

# Planning and Zoning Commission

March 18, 2024

Case #: **2024-0006**

Case Title: **Title 21 Text Amendments: H.O.M.E.  
Initiative**

Agenda Item #: **G.1.**      Supplementary Packet #: **2**



Comments submitted after the packet was finalized: **Comments  
received from 3/15 (3:00 pm) through 3/18 (1 :30 pm):**

- David Jadhon (p. 1)
- Patrice Parker (p. 1)
- Sandra Graham (p. 2)
- Sarah Kleedeahn (p. 2)
- Mara Carnahan (p. 2)
- Cindy Kindard (p. 2-3)
- Alexa Dobson (p. 3)
- Martin Hansen (p. 3)
- Deborah Hansen (p. 3-4)
- Nancy Pease (1<sup>st</sup>) (p. 4-5)
- Eric Visser (p. 5)
- Marty Margeson (p. 5)
- Mike Kenny (p. 5-6)
- Nancy Pease (2<sup>nd</sup>) (p. 7-9)

Sent by email:      **X**   yes               no

*This page intentionally left blank.*

## Public Comments: 2024-0006

Commenter	Email	Phone Number	Submitted
David Jadhon			3/15/2024 3:43:25 PM
<p>I disagree with the Assembly's plans to rezone South Addition. It appears to me they are appeasing developers who don't live here, just to increase their profits or maybe the tax base, with no consideration for safety or investments made by people who live here. Please allow the process to commence as it should, and not be ramrodded by this Assembly. My community council has expressed concern for months only for the Assembly to continue with these changes.</p> <p>Thank you taking time to read this. I have written ADN and KTUU asking if they would consider the current Assembly push to change our neighborhood as a news story.</p> <p>As I understand it, a 6-plex could potentially be constructed on a 6,000 square foot lot. Where will 6-plus vehicles park? Affordable housing? These will be income property, likely managed by some outside property management company. And will the MOA set rental rates to make them affordable?</p> <p>The excuse for this new zoning is people want to walk or bike to work and want to live near the town center. And yet Bootleggers Cove, where condos abound (otherwise known as 3- 4- 5- and 6-plexes), sees very little pedestrian or bicycle traffic heading downtown to work.</p> <p>Develop empty downtown lots.</p> <p>Several developments have already been built overlooking the railroad, or along 9th Avenue at the end of the Park Strip. Another apartment building is going in near Fire Island Bakery. They look nice and are dense, but don't provide AFFORDABLE housing. There's a double standard enforcement. Fences need to be 4 feet so we can see pulling out of our driveway, yet over the years, after developers no longer were required to provide off-street parking, new residents use the street to park trailers that fit 4 snow machines, plus 4 wheel drive vans, plus extended cab pickups. They take up half a block (15 and P). You have to pull into the street to safely turn. Inlet Place to N Street along 15 Ave are perfect examples.</p> <p>We can't accommodate the current population in our neighborhood, and more 4-6 plexes with more on-street parking does what exactly??? Photos of parking is South side of 15th Ave approaching N Street. Pretty soon the cars move into the center of the road. City can't plow if cars are constantly parked and they don't put up the signs when clearing snow like on the East side of I street. And 15th and P. Residents claim they don't have room for all their toys, 111 use the street. . The MOA cites and the owner moves around the corner, then back again. Come by the lagoon during the MOA skating events. South side of 15th isn't plowed and North side has cars along the rolled curb; half in the street and half on the sidewalk. No place to walk. And if there's a race, you can't use the trail.</p>			
Patrice Parker			3/16/2024 1:09:55 AM
<p>I oppose 2023-087(5). The Planning Department's scathing analysis reflects my concerns. Scattershot density, allowing unfettered commercial buildings within residential neighborhoods, no consideration of winter city concepts of sunlight penetration and snow storage are but a few of my concerns.</p> <p>Further, the Assembly began planning for both AO 2023-103 and -087 in September 2022, sitting down with developers and real estate professionals but not with their constituents. They continued to meet with these self-described "housing enthusiasts" for over a year before unveiling AO 2023-103 to us. Our community council minutes for that period of time show no mention of this legislation. As we tried to understand the proposed ordinance, they brushed away our questions and requests for postponement. The same thing is happening with AO 2023-087.</p> <p>Their behavior is appalling and no consequential legislation should be mishandled like this. Please vote no on this shabby excuse for rezoning.</p>			

