

**Anchorage School District  
REVIEW OF TITLE 21 - 1/06 PUBLIC REVIEW DRAFT #2**

Chapter	Subject	Comment	Recommended action	Resolved?
				Y=yes; N=no; N/A=not applicable (dropped)
<b>OUTSTANDING ITEMS FROM DRAFT #1 NOT RESOLVED OR RESPONDED TO</b>				
21.03.020	Common Procedures for Applications	The overall schedule, considering all the procedures, seems to be quite lengthy. Anchorage School District projects are frequently under tight schedules. We are seeing 90 days from P&Z application to approval under current procedures. This does not include further time required for Assembly approval. Footnote #2 on page 2 says, "However, staff resources in Anchorage may not be sufficient to fully implement the text as written." The procedures are only as good as the capabilities of the staff to support them. Recognizing that operating budgets are frequent targets of cost-cutting, the process should be streamlined to fit a conservative model of staffing, not <i>vice versa</i> .	Reduce schedule of paperwork process and maximize staff's efficiency by simplifying system while maintaining quality.	N  Not addressed. Same time line. See comment on 21.03.020.F.3a & 4
21.03.020.G.3.a & 4	Community meetings	The proposed minimums, totaling 35 days, are too restrictive and add to the already lengthy process. Community councils have their own calendaring requirements, which may vary between councils and from any time frame in Title 21. Draft #2 increases this by 7 more days, resulting in 42 days total.	Delete 3.a's reference to a minimum prior to first public hearing and reflect 4's time limit as a function of community council calendaring requirements. Reduce 21 days back to 14 days or less.	N  35 day minimum made worse by adding 7 days (21 + 21)
21.05.010 TABLE 21.05-2	Classification of alternative schools	Some alternative schools are K-12 or K-8. Where do they fall in the Table?	Clarify that the highest grade level determines the classification.	N  Charter schools added, but anomalies, such as given examples, are not addressed.
21.05.030.A..5.b.ii 21.05.040.E.4.b.iv.(A); See also 21.06.010 Table 21:06-4	Building code details in Land Use Planning document	Why do we need this level of detail here? Isn't this a building code issue? If this level of detail is retained, it should be consistent for all use categories.	Delete any provisions that duplicate, conflict with, revise, delete from, or add to accepted building codes.	N  Note says will be confirmed with Code. Still doesn't address philosophical challenge of duplicating, and conflicting with, building code provisions.
	Site coverage and setbacks	Neither the minimum lot size nor the setbacks work for urban schools like Denali Elementary at 9th and Cordova. It exceeds both the maximum 35% coverage and 50 foot side and back setbacks. A full elementary school educational program requires 15 acres, giving us about 10 usable acres. The State of Alaska DEED references the Council of Educational Facility Planners international site planning site standards as: (1) Elementary: 10 acres plus 1 acre per 100 pupils (ASD elementary schools have 550 pupils; 10 + 5 = 15 acres); (2) Middle: 20 acres plus 1 acre per 100 pupils (ASD middle schools have 1,058 pupils; 20 + 10 = 30 acres); (3) High: 30 acres plus 1 acre per 100 pupils	Allow exception to the site coverage for urban schools. Refer to the building codes for setbacks. Include a strong statement that the sizes are exceptions to the norm specified by the Anchorage School District educational specifications in compliance with State of Alaska DEED standards.	N  Urban schools such as Denali, would not comply.
21.05.040.E.4.b.iv.(B)	Minimum lot sizes			N  Does not comply with State standards changed from 0 to 0, but does not address child care as part of curriculum. King Career Center has >8.
21.05.070 TABLE 21.05-3: TABLE OF ACCESSORY USES	Child Care	Sometimes secondary education's Family & Consumer Science classes have provide child care for more than 6 children as part of the curriculum. Would this be permitted as an accessory use?	Clarify.	N  Not addressed.
21.05.080.E.9	Location of relocatables	Relocatables sometimes must be located in parking lots. They may also alter or impede on-site pedestrian traffic.	Provide exception for schools.	N  Not addressed.
