21 PLANNING ISSUES SUMMARY

1A More balanced and documented portrayal of the wastewater situation.

- Missing issue: design and development standards. This page only identifies “subdivision standards” while in the Central District and other subdistricts, there is likely to be mostly infill on vacant lots. Design and development standards should apply to all development, especially infill on existing undersized and steep lots. In this issues summary, introduce the concepts of
 - Vegetation retention by percentage of lot area
 - Impervious surface maximum
 - Floor area ratio, which is important to retain the open space character especially if cluster housing results in small lots
- This draft has not substantiated a need for conversion of any particular areas from onsite septic to AWWU sanitary sewer. Page 21 mentions “poorly performing areas”: where? Can they be remedied with new technology?
- There is professional disagreement whether MOA septic system standards allow the most efficient technologies. Some advanced technologies, such as composting toilets, are not even certified by the MOA. There should be consensus on the technologies before MOA endorses one system over another.
- Couldn't find any vegetation retention standards. Pg 47 mentions them but no standard is proposed.
- Multiple values of “Green infrastructure” are promised here, but nowhere else in the plan is there identification of specific green corridors that serve wildlife and recreation. Wetlands seem to have been ignored: why are none proposed for protection as “green infrastructure”?

P 23 It's vague to talk about an “improved” development review process. And probably misleading. There are still developments that are tapping into seeps and having washouts, etc. Make a point here, or drop this discussion.

P 24 Quantify what “many” home-based businesses means. Or, if the number isn't important, just say that they are generally accepted with existing restrictions.

P 24 Don't aggregate the “two different districts” of the current Lower Hillside Districts. They are distinctly different and shouldn't forced into the same future pattern of development.

Create a new district comprising the BLM lots south of DeArmoun Road all the way across lower Tideview Drive to Turnagain trailhead. These are uniformly low-density, country-lane neighborhoods with lots of trees and little traffic, and several important parks, HLB open space land, and the wildlife refuge. There are excellent opportunities for a continuous green infrastructure network across this district that serves watershed protection, drainage, wildlife and recreation. This new district should also extend east to Buffalo and east to the natural gas pipeline corridor. This area is NOT proximate to businesses and instutional services like the lower O'Malley/Furrow Creek area, and it is not suited to a road grid of through-roads.

P 25 . “Controlled growth” implies slowing or capping growth, when this alternative is to double or quadruple the density. (A controlled speed zone means lower speed than elsewhere.) So call it the “quadruple-density alternative.”

P 25-26 The final density and minimum lot size seems undetermined. First, densities are proposed to be changed in the Furrow Creek and BLM areas by re-zoning. Then, it appears that lot sizes could

further decrease through conservation subdivisions. Presumably PUDs could allow double density and further reduction of lots through clustering. And Accessory Dwelling Units are still allowed. So it is not clear if there could be 4 units, or 8 units, or up to 16 units per acre.

P 26 Explain WHY the MOA advocates double to quadruple density option for Lower Hillside. Explain whether this implements the Comp Plan intention of efficient patterns of development, which specifies infill and redevelopment of the major employment centers, town centers, and transit corridors. Will this be a competing thrust that will draw public and private investments away from intended centers of development. If it is too small to become a new center of intensity, then why do it? A recent Atlantic magazine talks about the devaluation of mid-density suburbs that don't have walkable centers and doesn't allow the peace and privacy of large lots. The Hillside has current zoning that meets the growth allocation of the 2020 Comp Plan, so it is not clear that there is a need or public benefit from catalyzing much higher density in a developed area.

P 27 & 28 This illustrative example is not "controlled growth" nor a conservation subdivision. It is a quadruple density PUD.

The "conservation subdivision" described here is different from the revised Title 21 which does not allow higher overall density than the surrounding zoning.

The "conservation subdivision" in the revised Title 21 requires 25 or 30 percent open space and some public or at has access provisions to the open space. It is misleading to claim that 2 acres out of 10 is an "exceptional level of open space" when a conservation subdivision would have 3 acres of open space and a traditional R-6 might have more than that retained by individual lot owners.

P 29 Change the table heading of "controlled growth" to "2x to 8x density increase". Unclear how the figure of 1,500 to 2,000 units was derived, but as worded it's a 20x increase in additional units. Show on a map which units the planners are assuming will become dense PUDS. Surrounding homeowners ought to see what's assumed next door to them.

P29 Quantify if water quality is a problem in the BLM. Otherwise, this isn't a justification and should be dropped.

P 29 Delete the vague statement that "changes will occur but in a less planned manner". The real situation: "Infill of vacant lots under existing zoning will result in approximately 8 % increase in the number of dwellings spread throughout this area."

