



Compatible-Scale Infill Housing (R-2 Zones) Project

An Update to Anchorage's Zoning Rules for Residential Development in the R-2A, R-2D, and R-2M Zoning Districts



PZC Case No. 2019-009

Public Hearing Draft – Supporting Exhibits
for Public Hearing on March 4, 2019



Compatible-Scale Infill Housing (R-2 Zones) Project:

The Compatible-Scale Infill Housing (R-2 Zones) project is updating Anchorage’s R-2A, R-2D, and R-2M zoning code rules for the height and bulk of residential development, in order to allow more housing opportunities while ensuring that the scale of new development complements existing neighborhoods.

This project helps carry out implementation Action 4-4 of the *Anchorage 2040 Land Use Plan’s Goal 4: Housing and Neighborhoods*. It is related to other ongoing code amendment projects and actions that seek to achieve the goals of the *Anchorage 2040 Land Use Plan*.

For More Information:

- Visit the project website: www.muni.org/Planning/2040actions.aspx
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Public Hearing Draft Documents: (under separate covers)

- Adopting Ordinance
- Exhibit A: Staff Report
- Exhibit B: Zoning Code Amendments
- Exhibit C: Planning and Zoning Commission Resolution
- Exhibit D: Policy Guidance from the Comprehensive Plan
- Exhibit E: Public Comments Received
- Exhibit F: Comment Issue-Response

Introduction:

Purpose

This Comment-Issue Response documents the Planning Department’s responses to the public comments regarding the *Compatible-scale Infill Housing (R-2) Zones amendment*, September 27, 2018 Community Discussion Draft. The responses help show the basis for the Public Hearing Draft which was released on December 10 and that is scheduled for a March 4, 2019 PZC public hearing.

This Comment-issue Response does the following:

- Summarizes each issue raised and identifies the commenter(s) who raised the issue;
- Provides Planning Department’s response and recommendations for each issue;
- References applicable policy guidance from the *Comprehensive Plan*;
- References analyses and other factors that formed the basis for the Department’s responses; and

Sources of Comments

Comments were received from stakeholders, experts, agencies, and general public through emails or in consultation meetings. The commenting individual, agency, or organization is identified with each issue statement. Copies of the comments are provided in **Exhibit E**, Section E-1. An index to the commenters is on page 5.

Table Organization

Part 1 of the Comment-Response table lists general issues which relate to all or most parts of the draft code amendment. Parts 2, 3, and 4 are arranged into the three main topics of the proposed amendment.

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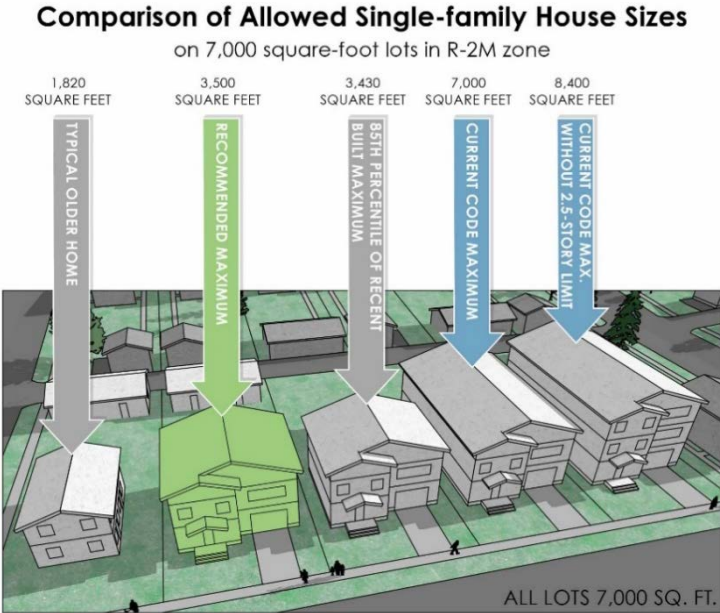
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Comment – Response Table

Item #	Comment or Issue	Response and Recommendation
Part 1: General Comments		
1-a.	<p>Allow Infill Housing Buildings to be Larger than Existing Housing.</p> <p>The proposed changes try to protect the nature of “existing neighborhoods” as infill and redevelopment projects move into those existing neighborhoods. But when we get more infill land redevelopment, eventually those newer buildings will outnumber the older existing homes, and then what are we protecting with this code language? The code would then be working against similar development for no public benefit. The new existing will be the larger multi-family homes resulting from infill/redevelopment that occurs in the coming years. <i>(Brian Harten, Hultquist Homes)</i></p> <p>The draft seems to focus on protecting existing neighborhoods. Many infill lots are adjacent to small single-story homes built in the 1950s-60s. These old homes will be gradually replaced with new construction housing. The draft severely limits the density potential of current construction projects based on the assumption that the old buildings will stay in perpetuity. This is not prudent in a city with a significant housing shortage. Density reduction does not promote the construction of affordable housing. <i>(Brandon Marcott, Triad Engineering)</i></p> <p>There is already a dramatic difference between an older, existing 1,000 square-foot home and a 3-story, 10,000 square foot 4-plex adjacent to it. Introducing FAR calculations and building length limitations don’t appear to provide any meaningful “protections” to the owner of the 1,000 square-foot home. <i>(Brandon Marcott, Triad Engineering)</i></p> <p>Existing neighbors and residents will never be happy with new construction adding new infill housing, regardless of how compatible we try to make it. There is no way to satisfy neighborhoods. <i>(AHBA Consultation Meeting)</i></p>	<p>Response: The proposed amendments allow new residences to be larger than existing buildings. For example, the green building below (second from left) shows the recommended maximum size of a home is much larger than typical existing building stock (first building on left). The comparison is similar for multi-unit buildings.</p> <p>Allowing greater bulk than older housing stock but within overall building size limits is consistent with the <i>Anchorage 2040 Land Use Plan</i>. Goal 7 promotes compatibility of new infill development with the neighborhood. Goal 7 allows for the housing to achieve Goal 4: new housing in the neighborhoods.</p> <p>Compatibility does not mean, “keep things the same as they are today”. Compatibility supports change and evolution. New buildings can be bigger than existing neighbors without overwhelming the existing residences, or being so large as to be not consistent with the intent for the R-2 zones. The <i>2040 LUP</i> outlines expectations for size and character in its Compact Mixed Residential—Low land use designation, which cross-references to the R-2M zone.</p> <p>Even as neighborhoods change and building sizes get larger, there are characteristics inherent to R-2 districts that remain constant. Characteristics include being compatible with adjacent single-family homes with yards, and with the enjoyment of one’s backyard. Neighborhood commenters express support for infill housing, but they want the bulk, scale, character, and number of dwellings on the lot to be in context with the neighborhood.</p> <p>Recommendations: Allow new buildings to be bigger than old ones, within certain size limits.</p>



Item #	Comment or Issue	Response and Recommendation
1-b.	<p>Require Infill Housing to be Compatible with Existing Neighborhood Character (e.g., <i>Building Scale</i>) and Affordability.</p> <p>Turnagain Community Council (TCC) appreciates the opportunity to comment on the proposed code amendments to implement the <i>2040 Land Use Plan</i> including the R-2 height amendment and other upcoming proposals including to the parking standards.</p> <p>TCC supports the goal of improving affordability and availability of housing in the city. However, as an established neighborhood, we are also concerned about the potential negative impacts of increased density and potential unintended consequences of changing Anchorage’s zoning regulations without careful consideration of what this means when these new policies are implemented over time. Would like concerns about the cumulative impact of changes factored into each proposed 2040 Land Use Plan code amendment as it is brought forward. For example, TCC concerns about increased demand for parking should be concerned broadly as it relates to increasing the number of people living on a street or in a neighborhood...</p> <p>Neighborhoods in TCC tend to be relatively older and built on narrower roads, or with narrow lots with few on-street parking spaces available to those without driveways or alleys. Many of our roads also do not have sidewalks, shoulders, or curbs, and still need improvements for pedestrian and bike safety as well as drainage and flood control, with very little space in the ROW to do so. We are concerned about the potential increase in traffic and demand for parking in these neighborhoods, with a greater number of units per acre or property than exist now. Changing the height limit for buildings in R-2 zones does not change parking requirements, but as its intended effect is to allow more units per acre, parking demand and traffic are likely to increase and worsen existing problems. (<i>Turnagain Community Council</i>)</p>	<p>Response: The R-2 amendment does not increase the number of dwelling units allowed by the zoning district on a lot. Its practical effect, especially on larger lots in the R-2M zones, will be to remove one factor that may dissuade a builder from constructing a number of allowed units that is closer to the allowed number of units.</p> <p>The <i>2040 LUP</i> calls for reducing certain regulatory barriers to compact housing that conforms to the allowable maximum housing densities and building size in the zoning district. These changes are planned to still ensure adequate parking, landscaping, infrastructure, and ground-rules for size and design. These changes to Title 21 site development standards are identified in <i>2040</i> Actions 4-3, 4-4, 4-7, 4-10 and other complementary Actions. The <i>2040 Plan</i> emphasizes compatibility in its Actions to create more housing. Actions 2-6, 3-4, 4-3, 4-4, 4-6, 4-7, and 4-10 incorporate compatibility standards as part of the action. Compatibility is essential and is consistent with the <i>2040</i> infill and housing in Goals 1, 2, 3, and 4.</p> <p>The intent of the language in the Compact Mixed Residential–Low provision on page 28 (first full bullet near top of middle column) is to seek housing opportunities that are in scale with the R-2M neighborhoods, and within the intended density (DUA-dwelling units per acre) of the zoning district and <i>2040 LUP</i> land use designation. The Compact Mixed Residential-Low designation calls for a gross neighborhood density range of 8–15 DUA. This designation is implemented by the R-2M district and applies to many existing neighborhoods. The existing overall average net density per R-2M lot, after deducting streets and non-residential uses, was only 9 DUA as of 2015. Therefore, the Compact Mixed Residential-Low description already provides the framework and intent for more compact housing types and density than exist today.</p> <p>Additional housing opportunities brings benefits to a neighborhood community. Additional neighbors help support nearby businesses and services such as the local grocery store, coffee shops, and other services and amenities. Neighbors also provide greater activity and eyes on public spaces including parks and greenbelts. Additional housing opportunities benefit friends, family, children, down-sizing existing residents, and the next generation of residents who will have a place in the community and keep the neighborhood strong in the future.</p> <p>As issue-response 1-a explains, <i>Anchorage 2040</i> Goal 7 is not about preserving the neighborhood exactly like it is, but managing change in new development. “Compatibility” refers to the sensitivity of new development proposals to the character of the surrounding context and avoiding adverse impacts on neighboring uses.</p> <p>Recommendations: No specific changes to the draft R-2 amendment language from this issue. Keep <i>Anchorage 2040</i> Goals and Policies (see Exhibit D) in consideration in responding to more specific issues.</p>

Item #	Comment or Issue	Response and Recommendation
1-c.	<p>The Bulk/Height Amendment is too Limited in Scope: Address the Other Contextual Issues that Impact Neighborhood Character.</p> <p>The proposed shift to use of FAR is likely to have an unintended impact on the pedestrian experience along the street. It is likely to contribute to a mish-mash of frontages along a block. What is the goal for the public realm in areas zoned R-2M? The goal should be to create a quality street experience with opportunities to engage neighbors in chance conversations. Consider engaging folks in a dialogue about more than just the bulk and massing of buildings but also about what type of street experience they want in their neighborhoods. <i>(Fairview Community Council Design Committee)</i></p> <p>The proposed R-2 zones bulk/height amendment is too limited in scope to be successful in mitigating contextual issues that likely will impact neighborhood character. Recommend no changes to the land use code as proposed without additional, concurrent changes that protect neighborhood character. Extend the project to include changes to other parts of the land use code together with the proposed changes in the draft R-2 zones amendment. Specific code amendments that this committee recommends are included below (issues 1-d, 1-e, and 1-f). These include limiting the width of driveways on street frontages, maintaining sidewalk infrastructure, and preserving sunlight access. <i>(South Addition Neighborhood Plan Committee)</i></p>	<p>Response: The R-2 amendment is only one part of one implementation Action (4-4) in <i>2040 Land Use Plan</i>. It focuses on a specific problem with the bulk/height regulations. Its proposed code changes are primarily adjustments to the bulk, height, volume, and massing of buildings. There are a few proposed amendments to mitigate the visual scale of three-story buildings, including maximum height of front entries/front porch steps and extension of building articulation requirements to facades facing neighboring lots.</p> <p>The other contextual site design issues besides the bulk and height of buildings, such as how the building orients or connects to the street in traditional urban neighborhood contexts, are to be addressed through other upcoming Title 21 amendment projects. These include amendments to the amount of required parking in urban neighborhoods near Downtown (2040 Action 4-3), to the required width of residential access driveways (Action 4-6), and to site development standards for compact housing (implements more of Actions 4-4 and 4-10).</p> <p>Anchorage 2040 Action 4-7 also calls for work in the near term on a traditional neighborhood development (TND) ordinance to create more “form-based” site development standards for urban neighborhoods like Fairview and South Addition.</p> <p>Recommendations: Retain the limited R-2 amendment scope. Include the public comments in issues 1-c to 1-g in the community concerns to be addressed in other, upcoming Title 21 code amendment projects listed on the <i>Anchorage 2040 Land Use Plan</i> implementation projects web page.</p>
1-d.	<p>Amend Title 21 to Further Restrict Driveways in Front and in Traditional Neighborhoods and Encourage Access from Alleys.</p> <p>Consider engaging folks in a dialogue about more than just the bulk and massing of buildings but also about what type of street experience they want in their neighborhoods. <i>(Fairview Community Council Design Committee)</i></p> <p>Do not recommend the proposed height/bulk amendments without additional and concurrent changes to the driveway/frontage access requirements that protect neighborhood character. Specifically, recommend including new or modifying language in Title 21 Chapter</p>	<p>Response: The <i>Anchorage 2040 Land Use Plan</i> and other elements of the <i>Comprehensive Plan</i> do in fact recommend a community dialogue about the type of neighborhood street experience and a reform of vehicle access standards. The plans recognize this priority as expressed by members in Fairview and South Addition and other neighborhoods with traditional urban development patterns. Limiting driveway width in TND neighborhoods is congruent with several LUP actions, such as LUP 2.3, LUP 4.2, and LUP 7.1. Additionally, these comments agree with policies of <i>Anchorage 2020</i>, such as Policies 46 and 49. Many area-specific plans further this concept. The specific code language suggestions are a valuable combination of neighborhood resident desires and technical expertise in urban design and the Title 21 land use code. The suggested language provides concrete examples of methods to modify the code.</p>

Item #	Comment or Issue	Response and Recommendation
	<p>21.07 parking and driveway access standards to address protection of R-2 lots in the Traditional Neighborhood Design areas to protect their valued neighborhood character as follows:</p> <ol style="list-style-type: none"> 1. In Section 21.07.090.H.e.iii, delete all sentences after the first sentence and replace with the following: <u>Residential developments up to four units abutting an alley on R-2M, R-3, and R-4 zoned lots shall be exempted from this subsection if parking areas are proposed with the usable portion fo the alley as circulation/parking aisle space. The traffic engineer may exempt multifamily dwellings up to four units on lots not abutting an alley on low volume streets, dead-end streets, and cul-de sacs.</u> 2. Add the following sentence to the end of 21.07.090H.8.d.i: <u>The land use code governs over the municipal driveway standards for this subsection in case of a conflict of interpretation between governing documents.</u> 3. Add the following provision iv. to 21.07.110F.3.b.: <u>iv. This section also applies to residential driveways accessing a street from any R-2 lot abutting a platted alley.</u> 4. Add the following provision iv. to 21.07.110F.3.c.: <u>iv. Residential driveways referenced above under 21.07.110F.3.b.iv. of this section shall be 12 feet or less in width measured anywhere along their entire length.</u> 5. Add the following sentence to the end of 21.07.110F.3.d.: <u>The traffic engineer shall not have the authority to change the standards above under 21.07.110F.3.c.iv.</u> 6. Modify section 21.07.110F.4.a. to remove exemptions and simplify the section to read: 	<p>The Planning Department is working on bringing forward amendments in 2019 to the residential driveway standards and other regulations as separate but coordinated projects. These are outside the limited scope and objectives of the R-2 height/bulk amendment. The comments in issue 1-d will help inform and be considered by the project teams on the upcoming code amendments that focus on vehicle and pedestrian access, and neighborhood streetscape character.</p> <p>Future Title 21 amendments are planned to revisit the development standards for compact infill housing using the tool of the Traditional Neighborhood Design areas designated on the Land Use Plan Map. These will be an important step towards developing contextually appropriate standards, such as when is it appropriate to allow front driveways in neighborhoods with alleys, and what should be the maximum width of paved vehicle access across the lot's street frontage when front driveways are allowed in a South Addition or Fairview or other TND context.</p> <p>Recommendations: No change – retain the scope of the R-2 amendment. Incorporate the public comments of 1-d into the scope of community concerns to be addressed in other, upcoming Title 21 code amendment projects listed on the <i>Anchorage 2040 Land Use Plan</i> implementation projects web page.</p>