Sandra Graham		3/16/2024 3:43:54 AM
I oppose the new zoning laws. It changes the character of historic neighborhoods in Anchorage, doesn't address parking or snow removal/storage, and doesn't create 'affordable' housing. Once again, the assembly is mandating changes that emulate social engineering rather than a reflection of true neighborhood concerns and conversations. I oppose the HOME initiative.		
Sarah Kleedehn		3/16/2024 1:09:00 PM
I live in the South Addition. i favor more density to keep our downtown and city vibrant. However what you are proposing is too much. Being able to put a 4 plex plus an ADU on a 6,000 sq. foot lot is not going to fit into the charm and design standards of our historic neighborhood. Also parking requirements need to be in place. There is already a shortage of parking. When it snows there is little room for snow removal and parking. Height standards should not be increased. We have solar panels and your proposed height increases could block our sun access. There are many vacant lots that could be used for density housing downtown. Please keep the current zoning standards. Thank you.		
Mara Carnahan		3/17/2024 10:13:40 AM
<p>I want to respectfully share my opposition to AO 2023-087 (HOME initiative) because it unravels decades of community planning, is unclear and incomplete (as pointed out by planning staff review), and does not embrace thoughtful and professionally guided planning for our beloved city.</p> <p>I believe the sponsors have good intentions, and want to address the real housing shortage in Anchorage, however, this initiative is not the correct path forward.</p> <p>We need to develop intentionally and proactively to design and build an Anchorage that continues to thrive for generations.</p> <p>I remember Anchorage of the past, where commercial developments sprung up in residential neighborhoods without planning and where site condos resulted in streets too narrow to accommodate emergency vehicles in winter,.</p> <p>I support carefully planned higher density developments that respect height, set back, and building dimensions of existing neighborhoods. In particular, we need to insist on standards that allow for healthy living in a winter community including access to sunlight and snow storage.</p> <p>Let's incentivize high density residential development in the downtown business core, let's encourage developers to inspire us with thoughtful development, let's be an example to other cities of how a community can come together to find creative solutions to housing needs instead of stripping away decades of intentional community planning.</p>		
Cindy Kinard		3/17/2024 3:56:30 PM

