

## Comments on Title 21 Chapter 21.07 Development and Design Standards

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**21.07.020 B 4:** I strongly support increased protection of stream corridors and water bodies and encourage a minimum 50' setback in which no disturbance takes place, other than the exceptions noted in 21.07.020 B 7. Dead and fallen trees should be removed only if stream bank is not disturbed. Stumps should not be removed because they are often important bank stabilizers.

**21.07.020 B 7 Line 3:** Change to “supplemented with additional native *plants*”(rather than “planting”)...

I recommend including a document that is the authority on what is invasive in addition to this booklet, which may not be updated and may not include plants that are a problem in the future. (the Forest Service is a division of the USDA.) “... Species listed as invasive in the *Selected Invasive Plants of Alaska* booklet by the USDA Forest Service, Alaska Region **or identified as invasive by municipal or Alaska Department of Natural Resources regulations.** (DNR is the state agency that determines noxious species.)

**21.07.030 A. 3:** In high density areas, such as the CBD, there may not be space for in-lieu options. Because of the increased demands on public facilities by new residents in these areas, consider allowing contributions to expand, upgrade, and maintain, public open spaces. As the number of residents in downtown increase, places like Town Square and the Delaney Park Strip will become their *yards*. It may be appropriate for developers to support and improve these amenities in areas where they can't physically provide new open spaces as required.

**21.07.050:** While moving utility lines underground will greatly improve the visual landscape, it could be very damaging to established landscapes throughout the municipality. I encourage you to require that utilities use tunneling techniques to place and repair lines underground. Many cities now use these techniques where lines can be run through tubes or pipes without disturbing surface amenities except for the entry and exit locations. I'm not an authority on this but have seen examples where lines were run for great distances without disturbing plants above them. I would not like to see blocks of mature or healthy trees removed in order to put lines underground and this could be the result without direction about how it is done.

**21.07.060 E1b:** Perhaps there is a good reason why it was removed, but I would like to see the paragraph encouraging safe pedestrian crossings remain in some form.

**21.07.060 F:** I would like to see bike lanes continue to be encouraged.

**21.07.080 F2 Line 4:** It would be clearer to say “minimum *number* and minimum average widths...”

**21.07.080 F 4:** I am very supportive of preserving trees on sites to be developed but they must be in good condition and worthy of preservation since they will take the place of trees that would otherwise be planted. I recommend that a certified arborist be retained to evaluate these trees. I mailed parts of a publication that gives criteria for deciding which trees can and should be preserved. Trees must also

be adequately protected during construction and this is usually the responsibility of people who have no training in this field.

Table 21.07-1:

- What is the definition of a landmark or signature tree and who decides that a particular tree meets the criteria?
- I would like to see credits for retaining 4-6 foot evergreen trees. An established 4' spruce will likely be larger than a 6' planted tree in just a few years and with less maintenance. Planting 4-6' trees is also more appropriate on some sites and they will become established more quickly. I concur with not giving additional points for trees taller than 10' as most people are not able to properly move and care for a larger tree.
- Multi-stemmed should have a size assigned – either for total caliper or individual stems.
- Define how caliper measurements are made or refer to American Standard for Nursery Stock, which states on page 1, “Caliper measurement of trunk shall be taken six inches above the ground up to and including four-inch caliper size. If the caliper at six inches above the ground exceeds four inches, the caliper should be measured at 12 inches above the ground. “ It will be important to have trees measured correctly and consistently. Landscape architects will know to apply this definition but it often causes confusion since foresters measure trees at 4.5 feet (diameter at breast height).

21.07.080 F 5iv / d.v.: I don't think the screening requirements along the Glenn and Seward highways are at all successful and this impacts a very large area and many thousands of people every day. Part of the problem is enforcement but I think it would help to be more specific in describing the purpose of this screening. It should screen the properties, including signs, from those passing by on the highway as well as screen the inhabitant or users of the property from the highway sights and lights. It is not succeeding in doing either currently. I think we should require a degree of screening if that is possible – there should be no space above a specific number of feet without vegetation.