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	<p><u>Access to parking for residential uses on any residential lot abutting an alley shall be from the alley with the exception of a single driveway of 12 feet width or less along its entire length on one street frontage of the lot.</u></p> <p><i>(South Addition Neighborhood Plan Committee)</i></p>	
1-e.	<p>Amend Title 21 to Maintain and Enhance Sidewalk Infrastructure in Traditional Neighborhoods</p> <p>Amend Title 21 Section 21.07.060E to address protection of neighborhood character by maintaining existing street infrastructure in Traditional Neighborhood Design Areas. Specifically, add the following subsection 21.07.060E.2.h. that reads,</p> <p><u>Existing sidewalks on public streets in all R-2, R-3, and R-4 zoning districts shall be maintained with their original longitudinal grade and a maximum two percent cross-slope at all proposed driveways and curb cuts. Any conflicts with the standards of the DCM or MASS shall be resolved in favor of this section.</u></p> <p><i>(South Addition Neighborhood Plan Committee)</i></p>	<p>Response: The Planning Department understands the concerns of residents regarding the disruption of their neighborhood connectivity and pedestrian amenities. As discussed in the response to issues 1-c and 1-d above, the R-2 zones height/bulk amendment project scope does not include addressing these issues. In an effort to make code changes easier to understand and approve, the R-2 zones height/bulk amendment is one of a number of more targeted, topic-specific amendments that address only a few code sections.</p> <p>Other upcoming projects, such as the residential driveways and vehicle access amendment, more specifically address the topic of pedestrian/vehicle conflicts and infrastructure at the driveway curb cut, and the creation or preservation of existing pedestrian infrastructure, at the point of interaction with vehicle access drives. This comment provides input to the amendment.</p> <p>Recommendations: No change to the R-2 amendment. Include the public comments with the community concerns to be responded to in the other, upcoming Title 21 code amendment projects listed on the <i>Anchorage 2040 Land Use Plan</i> implementation projects web page.</p>
1-f.	<p>Amend Title 21 to Require Northern City Design Features, Including Indoor and Outdoor Spaces that Capture Sunlight.</p> <p>How does the proposal promote south facing exposure of active use spaces within the building envelope? Anchorage is located at 61 degrees north latitude, in the sub-arctic and qualifies as a Winter City where the cold and dark prevail for approximately half of the year. Yet our Code does not produce the type of development where buildings embrace the sun in their design. While there are some measures in the Code that attempt to address solar access they do not appear robust enough to affect meaningful change in the built environment. We encourage the Planning Division to strongly consider moving toward a different type of regulatory regime more suitable for addressing light and shadow. It</p>	<p>Response: This issue concerns the sensitivity of residential project design to good northern climate design principles for site planning. Planning Department acknowledges that an important characteristic of appropriate architectural and landscape design in Southcentral Alaska’s “winter city”, sub-arctic, northern climate is for the site designers to arrange and orient dwelling units’ living spaces and private outdoor usable open spaces on the development property to capture sunlight—at least to the extent that the site conditions, context, regulations, and other factors allow.</p> <p>This issue, 1-f, concerns good site planning for northern climate living internal to the development site. For the departmental response to the concerns about mitigating the potential additional shadowing impacts on neighboring lots by deleting the 2.5-story standard, please see issue 2-e.</p> <p>There are several reasons why concerns about promoting better internal site design for winter city livability are probably better addressed in other upcoming Title 21 amendments besides the R-2 bulk/height amendment. First, the R-2 project is limited to replacing a 2.5-story construction limit with more flexible height/bulk which</p>




Item #	Comment or Issue	Response and Recommendation
	<p>is suggested that a Form-Based Code approach allows for better design solutions to address solar access and mitigation of shadows in an increasingly dense urban sub-arctic environment. <i>(Allen Kemplen, Fairview Community Council Design Committee)</i></p> <p>Consider insertion of language that encourages use of the vertical space above parking areas for communal decks, gardens and/or snow play area in winter. This also provides snow protection for the vehicles and reduces need /cost for snow removal. <i>(Allen Kemplen, Fairview Community Council Design Committee)</i></p> <p>Amend Title 21 section 21.07.110C.2.e. in the Residential Design Standards for Multifamily and Townhouses, to make orientation of dwelling units to capture sunlight access mandatory in Traditional Neighborhood areas, rather than just a menu choice as applied in current code, to read as follows (paraphrased by Planning Department):</p> <p><u>e. Subsections 21.07.110C.8.e., f., and g. shall apply as requirements to all residential development in the R-2A, R-2D, and R-2M zoning districts in the Traditional Neighborhood Design areas.</u></p> <p><i>(South Addition Neighborhood Plan Committee)</i></p>	<p>limit the overall size of the building in proportion to the lot, and tighter height limit exceptions for rooftop stairwell towers, etc. The project scope would need to be substantially changed in order to extend to residential site layout and building orientation standards. Other upcoming projects can better accommodate those issues.</p> <p>The Title 21 residential design standards already include northern climate features. These are still-relatively-new, having only having been mandatory for two years. The standards come in a menu. The site designer selects from a number of northern design/weather protection menu choices and may also propose design innovations as creative alternatives. It seems that more time and evidence is needed before we determine these new standards are not robust enough. If, as the commenters suggest, several of the menu choices, such as for orienting all living spaces to receive a certain amount of sunlight, should become mandatory requirements, there would first need to be testing to determine the feasibility of making a standard mandatory when that standard that was originally designed to only be a menu choice to all developments.</p> <p>This project is limited to the R-2 zoning districts. Other upcoming Title 21 amendment projects, such as the project advertised on the Anchorage 2040 implementation web page as “additional housing by design”, could consider winter city design for multi-dwelling projects spanning other zones, with broad citywide applicability.</p> <p>Recommendations: No changes to the R-2 zones amendment. Address mitigation of shadowing impacts on neighboring residential properties in issue 2-e. Forward the comments in issue 1-f. for consideration in the other, upcoming Title 21 code amendment projects listed on the <i>Anchorage 2040 Land Use Plan</i> implementation projects web page.</p>
1-g.	<p>Amend Title 21 to Reduce the 20-foot Front Setback and Discourage Paved Parking Stalls in the Front Yard</p> <p>Consider a reduction of the 20-foot front yard setback to 10 feet and providing incentives for porches within the front yard setback. As one increases density on a typical 7,000 square foot lot, the required off-street parking minimums result in placement of paved parking stalls in that front yard setback. The pedestrian or bicyclist in the public realm now interacts not with people in a yard or on a porch but with asphalt and machines. <i>(Fairview Community Council Design Committee)</i></p>	<p>Response: The R-2 bulk/height amendment does not increase the density or number of dwelling units allowed on a lot in the R-2 zoning districts. It does not reduce the amount of required on-site parking per dwelling unit, either. Nor does it increase the placement of parking stalls or vehicle access paved areas in the front setback--in fact the current residential design standards discourage the takeover of the front setback by parking.</p> <p>The current Title 21 already provides the incentives for front porches in the front yard setback. This incentive allows front porches to extend into the front yard setback.</p> <p>As discussed in the issues above, these concerns address the character of the public realm and will be included for consideration in other upcoming amendments to the code which are more related.</p> <p>Recommendations: No changes to the R-2 amendment. Consider this comment in upcoming code amendments that implement Action 7-4 of the <i>2040 LUP</i>, related to Traditional Neighborhood Design areas.</p>


Item #	Comment or Issue	Response and Recommendation
1-h.	<p>Accommodate the Need and Desire for More Housing near Downtown.</p> <p>The proposed changes do not reflect the desires of the community for more housing downtown, which will be denser in nature. Nor do they take into account the recent published findings by AEDC regarding the desire for downtown living. (<i>Claiborne Porter, NCF Design/Build</i>)</p>	<p>Response: The R-2A, R-2D, and R-2M are low-to-moderate density zoning districts. They are intended to accommodate 5-15 dwelling units per gross acre (DUA) of neighborhood area. In the R-2M district, the densest of the three R-2 zones, no more than 8 dwellings per residential building is allowed. The proposed R-2 Amendment allows greater flexibility for compact development to achieve these residential densities outlined in the Title 21 R-2 district dimensional standards. It is in keeping with the housing densities recommended for the land use designations in the <i>Anchorage 2040 Land Use Plan</i> that apply to the R-2 zoning districts.</p> <p>The R-2 zones are distributed across the Anchorage Bowl. The R-2M and R-2D districts near Downtown account for less than five percent (5%) of the total area of R-2 zoning districts in the Bowl. The proposed R-2 amendment reflects this citywide impact. Denser development for downtown-area R-2 neighborhoods would require reclassification to a higher-intensity land use designation, and rezoning to higher-density multifamily district such as the R-3 or R-3A zones. The R-3 and R-3A districts support between 15 and 40 DUA and 12 and 30 DUA, respectively.</p> <p>A variety of market and regulatory factors keep development within the R-2M zone from achieving the full number of housing units possibly under the R-2M minimum lot sizes. For example, parking and other site development requirements leave less room for the allowed housing. Several Title 21 amendment projects now underway are intended to reduce such barriers to achieving the density of compact housing called for in the R-2 zones, near Downtown and throughout town.</p> <p>Recommendations: No changes to the R-2 zones amendment. Carry out other Actions of the <i>Anchorage 2040 Land Use Plan</i> that re-designate appropriate areas to allow for more housing, through zoning map amendments.</p>
1-i.	<p>Clarify the Economic, Housing, and Development Project Effects of the Proposed Amendments, and How the Proposed Amendments Reduce, Maintain, or Increase Housing Supply/Density</p> <p>Consider the effects of FAR limits on financing of projects and existing / residual land value. If the Municipality restricts the overall size of a home, it affects land value and economics. It is a rule of thumb in lending/financing projects that the cost of the land should be only 25% of the cost of the project. So the value of the improvements must be three times the cost of the land. This is a driver for the size and quality of home construction. (<i>AHBA Consultation meeting</i>)</p>	<p>Response: In response to the comments Planning Department conducted more comprehensive inventory of existing and trending FARs in Anchorage, conducted six expert consultation meetings including with realtors, expanded and improved its site example testing to a dozen or so sites, researched other zoning ordinances, and tested several designs to explore the impacts of the proposed changes to development.</p> <p>Planning staff completed more comprehensive research of the building size and FARs of the existing housing stock in the R-2A, R-2D, and R-2M zoning districts. This provides FAR information by historical and recent developments, by lot size, and by housing type. This information has led to adjustments to the proposed maximum FARs for several housing types, as provided in issue-responses 2-h and 2-i. The FAR research findings are presented in Exhibit A: Staff Report Appendix.</p> <p>To supplement the FAR research with information regarding market trends as to the size ranges of duplex and townhouse units, and potential impacts and concerns with FAR size limits, staff held two consultation meetings</p>

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	<p>FAR limits may reduce housing density. Has the Planning Dept. tested the proposed amendment on actual development projects? There should be testing of the draft proposal. <i>(AHBA Consultation Meeting)</i></p> <p>The proposed ordinance does not consider the economic factors that owners and builders must live with. Each time a regulation is changed, there is an economic impact and time delay. <i>(Claiborne Porter)</i></p> <p>The implementation of this code change should be delayed until the Planning Dept. applies the proposed changes to a handful of test-case permitted projects to see what the impacts would be. The test cases should be “permitted” through the permit review process to see how the review process is influenced. The code should be revised to alleviate interpretive discrepancies that arise. The ramifications of the code changes need to be understood prior to using the review process on real projects as the litmus. <i>(Brandon Marcott, Triad Engineering)</i></p> <p>Title 21, in general, self-limits lot development to reduce density below the maximum number of dwelling units allowed within a given zoning district. How does the proposed R-2 amendment maintain, reduce, or increase higher-density development? Most of the examples shown in the community discussion draft show duplexes. But how does it affect 3-plex, 4-plex, and higher-density projects? <i>(Brandon Marcott, Triad Engineering)</i></p>	<p>with an informal group of real estate experts. These experts indicated the size range in market demand for duplex and attached townhouse units, which informed the revised FAR proposals in 2-h and 2-i.</p> <p>The Planning Department also researched other cities’ zoning ordinances and FAR code amendment projects, seeking any research regarding economic impacts in those markets. The Public Hearing Draft revised maximum FARs track with other cities’ maximum FARs for residential uses, even though these cities often have smaller lot sizes. This research also indicated that cities are using FAR to encourage the retention of more affordable housing, and the development of more affordable housing when new units do get built. Replacing older units with very large new units can actually reduce affordable housing stock. While FAR maximums prohibit certain types of large projects on small lots, they encourage more compact housing units that are relatively more affordable. Additionally, while FAR limits the building size, builders may add value through the quality of construction and materials. The Planning Department compared this information with the findings of the October 2018 AEDC housing preference survey, which indicated a trend toward smaller household sizes and more “compact” housing units.</p> <p>Finally, the Planning Department has also run a comparison test of the current code requirements and recommended code amendments on eight example developments: three under existing and five under the proposed code. These four-unit multifamily should illustrate how the proposed amendment does not reduce density, both codified and desired. In some respects, the proposed amendment may increase the ability of the development to reach the target density. These are “first-pass” tests, and do not re-create the entire permitting process. However, they address each design standard and provide explanations of compliance (see Exhibit A, Appendix 2). Staff believe that these tests are adequate to indicate how types of development would comply under current code as opposed to the proposed amendments. The results of these tests are available in the staff report, and have influenced the public hearing draft revisions.</p> <p>Recommendations: This issue-responses influences the more specific issue-responses in Parts 2, 3, and 4 of this table below, and their recommended changes in the draft R-2 amendment.</p>
1-j.	<p>Take a Softer Approach to Implementation of New Regulations: Provide a Dual-code Transition Period.</p> <p>SCC recommends a one-year grace period during which developers may chose whether to be under old vs. new R-2 height/bulk standards. <i>(Spenard Community Council)</i></p> <p>Is there an option to select “old code” versus “new code” for a year or more, to transition to the new regulations, similar to what was done for Title 21 as a whole? That may provide relief to developers who have</p>	<p>Response: While a dual-code transition period was used in 2013 when the entire Title 21 land use code was replaced, the R-2 amendment project is limited in scope to a few related code provisions. The Title 21 Rewrite was a unique situation involving a complete change in land use regulations. Most Title 21 code amendments are much narrower in scope and have been approved without dual-code grace periods.</p> <p>A grace period for the R-2 amendment would set a precedent for grace periods for the other, upcoming code amendments. Municipal Land Use Review has found that multiple dual-code periods are not workable. The tracking and administration of multiple codes also requires more staff resources and funding than is currently available at the Municipality, and these records must be kept permanently and consistently applied.</p>

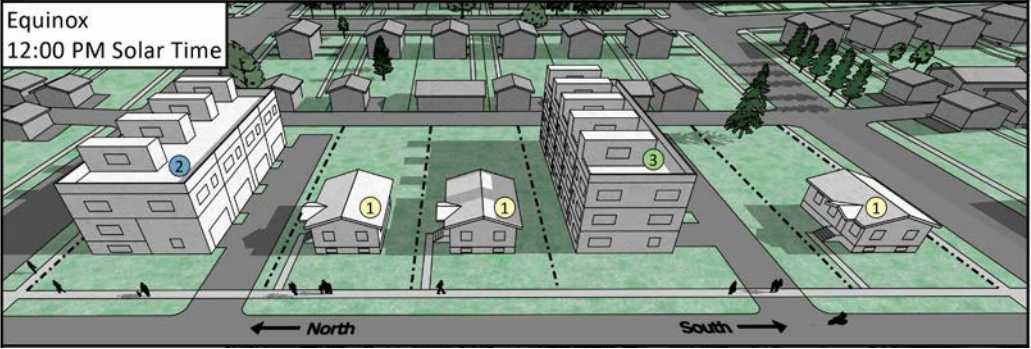
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	<p>already purchased property and are in the planning/design stages. (<i>Brian Harten, Hultquist Homes</i>)</p>	<p>During the dual-code transition period for the Title 21 Rewrite, applicants typically wanted to mix-and-match the old and new codes, picking and choosing parts of old code and new code that favored their proposal. There was confusion for some applicants. Other applicants submitted multiple incomplete permit applications just before the end of grace period deadline, effectively postponing full implementation.</p> <p>Some applicants will prefer the new R-2 regulations, because the amendment responds to their desire for allowing 3-story buildings on larger lots. These builders will not want to postpone the effective date.</p> <p>The Planning Department acknowledges changes to code have the potential to impact developments that are in the planning stages. The Department plans to provide outreach information to developers so they are aware of the potential revised standards as they prepare permit applications for the 2019 design/building season.</p> <p>The Department has also identified ways to increase administrative flexibility and relief mechanisms in the draft amendment. These include allowing minor modifications to the FAR limits, and allowing alternative equivalent compliance (ie., alternative means and methods) to meeting the intent of the code's standards.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Avoid a dual-code grace period. Apply one version of the code at a time. 2. Incorporate administrative flexibility and relief mechanisms into the draft ordinance, including: <ul style="list-style-type: none"> • Section 21.03.120B.1.a. (Page 1 of public hearing draft Exhibit B), revise Title 21 to allow minor modifications from FAR limits. • Section 21.04.020F.2. (Page 2, lines 28-31 of Public Hearing Draft Exhibit B), allow “alternative equivalent compliance” departures from the R-2 district-specific standards; and • Adjust the proposed maximum building length, FARs, and height for parapets and stairwell towers to be more lenient (see Part 3 of this table for specific changes). 3. Planning Department to provide public information as discussed in the issue response above.