Cindy Kinard (cont)	<p>I previously sent comments to the Assembly, after the proposal first was proffered. But, since the proposal was sent back to PNZ, etc., for review and PNZ wishes public comment...</p> <p>Here goes:</p> <ol style="list-style-type: none"> <li>1. ADUs-the "perfect" solution--This kind of proposal was previously used with the same sort of intent-when ADUs were made legal in many parts of the Muni. This proposal would have made more and more affordable units available with "minor" infill on existing residential lots with existing utility service...easy money, right? Well, no. The results have been much less than hoped. And no wonder! The economics of the situation just don't work...It simply doesn't pencil out for most homeowners, who, of course, already own, or at least have at their disposal, the land on which ADUs could be built.</li> <li>2. Massive rezoning-Next up-- This current proposal is likely really no different in its probable outcome. Where infrastructure exists that could most readily serve multi-unit abodes, the costs would generally include buying land and removing existing buildings, in addition to construction. With construction costs having soared in past years and construction workers being in such short supply, I believe any addition of units would be few and far between as well as priced way above the hoped "affordable stock" desired.</li> <li>3. Concluding-Rethink! This idea of throwing the problem back at the private market and calling things all good, is not productive...It is very likely that desired results can be achieved only with funding from outside/government/large foundation grants/gifts and with careful planning as to locations and configurations to best serve the target populations and retain the fabric of the well considered long-term plans already in place for the whole of the municipality.</li> </ol> <p>Let's go back to the drawing board with clear-eyed logic as our guide, not "kick this can out of our court" and-move-on-blinders.</p>
Alexa Dobson	<div data-bbox="1258 972 1529 1010">3/17/2024 6:54:10 PM</div> <p>Hello! Just adding my note of support for this zoning reform. I'm a born and raised anchorage resident and a homeowner here, and I support efforts to make it easier to build the affordable housing our community needs.</p>
Martin Hansen	<div data-bbox="1258 1121 1529 1159">3/17/2024 11:03:21 PM</div> <p>I object to the rezone proposed by the Anchorage Assembly in case 2024-0006. There has been limited opportunity for public comment in this hasty, rushed process. I live in the South Addition because it is an attractive neighborhood. The rezoning proposed would turn our neighborhood inside out and violate the northern design standards specified in Title 21. The Anchorage Assembly has bypassed the Planning and Zoning Department and and no data has been presented to demonstrate that Anchorage's zoning limits housing stocks or result in unaffordability. The proof of that are the 70 some lots in the South Addition that have been vacant for years - in some cases, more than 40 years. Zoning standards are being cited as causing housing unaffordability here and that is ridiculous. Zoning standards make this neighborhood a good place to raise kids, walk to downtown and have a good neighborhood. That's why it is desirable. Please reject the initiative and send it back to the drawing board, have a decent public process and take the time needed. Thank you.</p>
Deborah L Hansen	<div data-bbox="1258 1593 1529 1629">3/17/2024 11:17:59 PM</div>

I oppose the HOME initiative. It - 87(5) - does not meet rezoning approval criteria under Title 21.03.160.E

E.1. Public health, safety, and general welfare

E.2. Conform to Comprehensive Plan and Map

E.4. Compatible with surrounding development (specifically what is proposed for the South Addition.)

The proposal is incomplete and based on faulty data. I have attended both public meetings available to me- the March 4 zoom webinar where the three assembly members-presenters were not planning to take questions/comments and discuss. On the special zoom SACC meeting on March 14, the two assembly people proposing these changes clearly did not prepare to take questions and only took a couple of questions from a few people for a total of 2 hours. I have many questions and am outraged that the assembly is rushing a major zoning process that affects close to 1000 lots in the South Addition alone. There needs to be a clear public process and the planning staff input resulting in presentation to the assembly for approval. The current process is backwards. Thank you for your consideration.

Nancy Pease

3/18/2024 12:33:35 AM

I Oppose 87(5). I support the recommendations of Rabbit Creek Community Council, which include suspending the 87(5) rezoning effort and funding a 2050 Comprehensive Plan with broad public outreach and data-driven staff analysis in order to guide future zoning.

I also support the Planning Staff's recommendations, especially Staff Recommendation 3, which includes these points:

focus the scope of the zoning revisions on targeted infill and redevelopment areas with urban infrastructure and public services;

maintain low density in hazardous, inaccessible and critical environmental areas; and address impacts of more intensive uses on surrounding properties and infrastructure as required by policies of the 2020 Comp Plan and 2040 Land Use Plan.

I support affordable housing. AO 87(5) won't deliver that. Why? Because current Anchorage zoning isn't a significant areawide constraint to affordable housing or even market-rate housing. The diagnosis is wrong. And the rezoning "cure" is unproven: other cities have done broad rezoning and shown only very slow changes in housing stocks and affordability, if any. Both these cautionary points are mentioned in the Municipal staff's analysis of 87(5). Areawide rezoning is a radical treatment based on an incorrect diagnosis. The primary causes of unaffordable housing are mortgage rates, building costs, and Alaska's economic uncertainties: not zoning.

