



Your Voice for Responsible Growth

October 8, 2007

Planning Department
via email Title21@muni.org

RE: Comments on Chapters 4, 5 and 6 of the 2007 Draft of the Title 21 rewrite.

We preface our comments with a recap of the vision presented in Anchorage's Comprehensive Plan and a list of key goals from that plan that relate to Chapters 4, 5 and 6 of the Title 21 rewrite.

Anchorage's Comprehensive Plan, *Anchorage 2020*, was prepared in the late 90's with the participation of thousands of citizens. Here's the "Community Vision" distilled from that process:

A diverse, compassionate community where each individual is valued, and children, families and friendships flourish.

A northern community built in harmony with our natural resources and majestic setting.

A thriving, sustainable, broad based economy supported by an efficient urban infrastructure.

A safe and healthy place to live where daily life is enriched by a wealth of year-round recreational and educational opportunities.

A caring, responsive government that is accessible and equitable to its citizens.

An active learning community with abundant cultural amenities.

Key Goals of *Anchorage 2020* that are important for these chapters of Title 21:

Neighborhood Identity and Vitality: A variety of safe, pleasant and distinctive neighborhoods responsive to the diverse needs of residents, with good access to schools, recreation, natural areas and community facilities.

Northern City: Well-Planned development based on a design aesthetic that creates a sense of place and incorporates Anchorage's unique northern setting.

Economic Vitality: A built environment based on design standards that sustain long-term economic vitality and growth and that promotes affordable residential, commercial, and industrial development.

Natural Open Spaces: A network of natural open spaces throughout the community that preserves and enhances Anchorage's scenic vistas, fish, wildlife, and plant habitats and their ecological functions and values.

Water Resources: Water resources and watersheds that are protected and enhanced for their enduring vitality and values.

Wetlands: A system of wetlands with functions and values that are preserved and enhanced.

Wildlife: A wide variety of fish, wildlife and habitats throughout the Municipality that thrives and flourishes in harmony with the community.

Air Quality: Clear healthful air that is free of noxious odors and pollutants.

Parks, Trails and Recreation: A sustainable and accessible system of recreational facilities, parks, trails, and open space that meets year-round neighborhood and community-wide needs.

When the Citizens Coalition makes presentations to Community Councils and other groups, we find that this vision and these goals are still important to the citizens of Anchorage. Surveys and public input for district plans validate these values. We hope that changes to Title 21 will create a city that matches this vision and achieves these goals. Our comments will be directed towards Anchorage 2020.

We also hope that the final result of the Title 21 rewrite will make it more clear to developers what is expected and acceptable and also decrease the fear of residents that every change or development will harm their neighborhood.

Thank you for the opportunity to comment on these drafts of Chapters 4, 5 and 6 of the Title 21 rewrite.

John Weddleton
President

Chapter 4 ZONING DISTRICTS

Residential Districts, A. Purpose and Intent statements p. 4 Purpose statements use the term, "... district is intended primarily for ...". Does the term 'primarily' mean that it is acceptable for 51% of the land use in that district to be devoted to the intended density and the remaining 49% not? State the intent more clearly by deleting the word "primarily."

Throughout Chapter 4 there are generic purpose statements with the terms "minimize," "consider," "avoid," and "promote." These words are not adequate for the tasks with which they are charged.

p. 5 line 19 Anchorage can do better than "minimize the impacts" in this section. Change: "Minimize negative environmental impacts_of development ..." to "Protect the environment from negative impacts of development on stream corridors, wetlands and other important resources."

Make this change throughout the definitions of the zones.

p. 6 F. R-2F Mixed Residential District We appreciate that this new zoning provides a buffer between higher and lower densities. Please explain where in town this district may be appropriate, since it is so similar to the R2M district, and it is a new district, not previously anticipated on the proposed Land Use Plan Map.

p. 8 J. R-4A Multifamily Residential Mixed Use District While Anchorage needs more mixed residential and commercial use areas in order to accommodate population growth and meet comprehensive plan goals, established neighborhoods are fearful of high rise residential buildings that will shade existing homes and bring commercial uses into previously quiet neighborhoods.

The first choice should be to add a significant number of residential units into commercial districts, especially in downtown and midtown centers, town and neighborhood centers.

For existing neighborhoods to accept higher residential densities and new commercial uses, people must first accept that commercial areas cannot accommodate anticipated residential demand, and that sprawl will harm the community more than increased density. Proposals for increased density and new commercial space should come with reasonable estimates of anticipated changes to traffic patterns (remembering transit and walking) and solar access.

p. 13 21.04.030 p. 13 21.04.030 Residential development in business zones defines "mixed use," and residential use should be mentioned in the purposes for commercial and mixed-use districts since it is permitted in several business districts.

p. 17 J. NMU Neighborhood Mixed Use District It is disconcerting to hear of a “neighborhood” commercial and residential district that can be “30 acres” in size. While we understand that some existing suburban commercial districts may be that large, and the goal is to transition them into neighborhood mixed use districts, there must be another way to

1. limit the size of neighborhood mixed use districts to say, one to three acres, while
2. transitioning overly large (30 acre) commercial districts into livable spaces, than allowing Neighborhood Mixed Use Districts to be 30 acres in size.