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Part 2: Replacement of 2.5-story Height Limitation with Floor Area Ratio (FAR) Limitations on Size of Homes		
2-a.	<p>Simply Remove the 2.5-story Standard from R-2 Zones, and do not Replace it with Other Regulations</p> <p>Section 21.06.020A., Table 21.06-1 (p.5, Community Discussion Draft)</p> <p>Doesn't the combination of building height limits and maximum lot coverage control building bulk already, without needing FAR? (<i>AHBA Consultation Meeting</i>)</p> <p>Suggest deleting FAR and rely on building height limits and lot coverage maximums only. (<i>Andre Spinelli, Spinell Homes</i>)</p> <p>The proposed ordinance change seems far too complicated. It was my understanding that the only change being proposed was to change the height limitation from 2.5-stories to 3-stories. The proposed changes have complicated rather than simplified the issue, and will cause further delay in implementation of any changes. Please simplify this code change. It is very difficult to support in its community discussion draft form. (<i>Clairborne Porter, NCP Design/Build Ltd.</i>)</p> <p>Working draft staff documentation of concerns and problems with the 2.5-story standard that homebuilders and designers have raised:</p> <ul style="list-style-type: none">• It limits design flexibility in a manner not consistent with <i>Anchorage 2040</i>. Even the <i>2040 LUP</i> “Compact Mixed Residential—Low” designation which includes a photo of attractive, compact, 3-story small-lot homes that fit into their single-family context (<i>2040 LUP</i>, page 38, bottom right photo).• It does not actually limit the height of the one-half story walls or ceiling—only that it occupy half the area of the floor below it. The half-story can actually be quite tall.• Story ceiling heights and structural beam widths between the floors vary from house to house. A home may have 9- or 10-foot ceiling heights. The 2.5-story building is actually taller measured in feet, and depending on its placement on the lot could have a greater	<p>Response: The 2.5-story standard has a specific function carrying out the <i>Comprehensive Plan</i> policy direction that the scale of infill housing be compatible with the R-2 zones. It supplements the 30-foot height limit and other dimensional standards in order to meet this objective. Simply deleting the current standard and building out to the remaining zoning code entitlements would create buildings out of scale with existing neighborhoods, the intent of the R-2 zoning districts, and the policy guidance of the <i>Comprehensive Plan</i>.</p> <p>Regulatory History. Prior to 1985 the maximum allowed height in the R-2, R-2A and R-2D districts was 25 feet, or 2 & 1/2 stories. AO 85-18 revised the allowed height to 25 feet or 30 feet when at least 30% of the lot is maintained as open space. (The R-2 district was also deleted and the R-2M district created by AO 85-18.) The height provisions of AO 85-18 remained in code until 1999 when AO 99-49 increased the maximum allowed height of structures to 30 feet by-right. In 2008, during the Assembly review of the draft Title 21 Rewrite, the 2.5-story standard was added to supplement the 30-foot height limit in the R-2 districts, in response to concerns about the construction of larger scale, taller infill homes, duplexes, and multi-family projects impacting the character and livability of existing neighborhoods. The 2.5-story provision was a part of several subsequent rounds of Assembly Title 21 Committee review through 2012. The Assembly adopted the 2.5-story standard in 2013 (along with the rest of the Title 21 Rewrite) as a “short-hand” way to require new residential structures to fit in better with the two-story-maximum residential scale of existing neighborhood contexts, and protect neighbors’ sunlight (solar) access. Since the Title 21 Rewrite came into effect in 2016, the 2.5-story standard has limited structures to two full stories above grade. Any third floor must be tucked under a sloping roof and be only half the size of the second floor.</p> <p>Why Only the R-2 Zones? The R-2 districts have a unique characteristic and position among Anchorage’s residential zoning districts. They are the only neighborhoods that welcome a mix of housing types while intentionally retaining the low scale of a single-family neighborhood—including detached homes, duplexes, townhouses, and (in R-2M zone) small multifamily apartment buildings. This creates a “complete” neighborhood with a variety of household sizes, incomes, and ages. This unique coexistence of housing types compatible with a single-family-scale creates the need for ground rules that address multifamily bulk, scale, and height in context of a relatively low-scale neighborhood.</p> <p>The <i>Anchorage 2040 Land Use Plan</i> “Compact Mixed Residential—Low” land use designation provides for a compatible diverse range of single-family, attached, and smaller-scale apartment housing choices in the same neighborhood, including:</p> <ul style="list-style-type: none">• Single-family detached homes on standard-sized single-family lots.

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	<p>Daylight basements extending above grade do not count as stories and so make 2.5-story building heights vary some more.</p> <ul style="list-style-type: none">• The current standard does not provide a consistent height or size limit for the “one-half story”, only that it be under a sloping roof and its floor area is no more half the floor area of the story below.• The half-story can actually occupy a larger area if the story below it has a larger floor area. So larger houses get to have larger third “half-story” than smaller houses. <p>Photos provided or referred to by builders: homes with three stories:</p> <div data-bbox="301 570 924 943"></div> <div data-bbox="301 954 924 1369"></div>	<ul style="list-style-type: none">• Accessory dwelling units.• Small-lot single-family homes, two-family, and other kinds of compact housing.• Townhomes and smaller apartment structures that are <i>consistent with the area’s scale and intensity</i> (emphasis added).• A neighborhood-wide mix of housing types, unit sizes, and household incomes• Compatible infill on vacant or underutilized lots is encouraged (emphasis added). <p>This 2040 LUP land use designation also emphasizes compatibility in its directives for physical character:</p> <ul style="list-style-type: none">• Retains the characteristics of single-family neighborhoods, such as front and rear yards, front entries, driveways, and building height.• The building scale, appearance, and street orientation of new multi-unit/attached housing is compatible with a neighborhood built environment that includes single-family homes and invites walking.• Infill and redevelopment that is compatible with height, scale, and massing of adjacent homes and the overall character of the street frontage. <p>The R-2 residential zones are often older neighborhoods, where existing housing stock is smaller. Some of these older areas are becoming increasingly attractive for new infill housing because of their proximity to city employment centers. So they can be expected to come under greater redevelopment pressure relative to most R-1 zones as Anchorage shifts toward a more positive economic cycle. This combination of factors is a set-up for conflicts and juxtapositions in building scale.</p> <p><i>How to Respond to Weaknesses in the Current 2.5-story Standard.</i> Builders have demonstrated that the current 2.5-story standard has inherent weaknesses. These are detailed in the “Comment or Issue” column at left. The photo at right illustrates that a 2.5-story home can also be tall and bulky. Most of these shortcomings conflict with <i>Comprehensive Plan</i> policies that direct the Municipality to remove barriers to desired infill development, and allow and encourage innovative compact housing types (2040 Policies LUP 2.3 and LUP 4.2). The recommended response is to replace the 2.5-story standard with a standard that carries out the neighborhood compatibility policy while allowing for innovative, compact infill housing.</p> <div data-bbox="1983 922 2459 1268"></div> <p>The proposed FAR standard in combination with supplementary provisions recommended by the draft R-2 zones amendment reduce barriers to new housing, allow for greater design flexibility, and mitigate potential</p>

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		<p>visual bulk and shadowing impacts of three-story tall buildings. It is consistent with the <i>2040 LUP</i> housing Goal 4 and Goal 7 compatibility to respect existing neighborhood character and scale.</p> <p>Recommendations: Table 21.06-1 (page 3 of public hearing draft), move forward with replacing the 2.5-story standard with an overall FAR limit to the size of infill housing structures and supplementary provisions that mitigate the impacts of the newly-allowed three-story buildings, where adjacent to other properties.</p>
2-b.	<p>Retain the 2.5-story Height Limit in Traditional Neighborhoods.</p> <p>Section 21.06.020A., Table 21.06-1</p> <p>(Page 5, Community Discussion Draft)</p> <p>The proposed ordinance affects the R-2A, R-2D, and R-2M districts mostly by introducing the elimination of the 2.5-story standard. Modify the proposed maximum height limit to state, “Principal: 30’; not to exceed two and a half stories in Traditional Neighborhood Design areas only.” (<i>South Addition Neighborhood Plan Committee</i>)</p>	<p>Response: Traditional Neighborhood Design (TND) is a “growth-supporting feature” in <i>Anchorage 2040</i> that “promotes policies, guidelines, and incentives that allow and encourage new development and infrastructure”. <i>Anchorage 2040</i> TND is not a historic preservation tool or a historical conservation overlay to retain older-era building scales. Rather it enhances the accessible, interconnected street system, sidewalks, block sizes and pedestrian-accessible building patterns. TND builds upon the pedestrian-orientated layout of the grid street patterns and smaller blocks that are common in TND areas to support compact infill development. The photo below showing a modern, three-story townhouse development is from the TND section of the Plan.</p>  <p>The R-2 amendment advances the goals of the TND growth-supporting feature by introducing more flexible opportunities for compact development through FAR along with other dimensional standards.</p> <p>Additionally, not all TND areas designated on the <i>2040 Land Use Plan Map</i> are the same. There is variation in building form and street patterns within TNDs. If the community wants to address conservation of design characteristics specific to neighborhoods, area-specific plans and overlays should be considered. For example, the <i>Anchorage Original Neighborhoods Historic Preservation Plan</i>, adopted by the Assembly as an element of the <i>Comprehensive Plan</i>, calls for historic overlay zoning districts that could focus more on preserving existing building scales and historic structures in some TND neighborhoods. Policy Action 7.6.1 in the historic preservation plan calls for design guideless through a historic overlay zone that may address “scale, massing, rhythm, setbacks, ground-area coverage or floor area ratio, architectural character, and materials”.</p> <p>Lastly, there are inherent problems with the current 2.5-story standard, as discussed in issue-responses 2-a and 2-c. The project objective is to replace the 2.5-story standard because of these problems.</p> <p>Recommendations: Table 21.06-1 (page 3 of public hearing draft), move forward with replacing the 2.5-story standard. Avoid misusing the TND growth-supporting feature from the <i>2040 LUP</i> as a tool to limit the height</p>

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		<p>of buildings in the R-2 amendment. Address any neighborhood-specific scale, character, or historic preservation through area-specific zoning districts or overlay zones rather than in the R-2 zones amendment.</p> <p>See issue 2-e for issue-response and recommendations regarding related solar access concerns that underlie a part of the comments that argued for a 2.5-story standard.</p>
2-c.	<p>Retain the 2.5-story Height Limit for Smaller Lots (e.g., 20,000 Sq. Ft. or Less)</p> <p>Section 21.06.020A., Table 21.06-1</p> <p>(Page 5, Community Discussion Draft)</p> <p>Another option besides retaining the 2.5-story standard in the Traditional Neighborhood Design areas (see issue 2-b) is to exempt lots of 20,000 sq. ft. or greater from the 2.5-story standard as a district-wide solution. <i>(South Addition Neighborhood Plan Committee)</i></p>	<p>Response: This ordinance proposes to remove the 2.5-story standard and replace it with a more flexible, consistent standard that works at all lot sizes. There are inherent problems with the current 2.5-story standard, as discussed in issue 2-a. Keeping it for small lots would retain these inherent problems and then compound inconsistencies in a more complicated, arbitrary two-track application of Title 21 standards.</p> <p>The Planning Department has examined lot sizes throughout the R-2A, R-2D, and R-2M zoned areas. That analysis is shown on the map “R-2 Zoning District Parcel Sizes & Constraints” (See Exhibit A staff report). Based on that analysis, the Planning Department finds that:</p> <ol style="list-style-type: none"> Exempting larger lots would not provide predictability and would result in an arbitrary application of Title 21 compatibility standards. Lots larger than 21,000 square feet are widely distributed in smaller-scale R-2 neighborhoods throughout the Anchorage Bowl. As the map in Exhibit A shows, many lots sized between 21,000 square feet and one acre are found within neighborhoods near smaller lots and structures. Furthermore, smaller lots could be combined into larger lots in the future. Or large lots could be subdivided into smaller lots. Because the range of lot sizes varies within neighborhoods and even individual street blocks, the effect of a lot size-based dual system would result in unpredictable, arbitrary regulations and development patterns. Additionally, lot size does not determine how much a building’s height will impact its neighbors. <p>For example, in the scenario illustrated on the next page, two homes (Lots“1”) are shadowed by a tall 3-story building on a 14,000 square-foot lot (Lot “3”) that is exempt from the 2.5-standard. But the building on the 11,200 square-foot lot to the north (Lot “2”) is subject to a 2.5-story standard in this scenario, even though it shadows no neighboring lot. <u>Exempting larger lots would not provide consistent neighborhood protections or compatibility.</u> In fact, the neighbors on the lots labelled “1” could rightly complain the code failed to protect them, while the builder on lot “2” could rightly complain the code is arbitrarily applying a more restrictive height limit to the lot than to lot “3”.</p> <ol style="list-style-type: none"> Exempting only larger lots would limit development/design flexibility and new housing units, especially in areas where new housing is needed most. The number of lots that are larger than 21,000 square feet make up only about 3.8% of the total number of lots with existing R-2 zoning districts. Most of these larger lots are not located in areas that are prioritized for growth per the <i>2040 Land Use Plan Map</i>.

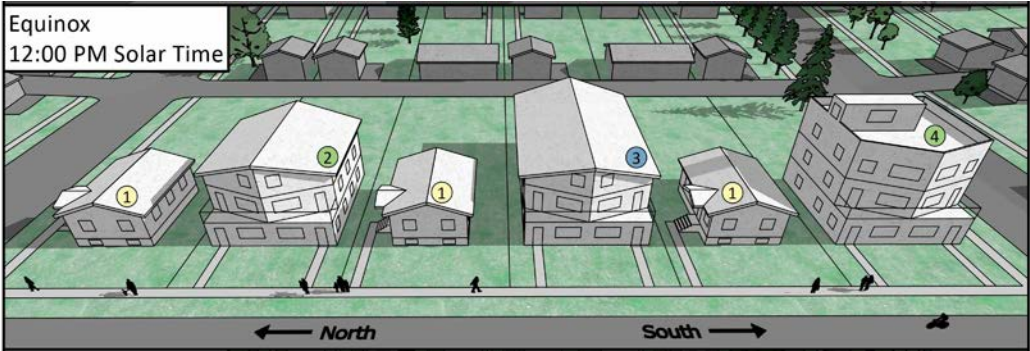
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		<p>This means that allowing the greater development flexibility of 3 stories only on larger lots could incentivize a sprawling pattern of development that does not use existing infrastructure efficiently.</p> <p>Potential Bulk and Shadow Effects of Applying a 2.5-story Limit Only on Smaller Lots; and Not Applying a Solar Access Step-back, in R-2M Zone Lot Size Threshold Scenario: Lots Less than 14,000 Square-feet are Subject to 2.5-Story Limit</p>  <p>① Existing Older Home on 7,000 Square-foot Lot ② 2-story Four-plex with Basement on 11,200 Square-foot Lot, Subject to 2.5-story Height Limit in this Scenario ③ 3-story Five-plex on 14,000 Square-foot Lot, Exempt from 2.5-story Height Limit in this Scenario</p> <p>3. There are inherent problems with the 2.5-story standard, regardless of what lot size it is applied to. As discussed in issue 1-a, the current 2.5-story standard limits design flexibility and does not ensure a consistent maximum building height or level of sunlight access protection for neighbors. For example, the illustration on the next page shows that the 2.5-story standard (shown on fourth building from left) could result in bulkier buildings than the proposed R-2 amendment’s maximum building size.</p> <p>Restricting architectural style is not consistent with the 2040 LUP policy to allow more innovative housing types. The photo from the 2040 LUP land use designation that the R-2M district implements (photo provided at end of issue 1-a, left column) a three-story modernist infill housing development can fit in with the scale and form of its single-family neighborhood environment.</p>