The 2040 Land Use Plan explicitly "does not recommend areawide rezoning", which is what 87(5) is attempting. The 2040 Land Use Plan calls for targeted rezoning to promote infill and redevelopment, as clearly shown on the LUP Actions Map 3.1. There are acres of multi-family lots empty in prime downtown locations where infill is needed to rescue downtown from its economic doldrums and dereliction.

Can the Assembly arbitrarily rezone the entire Anchorage Bowl for muddled or undisclosed reasons? Not legally. Under Alaska Statutes and Municipal Charter, zoning must comply with adopted comprehensive land use plans. Zoning is intended to be a tool of planning, not to override it. The Municipal Planning staff's analysis is clear on this.

Zoning should not be dramatically reconfigured without cause-and-effect data and analysis.

The Assembly's legislative process is not adequate for such complex and consequential land use decisions. The Assembly's process has thus far been a churn of draft legislation and lobbying. Municipal staff and the public are relegated to analyzing piecemeal drafts that become obsolete before they are subject to public hearings. 87(5) lacks full disclosure or analysis of changes to design standards, dimensional standards, allowed uses, and eventual densities.

Nancy Pease (cont)	<p>Only a small percentage of Anchorage residents know that their residential zoning and development standards are about to change. Even that small attuned percentage still have no way to fully understand the effect on their neighborhoods, their property appraisals, or the future pattern of Anchorage. 87(S) is lurching forward without any analysis of design standards, future densities, traffic patterns, etc. In fact, the proposed areawide residential rezoning poses economic burdens and urban sprawl, not a miracle drop in housing prices. The areawide rezoning will promote infill anywhere, and outward expansion at higher densities up into the subalpine areas of the Hillside, regardless of the environmental conditions or existing infrastructure. Traffic will unnecessarily increase because of the willy-nilly scattering of new density and commercial uses. There will be inefficient pockets of densities that do not match up with infrastructure. Taxpayers will be called on to extend roads, build new schools, fund additional police and fire protection. There will be public impacts from higher densities on steep slopes and wetlands and natural hazard areas. All this is inefficient and expensive. 87(S) promotes urban sprawl across the Anchorage Bowl, which is the opposite of the land use pattern adopted through our Comprehensive Plan. Our Comprehensive Plan promotes targeted infill and redevelopment in commercial centers, neighborhood centers, and transit corridors.</p> <p>In summary, I oppose 87(S) because it violates the planning process and subverts the adopted land use plans in many ways</p>		
Eric	eric@visser.com		3/18/2024 11:49:27 AM
	<p>I'm writing in support case 2024-0006. The Anchorage Assembly's HOME initiative ordinance underscores a pressing need for comprehensive zoning reform to address the challenges of housing affordability and development. Anchorage, like many urban areas, faces a critical shortage of affordable housing options, exacerbated by restrictive zoning laws that limit the construction of diverse housing types. By reforming zoning regulations, the municipality can unlock opportunities for increased housing density, mixed-income developments, and more efficient land use. Such reforms would not only encourage the construction of affordable housing units but also foster inclusive communities, promote economic growth, and mitigate urban sprawl. Embracing zoning reform through initiatives like HOME is essential for Anchorage to create a more equitable and sustainable housing landscape that meets the diverse needs of its residents.</p>		
Marty Margeson			3/18/2024 12:45:56 PM
	<p>With a Harvard diploma in Real Estate Development, and 35+ years in the industry, I fail to see how HOME zoning simplification benefits homeowners or our city. It allows commercial buildings to be reclassified as residential so that a developer may now build 5 townhouses on 7000 sq ft lot with up to 40 ft. heights, without any mandatory design standards, weatherization, drainage studies or onsite parking and promoting 60% lot coverage without landscaping or yards. This creates a hodgepodge of commercial-residential neighborhoods which does not attract families to maintain school enrollments, parking nightmares, energy guzzling cheaply constructed block-style buildings to profit builders and investors. Residential zoning historically is less restrictive because of the "pride of ownership" factor which controls development standards. With commercial for-profit property zoning standards need to be stricter to control the "greed" factor. HOME does not benefit housing for the homeless or affordable housing, and this hodge podge rushed planning will create a Portland non-tourist destination. We could learn from successful Arctic cities or from Dublin, Ireland – a tourist destination city prized for it planned low-rise historical development. Long-range our unique Arctic city will suffer losing more families and our tourist industry. I am amazed that our Assembly ignores the complexity of city planning and seems to think such planning is a do-it-yourself-kit. Ignoring constituents, rushing to meet builder deadlines is naïve and will to destroy the appeal of our cherished city.</p>		
Mike Kenny			3/18/2024 1:05:51 PM