I would like to see some things prohibited, such as signs being displayed for highway users. People do not want to maintain a landscape that screens their business from potential customers. A good (bad) example is the ATV dealer on the west side of the Seward and just north of Dimond. The side of their building is essentially a roadside billboard, which should not be allowed. There are also new subdivisions on the east side of the highway where the screening screens nothing and space has not been left for the trees to ever be large enough to screen either residents or drivers.

Another concern is with the 30' buffer requirement along the Glenn Hwy. where there are utility lines overhead in the 30' buffer. This precludes spruce, birch, and other vegetation that can provide screening in most of the 30' area. Trees and roots are damaged, which makes them more likely to fall onto the lines at some point, especially where the forest has been removed and the remaining trees are subject to the strong southeast winds that the forest sheltered them from in the past. The buffer needs to extend far enough beyond the clearance zone of the lines to allow screening trees to be planted. Perhaps an additional 5 feet could be added when electric lines limit the space for trees.

I'm thinking of the large, new subdivision in on the south side of the Glenn, west of Turpin. The buildings are so close to the “buffer” that there is not room for screening and you can look right into the windows from the frontage road. I do not believe this is what is intended.

We also need different planting specifications for planting in the natural forested areas along roads. I think smaller trees could be planted so there is less damage to the surrounding vegetation and the planting holes should not be as large as in disturbed areas. These guidelines should not be in Title 21

but it should refer to them as the standard to follow – perhaps in the Municipality of Anchorage Standard Specs.

Table 21.07-3: The minimum width at any point for L4 should be increased to 30 feet. A mature spruce is 20' wide and we should allow room for spruce to mature if we want an effective screen. I'm not sure the width of one tree is adequate.

L2 buffer of 8 feet is not adequate for most evergreens. Only a columnar variety would be appropriate and these are not often used. It should be noted that an evergreen with a mature width of greater than 8 feet is not allowed.

21.07.080 F 6 v: Trees are required to be within 10 feet of sidewalks. Evergreen trees should not be planted closer than 8 feet from a sidewalk. Even this is too close for a tree that will reach 20-25' in width. This is a safety hazard in many parts of town and cannot be easily fixed since they can not be pruned like a deciduous tree.

21.07.080 F 7 a.: Add to first sentence, "...prevents erosion and dust by covering bare or disturbed areas **and reduces and cleans storm water runoff.**

21.07.080 F 7cii: I think larger lots should retain more than one tree. It should not be the same for the smallest and the largest lots.

21.07.080 F 7d: Typo in last sentence. Replace *to* with *do* "...preferences do not support..."

21.07.080 F 7e: We need standards for what is retained. Someone with expertise must decide what is valuable, healthy, and safe. See reference that I mailed to you for typical standards for retention.

21.07.080 G 1a: There are no standards to use in determining what trees appropriate for our climate are salt-resistant, tolerant of urban pollution, and drought tolerant. Our native trees certainly do not qualify. I think it is better to just refer people to the Master Tree and Shrub list where these things can be taken into account. Also, it is misleading to imply that there is such a thing as a low-maintenance plant. Every plant will need care for at least the first few years, which means very regular and adequate watering.

In last sentence, I think it is most appropriate to say "Plants may be nursery grown or transplanted from the wild or native stands, provided they meet all ANSI Z60.1 standards." I think this language better complies with the standards manual, which refers to field grown in the nursery and wild or native stands.

21.07.080 G 1d: I'm not sure why one characteristic of evergreens is noted in reference to ANSI. There are many other requirements as important and more important than this. I would write, "All trees and shrubs shall meet ANSI Z60.1 American Standard for Nursery Stock, most current edition."

The requirement to use a minimum of 4 inches of mulch (I think it means to say "composted, not composed) is not correct. Mulch should be 2 to 4 inches and no more. There are several other important considerations for using mulch and other materials, such as rock, may be appropriate in some situations. I do not think this level of detail should be in Title 21. This document should refer to MOA Standard Specifications for details about tree planting. Recommendations change over time and need to be in a document that can be revised and can include comprehensive information and diagrams. The specs can also describe planting in different settings and conditions. The Master Tree

and Shrub List should also be referenced and I think is an important document for the municipality to maintain and keep up-to-date.

