

## If the 2040 Plan Didn't Envision Allowing Flexibility in Low Density Zoning: Then Why Did It Talk So Much About Housing Variety?

- The 2040 plan is clear and explicit about encouraging more housing types, housing capacity, and housing supply (see page 4-5).
- The 2040 plan is not explicit about maintaining strictly single-family zones on sewer and water infrastructure.
- For those who might suggest the plan should be amended before making these changes: the plan already provides good general guidance for moving forward; simplifying the code and adding more housing choice is already implementing the plan.
- For those who say that the “single-family and two-family” category is supposed to preserve some single-family only districts: What is the criteria for this, and what would it look like for implementation? How should the “single-family and two-family” designation be divided in a fair and objective way? If that was the intent, why weren't certain single-family areas provided their own land use plan category?

### Did the 2040 Land Use Map Intend To Preserve Single Family Neighborhoods Indefinitely?

The 2040 Land Use Plan Map has types of low-density land use designations in light yellow and yellow:

➤ **“Large-lot Residential”**

And

➤ **“Single-family and Two-family”**

- **“Large-lot residential”** is primarily intended for single-family development but allows up to two-family dwellings in some cases: *“This designation provides for single-family residences on lots that are generally one acre or larger in rural and semi-rural environments...Accessory dwelling units and two-family structures may also occur on large lots.”*

**“Single-family and Two-family”** doesn't call for sole single family development, and allows a variety of zones and housing types for implementation: *“This designation provides for a variety of low-density urban/suburban residential neighborhoods. Most areas have well-developed infrastructure, public water and sewer, and municipal services”.*

Had the category been called “Single-family OR Two-family,” it would be clearer that the intent was two discrete land use patterns and suggest a choice between one or the other. (“We can have salad and steak for dinner” doesn't mean that you can only have salad or you can only have steak. It suggests that both will be on the table.)

- **What is the definition of a “two family area”?** The 2040 LUP does not clearly direct that the “single-family and two-family” designation have some areas that should be restricted to only single-family development.

In the cross reference table in figure 3.2, the Plan lists the following as implementation zones for this designation: “*R-1 and R-1A; R-2A and R-2D in attached and two-family areas*” (note: a variety of zoning districts already exist in this designation, including up to R-2M). However, there is no definition of “two-family areas” anywhere in the definitions section of Chapter 15 of Title 21, or in the 2040 Land Use Plan except for a later paragraph that explains an allowable density might be “*3 to 5 housing units per gross acre in single family areas*” and “*5 to 8 units in two-family areas.*”

This suggests that one definition of a single-family area could be 3 to 5 dwelling units per gross acre, and a similar definition of a two-family area could be 5-8 gross dwelling units per acre. For reference:

3 dwelling units per acre	14,520 SF
4 dwelling units per acre	10,890 SF
5 dwelling units per acre	8,712 SF
6 dwelling units per acre	7,260 SF
7 dwelling units per acre	6,223 SF
8 dwelling units per acre	5,445 SF

One issue with this definition is that five dwelling units per acre could be both a “single family area” or a “two family area”, creating a gray area without a clear resolution. And raises another question: Does Anchorage intend to regulate density by housing type or dwelling units per acre?

To complicate the idea of a clear definition for “two family area” even further:

- The “Large-lot residential” 2040 LUP designation allows two-family dwellings in certain circumstances on lots much larger than those listed above. These would presumably also meet a different, but appropriate, definition of “two family area”.
- Duplexes likely already exist in every neighborhood in Anchorage, so whether the code acknowledges it or not, by prevailing development pattern, all of Anchorage might be a “two-family area” already.
- Accessory Dwelling Units, considered by the building code to be a dwelling unit, are allowed in every residential zoning district in Anchorage (and have been with the exception of R-3A since 2018 (2018-43(S))). Although the zoning code does not consider them to be units in terms of density, an ADU alongside a single family come could in fact result in two families living on the same property.