21.06.010 TABLE 21.06-4: DIMENSIONAL STANDARDS (PLI)	Lot coverage and setbacks	The PLI lot coverage and setbacks conflict with Section 21.05.040(E)(4)(b)(iii)(A). As noted in review comments to that Section, neither the minimum lot size nor the setbacks work for urban schools such as Denali Elementary School.	Refer to the building codes for setbacks.	N  Still allows 45% lot coverage

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21.06.020.A.2.h.ii	Handicap ramp	This is in direct violation of the International Building Code requiring 42" handrail heights at landings greater than 30" above adjacent grade. This is only one example of numerous other detailed provisions that ignore building codes' requirements.	with, revise, delete from, or add to accepted building codes. To avoid conflict with them, either leave the detailed building construction and dimensional issues to the building codes, or hire a building code expert to scrub your "land use planning" document of conflicts with the building codes.	N 48" max. width versus required 60"sq. landing or >72" switchback for direction changes. This is example of
21.06.020.E.3	Height Measurement and Exceptions	These may conflict with building code definitions.	Coordinate definitions with building codes for consistency.	N No apparent coordination with building codes - see comment above.
21.07.080.A	Purpose of landscaping, screening and fences	There is no reference to security issues. Crime Prevention through Environmental Design is a principal Anchorage School District seeks to include in its design standards. As an example, there is the 3' maximum, 8' minimum guideline which means no shrub between public street view and a school should exceed 3' high, with 18" clear from foliage to ground, and no tree foliage in the same circumstance should be less than 8' above ground level. For more information, see the website: <a href="http://www.safetyzone.org/pdfs/ta_guides/packet_4.pdf">http://www.safetyzone.org/pdfs/ta_guides/packet_4.pdf</a>	Add security and crime prevention as a purpose.	N Security is referenced in 21.07.080.F.6.d.vi for parking lots only. It also needs to apply to building perimeters and pedestrian routes to entries.
21.07.080.F.5	Purpose of perimeter buffer landscaping	See comments about CPTED above.	Address security and crime prevention.	N Security not referenced.
21.07.080.F.5 Table 21.07-3	Applicability of perimeter landscape buffering	The category 2 buffer appears to work against CPTED for both R-5 to R-10, TA, W and Collector, Arterial, Expressway	Compare with CPTED principles and adjust to category 1 perimeter buffer.	N ditto
21.07.080.H.3.d	Amortization of non-conforming Refuse Collection Receptacles	Any amortization term will be difficult for the School District. We have over 90 facilities, the majority of which do not comply with the proposed screening requirements. The District would have to present a bond issue to the voters. It is highly unlikely voters would approve dumpster screening when it is often difficult to have them approve schools for unhouseed students.	Exempt the School District.	N Five years would spread costs out more, but 10 years would be more manageable.
21.07.080.H.6	Screening of wall-mounted mechanical equipment and motors	the wall. Wall locations are better than roof, where possible because snow piles do not obstruct their function. Most of the vents are treated in an aesthetic manner and are usually limited to schools' service areas. Consider a kitchen exhaust 16' up high on a wall screening this would be very difficult	Delete or add options to treat exhausts in manners compatible with building's materials and design.	? To be discussed with community. Revisions later.
21.07.110.G.1	Building orientation	This does not work for all schools. For example, the neighbors requested the new South Anchorage High School have minimum visual impact from the road. Moreover, the School District needed maximum view of the building from the primary street side for visual security, and the solar orientation necessitated the building's orientation to be perpendicular to the primary street.	Exempt schools. - [9/05: The majority of these standards apply to PLI commercial buildings. There is a big difference between Educational and Commercial. Separate PLI schools from these. ASD's developing Design Standards would be the appropriate place for much of this.]	N Continues to be problematic. "Best practices" of the architectural and engineering professions in response to facility usage should govern.