Mike Kenny

I oppose 87(S). I understand that ridding cities of single family zoning has been implemented in cities in the lower 48. Anti segregationist forces believing that exclusionary zoning creates segregation along with libertarian believers holding that private property owners should have no zoning restrictions have made moves towards that end.

One size does not cover all. The SE hillside was created under an ice field flowing through what is now Turnagain Arm not from the ice flowing out from the Chugach Mountains. While the political boundaries are set by political decision the geological and biological boundaries are set by nature.

We put years of effort in creating the Comprehensive Plan and the Hillside District Plan element to take into account these elemental differences. There is much data and information to be gathered and reviewed by P&Z staff. The Spring of 2024 hardly seems enough time. The Title 21 rewrite was nearly a year long study.

A Zero Lot Line fiasco looms if the real estate industry faction of the Assembly compresses the time available to study the efforts to eliminate zoning in the lower 48.



TO: Planning and Zoning Commission  
RE: Case 2024-006, rezoning under AO 87S.

I support the recommendations of Rabbit Creek Community Council, which include suspending the 87(S) rezoning effort and fund a 2050 Comprehensive Plan with broad public outreach and data-driven staff analysis in order to guide future zoning.

I also support the Planning Staff's recommendations, especially Staff Recommendation 3, which includes these points:

focus the scope of the zoning revisions on targeted infill and redevelopment areas with urban infrastructure and public services;

maintain low density in hazardous, inaccessible and critical environmental areas; and

address impacts of more intensive uses on surrounding properties and infrastructure as required by policies of the 2020 Comp Plan and 2040 Land Use Plan.

I support affordable housing. AO 87(S) won't deliver that. Why? Because current Anchorage zoning isn't a significant areawide constraint to affordable housing or even market-rate housing. The diagnosis is wrong. And the rezoning "cure" is unproven: other cities have done broad rezoning and shown only very slow changes in housing stocks and affordability, if any. Both these cautionary points are mentioned in the Municipal staff's analysis of 87(S). Areawide rezoning is a radical treatment based on an incorrect diagnosis. The primary causes of unaffordable housing are mortgage rates, building costs, and Alaska's economic uncertainties: not zoning.

The 2040 Land Use Plan explicitly "does not recommend areawide rezoning", which is what 87(S) is attempting. The 2040 Land Use Plan calls for targeted rezoning to promote infill and redevelopment, as clearly shown on the LUP Actions Map 3.1. There are acres of multi-family lots empty in prime downtown locations where infill is needed to rescue downtown from its economic doldrums and dereliction.

Can the Assembly arbitrarily rezone the entire Anchorage Bowl for muddled or undisclosed reasons? Not legally. Under Alaska Statutes and Municipal Charter, zoning must comply with adopted comprehensive land use plans. Zoning is intended to be a tool of planning, not to override it. The Municipal Planning staff's analysis is clear on this.

Zoning should not be dramatically reconfigured without cause-and-effect data and analysis. The Assembly's legislative process is not adequate for such complex and consequential land use decisions. The Assembly's process has thus far been a churn of draft legislation and lobbying. Municipal staff and the public are relegated to analyzing piecemeal drafts that become obsolete before they are subject to public hearings. 87(S) lacks full disclosure or analysis of changes to design standards, dimensional standards, allowed uses, and eventual densities.