## Have Any Neighborhood Plans Adopted Since 2017 Called for Exclusive “single-family areas”?

The 2040 Plan provides some clarification where it states: “*Neighborhood and district plans may delineate attached and two-family areas separate from single-family detached neighborhoods,*” suggesting that the neighborhood plans adopted after the 2040 LUP should have guidance on the topic. However, no plans that we could find since the 2040 Land Use Plan was adopted in 2017 appear to have delineated explicit, separate areas which should be exclusive to single-family housing. The Spenard Corridor plan’s (October 2020) lowest designation is “single-family and two-family”, which appears to be inclusive of duplex or other low-density development: “*Single-Family and Two-Family. Single-family houses and low density residential.*”

## Shouldn't there be a statistical analysis of sprawl versus density, looking at various possible growth rates? Will the proposed zoning disperse new growth ( e.g., create sprawl), or concentrate it enough to achieve walkable, transit supportive neighborhoods in a few places?

Increasing density is one step towards realizing the goals of both 2040 LUP and 2020 Comprehensive Plan. To achieve walkable, transit supportive neighborhoods we will need to move more housing into the areas that are already walkable, and we will need to add commercial closer to established neighborhoods through infill.

## Where the 2040 LUP and Existing Zoning Don’t Align

Some areas of East Anchorage have the designation of “Single-family and two-family” yet are already zoned for R-2A and R-2D, the highest zoning category allowed for implementing this designation. Other areas in west Anchorage have the designation of “Single-family and two-family” but are zoned R-2M, an even higher density zone. This shows that the “Single-family and two-family” designation already encompasses a wide range of housing types and range of densities. It could also suggest that the prevailing development type might sometimes be in conflict with the land use designation in favor of less density and sometimes in conflict with the land use designation in favor of more density. This makes it even more difficult to narrowly define or limit the “Single-family and Two-family” designation in a fair and objective way.

## For anyone who suggests that reducing the “Single-family and Two-family” designation to one more-flexible zone does not follow the intent of the plan: What *would* follow the intent of the plan? Or what would full implementation of this designation, or the plan overall look like?

- Existing zoning should not necessarily shape the interpretation of a land use plan designation, as a land use plan designation is intended to be aspirational, not just a reflection of the conditions on the ground at the time the plan was published. Some sections of the 2040 plan appear to reflect the existing conditions at the time of the plan publication rather than the best and highest use of a certain area in the context of the community overall. Comprehensive plans guide, zoning follows. As 21.01.030 states: “The purpose of this title is to implement the comprehensive plan...” In the service of community priorities, zoning should be allowed to implement up to the intention of the adopted Comprehensive Plan.
- If the intent was to preserve exclusionary areas in the future, why weren’t certain single-family areas provided their own land use plan category, possibly something like “Single-family”?

- In terms of implementation, how would the planning department differentiate between single-family and two-family areas within the “single-family and two-family designation”?
  - What are the criteria and boundaries for making this assessment?
  - What is the minimum square footage/number of houses/block size of one of these “areas”?

## **What do the 2020 Plan and 2040 Land Use Plan Say about Housing Choice & Variety?**

### **The Anchorage 2020 Plan discussed the need to accommodate a diverse supply of housing:**

*“Anchorage Bowl Comprehensive Plan Guidance: Housing. Provide a diverse supply of quality housing that meets the needs and preferences of city residents, for all income levels, in safe and livable neighborhoods.*

### **The Anchorage 2040 Plan was designed to accommodate growth:**

“The Anchorage 2040 Land Use Plan is designed to accommodate a healthy yet moderate forecast average annual population growth rate of 0.8 percent, and an employment growth rate of 0.9 percent, between 2015 and 2040. It balances the needs of the residential, commercial, and industrial land markets, and anticipates sustained, equitable, and orderly growth beyond 2040.”

### **The Anchorage 2040 Plan is clear about intending to allow more types of housing:**

- **Goal 2** Infill and redevelopment meets the housing and employment needs of residents and businesses in Anchorage. Actions 1-1, 5-3, 6-2, 6-4, and 6-8 in other sections of this table are also integral to this Goal.
- **Goal 3** Mixed-use, walkable commercial centers and corridors thrive within their neighborhood context, offer housing affordable to a range of incomes, and enable business growth. Actions 2-1 to 2-7, 4-2, 5-1 to 5-3, 6-2 to 6-5, and 6-8 are also integral to this Goal.
- **Goal 4** Anchorage’s neighborhoods provide a range of places to live, meeting the housing needs of residents at all income levels, household sizes, interests, ages, abilities, and races and ethnicities.
- **LUP 4.2.** Allow and encourage innovative compact housing types and a variety of housing options that respond to changing preferences.
- **LUP 4.10** Amend Title 21 to reduce restrictions that currently deter construction of compact housing types; and expand provisions that allow for compact housing types, including small-lot housing, cottage houses with shared courtyards, townhouses, and small scale garden apartments. Determine appropriate measures through a meaningful, collaborative public process and make subject to site development standards including standards for neighborhood compatibility.