Another issue needs to be resolved here. Multifamily residential development is “allowed.” It should be a primary use, along with retail uses. In the past, language has described residential commercial districts “surrounded by” residential uses. J. 1 needs to be rewritten to encourage neighborhood retail services integrated with residential development in the same buildings. Residential uses adjacent to retail and commercial uses (along with convenient transit service) dramatically reduces auto ownership and use.

p. 18 L. RMU: Regional Mixed Use District The emphasis on “auto-oriented” is surprising. The RMUs are a great opportunity to take advantage of transit and meet comprehensive plan goals to reduce reliance on the automobile. To make the Dimond Center a better RMU, it would help to decrease the amount of car traffic. The bus transfer station and the proposed rail link are examples. This opportunity should be highlighted and encouraged in RMU’s.

Chapter 5 USE REGULATIONS

In the 2006 draft of Chapter 4 Zoning Districts, the zones R1-2 (R-6), RL-3 (R-8 and R-9) and RL-4 (R-10) said in their "Purpose" paragraphs "Certain types of non-residential uses, such as governmental, educational, religious, or recreational uses, may be allowed subject to restrictions intended to preserve and protect the residential character of the district." This should be added back to the definitions of these zones.

Non-Residential uses over a certain size and those that will increase neighborhood traffic should be subject to a major site plan review. These uses always stir up concern. That should be recognized with an overt requirement.

Neighborhoods in all residential zones appear to have no protection from busy religious assembly buildings that can have impacts comparable to big box stores in terms of parking, footprint, land clearing, and traffic.

p. 24 21.05.030A8 vii(A) Manufactured Home Community Street Surface The minimum surface width of 34’ is very wide. Is this width necessary? Such widths encourage high-speed traffic. Encouraging pervious surfaces may decrease runoff.

p. 38 7.Religious Assembly lines 21-27 It’s not unusual for church spires to hide cell phone and perhaps other towers. There could be an accommodation of allowing a greater

height for the spire if it contains a hidden tower. The description of Type 4 towers on page 45 and the bottom of page 46 allow 65' towers in residential districts.

p. 42-43 section G The new definition of parks and open space (replacing the current practice of park designation within the PLI zone) appears to focus on recreation, de-emphasizing walking and other passive uses. The proposed definition calls for “play grounds, play fields or open space.” It should include solar access, views, habitat protection, water quality protection and so forth.

p. 47 lines 13-17 b Tower Structure Height iv. This would allow a tower of 95' in a residential area. That seems excessive. The towers needed in neighborhoods would likely be cell towers that do not appear to need vertical separation of their antennas. This paragraph should start with “Except in residential areas ...”

p.105 lines 15-20 12. Home Occupation If a home has a wind tower or solar panels generating electricity that is “sold” to Chugach Electric, is that a “home occupation?” Solar panels may occupy more than 500 square feet.

Chapter 6 DIMENSIONAL STANDARDS

p.2 line 27-28 It would help to emphasize the second to last sentence “In particular, some uses have use-specific standards in Chapter 21.05 that impose stricter requirements than set forth in these tables.” This could be broken out as a final paragraph on this page. Also, it would help in Chapter 5 to indicate where a requirement exceeds the standards in Chapter 6.

Chapter 6 Tables A and B Dimensional Standards It's good to see for the first time, that many commercial zones have height restrictions. The addition of height restrictions in the R-6 is also a positive change.

Chapter 6 Tables A and B Dimensional Standards It would be useful to determine a maximum amount of impervious surface on a lot. While this ties in with limitations on lot coverage, parking and landscaping, setting a limit can encourage the use of semi-pervious surfaces for parking, driveways and walkways. If limits are set, they should go in this table.

p. 21 lines 38-43 and p. 22 b. D. Height 5. Height Exceptions This limits the square footage of a roof covered with photovoltaic panels, skylights and solar reflectors. These should not cause a visual problem and the community would benefit from maximum coverage.

Technology for electric generating windmills has progressed so they are cost effective. There does not seem to be an accommodation for them in this code. There may be advantages to allowing them on top of buildings.

p. 22-23 7. Height Transitions for Neighborhood Compatibility Neighborhoods will benefit from the requirement that a commercial building next to a residential neighborhood must step back its height towards the neighborhood, and/or to place the building closer to the commercial road it fronts on.

Anchorage has examples of overly tall buildings towering over residential property including the Woronzof tower at the NE corner of Fireweed and Spenard, and the Tudor Road storage facilities north of Tudor, west of Bragaw.

These standards should be applied to these problem situations and demonstrate how they resolve problems with solar access.