

Thank you for the opportunity to comment on the current Title 21 draft revisions. See below for my specific comments that I am giving to you as an individual landscape architect practicing in Anchorage.

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General comments:

- 1) **Intent of Landscaping:** This draft still places great emphasis on landscapes that screen. This is inherent in the wording of the text, plant material requirements, percentages of coniferous plants, and the dictation of how planting and fencing is placed.
- 2) **Effective Incentives:** This draft does a better job of offering incentives to good design. Allowing landscape units for art, lighting and other creative northern design solutions is a great start. As well, the irrigation incentive to remove the bonding requirement is another way to create positive incentives. Additional incentives would still be beneficial. These could include: detention ponds (and progressive stormwater management in general), snow storage, facility sharing (parking, screening, etc...), maintenance, tree retention, and alternative transportation facilities. Many of the site design approaches within the LEED (Leadership in Energy and Environmental Design) certification system should be encouraged and rewarded within the proposed Title 21.
- 3) **Unenforceable Language:** There are numerous locations in the document where text is provided that is unenforceable and does not necessarily lend clarity to the subject areas. Any text that is philosophical, guiding in nature, or unenforceable should be removed. The location for this text is at the beginning of sections where 'purpose' is discussed. Additional unneeded text will only detract from clarity.
- 4) **Prescriptive vs. Performance Requirements:** The developer/designer should be allowed flexibility in how they meet some requirements. Rather than telling them 'how' they must do it, describe what the end product must (or must not) look like. For example, for screening, a height needn't be dictated for fencing. Rather, state that what is to be screened must not be seen from a stated location(s). This is still fully enforceable.

Specific comments:

21.07.080 – F. – 4 landscape units awarded (p.349)

Delete or further modify "encourage use of larger trees" – in speaking with local tree professionals, larger trees do not necessarily provide a benefit, as their mortality is higher during establishment.

Table 21.07-1: Landscape Units Awarded(p.350)

-This table needs substantial work to tailor it to actual costs, and to ensure that the points associated with any given item are not less expensive to buy than other points. This would skew usage to items that reduce project budget, but still meet the same requirements. (This table could also be used to reward the use of certain items by purposefully making them less expensive)

-Within 'retained vegetation mass'... it is confusing as to what "or any combination thereof" actually means. For example, for 300+ square feet, I would recommend stating a requirement of 6 trees if that's what it means. At the beginning or the end of this section, state the minimum size requirements in general.

-Within "NOTES": is this meant to refer only to 'perimeter buffers' or does it mean perimeter landscaping? Would better wording be, "points awarded for retained vegetation may only be applied to the lot line, street frontage, or interior area where the vegetation is found."

- Trees counted for credit should only be those that are expected to survive. For example, this could be delineated as only trees with their entire drip line contained within the area as counting for credit.

-a minimum width for retained plantings should also be listed. For example, listed square footages should have a minimum dimension of XX'.

21.07.080 – F. – 5.a. Purpose (p.351)

The four landscape levels could/should be simplified, and brought semantically into line with current T21. For example: L2 buffer should be kept, but termed "visual enhancement landscaping" or perhaps "perimeter enhancement landscaping". L3 separation should be kept, but termed "screening landscaping" or "perimeter screening landscaping". Flexibility should be built into the two of them through average and minimum widths.****

Table 21.07-3: Specifications for site perimeter landscaping

The units for L2 are roughly equivalent to existing T21 standards. Units for L1, L3 and L4 are significantly higher than any requirements within existing T21. It is requested that whatever levels of landscaping are used, that they be made equivalent to existing T21 requirements. Existing T21 provides for a good level of landscaping.

21.07.080 – F. – 5.d.v. (p.353)

Trees counted for credit should only be those that are expected to survive. For example, this could be delineated as only trees with their entire drip line contained within the area as counting for credit.

21.07.080 – F. – 6.C.v. perimeter landscaped areas wider than 20 feet (p.355)

Why is there this requirement? Very prescriptive and unnecessary.

21.07.080 – F. – 6.D.iii. Minimum stocking requirements (p.355)

If you read between the lines, existing T21 has an equivalent of approx. 6 units/200sq.ft. (application of visual enhancement landscaping #'s). The proposed 8 units/100 square feet would be very dense and should be reduced.