## **What does the 2040 Plan Say About Increasing Housing Choices?**

[2040 Plan](#) on diverse options for housing, housing choice, & variety:

- “Challenges do remain, some of which municipal land use policy can measurably address and improve...**Housing choice** availability at different affordability levels and types”
- **Housing. Provide a diverse supply of quality housing that meets the needs and preferences of city residents, for all income levels, in safe and livable neighborhoods.”**

- “Neighborhood Identity and Vitality. Encourage distinctive neighborhoods that are responsive to the **diverse needs of residents in urban, suburban, and rural settings**, with amenities and infrastructure to absorb growth, such as good access to schools, recreation, natural areas, and services.”
- “**Diverse households** and income levels that need more affordable **housing options** and more transportation choices.”
- “The Plan also identifies where and how existing residential neighborhoods can absorb housing. In areas of anticipated growth, it uses the infill and redevelopment strategies to coordinate infrastructure investments. It recommends **allowing and encouraging more “compact” types of housing choices**, including small-lot “cottage” homes, accessory dwelling units (ADUs), attached dwellings (duplex/ triplex/townhomes), small multifamily buildings, forms of cohousing or shared courtyard homes, and mixed-use housing in commercial developments.”
- “Fewer changes are anticipated for existing single-family neighborhoods. Changes may focus on **improving connectivity, pedestrian and bike safety, neighborhood character, housing choice**, and buffering transitions to more intensive land uses.”
- “Over time, compact development can create ridership demand to support more frequent bus service. It will give Anchorage’s households more choices in how to get to work and other destinations. It also provides **more opportunities to live in a walkable, accessible, and affordable neighborhood environment.**”
- “Provide sufficient land to meet the **diverse housing needs** of Anchorage’s citizens, where the integrity of the residential neighborhood area is protected from expanding commercial corridors or non-neighborhood employment activities.”
- “LUP 4.3. Promote balanced neighborhoods with **diverse infill housing**, and provide opportunities for development of affordable and accessible housing that avoids creating areas of concentrated low-income housing.”
- “New and updated plans are **expected to maintain or increase housing** and employment capacity and help achieve the citywide goals, policies, and growth strategies.”
- “However, many of these challenges have intensified as demand grows for more choices of housing types. Millennials, downsizing seniors, and **a more diverse population desire smaller homes and compact housing, located in walkable neighborhoods near services, jobs, entertainment, parks and trails**, and with less driving and yard maintenance.”
- “2-10 Host a joint workshop with the housing finance and mortgaging lenders and AHFC regarding implementation of the 2040 LUP. Provide a workshop report with findings and conclusions regarding potential lending programs and practices that could coordinate with municipal policies and regulations to reduce housing costs and promote **new housing choices.**”

### **What about the character of Anchorage Neighborhoods?**

The introduction of the 2040 Plan was clear about the need for balancing equitable growth with a sense of valued characteristics of Anchorage neighborhoods:

*“To ensure efficient and equitable growth within our limited geographic area, Anchorage must maximize land use efficiencies while protecting and enhancing valued neighborhood characteristics and natural resources. The 2040 LUP recommends strategies for compatible infill and redevelopment, housing and neighborhoods, commercial centers and corridors, open space and greenbelts, transportation, and coordinated and focused public investments.”*

Goal 7 of the plan provided a path forward for accommodating more housing choice that maintains the positive feeling of residential areas: “*Infill development is compatible with the valued characteristics of surrounding properties and neighborhoods.*”

A notable phrase is “*The form and scale that new developments take—more than its density— is increasingly a primary concern.*” This balance between preserving neighborhood feel and welcoming more dwelling units should be at the heart of the discussion around solving our housing crisis. It begs a question: In a Single-AND-Two-Family land designation, why should a 2,000 sq ft single family home be permitted but not a 2,000 sq ft duplex? Should it be the view of policymakers or the Planning Department that it is somehow inherently bad that two families be housed instead of one, provided the structures meet similar design or dimensional standards?