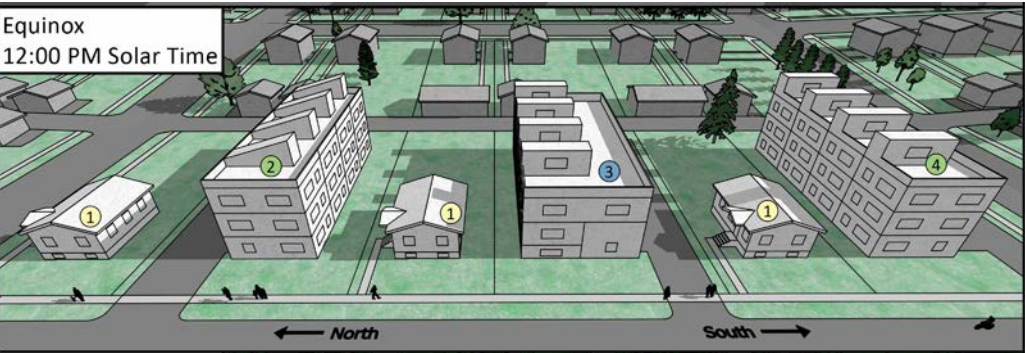
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		<div><p>Comparison of Allowed Duplex Sizes on 7,000 square-foot lots in R-2M zone</p><table><tr><td>2,400 SQUARE FEET</td><td>4,550 SQUARE FEET</td><td>4,690 SQUARE FEET</td><td>6,800 SQUARE FEET</td><td>8,100 SQUARE FEET</td></tr><tr><td>TYPICAL OLDER DUPLEX</td><td>RECOMMENDED MAXIMUM</td><td>85TH PERCENTILE OF RECENT BUILT MAXIMUM</td><td>CURRENT CODE MAXIMUM</td><td>CURRENT CODE MAX. WITHOUT 2.5-STORY LIMIT</td></tr></table><p>ALL LOTS 7,000 SQ. FT.</p></div> <p>Rather than control roof design style or stories, the proposed FAR standard focuses on building bulk in combination with other proposed three-story building standards. FAR more consistently, effectively addresses overall building scale, and graceful transitions in height and bulk to neighboring properties.</p> <p>Recommendations: 1. Move forward with deleting the 2.5-story standard, and not retaining it on small lots of any size threshold.</p> <p>2. Address solar access concerns that underlie a part of the comments for a 2.5-story standard. See issue 2-e.</p> <p>3. Address neighborhood-specific scale, character, or historic preservation through other code amendment projects, area-specific districts, or overlay zones rather than through the R-2 zones amendment project.</p>	2,400 SQUARE FEET	4,550 SQUARE FEET	4,690 SQUARE FEET	6,800 SQUARE FEET	8,100 SQUARE FEET	TYPICAL OLDER DUPLEX	RECOMMENDED MAXIMUM	85TH PERCENTILE OF RECENT BUILT MAXIMUM	CURRENT CODE MAXIMUM	CURRENT CODE MAX. WITHOUT 2.5-STORY LIMIT
2,400 SQUARE FEET	4,550 SQUARE FEET	4,690 SQUARE FEET	6,800 SQUARE FEET	8,100 SQUARE FEET								
TYPICAL OLDER DUPLEX	RECOMMENDED MAXIMUM	85TH PERCENTILE OF RECENT BUILT MAXIMUM	CURRENT CODE MAXIMUM	CURRENT CODE MAX. WITHOUT 2.5-STORY LIMIT								

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2-d.	<p>Generally Support Proposed FAR Limits on the Size of Buildings. Section 21.06.020A., Table 21.06-1 (Page 5, Community Disc. Draft) Support the proposed amendment. <i>(Abbott Loop Community Council)</i></p> <p>The FAR concept is a good planning tool to provide the design flexibility for different designs, and this committee supports its introduction into the R-2 districts. The FAR numbers listed seem reasonable. However some developments especially multifamily townhouse-style developments will result in completely impervious lots consisting of buildings and paved access drives. That is not compatible with the already-developed Traditional Neighborhood Design areas. <i>(South Addition Neighborhood Plan Committee)</i></p> <p>No objection to replacing the 2.5-story requirement with floor area ratio (FAR) as one of the dimensional requirements in the R-2 districts, provided that the 30-foot height requirement and setback requirements remain in place. <i>(Turnagain Community Council)</i></p> <p>I live in one of the areas that will be affected by this proposal. When a multi-plex was built in our neighborhood (end of E 79th Avenue on the north side of street) it was placed within five feet of the neighbor's property line and the entire property was paved over, not a place for children to play but in the street. I am against this type of development, it destroys neighborhoods. Why not instead open up some of the lands owned by other entities like the Mental Health Trust? <i>(Janie Odgers)</i></p> <p>Support the proposed changes that put limits on the height and scale of new buildings in established neighborhoods including South Addition. New development will be much easier to support if it is compatible in scale to the existing dwellings in the neighborhood. The key features of the FAR methodology are the FAR ratios as proposed in the community discussion draft. If the FAR ratios are subsequently increased, those increases will undermine the effort to guide new development that complements existing single-family neighbors. <i>(John Thurber)</i></p>	<p>Response: The FAR limits are designed to supplement other dimensional standards including setbacks, height limits, and lot coverage limits, and to also work well with other site development requirements including parking and access, landscaping, and open space.</p> <p>The commenter on E 79th Avenue is reacting to townhouse development at 655 E. 79th Avenue that was constructed under the “old” Title 21 in 2014. It pre-dated the improved private open space and landscaping requirements under the current Title 21, which was adopted in 2013 and became fully effective only in January 2016. The proposed FAR amendments would allow for the amount of building bulk constructed at 655 E. 79th, but would likely require more private open space areas and landscaping breaks.</p> <p>The commenter on E 79th Avenue also suggested other areas be opened up to housing rather than introducing infill housing in R-2 zoned neighborhoods. In fact, other lands including Mental Health Trust lands and some municipal lands are identified by the <i>Anchorage 2040 Land Use Plan</i> as future housing / residential mixed-use areas. However, these lands will not be enough to meet forecast population growth.</p> <p>In response to the last comment: The FAR limits are meant to allow for the primary range of dwelling unit sizes desired on the market. The FAR limits have undergone testing and refinement, and some may be adjusted upward from the Community Discussion Draft to the Public Hearing Draft based on improved understanding of existing conditions.</p> <p>Recommendations: Table 21.06-1 (page 3 of public hearing draft), move forward with the overall proposed FAR approach. See subsequent issue items for more specific recommendations as to FAR limits.</p>

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2-e.	<p>Address the Sunlight Shadowing Impacts before Replacing the 2.5-story Height Limit with FAR Limits</p> <p>Section 21.06.020A., Table 21.06-1</p> <p>(Page 5, Community Discussion Draft)</p> <p>Airport Heights CC requests a slow down on the R-2 zones project, so that more information about solar access protections can be collected and discussed, and to incorporate solar protections as part of the amendment. Airport Heights was chosen for the pilot project for Solarize Anchorage, through which 33 homeowners invested a total of \$500,000 in rooftop solar panels. Solarize Anchorage is a project of the Alaska Center in conjunction with Launch Alaska and the Alaska Center for Energy and Power (ACEP). There is an Alaska Statute for solar easements – AS 34.15.145. ACEP has been doing a lot of work on solar and solar calculations for Alaska, and is researching how other communities have approached solar access protection. This issue applies across Anchorage. Solarize is gearing up to launch in at least two more neighborhoods next year. Research this has been done in other places along with lessons learned and then apply these ideas toward a final amendment. Possibly a solar working group could be assembled to examine this issue. It will be easier to resolve this issue now than to go back and try to fix it later. (<i>Carolyn Ramsey, President, Airport Heights Community Council</i>)</p> <p>Alaska Center for Energy and Power (ACEP) has worked with (Chris Pike) and Alaska Center to facilitate the recent Solarize Anchorage project in Airport Heights neighborhood. We are moving forward with plans for Solarize in additional neighborhoods next summer based on interest from Anchorage residents. In addition, we have been working with the Municipality’s sustainability manager on the Municipality’s SolSmart campaign, which seeks to encourage solar installations. Solar installations continue to gain popularity as the price of solar modules drops and residents look for energy alternatives. We are concerned that the proposed change may impact output from current and potential residential solar installations. These installations are sizable</p>	<p>Response: Solar (or sunlight) access, as defined in Title 21 (AMC 21.14.040), is the availability of, or access to, unobstructed direct sunlight. Protecting solar access means promoting buildings that reduce shadowing impacts on neighboring indoor or outdoor living spaces, and solar energy PV collectors. The level of solar access protection needed can vary with the purpose of the space.</p> <p>The level of solar access is closely related to land use, building heights, and setbacks of buildings. Protection of access to light, air, and views is a longstanding part of the intent behind having zoning regulations, including building height limits. Northern climate, or “winter city” design is also a policy of the <i>Comprehensive Plan</i>, and an objective of the Title 21 land use regulations. <i>Anchorage 2020</i> Policy 41 directs new land use regulations to include design requirements that are responsive to Anchorage’s climate. The purposes of Title 21 include promoting development that reflects the Municipality’s unique northern setting and winter city character.</p> <p><i>Anchorage 2040</i> LUP Infill Design Principles for the relationship to surrounding neighborhoods include that “Infill and redevelopment that is compatible with height, scale, and massing of adjacent homes,” and also that Protects front-, side-, and rear-yard setbacks to provide open space, play space, landscaping, and <i>sunlight access</i> (emphasis added, page 35, <i>Anchorage 2040</i>).</p> <p>See issue 2-a for discussion of <i>Anchorage 2040</i> direction regarding the “single-family” character and scale of buildings in the “Compact Mixed Residential—Low” land use designation that corresponds to the R-2M zone.</p> <p>Compatibility in context of northern climate design, means to take into account how proposed buildings will affect the surrounding micro-climate of neighboring lots. Sunlight access is a basic need for human health, comfort, and livability. Seasonal sunlight is one of the biggest challenges of building a livable, desirable city in northern altitudes. Low sunlight angles, prolonged seasons of darkness, and inhospitable temperatures in areas of shadow are a primary challenge against keeping talented, skilled residents from the standpoint of economic development. Sunlight access is also growing in importance for building energy efficiency and energy collection, due to rising heating costs and anticipated continuing advances in solar PV technology.</p> <p>However, sunlight access protection should be seen in context of <i>Anchorage 2040</i> Goals 2 (infill/redevelopment) and 4 (housing). Given the objectives of the R-2 zones, an appropriate level of sunlight access is probably one that (a) allows for practical development of the full number of housing units and housing types allowed by the R-2 zoning district, while also (b) being compatible with enjoyment of single-family homes with usable outdoor yard activity and gardening areas on adjoining lots.</p> <p>The solar access issue affects the R-1 zoning districts, and other residential zones as well. Resolving solar access issues in a more comprehensive way is beyond the scope of this project. Much time and effort would be needed to research, develop, and discuss more cohesive policies, programs, code requirements, and incentives</p>

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	<p>investments for homeowners. State of Alaska does have a solar easement option, and there are resources that detail actions taken in other states on this issue. A city may include a solar access requirement or encourage that installations obtain an easement. While I am not sure what the right answer is for Anchorage, please carefully consider this issue as the amendment project moves forward. <i>(Erin Whitney, Alaska Center for Energy and Power)</i></p> <p>How does this proposal actually mitigate shadow effects of taller buildings? It is understood one of the intended purposes of the proposal is to minimize shadowing by allowing a developer to move the building footprint around on the site. However, the language in the code uses the permissive term “should” when discussing minimizing neighborhood impacts. The neighborhood and adjacent properties would be better protected if the word “should” was replaced with “shall” in the code. A developer then must explicitly document in their project development packet the depth of consideration they have given to minimizing shadow impacts and what techniques they have employed to mitigate them. <i>(Allen Kemplen, Fairview Community Council Design Committee)</i></p> <p>Amend Section 21.07.110C to address protection of R-2 zoned lots in the Traditional Neighborhood Design areas to protect their valued neighborhood character by require that developments preserve solar access to neighboring lots are requirement instead of a menu choice. Add the following subsection 21.07.110C.2.e. that reads,</p> <p><u>e. Subsections 21.07.110C.8.e., f., and g. shall apply as requirements to all residential development in the R-2A, R-2D, and R-2M zoning districts in the Traditional Neighborhood Design areas.</u></p> <p><i>(South Addition Neighborhood Plan Committee)</i></p>	<p>to prioritize and enact in Anchorage. The R-2 amendment is not the appropriate public process by which to tackle solar access protections comprehensively but it can promote development of such standards in the near future.</p> <p>The Municipality is currently facilitating a separate public process to develop a climate action plan. This effort can be used to help provide an overall policy statement concerning solar access, and identify appropriate strategies to explore for encouraging solar access.</p> <p>In regards to the scope of the R-2 zones bulk/height amendment project, its potential effects on solar access seem mixed:</p> <ol style="list-style-type: none">1. Property owners in the R-2 zone already have entitlement to build 2.5-story houses up to 30 feet in height under the current code. So the R-2 amendment would be only an incremental change from an already limited level of sunlight access protection. The middle building in bulk shadow comparison diagram on the next page shows the level of shadowing already possible under current development entitlements.2. The R-2 amendment appears to actually increase the total amount of sunlight access protection to neighboring properties overall. This is because it limits the overall bulk and volume of a building more than does the current code with the 2.5-story standard. Even if the building is taller it will cover less of the lot, which means that some part of the neighboring property such as the yard, garden, or patio may actually receive sunlight for longer periods of the day and year. The diagram on the next page shows this effect. FAR could allow a 3-story building, but that building will occupy less of its lot.3. However, because the recommended FAR provision is flexible in relative to building placement and massing, the FAR standard does not predict which part of the neighbor’s lot will receive sunlight access. So the building may shadow one part of a neighbor’s lot less than the current code allows, it can shadow another part of the neighbor’s lot more, by being taller. The diagram below shows that, where the 2.5-story limit might typically result in building side walls 22 to 25 feet in height, the amendment would allow for 33 foot tall sidewalls (including the parapet) compounded by a rooftop stairwell. Addressing the R-2 amendment’s impact on solar access, in a limited manner, is within project scope <p>.</p>

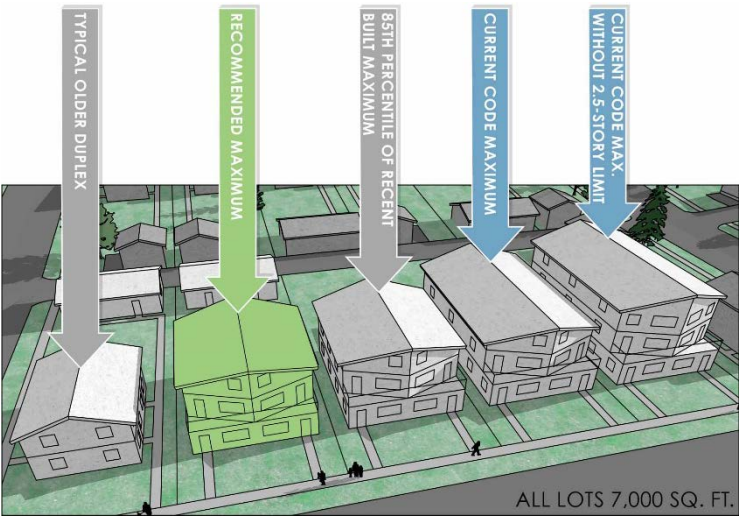
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		<p>Shadow Analysis of Maximum Allowed Duplex Sizes, R-2M Zone 3-Story Flat Roof Scenario Sunlight Shadowing Impacts at Equinox (Mar. & Sept. 21), Row of Lots North and South of Each Other</p>  <p>Equinox 12:00 PM Solar Time</p> <p>1 Existing Older Home 2 Proposed Max. Duplex Size: Half-story Under a Pitched Roof Design Scenario 3 Current Code Max. Duplex Size: Typical Ceiling Heights Under 2.5-story Height Limit 4 Proposed Max. Duplex Size: 3-story, Flat Rooftop Deck Design Scenario</p> <p>A simple bulk step-back can re-create an equivalent level of sunlight access protection for residences in the R-2A, R-2D, and R-2M districts as exists under the 2.5-story standard. A bulk-plane step-back requirement limited to retaining the level of sunlight access protection in those situations would also avoid impacting entitlement to build. It could also address shadow impacts of multi-unit buildings, as illustrated next page:</p>

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		<p data-bbox="1190 240 2110 305">Comparison of Potential Shadow Impacts of Four-plex Multifamily Buildings on 11,200 Square-foot Lots, R-2M Zone</p> <p data-bbox="1190 316 2099 337">Sunlight Shadowing Impacts at Equinox (Mar. & Sept. 21), Row of Lots North and South of Each Other</p> <div data-bbox="1190 358 2214 708"><p data-bbox="1190 370 1408 423">Equinox 12:00 PM Solar Time</p></div> <div data-bbox="1190 724 2163 841"><p>① Existing Older Home on 7,000 Square-foot Lot</p><p>② Proposed Max. Four-plex Size on 11,200 Square-foot Lot: with Solar Access Step-back from North Lot Line</p><p>③ Current Code Max. Four-plex Size on 11,200 Square-foot Lot: 10-foot Side Setback from North Lot Line</p><p>④ Proposed Max. Four-plex Size on 11,200 Square-foot Lot: 10-foot Side Setback, No Solar Access Step-back</p></div> <p data-bbox="1155 875 2448 938">Recommendations: Address solar access concerns and build bulk step-back concerns through one or both of the following:</p> <ol data-bbox="1204 959 2462 1360" style="list-style-type: none">1. Page 6 of Public Hearing Draft (Exhibit B), insert a new subsection 21.06.030D.7., <i>Solar Access Step-back</i>, in Title 21 Chapter 6 provisions for building height, in order to retain an equivalent level of solar access protection for residences in the R-2A, R-2D, and R-2M districts as existed prior to the removal of the 2.5-story standard. Make the step-back re-create the approximate height of a typical 2.5-story building wall and sloping roof pitch. Apply the step back only along lot lines shared with a residential property where shadowing would occur. Exempt roof features common to sloping roofs, but not stairwells, elevators, or parapets on flat roofs. Build in flexibility for applicants to create alternative designs that provide equal or better solar access.2. Beyond the R-2 zones amendment project, Municipality should determine an appropriate level of sunlight access for residential zones more comprehensively, and then what strategies should promote, encourage, allow, or regulate sunlight access and PV collectors.