21.07.110.G.1.e	solar orientation of public spaces	On a large building, such as a school, there are multiple entries and the massing is not usually a simple form. This presents a challenge during the months of use (fall through spring) to prioritize which spaces should receive the best solar orientation. It is probably more useful for the classrooms to receive the greater priority than the entries, in cases where there is a conflict. There is also minimum use of exterior entry plazas in the winter when the sun angle and temperatures are low.	Test validity of this on a number of ASD schools before requiring schools to comply.	N Ditto
21.07.110.G.2.c	Roof cornice requirement	What is the purpose of this? Consider the new Service High School fascia with no cornice. It very much improves the appearance of the building's elevation. Cornices also invite icicles except for the most careful detail design, including heat trace.	Delete requirement.	N Ditto

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21.07.130.E; Table 21.07.13	Lighting zones	The School District, in its designs, is mindful of light pollution into neighborhoods. It also must strive to meet the CPTED goals of crime prevention.	Verify that the lighting zones for PLI comply with CPTED.	N Unclear if IESNA RP 33-99 addresses same level of security provisions as CPTED.
21.01.090.D.1.b p.12	Pending applications for multi-phase projects	If a Master Plan has been approved prior to effective date of new Title 21, do new provisions affect individual phases designed after effective date? For example, high schools have multi-phase, multi-year projects. Most have approved master plans going back to 1999 or 2000.	Clarify.	N No response or revision
21.03.020 Table 21-03-1, page 41	Summary of Notice Requirements	This requires school to have notices mailed for their Major Site Plan Review by the Director, including to "such additional persons or geographic areas as the Director may designate". Assuming this would include schools' attendance areas, it appears to be an excessive and expensive requirement, considering quantities of attendance areas' households. For example, Dimond High School's attendance area might include 12,300 households (1,900 students); one of its feeder, Mears Middle School's area, 12,300 households (1,100 students); and one of its feeder, Sand Lake Elementary School's area, 2,125 households (625 students). Except for new schools, each has its own communications system with parents and students. Moreover, projects are presented to Community Councils and PTSA's in each area. At each school with a capital project, a Building Design Committee is formed. This is intended to include members of the community, parents, staff, and students. The historical practice has been to both post and publish school capital projects. This should be adequate.	Delete "Mailed" notice requirement for PLI.	N No response or revision
21.030.170.A & 21.11.060.B.3	Nonconforming signs	Verify that this means the Polaris K-12 Marquee school sign would need to be removed by October 1, 2006.	Verify.	N
21.05.010 Table 21.05-2	Transportation Facility	Would ASD's bus garage fall under Transportation Facility even though it isn't a "Bus transit center"? Or would it fall under "Vehicles & Equipment" (non-PLI)?	Clarify.	N No response or revision
21.050.040.C.4.a	Governmental Administration and Civic Buildings	It is assumed that this definition includes Anchorage School District's administrative and curriculum support offices.	Verify.	N
21.050.040.E.4.b.vii	Elementary School Buffering Standards	Why are buffering standards along property lines adjacent to residential zones applied to elementary schools only and not high or middle schools?	Clarify.	N
21.070.110.B	Building Standards Applicability	Do schools, which could very well be considered "special-purpose public facilities", fall under this exemption? Again, as noted in previous comments, schools and commercial buildings serve very different purposes and have different design requirements.	Exempt schools and rely on the Anchorage School District standards (as noted in 21.05.040.E.b.iii), or pull out and edit those provisions related specifically to schools as public facilities.	N
21.07.120.E	"commercial establishments"	21.07.110 refers to "...COMMERCIAL BUILDING STANDARDS". 21.07.120 delineates standards for "LARGE COMMERCIAL ESTABLISHMENTS". This is confusing when many provisions of the "General Standards Menu" for each address the same concerns and some are unique. Including "PUBLIC FACILITIES" with "COMMERCIAL" further exacerbates the confusion.	Clarify.	N No response or revision
21.07.130.I.1.d	Lighting "spillover"	Lighting spillover can differ greatly depending on atmospheric conditions despite baffles, e.g., ice fog, low snow clouds, clear night sky, etc.	Qualify requirement.	? Under revision.