P 30 Impact on neighborhood character: current evaluation is inaccurate. The conservation standards might minimize impacts, but this "framework" proposes rezoning and PUD-type development, which will transform the neighborhoods. Under the evaluation of impacts, state: "A density increase of 2x to 8x will result, over time, in a wholesale change from rural character to a mid-density suburban setting with much higher traffic, building density, and modified landscape."

P 30 Impact on roads, drainage, open space and trails: Add a statement under base case: "traffic volumes would remain near current levels within neighborhoods given the 8 percent increase in residences at full build-out". Existing 1 acre lot sizes in the BLM are likely to retain a pattern of private open space."

Add a statement under the 2x to 8x increased density option: "overall open space will be markedly decreased by the greater road and building density. There may be some private open space within developments but no public open space, trails, or stream corridors are required under proposed standards for denser development."

P 30 last paragraph: Remove the claim that development standards are stringent. It implies that mistakes are no longer occurring. A developer can still cut all the trees. Seeps still get unearthed and ditched.

P 31 “green infrastructure” is a vague promise. To make sure it delivers benefits, the HDP must identify where there should be green infrastructure (e.g. creek corridors and wetlands). It must propose measurable standards for green infrastructure in subdivisions such as

- minimum dimensions of retained areas,
- a percentage of natural terrain or maximum amount of slope alteration,
- a percentage of natural vegetation to be retained,
- specific high-value vegetation and terrain in particular, such as wetlands, creek corridors, wind breaks, and scenic areas, and
- in some instances, public access (visual access or physical access).

P 32. This evaluation is poor. Under the “base case”, the statement of “No change to regulations” doesn’t explain the changes on the ground as development occurs. In reality, there are ongoing deficiencies in in MOA regulations especially regarding transportation planning, drainage, terrain, vegetation removal. This isn’t made clear.

Under the “built/green infrastructure”, it seems undocumented that the built/green approach reduces road and trail costs. Doesn’t it just let the public help pay for them?

P 32 Impact on neighborhood character and development standards: the reader of this plan learns nothing from the statement that there are “more stringent standards” than in the past. MOA still does not have standards for retaining natural vegetation, limiting impervious surfaces, handling drainage on-site. Clarify what impacts will continue.

P 33 Conservation subdivisions have built-in incentives of lower infrastructure costs. Density increases shouldn’t be necessary.

p. 34 add to road and trail standards:

- incentives to create public greenbelts and trails in off-road settings

p 37 Add to the evaluation of commercial centers: trip generation and travel patterns. New commercial centers should be demonstrated to reduce vehicle miles. The 2020 comp plan calls for reduced vehicle dependency. Yet, commercial centers that are not well-integrated and oriented to the neighborhood may generate new trips and single purpose trips and actually increase vehicle miles.

P 37 & 40 Do not re-zone to allow a floating opportunity for a commercial center along heavy traffic corridors. This is not fair to existing land owners. It will not result in planned and manageable traffic pattern. If there is a demonstrated need for a commercial site at either location, zoning for a commercial use should occur only after transportation upgrades are in place, and a particular site where traffic can be managed.

P 40 & 41 See general comments: do not re-zone for a mercantile store unless and until there is a clear market demand. Let an entrepreneur show a market study that demonstrates viability but do not create a “business right” by rezoning until three conditions are met:

- a trip generation/ destination analysis shows a reduction in overall vehicle miles from a store at this location versus other available shopping,
- the traffic infrastructure is in place, and
- the market demand has been demonstrated.

P 41 Under Potential for Business Failure: note that viability of the “country store/community magnet model” hasn’t been tested through a market study. Note that the model of New Sagaya hasn’t been tried outside of the Downtown City Market location.

P 41 Under “gathering space”, would there be a requirement for a minimum of the square footage indoors and outdoors to be designed for public gathering?

P 43 Under traffic safety and congestion: note the hazardous conditions of Rabbit Creek & Old Seward Highway: intersection at bottom of two hills, grade or road sloped wrong way for a turn, no guard rails, no controlled turning, etc. There has been a fatality there. Specify that upgrades to meet safety and congestion problems would have to be a prerequisite before commercial traffic could be handled.

Drawing commuters off the New Seward Highway doesn’t benefit the neighborhood.

There is potential for theme of “wildlife refuge/greenbelts/outdoor trail-based recreation” here, but the HDP fails to support or develop it. There is a need for interagency coordination and the HDP could get that started. Add some connectivity planning for a “country lane” design theme to the Old Seward Highway and trails (off-the-road) to connect from Rabbit Creek greenbelt park to Little Rabbit Creek to the HLB lands east of Potter Marsh, to viewing points for Potter Marsh wildlife, to Turnagain Arm Trail and Potter Section House. There are HLB lands designated for Open Space that should be identified as “green infrastructure”. This should be a sub-district that the local public and areawide outdoors enthusiasts could support.

P 45. the measures to reduce run-off should apply to individual lot development, not just subdivisions.

P 47 Add to run-off controls: guidelines and limits to cut-and-fill; and limits to percent of impervious surface.