Furthermore, how do Anchorage policymakers and planners thoughtfully examine the exclusionary housing practices of the past in context and, in a modern era, seek to right the wrongs of housing inequities and history of housing practices in Anchorage that were rooted in systemic racism?

“As the city grew, that area, known as Chester Flats, later East Chester Flats and finally the larger Fairview, became an island surrounded by all-white subdivisions. African-Americans could only live in Fairview or a few other areas, including Greene Acres, near Lake Otis Parkway and 36th Avenue.

Elsewhere, they were kept from buying land by deed covenants and bankers' refusal to lend. Covenants covered property in Turnagain, downtown, Rogers Park and other neighborhoods.”

- *How Some Anchorage Neighbors Redeemed the City's Racist Past*; Charles Wohlforth; Anchorage Daily News; published February 27, 2017

Finally, the 2040 LUP emphasized that more housing that fits in existing neighborhoods can enhance them for people of all generations:

*“Smaller scale housing can be designed and situated to fit with existing neighborhood character. Smaller or compact housing can contribute to property values and generate income. It also aligns with the capabilities of many builders and property owners. As a result, neighborhoods are enriched with a greater variety of housing opportunities for all generations.”*

### **Will zoning changes increase housing, particularly affordable housing?**

These questions are all addressed in the Anchorage Housing Market Analysis (March 2012)

## **How are changes to Title 21 made, including the Comprehensive Plan and Land Use Plan?**

Title 21 is the mechanism to change zoning.

Chapter 21.03: Review and Approval Procedures Sec. 21.03.160 Rezoning (Zoning Map Amendments)

D. General Procedure

1. Initiation a. **A rezoning may be initiated by the assembly**, the planning and zoning commission, or by the administration.

## Chapter 21.03: Review and Approval Procedures Sec. 21.03.210 Title 21 – Text Amendments

### A. Purpose and Scope

**The assembly may amend the text of this title in accordance with the procedures set forth in this section.** The purpose of text amendments is not to relieve particular hardships, nor to confer special privileges or rights on any person, but rather to make adjustments to text that are necessary in light of changed conditions or changes in public policy, or that are necessary to advance the general welfare of the municipality.

### B. Procedure.

#### 1. Initiation

A petition for amendment to the text of this title may be initiated by any review or decision making body.

### C. Approval Criteria.

Text amendments may be approved if the assembly finds that all of the following approval criteria have been met:

1. The proposed amendment will promote the public health, safety, and general welfare;
2. The proposed amendment is consistent with the comprehensive plan and the stated purposes of this title; and
3. The proposed amendment is necessary or desirable because of changing conditions, new planning concepts, or other social or economic conditions.

## **Additionally Comprehensive Plan amendments are allowed when:**

### **If the Comprehensive Plan can be changed, why aren't efforts being made to first re-envision and amend our 2040 Land use Plan, 2020 Comprehensive Plan, and several neighborhood and district plans before any zoning districts are compacted?**

The zoning changes will realize the goals expressed in both the 2020 CP and 2040 LUP. Change does not come from rewriting the plans, only from amending Title 21.

### **Impacts to neighborhood and district plans:**

It has always been the intent to honor neighborhood and district plans. The goal of the ordinance is to bring the zoning districts into conformity with the 2040 LUP to achieve the goals of the 2020 Comprehensive Plan.

### **Where the five zoning districts come from for the proposed Title 21 changes:**

The 5 zones proposed follow the land use categories established in the 2040 LUP which went through a public process prior to adoption. The full initiative streamlines all of the residential zoning districts as specified in the goals.

### **Why has the Planning and Zoning Commission been eliminated from this process?**

The substitute version of the ordinance has a referral to the Planning and Zoning Commission specifically to identify what amendments are required of the Comprehensive Plan as well as the Land Use Plan to ensure consistency with the proposed zoning changes. Often when a rezone is initiated, the Comprehensive Plan and Land Use Plan Map are amended concurrently. Referring to PZC will allow for the same process for this ordinance.