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2-f.	<p>Simplify the Ordinance, as FAR is Complicated and Difficult to Understand.</p> <p>Section 21.06.020A., Table 21.06-1 (Page 5) Section 21.06.030E. (Page 7) Section 21.14.040 (11 lines 3-10) (Pages 5, 7, and 11 lines 3-10, refer to Community Discussion Draft)</p> <p>Not understanding FAR. FAR is complicated. (<i>AHBA Consultation Meeting</i>)</p> <p>Introduction of FAR calculation is overly complicated. There needs to be a better understanding of which will be the limiting factor, maximum lot coverage or FAR. (<i>Brandon Marcott, Triad Engineering</i>)</p> <p>How does parking, landscaping, and private open space requirements fit in with the new FAR calculation? Will these other requirements remain the same? Additional calculations become very cumbersome to the designer and lead to an iterative process of design which increases development costs. (<i>Brandon Marcott, Triad Engineering</i>)</p> <p>The code language is going to become ever so complicated especially with the inclusion of the FAR. (<i>Claiborne Porter</i>)</p>	<p>Response: FAR is a simple and familiar zoning tool for keeping the bulk of large structures in proportion to the size of the lot, while providing flexibility in building siting, style, and design.</p> <p>FAR limit is a simple ratio between two already-known quantities: the building’s gross floor area (GFA) and the lot area. If the FAR limit is 0.5, then the building gross floor area (GFA) must be less than or equal to half of the lot area.</p> <p>The builder may distribute this gross floor area in any way that complies with the rest of the land use regulations—including staying within height limits, setbacks, lot coverage, etc. The builder may distribute this floor area to more than one structure on the lot.</p> <p>Included in FAR limit calculations are: Floor area in stories that are above grade plane, any portion of attics or “half stories” that have adequate ceiling height, enclosed porches, balconies, and arctic entries, basements that are 6’ or more above the grade plane or 12’ above the finished grade plane at any point.</p> <p>Not included in FAR limit calculations are: Portions of attics or half story where the ceiling is less than adequate ceiling height, unenclosed porches and balconies, basements that are below grade plane, crawl spaces, dormers and building appurtenances that are less than or equal to the standards stated in this ordinance. Since “crawl spaces” are not even considered a part of gross floor area, there is no reason for the code to have to exempt crawl spaces from the calculation of FAR in subsection 21.06.030E.2.</p> <p>See current definitions of FAR and GFA in 21.14.040 and the FAR exemptions of 21.06.030E. Other Title 21 such as “story below grade plane” help define parts of a building exempt from FAR calculations.</p> <p>The Planning Department acknowledges that adding R-2 zones to the set of Title 21 districts using FAR is introducing FAR to a much broader set of users including more homebuilders. While FAR is a simple ratio, and the definitions of gross floor area and which parts of a building are included in FAR is provided in code, this information is new to many residential code users and not immediately apparent. A handout or how-to guide, with examples and illustrations showing which parts of a building are included or not in GFA and FAR calculations in Title 21 would be helpful.</p> <p>Recommendations: Section 21.06.030E.2., (p. 7, Public Hearing Draft), delete exemption for “crawl spaces”.</p> <p>Planning to provide Director’s code interpretation policy which illustrates and exemplifies which parts of a residential building are included in the calculation of “Gross Floor Area” and “Floor Area Ratio”.</p>

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2-g.	<p>Ensure the Municipality has the Resources and Expertise to Successfully Implement FAR.</p> <p>Section 21.06.020A., Table 21.06-1 (Page 5) Section 21.06.030E. (Page 7) Section 21.14.040 (11 lines 3-10) (Pages 5, 7, and 11 lines 3-10, refer to Community Discussion Draft)</p> <p>The Floor Area Ratio (FAR) concept is an excellent planning tool, but the sophistication of the housing sector of our building industry will require that the Municipality has the resources to provide expertise in place for its wide implementation at the Development Services Department Land Use Review division. It would be a disservice to builders and to the entire community to have such a powerful development tool fail in Anchorage because the implementation was not in place for its success. <i>(South Addition Neighborhood Plan Committee)</i></p>	<p>Response: FAR is a familiar zoning tool to municipal land use reviewers, already long used by Title 21 in certain single-family, multifamily, and commercial zones:</p> <ul style="list-style-type: none"> • FAR has been used for decades in the R-4 district and in the RO and B-3 districts for apartments; • FAR has been in use in Girdwood low to medium density residential zones since 2005, with municipal staff reviewing and issuing residential permits in Girdwood including compliance with max FAR. • FAR also appears in more sophisticated forms with FAR bonus systems in the R-4, R-4A, and for mixed-use developments non-residential districts, than proposed in the R-2 zones. <p>Planning Department should provide a how-to guide/information to support consistent interpretation of GFA, FAR, and other related code requirements among applicants and land use reviewers.</p> <p>Recommendations: No changes to the proposed R-2 code amendment.</p> <p>Planning to prepare a Director’s code interpretation policy which illustrates and exemplifies what parts of a residential building are/are not included in the calculation of “Gross Floor Area” and “Floor Area Ratio”.</p>
2-h.	<p>Increase the Proposed Maximum FARs for Single-family Homes and Duplexes.</p> <p>Section 21.06.020A., Table 21.06-1 (Page 5, Community Discussion Draft)</p> <p>Why do FAR limits vary by type of residential land use (e.g., single-family, duplex, townhouse, multifamily)? <i>(AHBA Consultation Meeting)</i></p> <p>Do not agree with reducing the FAR for duplexes and single-family homes. If there is to be a FAR limit then suggest raising the allowed FAR for single-family homes and duplexes to match what is allowed for townhomes. These lower FARs are problematic, particularly in South Addition, and just create road blocks for development. <i>(Andre Spinelli)</i></p> <p>(Repeated from 2d. above) The key features of the FAR methodology are the FAR ratios as currently proposed in the community discussion</p>	<p>Response: The <i>Anchorage 2040 Land Use Plan</i> Policy 1.2 calls for accommodating the forecasted population growth. Policies 2.3, 4.2, 4.3, and 4.4 support infill and redevelopment with innovative housing. Actions 4.3 and 4.4. also identify the need for preserving existing housing and structures, especially if it is affordable, and encourages growth to be complementary of existing scales and characters of established neighborhoods.</p> <p>Floor Area Ratios vary for different land uses for several reasons. Each additional housing unit brings additional floor area. However, a multiplication of the floor area is not consistent, because unit sizes do not increase as their number increase. Families living in a single-family home have certain expectations of amenities and space that families living in two-family buildings may not. Additionally, multifamily buildings become unaffordable to build and occupy when unit sizes are too large: market trends toward lower unit sizes overall, and certain floor areas for type of unit, illustrate this fact.</p> <p>The existing code recognizes the added bulk of multifamily units by requiring additional lot area for each additional housing unit. The intent is that each building remains in scale with, and contributes to the character of, the neighborhood. The growth of all living areas associated with increasing housing unit numbers is not proportional to the increases in lot size, however, and for that reason the proposed FAR values increase with the use. The data of existing construction confirmed this pattern, and led to the determination of the values.</p>

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	<p>draft. If the FAR ratios are subsequently increased, those increases will undermine the effort to guide new development that complements existing single-family neighbors. <i>(John Thurber)</i></p>	<p>Starting with Property Appraisal data, the Planning Department analyzed every residential or commercial residential building in all R-2 districts ever built to determine existing FAR values. Planning broke the data into several categories: zone, land use, lot size, and year built (this consisted of three data sets, before 1971, after 2008, and all years). See Exhibit A, Staff Report. To suggest the limit, Planning staff looked at the number of projects in each category, and the minimum, median, mean, most common (mode), and 85th and 95th percentiles, and the maximum FAR for each lot size range within each use. Broadly, the proposed FAR limits come from the 85th percentile of the most common lot size for each use within each zoning district.</p> <p>Looking at two-family structures in R-2M, most (over half) occupy lots between 6,000 and 8,499 square feet. This remains true when isolating those built in the last decade. Although the 85th percentile of these is 0.67, compared with .49 for all years. Some recent construction is out of scale with the neighborhoods and has resulted in some public concerns. The duplex at 1239 G St, built in 2016 on a 7,000 square foot lot, has an FAR of 0.78. To balance the concerns of neighbors and the demands from the market, we chose to increase FAR to 0.65 for two-family in R-2M. We recognize some developments appear too large, but the intent is not to create “road blocks” to new housing. Within South Addition, where lot sizes vary from 6,000 to 8,499 square feet, this gives 3,900 to 5,525 square feet of calculated floor area, notwithstanding basements or detached structures under 0.15 FAR. Originally, we had proposed 0.60, but this was before we had analyzed all the data sets.</p> <p>Looking at single-family houses in R-2M, the majority of houses built in the last decade are on lots between 6,000 and 13,999 square feet, with 85th percentile values of 0.49 and 0.35 respectively. In order to accommodate these values, we increased the proposed limit from .45 to .50. This value works in many other communities, most with smaller lot sizes than here. Given the above range, this value provides between 3,000 and 7,000 of calculated living space. Comparing this FAR value to that of townhouses is incongruous. Townhouses have smaller lots, and lack side setbacks. Therefore, the same unit floor area as that of a duplex unit is on a much smaller lot. The data proved this trend, with FAR values consistently higher for townhouse developments.</p> <p>For multifamily developments, the 85th Percentile values were close to 0.80 FAR. Imagining a single-family house at this high of a value is almost comical. Because of the nature of R-2M zones, multifamily structures already must be on larger lots, in order to appear in scale with the neighbors. A single-family house or duplex built to the same size as a multifamily would not only appear out of character for the neighborhood, but would physically be out of scale for its own use. For multifamily development with single- or two-family-style construction replicates the density of single- and two-family developments on their own lots. Further, the proposed limit on multiple single- or two-family-style structures on one lot was consistent with recent developments, whose 85th percentile is 0.55 and maximum is 0.60. For these reasons, there were no changes to the limit for the Public Hearing Draft.</p>

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		<p>Preserving older homes maintains an affordable housing stock; replacing a smaller, older home with a new, mansion-sized home does not add any additional dwelling units, and makes the house inaccessible to lower-income individuals. The same goes for duplexes, both in replacing existing single-family homes and historic duplexes.</p>  <p>Diagram illustrating building types and their relative sizes on a 7,000 sq ft lot. The diagram shows five building types: Typical Older Duplex, Recommended Maximum, 85th Percentile of Recent Built Maximum, Current Code Maximum, and Current Code Maximum without 2.5-story limit. The Recommended Maximum is highlighted in green. The diagram shows that the Recommended Maximum is a smaller, more compact unit compared to the Current Code Maximum and the Current Code Maximum without 2.5-story limit. The Typical Older Duplex is also shown as a smaller unit. The 85th Percentile of Recent Built Maximum is shown as a larger unit. The diagram is labeled 'ALL LOTS 7,000 SQ. FT.' at the bottom right.</p> <p>Even though large buildings may “realize” the economic value of the lot, their sizes and prices displace families and construct economic road blocks to young or minority families, decreasing the civic and social value. This is not improving the housing situation. However, newer, smaller construction, is a market need and does improve housing. Maintaining reasonable FAR values for developments that reflect the number of units is consistent with the findings of the AEDC housing market survey, which showed interest in smaller, more compact units and more housing near Downtown.</p> <p>Recommendations: Increase the proposed maximum FARs for single-family and two-family as follows:</p> <ol style="list-style-type: none">1. Section 21.06.020A., Table 21.06-1 (page 3 of Public Hearing Draft, Exhibit B), increase the proposed maximum FAR for single-family detached homes from 0.45 to 0.50 FAR in all three R-2 zones.2. Section 21.06.020A., Table 21.06-1 (p. 3 Public Hearing Draft), increase the proposed maximum FAR for two-family (duplex) and attached single-family uses from 0.50 to 0.60 in the R-2A zone, and from 0.60 to 0.65 in the R-2M zone. No change to the proposed 0.60 FAR in the R-2D zone.

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<p>2-i.</p>	<p>Increase the Proposed Maximum FARs for Multifamily and Townhouses.</p> <p>Section 21.06.020A., Table 21.06-1</p> <p>(Page 5, Community Discussion Draft)</p> <p>Proposed FAR limit would reduce the size of buildings we can build to meet the demand for adequate housing. For example, it would not allow the construction of our Park Strip Lofts project on 10th Avenue. This project is featured as a good example in the draft amendment and was well-received on the market. It has 10,652 sq. ft. of floor area on a lot size of 11,203 sq. ft., which is 2,810 square feet over what would be allowed in the proposed FAR limit of 0.70 FAR for multifamily structures in the R-2M zone. If we deduct the daylight basement living space below grade plane, the development is still at 9,352 sq. ft. of floor area, 1,500 feet above the proposed FAR limit. This is a substantial change in the regulations that would have a tremendous impact on the design, livability, and marketability of this development. We have other projects in planning and design phases in R-2 zoning district areas that will also exceed the proposed FAR, as currently planned. The proposed FARs are too restrictive for the size and style of buildings that these areas need and can support. At a minimum attached garages be excluded from FAR. <i>(Brian Harten, Hultquist Homes)</i></p>	<p>Response: This project is one of many implementation projects that continue the sentiments of the <i>2040 LUP</i>, and streamline construction of housing. Most of Goal 2 of the plan fits with this project, as it aims to allow innovative and varied housing options that are more compact and consistent with existing neighborhood contexts (LUP 2.3, 4.2, and 7.1). Additionally, Goal 4 highlights policies aimed at maintaining and increasing housing equity and quality, especially preventing the displacement most associated with redevelopment. New construction should be as accessible to residents as the replaced structures were. Most applicable to this project is Goal 7, seeking compatible infill development. Redevelopment and infill are great methods of providing housing, but their products should respect the character of the neighborhoods in which they occur, and the residents therein. Looking toward the future, buildings must reflect our uniquely Alaskan values, climate, and construction methods.</p> <p>The intent of the R-2M zone (the only R-2 district that allows multifamily) is to provide a transition from single-family and two-family neighborhoods to the denser multifamily neighborhoods of R-3 and R-3A. Although multifamily is permitted, it must fit the scale of the other uses: this is the reason multifamily developments require so much more land area. Floor Area Ratio provides another safeguard against incompatible construction that negatively impacts neighborhoods and their residents. Some projects, including those already built or planned (as the comment enunciates), do not fit within some neighborhoods, and have too much bulk or appear uncharacteristic for the area. The buildings themselves do provide the housing allowed, in the case of the comment, four units, but the dimensions of the units could be scaled differently to be contextual.</p> <p>As mentioned elsewhere in this table, and explained further in Exhibit A, we conducted extensive research of existing FAR values. After assessing all the data, we are more confident proposing an FAR limit of 0.80 for multifamily and 0.90 for townhouses, but retaining the 0.60 for multifamily with single- and two-family-style construction. Recent multifamily buildings have 85th percentile FAR values of 0.82 for the most common lot size (greater than 14,000). For five-unit multifamily on a 14,000 sf lot, 0.80 gives about 2,240 square feet per unit, including the garage. Consultations with realtors and builders have confirmed this as a unit size in demand. The criticism that an FAR will reduce the number of units disappears when considering that 0.80, a value greater than 84% of all multifamily built in the last decade. Accepting a higher value would be statistically unrealistic and not reflect current development.</p>

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		<div data-bbox="1150 235 1876 734"></div> <p data-bbox="1150 748 2467 914">Because the data were still in analysis when the Planning Department released the Community Discussion draft, some of the values did not accurately represent the existing conditions. After completing the analysis, we adjusted the multifamily FAR to 0.80, as elaborated above, as well as the townhouse FAR to 0.90. Townhouses are unique because their lots are very small, and most lack side setbacks. They are allowed greater lot coverage as well, to accommodate the area of a suitable dwelling unit.</p> <p data-bbox="1150 933 2427 995">In essence, the limits do not prevent construction, only aim to produce more varied housing types (LUP 4.2) that remain considerate of the neighborhood scale and character.</p> <p data-bbox="1150 1015 2454 1076">Recommendations: Increase the proposed maximum FARs for townhouse and multifamily uses in the R-2M zoning district as follows:</p> <ol data-bbox="1204 1096 2467 1401" style="list-style-type: none">1. Section 21.06.020A., Table 21.06-1, Table 21.06-1 (page 3 of Public Hearing Draft), increase the proposed maximum FAR for townhouse land use (in which each townhouse unit is on its own lot and attached at its side lot lines) from 0.70 to 0.90 FAR.2. Section 21.06.020A., Table 21.06-1, (p. 3 Public Hearing Draft), increase the proposed maximum FAR for multifamily dwellings (three or more units are in a building on a lot) from 0.70 FAR to 0.80 FAR.3. No changes to proposed 0.60 FAR for multi-family dwellings that consist of multiple single-/two-family style buildings on one lot.