21.07.080 G 3a: Retaining trees in a construction area is important and difficult to do successfully. I think the term “tree protection zone,” might be better understood than “critical root zone.” Although it does remind people that the roots are important. In any event, a definition is necessary. I mailed a publication to you with information related to this. It defines tree protection zone as the area around a tree or group of trees in which no grading or construction activity may occur. There are different methods for determining what size this should be. The method that takes into account the age and condition of the tree seem best but if that is too difficult for us, the tree trunk method would work – the zone would be a minimum of 1.5 feet from the trunk for every inch of diameter at 4.5 feet above grade (DBH).

I am glad to see a six-foot fence required around the trees with no disturbance allowed within that area. I would also recommend that a sign be required on all protected areas: Tree Protection Zone – Within this zone there shall be no ... list prohibited activities b.ii (A) – (F). The MOA should provide these signs to contractors. Seattle posts such signs on all construction areas along with the penalties for damage to the tree. (I have a copy).

21.07.080 G 3c: I support raised beds but do not support reducing the width by two feet if this applies to 8-foot beds where trees are allowed and there is the possibility of bumpers overhanging beds. Even an 18” wall will not keep out bumpers of large trucks. Six feet is not wide enough for any evergreen except the most columnar varieties. This works for perennials or small shrubs and most deciduous trees.

21.07.080 G 3e: I encourage you to put this section back in unless it has been moved elsewhere. We should encourage onsite retention and treatment of runoff. Many cities use these and would have standards that ensure that they are functional and attractive. Use the term, “rain gardens,” rather than retention pond.

21.07.080 G 4 a: I can’t think of a reason why trees and shrubs could not be planted until August 31. Plants are often more successful when installed during this wet part of the summer.

21.07.080 G 3c: First sentence does not need the second “removed”. This seems too long a period to wait before replacing a dead landscape. Plants could remain onsite, dead, for almost an entire growing season. If it is early in the season, they should be replaced by late in the year and if they are found dead or damaged late in the season, they should be replaced early in the next season.

21.07.080 H 2: I recommend, “...refuse collection receptacles **must** ~~should~~ be adequately screened...”

Reducing the number and intrusiveness of dumpster is one of the least expensive and least difficult steps we can take to improve the appearance and health of our neighborhoods. There are so many now that it is almost impossible to enforce standards so reducing the number is the only viable means to reduce their impacts. I also strongly support not allowing dumpsters at 4-plexes. This will greatly reduce the number of dumpsters that the city will have to inspect for compliance. I do not believe we will ever have staff to enforce standards for this large number of dumpsters and eliminating 4-plexes would make this job much easier. Most of the ones I see have the lids up with trash spilling out or piled high so that it blows in the wind and is spread by ravens and other animals.

I also believe that three years is plenty of time for property owners to comply. They should be aware by now that changes are in the works so it should not take longer than 3 years to make these changes. If it is not feasible for those who have to install screening, at least consider reducing the time for those who merely have to get rid of dumpsters and go to individual garbage service. This should be done within one year.

21.07.080 I 3: Six feet seems like an adequate height for residential fences. If the concern is for moose, then the top two feet should be some open or lattice type design, not solid for eight feet.

**21.07.100 D 2 vi:** I'd like to see us encourage alternatives to impermeable surfaces. Other cities in the Pacific Northwest are offering incentives for permeable blocks and other surfaces that reduce the amount of runoff. Rather than offering it through an exception, provide suitable alternatives. Driveways are the best places to begin as they do not handle large volumes of traffic.

**21.07.110 E:** I'm not sure what category to put this option in, but would like to encourage green roofs and roof gardens, and also use of rain gardens and other means of retaining and treating storm water on site. Maybe this is an incentive that does not fit in the design section, but think we should find economic incentives since it can save us money in the long term.