21.10.060.C.2.a	Signs: wrapping structural steel supports"	ASD has a number of signs less than 8' tall with steel column supports less than 4" tall between the base and sign. Are these to be wrapped?	Clarify. There appears to be a lack of rationality. If a 6" length is waived, how about 12" length? If the purpose were defined, it would be easier to understand this provision.	N
21.13.020 4/17/2006	Rules of Construction & Interpretation	Because there are a number of Title 21's design standard dimensions and conditions that may conflict with Municipality-adopted building codes, and lacking verification that all such measures have been coordinated with the building codes, some order of precedence should be included to address possible conflicts.	Add provision that gives precedence to building codes over Title 21.	N

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21.13.030	"Profession"	Previous definition was broader and more inclusive.	Add "architecture" to list.	N
<b>ITEMS FROM DRAFT #2</b>				
21.02.020.C.12.a	Record of Proceedings	Tapes are quickly becoming obsolete and being replaced by digital.	Revise "tape recording" to "audio recording".	
21.02.080.B.7	Art funding	"Implement the art funding requirements for public buildings and facilities, as stated in title 7," does not reflect the current process where Jocelyn Young's office in the Museum implements and manages the 1% Art program for public facilities, including schools. Does this provision abrogate her responsibilities? Does this refer to art only on the exterior or include interior art?	Clarify.	
21.03.020.F.1	Request for supplemental information	If the Department requests supplemental information, it will generally mean a 30-day delay in hearing the application. Other than the Department issuing a waiver, this delay could make a substantial difference in beginning a project's construction during a current building season. This gives the Department undue control over the success or failure of a project based on timeliness and financing.	Add language to the effect that the Department's request for supplemental information makes a significant difference in the approval/denial.	
21.06.010 Table 21:06-4	Site Coverage and Setbacks	This appears to conflict with 21.05.040.E.4.b.iv.(a) - 45% coverage versus 35%; 25' setbacks versus 50'.	Resolve apparent conflict and also note inappropriateness of 35% and 50' with urban school site.	
21.07.090 Table 21.07-4	Off-Street Parking Schedule A	For East HS, this would mean about 650 parking spaces minimum. Our Master Plan shows more than this. Briefly looking at other schools, this also appears to be achievable. Conclusion: generally acceptable to ASD.	No action required.	N/A
21.07.090.H.6a.i and iii	Snow Storage and Handling	ASD infrequently removes snow from its sites. It does not have the financial resources to do so. Increasing the Budget to comply with this Title 21 provision is questionable use of tax-payers' money. Education has a higher priority than snow removal in the General Fund Budget. In most cases, except for a year with heavy snowfall, snow is stored on sites for the entire winter. Therefore, the 21-day limit is unacceptable to ASD. Where possible, ASD attempts to reserve snow storage equal to 20% of the parking areas. On small sites (such as Denali Elementary School), snow has to be placed on sites' perimeters. This provision says ASD cannot store snow on its site perimeters. Wherever possible, ASD avoids depositing snow on its landscaping - especially shrubs and trees.	Exempt ASD from this provision.	
21.07.080.G.2.d	Visibility Clearance Areas	The referenced chapter 21.06.020.A.8 was deleted in Draft #2. What is the new reference, if any?	Clarify.	
21.07.080.G.4.b	Installation of Landscaping - Surety	Is this in addition to ASD's warranty requirements? If so, ASD would need to reference it. The amount of retainage for warranty may conflict with ASD's Division 0 and 1 provisions.	Clarify and coordinate.	
21.07.080.H.2.i	Refuse Collection Screening	This does not appear to address trash compactors commonly used at ASD school sites.	Clarify.	
21.07.110.E.4.b	Windows on ground floor	This does not address educational spaces, such as Music Rooms, Instructional Media Centers and Gymnasiums, where it is advisable to have higher windows for acoustical reasons, use of wall for shelving, and damage control. See Denali Elementary School and South Anchorage High School, for example, where the majority of the north elevations have higher windows.	Test restrictions in real-life situations.	
21.10.120 Table of Contents	Table of Contents - 21.10.100	Referenced 21.11.070 Nonconformities chapter is not include in Draft #2.	Provide 21.11.070	