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2-j.	<p>Clarify the Definition of “Story Below Grade Plane” in “Areas Not Considered in Measuring FAR.”</p> <p>Section 21.06.030E.2.d.</p> <p>(Page 7, line 18, Community Discussion Draft)</p> <p>Will floor area in stories only partially below the grade plane count toward FAR, or will it be discounted from FAR? Please clarify this rather than leaving it to staff discretion. Consider expanding the proposed definition of “Half Story to include “Story Below Grade Plane”. (<i>Brian Harten, Hultquist Homes</i>)</p> <ul style="list-style-type: none"> • Related issue: 2-e. 	<p>Response: Per Section 21.06.030E.2., floor area in a “story below grade plane” does not count toward FAR.</p> <p>“Story Below Grade Plane” is defined in the Title 21 glossary in section 21.14.040. This definition is inclusive of daylight basements, and leaves no room for discretion/interpretation. It defines a story below grade plane as a story in which the finished floor of the story above it is no more than six feet above the grade plane, and no more than 12 feet above the finished grade at any point. (“Grade Plane” is itself defined in Title 21 and is established for every development site as part of measuring building height.)</p> <p>For example, on a flat site, if the daylight basement’s ceiling is only 4.5 feet above grade, and the sum total depth of the joists, subfloor, and flooring of the floor above the basement ceiling comprise only 1.5 feet, then the finished floor of the floor above the basement is only 6 feet above grade and the daylight basement is considered a “story below grade plane”. The daylight basement in this case would not count toward FAR.</p> <p>A half-story is specific to an attic-like living space as a top floor tucked under a sloping roof form, and has its own definition in Title 21, as well as its own tailored exemption from FAR calculations.`</p> <p>Recommendations: Section 21.06.030E.2, exemption for a story below grade plane on line 18, page 7 of Public Hearing Draft, add a reference to the Chapter 21.14 current definition of “story below grade plane”.</p>
2-k.	<p>Consider Counting Basement and Attic Living Spaces toward FAR.</p> <p>Section 21.06.030E.2.a.-d.</p> <p>(Page 7, lines 13-18, Community Discussion Draft)</p> <p>TCC has concerns about the implications of excluding some living spaces in calculation of FAR. We understand the intent is to address visible, aboveground square footage of a building as it relates to how large and bulky it looks. We also understand that the current code excludes these spaces (basements, attics). However, basements and attics that are considered rental unit space would still contribute to higher density per lot. If basements and attics were not exempt, what impacts would this have? Is that a feasible alternative? (<i>Turnagain Community Council</i>)</p>	<p>Response: Firstly, buildings in the R-2 districts are not subject to any FAR size limits under current code. So the proposed FAR limits, even with the exemptions for basements and attics, will limit the maximum size of buildings in R-2 neighborhoods more than current code. The proposed amendments are not increasing the maximum allowed floor area size of homes, attics, or basements; rather they are setting new limits to floor area.</p> <p>Secondly, for buildings in various zoning districts already subject to FAR limits in Title 21, the proposed FAR amendment carries forward the current FAR exemption for basements and living spaces, with a few modifications. If the R-2 amendment were to propose to start including these spaces in the calculation of FAR, it would affect many properties outside the R-2 zones. The following areas are not included in the proposed FAR limit calculations: Floor area in attics or “half stories” under a sloping roof that have a ceiling height less than 7’-6”, non-enclosed porches or balconies, basements below first floors that are 6’ or less above grade, and a certain amount of combined FAR for detached accessory buildings. Note: The Community Discussion Draft did not count attic spaces with ceiling heights less than 6’8”. Municipal building reviewers have since advised that a ceiling height of 7’-6” (90”) better co-relates to the definition of “habitable area” in the Building Code.</p> <p>Exempting attic or basement floor space from FAR does not increase the number of dwelling units allowed on the lot. If they were counted toward FAR they could still be used as living space.</p>

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		<p>FAR exemptions for attics, basements and detached ADUs can benefit neighborhoods. Were attic and basement living spaces not exempt, fewer homes would be designed with the attics or basements because builders would opt to build all floors starting from at grade. The resulting building built at grade would not reduce its overall appearance of building bulk.</p> <p>Because of attics' low ceiling heights, and because of basements' placement at least halfway underground, these spaces do not contribute as much to a building's bulk or shadowing effects. Exempting these spaces is a way to allow for and encourage the types of building designs, living space, and ADUs that have less impact.</p> <p>If the Municipality were to propose to count attics and basements toward FAR, there would probably be greater pressure to increase the maximum proposed FAR limits. Under the current code and R-2 proposal, if builders want to create a very large dwelling unit, the extra space can be channeled to basement and attic spaces.</p> <p>Recommendations: Section 21.06.030E.2. (Page 7, line 14 of Public Hearing Draft), change the ceiling height threshold below which attic space is not included in FAR from 80 inches to <u>90 inches</u>. No other changes.</p>
2-l.	<p>FAR Exemption for Detached Accessory Structures.</p> <p>Section 21.06.030E.2.e.</p> <p>(Page 7, lines 19-20, Community Discussion Draft)</p> <p>The exemption of only 0.10 FAR of floorspace in detached accessory structures does not seem to be enough for detached garages with an ADU or other additional floorspace above the garage. For example, on a 7,000 sq. ft. lot the exemption is 700 sq. ft. of floor space, but a detached garage is 26'x26'=676 sq. ft. and so the upper living space would not be exempted. Since the majority of the cost of construction is in the foundation, slab, and roof, adding a second story is cost effective. Attic living space (which itself is discounted partially from FAR) is difficult to design and build and creates inferior space. (<i>Brian Harten, Hultquist Homes</i>)</p> <p>On page ii in the introduction, in item 1.c., the text refers to “allowing extra square footage for detached accessory structures” but the code language provided on page 7, lines 19-20 (21.06.030E.2.d.) does not indicate this is the case. Is the proposal to provide an additional</p>	<p>Response: The intent of this FAR exemption is to credit properties with an accessory structure. It encourages developers to break up the building floor area on the site into primary and accessory structures, instead of constructing one large structure. For example, if a developer wanted to build a duplex, the structure might have attached garages, perhaps occupying most of the first level of the building. Under the exemption, however, the duplex could have all of the counted FAR entirely given to living space, if the garage were a separate building.</p> <p>As for two-story accessory structures, as the comment suggests living space over a garage, the structure might be equal to or taller than the primary structure. Taller structures produce greater shadowing, and expose neighboring lots to the gaze from upper stories, and generally appear larger on the site.</p> <p>This amendment does not prohibit two-story accessory structures, nor does it limit their size. The intent of this exemption is to incentivize the breaking up of the total amount of building bulk on a property into multiple buildings, rather than in one large building. With this in mind, the suggested example of a garage under living space in an accessory structure allows the primary structure to be more inviting to the street, and offer greater flexibility in building design, simply because the garage is no longer in that structure.</p> <p>The concern expressed by the first commenter comes down to the amount of the exemption. An objective of this credit is to encourage ADU construction, instead of unintentionally hindering it. Other cities with FAR limits for residential areas give a similar FAR credit. In these cities, the credit correlates with the maximum ADU on a standard lot. In Anchorage, most R-2 zoned lots are less than 8,500 square feet, and the maximum size of an ADU is 900 square feet. The minimum lot size for R-2D and R-2M districts is 6,000 square feet, and many standard urban lots are 7,000 square feet. The same maximum-sized 900 square-foot ADU would account</p>

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	<p>allowance of square footage for ADUs, or is that a part of the new FAR formula? <i>(Turnagain Community Council)</i></p>	<p>for 0.15 FAR on a 6,000 square foot lot, or 0.12 FAR on a standard 7,000 square-foot lot. This seems to indicate that, in order for this exemption to have the intended result, the number should be 0.15 instead of 0.10.</p> <p>An FAR exemption of 0.15 seems adequate for the first commenter’s example of a 26’x26’ garage with an upstairs ADU. For example, on a standard 7,000 square-foot lot, such a two-story accessory building would comprise 0.19 FAR. Only 0.04 FAR (approximately 280 sq. ft. of floor space) of the entire accessory structure would be counted toward the maximum allotment of FAR for the lot. This seems appropriate, that at least some part of the floor area of a two-story accessory structure of this size be counted toward FAR, in recognition of the bulk/size/height of such a structure, as discussed above.</p> <p>To address the second commenter’s concern, the introduction to the Community Discussion Draft (p. ii item 1.c.) explains how the language in the code, 21.06.030E.2.d., can encourage the construction of accessory structures. It did not mean to imply that the proposed changes would increase the maximum allowed size of an ADU. The proposed ordinance does not increase the maximum size of an ADU, which 21.05.070 establishes as 900 square feet or 75 percent of the principal dwelling’s floor area. The FAR exemption for detached accessory structures is just a credit within the maximum FAR formula. This FAR exemption includes Accessory Dwelling Units, but is not exclusive to them. Garages are another type of accessory structure.</p> <p>Recommendations: Subsection 21.06.030E.2.d. (Page 8, Public Hearing Draft), increase the FAR exemption for detached accessory structures from 0.10 FAR to 0.15 FAR.</p>
2-m.	<p>Legal Status of Existing Buildings, Building Permits, and Buildings in Design/Planning Stages.</p> <p>Section 21.12.040C.</p> <p>(Page 9, Community Discussion Draft)</p> <p>Will the exemption for pre-existing buildings apply to buildings that are designed and fully permitted, but are not yet started or completed?</p> <p>Does this exemption apply to properties that have been purchased with the intent of infill and redevelopment, but for which a design has not yet been submitted for a building permit? <i>(Brian Harten, Hultquist Homes)</i></p>	<p>Response: The regulations do not apply to any structure for which a building permit has been submitted before the regulations become effective. For example, if the builder submits a building permit application on March 25, and the regulations become mandatory on March 26, then the building is considered an “existing” building and is not subject to the new regulations. See Title 21 subsection 21.01.090, <i>Transitional Provisions</i>, for the ground-rules for the processing of applications commenced or approved under previous regulations.</p> <p>These regulations would affect existing homes that were built with intent to add an addition or attached ADU later. Allowing for an addition that exceeds the maximum FAR would mitigate this problem, and reward the retention of older, more affordable, and potentially more compatible/historical building stock.</p> <p>Recommendations: No changes to proposed language in 21.12.040C.1., <i>Building Exceeding Maximum FAR</i> (Page 10, Public Hearing Draft).</p> <p>Subsection 21.06.030E.2. (Page 7, lines 21-24 of Public Hearing Draft), insert an FAR exemption for one addition of up to 400 square feet or 0.10 FAR in size to existing homes and duplexes.</p>

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2-n.	<p>Retain the Existing Definition of “Half-story” as Part of Retaining the 2.5-story Restriction.</p> <p>AMC 21.14.040.</p> <p>(Page 11, Lines 13-38, Community Discussion Draft)</p> <p>Generally support the proposed changes to the definitions with the exception of deleting the one-half story reference since this committee recommends to retain the 2.5-story standard for TND neighborhood areas in Table 21.06-1 Dimensional Standards. (<i>South Addition CC Neighborhood Steering Committee</i>)</p> <p>(ref. Issue 2-b)</p>	<p>Response: The draft ordinance does not actually delete the one-half story definition so much as it shortens the term to “half story” and changes the definition. The clarified definition is necessary in order to support the floor area ratio (FAR) limit and coordinate better with the definition of Gross Floor Area. It is clearer than the current “one-half story” definition in several ways. The “one-half story” definition can be confusing to some readers who may wonder what it means to not exceed 50 percent of the floor area of the floor below. The current definition is also unclear about how tall the half-story can be. It provides no limits to the actual height of its walls or roof—only that its floor area cover only half the floor area as the floor below.</p> <p>The new definition is more consistent with other definitions currently in use such as the municipal Property Appraisal department’s definition in use.</p> <p>The Planning Department reviewed the new draft definition in comparison to other codes, including the old Title 21 code, as well as compared it to the heights of attic spaces, and finds that the draft five-foot height limit of its sidewalls is too tall to be a half-story. The standard wall height in a room is eight feet, and five feet is more than half that height. Most definitions set the sidewall height at 2 to 3 feet.</p> <p>Recommendations: Section 21.14.040, <i>Definitions</i> (Page 11 of Public Hearing Draft), reconfigure the change from “One-half Story” to “Half story” by revising rather than replacing the current definition. Move forward with the proposed “Half story definition proposed in the Community Discussion Draft, except change the maximum sidewall height from “less than five feet” to “less than four feet.”</p>

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Part 3: Revisions to Height Exceptions for Rooftop “Appurtenances”		
3-a.	<p>Support/Do Not Support Reducing Height Exceptions for Rooftop “Appurtenances”</p> <p>Section 21.06.030D.6.</p> <p>(Page 13, lines 3-42, Community Discussion Draft)</p> <p>No objection to the proposed changes to the height exceptions of smaller building features that exceed the 30-foot height limit. Generally support rules that protect neighborhood character by establishing minimum aesthetic standards or incentivize builders to make choices for attractive, high-quality developments. <i>(Turnagain Community Council)</i></p> <p>The changes to the height exceptions in 21.06.030D.6.c.iv appear overly prescriptive and limiting to the builder. The proposed code appears to micromanage the building design beyond a reasonable level. <i>(Brandon Marcott, Triad Engineering)</i></p>	<p>Response: Title 21 allows building appurtenances to not be counted toward the maximum allowed building height in the district. However, appurtenances do contribute to the bulk and scale of buildings.</p> <p>Currently, Title 21 allows stairwells and mechanical enclosures to exceed the R-2 districts’ 30-foot height limit by 15 feet. Elevator enclosures may exceed by 25 feet. The proposed changes reduce the exemption for stairwells to 10-12 feet, and for elevators to 16 feet.</p> <p>The changes respond to other amendments in this ordinance that enable construction of three-story, flat-roofed buildings with rooftop stairwell enclosures. The proposed ordinance seeks to lower the height exceptions for stairwell and elevator enclosures for residential buildings in the R-1 and R-2 series of zoning districts only. The current exceptions were written for multi-story apartment complexes and commercial office buildings in higher intensity districts, and not for the scale of the R-1 and R-2 zones. Historically, this was not an issue because three-story flat-roofed buildings with stairwell towers were rare in these zones. But recent trends are toward taller buildings with greater massing and height, which have impacted their neighbors.</p> <p>The proposed rooftop enclosure dimensions reflect consultations with elevator installation companies and municipal elevator inspectors regarding the minimum height needs of rooftop access stairwells and elevator models commonly used in residential buildings of three stories or less.</p> <p>Recommendations: No change in the general approach to reduce height exceptions for tall rooftop appurtenances. However, simplify and relax parts of these amendments as provided in in 3-b and 3-c below.</p>
3-b.	<p>Reduce the Height Exemption for Rooftop Elevator Enclosures to Five Feet above Allowed Building Height.</p> <p>Section 21.06.030D.6.c.iv.(D).</p> <p>(Page 13, lines 35-37, Community Discussion Draft)</p> <p>Concerns with exempted heights of 16 feet for elevator enclosures. There is no technical reason why an elevator enclosure for elevator mechanical equipment above the elevator car needs to exceed 10 ft. or beyond a top floor elevation. If such a design becomes the desire of any builder the variance process is available to accommodate it. An elevator enclosure height above the rooftop is reasonable to be capped at five</p>	<p>Response: A policy objective for the proposed 16-foot height exemption is to continue to allow for elevator access to rooftop open space on a building that meets the 30-foot height limit. So a building with a rooftop deck 30 feet above grade can be accessed by an elevator. Expert consultations with building officials and two elevator installation companies indicate that the proposed height of 16 feet for elevator enclosures is adequate with a bit of room to spare. A lower exemption than 15 feet would not enclose the machinery needed to run at least some models of elevators that accesses the rooftop on three-story residential buildings.</p> <p>The commenter seems to be proposing that the code should not necessarily provide enough height exemption to allow for rooftop elevator access to the roof of a three-story, 30-foot tall building. Instead, the commenter’s proposal would be to provide only enough height exemption to accommodate the mechanical equipment on top of an elevator car that accesses the top story (e.g., third story) of a 30-foot tall building.</p>