21.07.080 – F. – 7.c Site enhancement landscaping (p.356)

Is site enhancement landscaping only what's "left over"? Might this negatively encourage people to 'dedicate' areas as being something else... excessive snow storage etc?

21.07.080 – F. – 8.e.i. Signature Trees (p.357)

Are signature trees defined?

21.07.080 – G. – 1.a. Plant choices and quality (p.358)

-Delete salt-resistant. This isn't really an option for plant materials.
-I would prefer that the Muni reference the USDA publication on Invasive Species in Alaska for a list of plants that people CAN'T plant (<http://akweeds.uaa.alaska.edu/index.htm>). This will be much easier to enforce, and allow more creativity with new cultivars or species.

21.07.080 – G. – 1.b. Credit for retaining Existing Plant material (p.358)

-As per previous comment, plants should not be on the USDA invasive species publication.

21.07.080 – G. – 1.c. Winter color and interest (p.358)

-This is unenforceable and should be deleted. It is not appropriate in this section (plant materials) to discuss hardscape elements or artistic elements or lighting etc...

21.07.080 – G. – 1.d. Tree Plantings (p.358)

-Mulch depth should be 3-4" and not more. More mulch can cause plant health problems.

21.07.080 – G. – 2.1. Adequate distance from curb and intersection (p.359)

-change last paragraph to "plant materials that can accommodate vehicle overhangs including low shrubs and perennials are allowed for the first 3 feet from back of curb where there will be vehicle overhang." Previous wording 'are required' is not appropriate.

21.07.080 – G. – 2.c. utility easements (p.359)

It is not appropriate for the Muni to dictate what can or cannot be within easements. It is necessary to get a letter of non-objection from the utility in question. Requiring that a portion of landscaping 'not' be in an easement on any frontage or area is appropriate to ensure that it is not removed with utility work.

21.07.080 – G. – 3.b. ii. Development Limitations in tree retention Areas (p.360)

-define “critical root zone”

21.07.080 – G. – 4.b. Surety (p.361)

-be careful with the assumption that a project will have a “project landscape architect”. Currently this is not fully required by state legislation.
-24 month warranty is not standard. 12 month warranty is industry standard.
-who will enforce?

21.07.080 – G. – 4.c. survival (p.361)

-should clarification be made that replacement is for the life of the development?

21.07.080 – G. – 6.a. Maintenance (p.361)

-“...and litter to the extent reasonably feasible” does not seem to be enforceable language.

21.07.080 – G. – 6.b. Irrigation (p.361)

-Replace first sentence with “...establishment period when they are most vulnerable to lack of watering.” The ‘due’ in the current version changes the meaning.

21.07.080 – G. – 6.b.i (p.362)

-this is weak wording. Should be something like: “A fully-functional irrigation system with automatic controller that has been installed by an irrigation contractor who has experience installing similar systems.”

21.07.080 – G. – 6.b.ii (p.362)

-landscape architects design and give final approval on irrigation systems, but do not ‘certify’ them.

21.07.080 – H. – 3.b. (p.363)

-A fence between six and eight feet might not provide adequate screening for large trucks. Change it to performance perhaps? “Screening shall be of a height necessary to screen the average expected truck, but shall be no lower than eight feet in height”

21.07.080 – G. – 6.b. (p.364)

-Some utilities are required in sidewalks. i.e. traffic light controllers

21.07.090 – H. – 10 Bicycle Racks (p.391)

-I would like to see specific numbers of bicycle racks dictated for larger parking areas or building uses. This minimum is not sufficient for larger developments or office buildings. Credit should also somehow be given for providing commuting facilities such as showers and change rooms for staff that wish to bike to work (could this be given as landscape units?)

21.07.090 – J. – 10 Accessible Parking Requirements (p.392)

This section should be deleted in its entirety. These are set out in ADA-ABA guidelines (<http://www.access-board.gov/ada-aba/guidenprm.htm>) and should be referenced, not reprinted. Unless the municipality is issuing stricter requirements, these federal guidelines will trump local requirements. If ADA becomes stricter, the muni will be responsible for misinforming developers.

21.13.080 Rules of construction and definitions (p.551)

-definitions prior to the letter 'F' are missing