P 48 Will storm pipes divert water into the sanitary sewer? Stormwater should be captured for retention and local filtration and re-charge, not diverted out of the watershed.

P 48 Set standards that the Hillside District detention ponds should be required to have a natural vegetated character, not like the fenced industrial basin at the highway frontage road near Abbott Road.

P 50 If privately-owned detention ponds have failed, change the DCM standards and enforcement. Do not abandon the on-site detention approach altogether.

P 51 Add these critical standards for sustainable watershed management:

- Until watershed plans are adopted, the HDP sets standards for quantity and quality of the recharge to groundwater and surface waterbodies, as necessary to sustain a supply water for residential use and aquatic & riparian wildlife. Water quality management shall include protection from contaminants as well as maintaining water temperatures for wildlife.
- Until watershed plans are adopted, the HDP sets greenbelt management standards for stream setbacks, including vegetation retention to ensure habitat and water quality; and specifies monitoring for sediments, other pollutants, temperature, and encroachments.

P 52 Where are the proposed “rural road standards” for the Hillside? The public should review and comment on these.

P 52 Under summary: the neighborhood qualities that need protection from road upgrade impacts should be specified: quiet, privacy, air quality, safe pedestrian use, and general control of traffic volumes and speeds. Add these concerns.

P 53 Multiple homes on private driveways is a land-efficient design. It should not be listed as a problem.

P 54 The first paragraph under roads shows an urban, engineers' design bias of sizing-it-up to meet demand. Add language that: " Roadway design for the hillside should be influenced by terrail, soils, and other natural constraints. There may be limits to road capacity that in turn suggest limits to density."

P 55 The subalpine roads in upper Potter Valley, Upper Bear Valley, and the ShangriLa area should not be "primary" roads. The terrain limits housing density and therefore traffic volumes. These should be secondary roads with a country lane design. The Hillside quality of life would be diminished by high design-speed roads in these upper areas.

P 55 The proposed through-way road past Bear Valley school creates negative impacts to the regional park/school area that will become a community nexus. This is also an extensive wetlands area. There is no demonstrated need or evidence that this improves the traffic patterns on the Hillside. This alignment was criticized in the Hillside sub-district plan just a year or two ago.

P 56 Correction: There is no transit service to the BLM lots area.

P 57 In the Impact on Neighborhood Character section, road design must not only correlate to the planned function of the road.

Add that : "road design must correlate to the natural terrain and the character of the landscape and neighborhood. On the Hillside, especially where roads will be greatly upgraded or expanded into non-roaded areas, context sensitive design will be applied to maintain the natural landscape and neighborhood character and privacy."

P 59 There should be a regional trail, separated from the roads, from Rabbit Creek near its crossing with the Old Seward Highway all the way to the Turnagain Trail. There are big gaps currently on the HDP map. It must be shown in this HDP as a continuous trail, in part as a placeholder for when DOTPF re-designs the Old Seward Highway, and also to assert the pedestrian circulation pattern if and when commercial or BLT development occurs.

P 59 In the diagram of roadside paths, address the need for path width that safely accommodates two-way use when a path can be built only on one side of a road. 5 feet is definitely not safe for head-on bike riders to pass.

P 60 Provide a description of "priority trailheads". If there will be parking, there needs to be security such as gating or a camera, trash, maybe toilets.

P 61 Currently, the Trails Plan component of this HDP should assert the public need and benefit for pedestrian connectivity with the same authority as it sets road connectivity. If a plat can be required to reserve a road easement, it can and should be required to reserve pedestrian access easements needed for circulation among neighborhoods and community destinations.

P 63 Add to the Factors Affecting Selection of trails:

- Transportation and access values: trail access within neighborhoods and leading to recreation destinations reduces driving and reduces pressure on major trailheads.
- Multiple use values: trail alignments can coincide with green infrastructure and landscaped buffers
- Highest safety: trails separated from traffic are generally safest, and especially safer for children
- Aesthetic values: trails in a greenbelt setting, with scenic overlooks, or separated from roads, contribute to community health and property values.

P 64 Water and wastewater section

General comment: the evaluation of alternatives doesn't give enough weight to the fact that the AWWU system dumping of primary-treated sewage is not a long-term environmentally responsible practice, and in the interim, onsite treatment reduces the quantity of sewage going into the Inlet.

General comment: the Hillside HDP should consider conservation standards to reduce water use and therefore reduce wastewater disposal on the Hillside as part of the determination of when on-site treatment can work..

General comment: the availability of groundwater to serve some of the proposed additional high density areas has not been adequately addressed. The current MOA codes do not require adequate aquifer analysis for new subdivisions and institutional uses, and often allow decades-old well logs or limited draw-down tests as the basis of approvals of new developments that will use groundwater wells. The HDP should note this regulatory deficiency and require it to be remedied.