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	feet above the allowed building height. (<i>South Addition Neighborhood Plan Committee</i>)	<p>Where a rooftop elevator tower is likely to cause substantial shadow impacts on neighboring properties, issue-response 2-e provides recommendations for sensitive placement of such towers on the development property.</p> <p>Recommendations: Section 21.06.030D.6.c.iv.(D). (Page 4 lines 33-35 of Public Hearing Draft), no changes to proposed 16-foot height exemption to allow for rooftop elevator access on three-story buildings to rooftop deck heights of up to the maximum building height of 30 feet. Address solar access in issue-response 2-e.</p>
3-c.	<p>Simplify, Relax, and Allow Administrative Variances from the Proposed Lower Height Exceptions.</p> <p>Section 21.06.030D.6.c.iv.</p> <p>(Page 13, lines 25-42, Community Discussion Draft)</p> <p>For flat-roof style buildings, the reduced height exception for stairwells and elevator housings are probably workable for most situations, however it would force more buildings to a fully flat roof system, and limit design options and therefore aesthetics/curb appeal. (<i>Brian Harten, Hultquist Homes</i>)</p> <p>Consider allowing an administrative variance by which the Planning Department may grant an additional 1 or 2 feet of height for stairwell and elevator access enclosures where the applicant demonstrates the need to go higher for technical or mechanical reasons. (<i>AHBA Consultation Meeting</i>)</p> <p>Elevator enclosures might require additional height over what is proposed because of ever-changing code and mechanical equipment requirements. (<i>Brian Harten, Hultquist Homes</i>)</p> <p>Why not have the same height exception for both stairwell and elevator access enclosures, to simplify the code? (<i>Brian Harten, Hultquist Homes</i>)</p>	<p>Response: The proposed rooftop enclosure dimensions in the Community Discussion Draft reflected consultations with municipal building structural reviewers and elevator inspectors regarding the minimum height needs of rooftop access stairwells and elevator models commonly used in low-rise residential buildings. The proposed changes are intended to be adequate for rooftop enclosures and access using current and anticipated construction methods and equipment, with a bit of room to spare in order to build in flexibility. If the rooftop height exceptions are adequate with room to spare, even on top of a building roof that is right at the 30-foot height maximum, then the built in flexibility will be adequate.</p> <p>In response to the commenters at left, the Planning Department held additional expert consultations to ensure the proposed height exceptions are adequate. Additional consultations with municipal elevator inspectors and with two separate elevator installation companies verify that the proposed 16-foot height exemption should be adequate for the current and anticipated types of elevators used on low-rise residential and multi-unit buildings. The most common category is the hydraulic elevator. For example, the ThyssenKrupp HMRO model in use in Anchorage needs 13’10” of clear space to the enclosure ceiling, which leaves 2’2” for elevator enclosure roof thickness within the 16’ maximum enclosure height. Elevator height needs have been stable, and there does not seem to be a foreseeable increase in elevator space needs.</p> <p>Additional consultations with municipal Building Safety reviewers indicate that a 10-foot maximum stairwell height exemption would not be adequate in some instances when on top of a 30-foot tall roof. Depending on stairwell landing ceiling heights, joist and insulation thickness, an 11’ to 11’6” height exemption may be warranted. On a flat-roofed stairwell this would include an 8’ ceiling, 16” joists, 2” of hardboard, and up to 12” of roof insulation. A 4:12 pitch stairwell roof comes to a similar height of around 11’6” over an 8-foot run. An 11’ height exemption is adequate assuming a minimum stairwell ceiling height of 7’6”.</p> <p>Recommendations: Section 21.06.030D.6.c.iv., (Page 4, line 24, Public Hearing Draft) increase the proposed height exception for stairwell and mechanical enclosures from 10 feet to 11 feet. No other changes.</p>

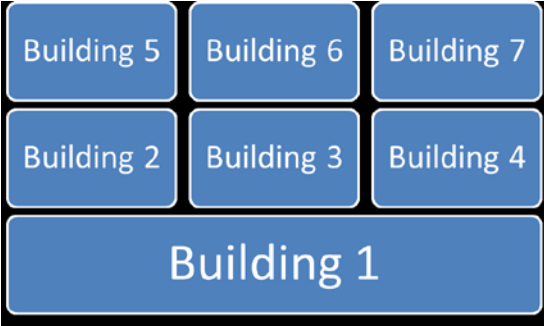
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3-d.	<p>Simplify and Relax (or Delete) the Proposed Changes to Height Exceptions for Parapets and Railings.</p> <p>Section 21.06.030D.6.c.iv.(F) and (G)</p> <p>(Page 13, lines 39-42, Community Discussion Draft)</p> <p>It is unclear if the 5-foot maximum is the maximum height of the railing, or if this includes the 1-foot max parapet wall. Is it 5-feet total, or 5-feet plus 1-foot parapet? (<i>Brian Harten, Hultquist Homes</i>)</p> <p>Allow parapets to exceed the allowed building height by two feet in all R-2 districts so a continuous wall surface is pursued by builders rather than a combination of potentially unsightly solutions that are sought to meet the proposed transparency requirement. The extra foot allows roof assemblies that have higher insulation value without forcing the parapet into a variance. (<i>South Addition Neighborhood Plan Committee</i>)</p> <p>Defining what qualifies as “transparent” would be helpful, otherwise it may be a sticking point with staff interpretation. Applicant can argue about what amount of light pass-through is transparent. Is a height limit even necessary for a clear glass railing or barrier panel? Preferable to delete this provision completely, as it may not serve a good public purpose for the code to get into railing material selections. While the intent of the language is to allow more natural light to pass by the structure onto neighboring properties, in some situations a solid panel railing would protect the neighborhood from noise or views associated with rooftop living activities. Another consideration is buyer/market preferences—a clear or translucent railing is not attractive to all buyers, for privacy, etc. (<i>Brian Harten, Hultquist Homes</i>)</p> <p>Perhaps open parapet/railing would not meet aesthetic needs of designer/buyer. (<i>AHBA Consultation Meeting</i>)</p>	<p>Response: Parapets are typically a low wall surrounding a flat roof, or a protective barrier at the edge of a roof terrace. A parapet is a barrier to prevent people or objects from falling from the edge of the structure and in some instances to slow the spread of fire.</p> <p>In R-2 neighborhoods, three-story flat-roof construction with opaque parapets extending above the 30-foot maximum allowed height will create shadowing and bulk conditions not previously experienced in these neighborhoods. To mitigate these conditions, the R-2 amendment proposes that parapet walls be no higher above the allowed building height than functionally necessary.</p> <p>In response to the comments at left, Planning staff held consultations with a local architect and building permit reviewers, and conducted other research. These consultations indicate that the proposed height exception should be increased from a one to three feet. A three-foot exemption is adequate in all zones not just the R-1 and R-2, and for both residential and commercial building types. Three feet appears to be adequate even when a safety railing bracket needs to be attached to the parapet wall. In residential zones, an extra foot of wall height matters a great deal, especially in reducing shading and increasing visual access to the sky.</p> <p>The research and consultations also suggested completely exempting open railings from maximum building heights, and to clarify the definition of “open and transparent railing” without regulating material type.</p> <p>Privacy on the roof-top patio is a secondary concern to bulk/shadow impacts, especially if the patio is one or two stories above its neighbors, and therefore out of sight. Enclosures around rooftop hot tubs or other activity areas are not subject to the parapet height limits.</p> <p>During the course of the consultations, municipal Building Safety reviewers recommended that “firewalls” be changed to “required fire-resistant rated walls”, in order to improve consistency in usage of terms with the Building Code. The consultations indicated that three feet is adequate for required fire-resistant safety walls.</p> <p>Recommendations: Subsections 21.06.030D.6.c.iv.(E) and (F), (Page 4, lines 36-39, Public Hearing Draft) revise the parapet height exception as follows:</p> <ol style="list-style-type: none"> 1. Allow parapet walls, “required fire-resistant rated walls, and skylights to exceed by up to 3 feet in all zones; 2. Exempt “open and transparent” railings from the three-foot limit on the height exception. <p>Section 21.14.040., <i>Definitions</i> (page 11, line 23 of Public Hearing Draft) provide a definition of “Railing, Open or Transparent”, based on the percentage of openness and/or transparency for portions of the railing.</p>


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<p>3-e.</p>	<p>Clarify if there is a Height Exception for Rooftop Greenhouses in the R-2 Zones.</p> <p>Current Title Section 21.06.030D.6.d. (not included in R-2 ordinance)</p> <p>Are greenhouses allowed on top of structures in Title 21 R-2 zones, and if so would they be exempt from height limits? It was not obvious in the draft proposal whether greenhouses were going to be explicitly addressed in this revision. A brief narrative about greenhouses would be helpful. <i>(Fairview Community Council Design Committee)</i></p>	<p>Response: Greenhouses are exempt from height limits only in the higher-intensity R-3 and R-4 multifamily districts and in commercial zoning districts, as provided in Title 21 subsection 21.06.030D.6.d.</p> <p>Greenhouses are not exempt from height limits in the lower-density R-1, R-2, or large-lot residential zones. Rooftop greenhouses are allowed in the R-1 and R-2 zones as long as they do not exceed the height limit in the zone and comply with building code requirements.</p> <p>The greenhouse height exemption provision in 21.06.030D.6.d. is not shown in the proposed amendment because it does not apply to the R-2 zoning district.</p> <p>Recommendations: No changes to the draft code amendment language or greenhouse height exemptions.</p>
<p>3-f.</p>	<p>Support the Proposed Height Exception for Dormers, and Expand it to Exempt Dormers with a Shallower Roof Pitch than 3:12.</p> <p>Section 21.06.030D.6.e.</p> <p>(Page 15, lines 5-12, Community Discussion Draft)</p> <p>The intent and technical details of the proposed new section that deals with dormers seems reasonable to guide dormer design. <i>(South Addition Neighborhood Plan Committee)</i></p> <p>Why require a 3:12 roof pitch for dormers to get a height exception? Roofs with 2:12 pitch can be done, and including those would allow more design options. <i>(Brian Harten, Hultquist Homes)</i></p>	<p>Response: The purpose of a minimum roof pitch is to ensure the dormer is not simply a flat-roofed projection increasing the bulk and scale above the allowed height, but rather a secondary mass that is recognizable as a dormer. Roof pitch also lowers the profile of the mass allowing more light and open sky views to pass the exempted roof mass.</p> <p>Although a 3:12 slope is more common in roof construction, this could be too restrictive for smaller structures, negating this incentive. A roof pitch of 2:12 is more shallow, but sufficient for drainage. Most importantly, it still appears to be sloping, decreasing the apparent bulk of the structure and giving greater access to the sky from neighboring lots. Additionally, it gives more height above the primary roof slope, making it easier to fit another story.</p> <p>Recommendations: Subsection 21.06.030D.6.e. (Page 5 of the Public Hearing Draft), change the proposed minimum roof pitch for exempted dormers from 3:12 to 2:12.</p>



Item #	Comment or Issue	Response and Recommendation
Part 4: R-2M District-specific Development Standards to Mitigate Impacts of 3-story Buildings		
4-a	<p>Base the Limitation on Building Length on the Number of Stories or Feet of Height?</p> <p>Section 21.04.020F.2.b.</p> <p>Page 3, lines 17-19, Community Discussion Draft)</p> <p>Suggest deleting any reference to a number of stories, and rely on maximum building height (measured in feet) to do this job. (<i>Andre Spinelli, Spinell Homes</i>)</p> <p>The elimination of the 2.5-story restriction on maximum building length should not apply to Traditional Neighborhood Design (TND) areas designated in the Anchorage 2040 Land Use Plan. The current language is fine for TND areas. (<i>South Addition Community Council Neighborhood Plan Committee</i>)</p> <ul style="list-style-type: none"> • <u>Related issue: 2-b.</u> 	<p>Response: The current R-2M district-specific standards limit the length of buildings that are 2.5-stories tall to 150 feet. Buildings with only one or two stories may be 180 feet in length. This standard allows lower-profile buildings to be longer than taller-profile buildings. It keeps taller townhouse structures from becoming as large as 12- or 16-unit apartment complexes—i.e., out of scale with the R-2M neighborhood.</p> <p>The proposed amendment converts the height basis for maximum allowed length from height measured in stories to height measured in feet. It replaces a reference to 2.5-stories with a close equivalent in feet (25 feet). This is consistent with other proposed changes in the ordinance that delete the 2.5-story standard.</p> <p>Height measured in feet is a more consistent measure than stories of actual building height. Using height instead of stories is less subjective, and easier for planning, design, and municipal review. See issue 2-a. regarding inconsistencies in the story-based measurement of building height.</p> <p>The <i>Anchorage 2040 Land Use Plan</i> does not support placing tighter restrictions on the number of stories in Traditional Neighborhood Design (TND) areas. TND is a “Growth-supporting Feature” not a historic preservation concept that seeks to limit building sizes as compared to non-TND areas. See issue-response 2-b. for more information about the intent and proper usage of the TND growth-supporting feature.</p> <p>Recommendations: Section 21.04.020.F.2.b. (Page 2, line 19 of Public Hearing Draft), change “three stories” to “greater than 25 feet in height”.</p>
4-b.	<p>Increase the Proposed Maximum Building Length.</p> <p>Section 21.04.020F.2.b.</p> <p>(Page 3, lines 17-19, Community Discussion Draft)</p> <p>There is confusion regarding the maximum building length standards. (<i>AHBA Consultation Meeting</i>)</p> <p>The reduction in the maximum length of structures does not appear to solve any problems. However it could exclude an 8-unit structure from development, which conflicts with allowing such a structure in the provision just above it in 21.04.020F.2.a. (<i>South Addition Community Council Neighborhood Plan Committee</i>)</p>	<p>Response: The current maximum building length for taller buildings in the R-2M district mitigates the bulk and shadowing effects of these larger buildings. Longer and taller buildings cast greater amounts of shadow than shorter, 1- and 2- story buildings. To reduce the impact of the extra story, the length should be less. Looking at the lot patterns in residential neighborhoods, most buildings can only build between 100 and 130 feet in length. To make new construction compatible with existing conditions the length should less than 150 feet.</p> <p>The purpose of the R-2M zone is to provide “a transition between single-family, two-family, and higher density multifamily”. New buildings should be “complementary” to, not out-of-scale with, existing buildings.</p> <p>The proposed amendment to the current standard responds to the deletion of the 2.5 story construction limit. This ordinance seeks to ease construction of multi-family buildings, especially by more efficiently accommodating living space on constrained sites, while respecting the scale and character of neighborhoods. Therefore, it seeks to mitigate the adjacencies of three-story, multi-family structures constructed on lots abutting other properties in R-2M neighborhoods. A 150-foot long, 3-story building can become out of scale</p>

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	<p>Why reduce the maximum building length from 180 to 125 feet? It will be very difficult to fit 6 properly proportioned townhouse living units in to a 125-foot length. This will cap higher price townhome projects at 5 units per building, without coming right out and saying it. Oftentimes it is the sixth unit that will allow a potential development project to become profitable to build, and losing it can force a development site to be infeasible, and reduce the pre-developed value of the land. This also results in property tax base impacts from reduced valuations of existing parcels and lost increase in property taxable values that follow development of those same parcels. <i>(Brian Harten, Hultquist Homes)</i></p> <p>Limiting the length of building wall based on the number of stories is not consistent. The number of stories does not consistently equate to the actual height of the building / building wall, because ceiling heights, roof styles, and use of daylight basements varies. It is not consistent with the policy of deleting story-based height regulations. <i>(AHBA Consultation Meeting)</i></p> <p>The proposed limit to building length reduces housing density. <i>(AHBA Consultation Meeting)</i></p> <p>Limiting the length of a 3-story building to 125 feet seems completely arbitrary. What is the reason for this reduction? There is no benefit to the developer to build up to 3 stories if the result means losing one (or more) units. A developer would be further penalized if they tried to develop an elongated-shaped lot under this change. This does not promote maximizing density. <i>(Brandon Marcott, Triad Engineering)</i></p> <p>Suggest deleting the maximum building length limitation, or keep existing 180-foot limitation for all buildings. The R-1, R-1A, R-2A, and R-2D districts do not have this limitation on building length and the R-3 and R-4 districts are limited but much longer buildings are allowed. Several large R-2M zoned lots exist where longer buildings should be accommodated by code. Existing design standards in Title 21 should mitigate the aesthetic issues. <i>(Andre Spinelli, Spinell Homes)</i></p>	<p>with the R-2M zone. The majority of buildings in the R-2M have length dimensions less than 70 feet in any direction. A single, large building can quickly overwhelm a street in the R-2M zones, based on existing block size patterns.</p> <p>The number of units in a building are an additional factor in building length. The R-2M district allows up to eight units in a building. Historically, the configuration of multi-unit structures was in apartment buildings, in which units more efficiently grouped or stacked within the structure. Recent trends are a shift toward larger units arranged in townhouse-style, in which each unit is two to three stories in height, from ground to roof, and is attached to other units only at the sidewall. This creates a much larger building with fewer units. The table below uses typical 20, 24, and 28-foot townhouse unit widths.</p> <table><tr><td>Townhouse Unit Width (feet)</td><td>80’</td><td>90’</td><td>100’</td><td>110’</td><td>120’</td><td>150’</td></tr><tr><td>2-car garage min. (20’ per unit)</td><td>4</td><td>4</td><td>5</td><td>5</td><td>6</td><td>7</td></tr><tr><td>2-car garage std. (24’ per unit)</td><td>3</td><td>3</td><td>4</td><td>4</td><td>5</td><td>6</td></tr><tr><td>2-car garage max. (28’ per unit)</td><td>2</td><td>3</td><td>3</td><td>3</td><td>4</td><td>5</td></tr></table> <p>The table indicates that limits to building length does not necessarily reduce the number of townhouse units, but the size of units. A 150-foot long building can accommodate six 24-foot wide townhouse units and up to seven or even eight smaller townhouse units. Smaller units generally are more affordable for the residents. Apartment buildings can accommodate eight units without much difficulty within a much shorter building length.</p> <p>Recommendations: In Section 21.04.020.F.2.b. (Page 2, line 20 of Public Hearing Draft), retain the current code’s maximum building length of 150 feet, and apply that limit to buildings taller than 25 feet per issue 4-a.</p>	Townhouse Unit Width (feet)	80’	90’	100’	110’	120’	150’	2-car garage min. (20’ per unit)	4	4	5	5	6	7	2-car garage std. (24’ per unit)	3	3	4	4	5	6	2-car garage max. (28’ per unit)	2	3	3	3	4	5
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2-car garage max. (28’ per unit)	2	3	3	3	4	5																								