Only a small percentage of Anchorage residents know that their residential zoning and development standards are about to change. Even that small attuned percentage still have no way to fully understand the effect on their neighborhoods, their property appraisals, or the future pattern of Anchorage. 87(S) is lurching forward without any analysis of design standards, future

densities, traffic patterns, etc. In fact, the proposed areawide residential rezoning poses economic burdens and urban sprawl, not a miracle drop in housing prices. The areawide rezoning will promote infill anywhere, and outward expansion at higher densities up into the subalpine areas of the Hillside, regardless of the environmental conditions or existing infrastructure. Traffic will unnecessarily increase because of the willy-nilly scattering of new density and commercial uses. There will be inefficient pockets of densities that do not match up with infrastructure. Taxpayers will be called on to extend roads, build new schools, fund additional police and fire protection. There will be public impacts from higher densities on steep slopes and wetlands and natural hazard areas. All this is inefficient and expensive. 87(S) promotes urban sprawl across the Anchorage Bowl, which is the opposite of the land use pattern adopted through our Comprehensive Plan. Our Comprehensive Plan promotes targeted infill and redevelopment in commercial centers, neighborhood centers, and transit corridors.

I oppose 87(S) for several reasons:

- A. **The promise of affordable housing is false.** There is no evidence that rezoning will significantly boost housing stocks or drop prices on the timeline we need.
- B. **87(S) is not ready for a decision under Title 21.03.160.** Insufficient information prevents accurate scrutiny under the rezoning criteria of 21.03.160.E.
- C. **87(S) does not meet primary purposes of Title 21** - 87(S) fails to comply with many of the stated general purposes of Title 21 planning and zoning, including:

efficient use of existing infrastructure; promoting development in city centers and infill areas for efficient travel patterns; and

promoting development patterns that protect and enhance a variety of appealing and distinctive neighborhoods

- D. **87(S) does not meet primary purposes of Title 21** - 87(S) fails to comply with many of the stated general purposes of Title 21 planning and zoning, including:

efficient use of existing infrastructure;

promoting development in city centers and infill areas for efficient travel patterns; and

promoting development patterns that protect and enhance a variety of appealing and distinctive neighborhoods.

- E. **87(S) does not meet rezoning approval criteria - Title 21.03.160.E**

- E.1. Public health, safety, and general welfare
- E.2. Conform to Comprehensive Plan and Map
- E.4. Compatible with surrounding development
- E.5. Sufficient infrastructure and services
- E.6. Avoid or mitigate significant environmental impacts
- E.7. Avoid significant impacts to adjacent land uses
- E.8. Avoid a land use pattern that is contrary to the Comprehensive Plan

#### **4. 87(S) does not comply with the 2040 Land Use Plan**

The LUP calls for targeted rezoning and explicitly “does not recommend areawide rezoning.”

LUP Map 2-1 (p 31) has been misrepresented as the reason for areawide rezoning: but Map 2-1 is a land use patterns map, not a zoning map.

LUP Map 3-1. Actions Map (p. 94) shows targeted rezoning, justified by Appendix A: Planning Atlas Map PZ-2 Zoning Map Amendments (p. 111), These maps plus other LUP language, explicitly call for targeted rezoning.

**5. (87(S) does not comply with the Anchorage 2020 Comprehensive Plan**

The Anchorage Comp Plan calls for targeted rezoning in specific commercial and residential areas, not areawide rezoning. The 2020 Comp Plan cites design standards as an essential tool for compatible infill and for distinctive neighborhoods.

**6. 87(S) does not comply with the Hillside District Plan**

87(S) would rezone the entire Hillside into one zone. The HDP growth policy has strong justifications for varying residential zoning and density based on existing infrastructure, onsite well and septic, and natural constraints such as slopes, soils, and hazards.

Nancy Pease

Nancypease2@gmail.com