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4-c.	<p>Support/Do Not Support the Proposed 3-story Building Articulation Requirements (to Break up Flat, Blank Walls).</p> <p>Section 21.04.020F.2.c.</p> <p>(Page 17, lines 7-18, Community Discussion Draft)</p> <p>The aim and direction of this new section to promote compatibility of new, now three-story development within an already existing context is supported by this committee, with the caveat that removal of 2.5-story standard is not supported by this committee in the Traditional Neighborhood Design areas designated in <i>Anchorage 2040 Land Use Plan</i>. One shortcoming of the building articulation section may be a potential perception of undue complexity. (<i>South Addition Neighborhood Plan Committee</i>)</p> <p>TCC general supports rules that encourage attractive, high-quality developments, including the proposed requirements that building facades be more interesting than simply blank walls. TCC has no objection to the proposed limit regarding stair entrances to buildings. (<i>Turnagain Community Council</i>)</p> <p>General concerns and comments were made regarding multi-family design standards proposed in the draft ordinance. Don't the existing Title 21 residential design standards that take care of this issue? (<i>AHBA Consultation Meeting</i>)</p>	<p>Response: Issue-response 4-d shows which facades the current façade articulation requirements apply to, and how the proposed amendments would extend those requirements to three-story multi-family facades that face neighboring residential lots.</p> <p>The proposed amendments further mitigate the effects of allowing three-story facades by requiring at least one three-story façade that is subject to the articulation requirement to include wall plane modulation (projections and recesses). It would require the wall be divided into smaller, distinct sections (“wall planes”). This may come in minor modulations, in step-backs or cantilevers, or other means. This requirement reflects that wall plane modulation is an effective way to break-down the visual scale of a large blank wall. The Community Discussion Draft proposed to require every 3-story façade to have wall plane modulation. In response to concerns by builders and testing, the Public Hearing Draft now proposes to require wall plane modulation (recesses and projections) on only one three-story, multi-unit building façade.</p> <p>The proposed amendments extend the modulation requirement because the current Title 21 requirements do not address the impacts of three-story multifamily building walls in an R-2 zone neighborhood context. The proposed amendments respond to the deletion of the 2.5-story standard, and seek to mitigate the adjacencies of 3-story, multi-family structures constructed on lots abutting other residential properties in R-2M neighborhoods. The objective is to promote thoughtful design of long three-story tall walls when in view of other residential properties. The photo below left illustrates the concern. The photo below right is an example of breaking up a wall facing a side lot line.</p> <div data-bbox="1680 885 2405 1136"></div> <p>Recommendations: Subsection 21.04.020F.2.c. (Page 2 of Public Hearing Draft), change the proposed language to require wall plane modulation only on <u>one side</u> of a three-story multi-unit building, rather than requiring it on all three-story façades including on duplexes as proposed in the Community Discussion Draft. Applicants to select facade.</p>

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4-d.	<p>Apply Building Articulation Standards Consistently to All Buildings in a Multiple-Structure Development.</p> <p>Section 21.04.020F.2.c.</p> <p>(Page 17, lines 16-18, Community Discussion Draft)</p> <p>The proposed design standard applies only to external-facing facades—ie., those facing the street or adjacent properties. We are concerned about two aspects of this proposal, as provided below, and recommend to apply the façade design standards to all buildings, and at least three walls, in a multi-unit development, not just those facing the street or other properties. This would ensure that there is more visual interest and better standards than with many current developments.</p> <p>(a) The design standards for building exteriors should not be exempt simply because the building is far from the property line, or if it is a building surrounded by similar buildings in a multi-unit development. For example, this hypothetical development has 7 buildings, with Building 3 surrounded by others in the development:</p> <div data-bbox="373 914 916 1237"></div> <p>While other buildings would be required to have an interesting façade, Building 3 in the middle would not. The development would be more attractive if all buildings are held to the same standards, regardless of location on the property or placement</p>	<p>Response:</p> <p><i>Current Building Articulation Requirement.</i> In response to the concern regarding consistency of building articulation requirements across a multi-building development, as well as to homebuilder concerns raised in issue 4-e, Planning staff tested the combined applicability of the current code and proposed R-2 building articulation standards on several existing multi-building residential developments. The images below visualize the results of several tests as to applicability of the development standards from one façade to the next.</p> <p>The images reflect that the current code’s residential design standards for multifamily and townhouse developments already require any building elevation that faces a street or has a front entry provide articulation.</p> <p>The current articulation requirement is to select at least four out of more than a dozen menu choices in the “building articulation menu” (AMC 21.07.110C.7.). End-walls (generally shorter walls located at the end of a row of attached units) need have only three menu choices. If any building in a development has more than two sides that face a street and/or have a front entry, then the current code requirement applies to no more than two sides of a building with a priority toward street-facing facades. Some of the menu choices involve actually breaking up the flat wall plane, with projections and recesses in the wall plane. Other menu choices use other, potentially less expensive means to visually “break up” flat blank walls. These include ornamental features and detail elements, balconies, windows, variations in siding materials. Designers may also propose alternative design features as their own menu items.</p> <p>The current code does not necessarily require breaking up a long, flat, blank side wall that faces a neighboring property.</p> <p><i>Proposed R-2 Amendment:</i> The draft R-2 bulk/height amendment proposes to mitigate removal of the 2.5-story standard by requiring every three-story façade on a multi-unit building with three or more dwelling units that faces a street or adjoining residential property to comply with the building articulation menu. This amendment extends the applicability of the building articulation requirements to more facades in two ways. First, 3-story multifamily facades that face a neighboring property must now comply. Second, the building articulation requirement is expanded to every 3-story street-facing façade even if the building has more than two facades that face a street and/or have a primary entrance. Three-story buildings are to become allowed, but more than two sides of a three-story, multifamily building are potentially subject to breaking up long flat blank walls.</p> <p><i>Loussac Manor Test:</i> In the right-hand image below, Loussac Manor is a large, multi-unit development in the R-2M district. It was constructed in the years just prior to the adoption of the current Title 21, and so it was not subject to building articulation requirements. However, the developer designed a set of building designs that feature extensive articulation that likely exceed current Title 21 requirements. The development consists of</p>

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	<p>relative to other buildings, so that regardless of which unit you live in, your view of the other building exteriors has some architectural features.</p> <p>(b) Even if the intent of this section remains the same, the actual language is not sufficiently narrow in describing that situation, and instead only refers to buildings located 50 feet or more from the property line.</p> <div data-bbox="392 553 935 777"></div> <p>This would allow any building that is far enough away from the property line to be exempt from the requirements. If the intent is to only exempt “interior” buildings a multi-unit development, this should be stated more explicitly. For example, if the setbacks in the illustration are 60 feet and 120 feet, this building would be exempt although it is the only building and faces the street.</p> <p><i>(Turnagain Community Council)</i></p>	<p>approximately 30 separate residential buildings along a network of private streets. Four of the buildings have only two units, and the rest have more than three units. For simplicity, this test assumes every building is three stories.</p> <p>In the image below, the solid purple lines identify the building facades in Loussac Manor that would be subject to the building articulation menu under current code. In this test case, nearly every street-facing façade is already required to have articulation. The dashed yellow lines identify the building facades that would be likely to also come under the articulation requirement under the draft R-2 zones amendment. In some cases, such as in the two northernmost buildings of the development, these are a third street-facing façade. In other cases, such as in the row of buildings at the very south end of the development, these are long 3-story multifamily building walls that face an abutting residential property.</p> <p>It happens that, in the case of Loussac Manor, the proposed R-2 ordinance has a built-in provision by which the Planning Department would administratively exempt these southernmost building facades that face the neighbor. This is because Loussac Manor happens to be at the foot of a steep hillside and its buildings screened from the neighbors by vegetation and in part topography.</p> <p>Zion Court Test: In the left-hand image below, Zion Court is a small- to medium-size infill housing development along Lake Otis Parkway. Like Loussac Manor, it was constructed in the years just prior to implementation of the current Title 21 requirements for building articulation. And like Loussac Manor, the developer selected building designs which included articulation and material changes in the facades. As a result, even though the builder was not designing to today’s code, it happens to generally meet or exceed the current code’s facade articulation requirements.</p> <p>The Zion Court development consists of six townhouse-style structures, three of which have four units each and three have two units each. The buildings face an internal private street, Zion Ct., and adjoin two local streets to the north and west, as well as Lake Otis Parkway along the east property line. Two residentially-zoned properties to the south adjoin the Zion development.</p>

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		<div><div>Building Facades Subject to Building Articulation Menu Requirement</div><div>Facades Already Subject under Current Code —————</div><div>Additional Facades under R-2 Zones Amendment - - - - -</div><div>Facades Exempted Due to Topography or Vegetation under R-2 Amendment ✕</div></div> <div><div><p>Zion Court (Lake Otis Dr.)</p></div><div><p>Loussac Manor (A and C St.)</p></div><div><p>ⓘ Not considered to be “street-facing building elevations” by Title 21 because building grade level is eight feet or more below grade plane of the adjoining street pavement.</p></div><div><p>All six structures are three stories tall. A caveat about this test site: Zion Court’s buildings are slightly taller than the 30-foot R-2 zones height limit. This is because Zion Court is zoned RO. However, its 3-story buildings are similar in scale to what would be possible under the R-2 zones proposed amendment. It also provides an example of the applicability of façade articulation standards across a multi-unit development. Therefore, just for this test, imagine this development was zoned R-2M.</p><p>The solid purple lines identify the building facades in Zion Court that would be subject to the building articulation menu under current code. Most street-facing façades are already required to have articulation. The</p></div></div>

Item #	Comment or Issue	Response and Recommendation
		<p>dashed yellow lines identify the building facades that would be likely to also come under the articulation requirement under the R-2 zones amendment.</p> <p>Note that the middle building in the south row abuts two residential properties, one with a residence and one that is still vacant. This test identified an issue in the wording of the Sept. 27 community discussion draft R-2 zones amendment. The community discussion draft only required articulation facing an adjoining residential lot if that adjoining lot already had a residence built on it. This did not account for the reality that sooner or later the vacant lot would also become a residence.</p> <p>Note also that, in both tests, the two-unit buildings are subject only to current code façade requirements. The previous, Community Discussion Draft would have required the two-unit buildings (with three stories) to the additional articulation requirements. In response to builder comments, the Public Hearing Draft proposes to limit the additional building articulation requirements to the longer, larger blank walls of multifamily structures.</p> <p>Maximum Distance of Applicability: Finally, the test sites seemed to support the commenter’s question about the need to establish a maximum distance of applicability from the neighboring property. Buildings are typically closer than 50 feet or they are blocked from view by other buildings or site features. The code has other means of exempting building facades that are not in view of the neighboring property. If the building is further than 50 feet away and still in view, it will still impact the neighbors.</p> <p>Recommendations: Subsection 21.04.020F.2.c. (Page 2 of the Public Hearing Draft), change the proposed language as follows:</p> <ol style="list-style-type: none">1. Apply the R-2 three-story building articulation requirements to facades that abut other residential-designated lots, regardless whether the adjoining lot currently has a residence or is vacant. However, retain the Community Discussion Draft exemption for facades facing non-residential uses, as discussed in issue 4-e.2. Apply the R-2 three-story building articulation requirements only to buildings with three or more dwelling units. Rely on current code articulation requirements to two-unit structures.3. Remove the 50-foot distance from neighboring lots or streets as a threshold for applicability.

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<p>4-e.</p>	<p>Do Not Require Building Articulation where it is Not Necessary to Protect Neighboring Properties.</p> <p>Section 21.04.020F.2.c.</p> <p>(Page 17, lines 7-18, Community Discussion Draft)</p> <p>The discussion on building elevations does not consider whether a building is being constructed adjacent to park/public or other non-developable property, where articulation is not necessary to protect aesthetics or shadowing impacts on neighboring properties. It would also not be necessary if the subject lot was at the toe of a steep slope, with the ground rising up and away from the proposed building. In that instance, building articulation would provide no benefit, because the building would not be seen from the higher, neighboring property.</p> <p><i>(Brian Harten, Hultquist Homes)</i></p>	<p>Response: The proposed extension of the current building articulation requirement from street-facing facades to facades facing side lot lines is intended to apply only to side-yard facades that face toward and visually impact a neighboring residential property.</p> <p>If a side lot line abuts a non-residential use, or the side-facing façade is obscured by topography or other permanent obstacle from the neighboring property, then the neighbor-protection need for requiring articulation of three-story facades goes away.</p> <p>The Community Discussion Draft proposed to apply the three-story articulation requirement to only facades facing an existing residence on a neighboring property. However, a review of buildable lots and example tests showed there are vacant R-2 residential lots that are likely to be built in the future. The Zion Court example in issue-response 4-d above indicates that a more consistent approach is to apply the articulation requirement to three-story facades facing residential lots that have residences or are vacant. The intent is to continue to exempt facades that face a non-residential use.</p> <p>The test of Loussac Manor in 4-d provides a good example of the commenter’s argument that facades that are obscured from the neighboring lot by topography or vegetation should not be subject to the proposed three-story façade articulation requirement. The existing Alternative Equivalent Compliance procedure could be used to provide administrative flexibility without imposing extra review process or fees on the applicant.</p> <p>Recommendations: Subsection 21.04.020F.2.c. (Page 2 of the Public Hearing Draft), change the proposed draft language as follows:</p> <ol style="list-style-type: none"> 1. Apply the three-story façade articulation requirement where the façade faces a vacant residential lot. Retain the Community Discussion Draft’s exemption for facades facing non-residential uses. 2. Add a flexible exemption for buildings screened from view because of topography, vegetation, or other reasons. Use the Alternative Equivalent Compliance procedure available in 21.07.010.
<p>4-f.</p>	<p>Require Upper-floor Building Step-backs / Setbacks from Neighboring Properties.</p> <p>Section 21.04.020F.2.c.</p> <p>(Page 17, lines 7-18, Community Discussion Draft)</p> <p>The proposed requirement for breaking up the large vertical faces of multi-level structures is supported. However, one could also reduce the</p>	<p>Response: The Title 21 building façade articulation requirements comprise a menu of choices for breaking up a large flat blank wall. One of the choices is an upper floor step-back from the lower part of the building. While selecting this choice is not required, it does provide credit toward the articulation requirement.</p> <p>The R-2 amendment proposes to require three-story facades to use at least one menu choice that involves modulating the façade’s wall plane with projections and recesses. The upper floor step-back menu choice is one of those. In response to public comments, a solar access step-back is also introduced issue 2-e. A solar access step-back would result in a 3-story wall being set back further or stepped away from neighboring lots.</p>

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	<p>visual impact of the building bulk by having a design that steps-back away from the property lines on the upper stories. This approach re-establishes a more human scale to the structure and adds variety on the horizontal plane. <i>(Allen Kemplen, Fairview Design Committee)</i></p>	<p>Recommendations: Move forward with the proposed façade articulation and solar access step-backs for three-story, multi-family buildings.</p>
4-g	<p>Allow Exterior Stairs to Go Higher. Section 21.04.020F.2.c. (Page 17, lines 14-15, Community Discussion Draft)</p> <p>A limitation on stair height to 6 feet above the grade plane works for projects like our Park Strip Lofts, where we had the first story partially below the grade plane, but would not work for a true three story building, where the entrances was desired to be on the second floor. This would just push building design to carry these stairs inside the structure, from a lower level entrance door. Not problematic per se, but harkens back to the 2.5-story standard in certain cases. Bringing these stairs inside will remove the exterior design concerns, but will also reduce available interior living space that is limited by the FAR restrictions. Perhaps an exception for up to 8-foot stair heights if certain conditions are met? <i>(Brian Harten, Hultquist Homes)</i></p>	<p>Response: Limiting the height of exterior entry stairs on the front of a building prevents primary entrances too far above a ground plane. Such regulations prevent so-called “motel-style” multifamily development, with exterior stairs and balconies. Ensuring the primary entrance is at the first story above grade also prevents a ground-floor, street-facing façade being entirely composed of garage doors.</p> <p>Entry stair height limits can also encourage a building and entrance to be closer to a street. Because any stair above 30” in height must conform to the setbacks, long stair runs push the building back from the street frontage.</p> <p>The proposed limit permits residential entrances to be up to six feet from grade plane in order to accommodate snow accumulation, precipitation run-off, privacy needs, and “daylight basements” and partially below-grade floors. This allows desirable “up-down” development that was once more common in the city.</p> <p>From the standpoint of good urban design practice for the neighborhood and streetscape, having the entrance at five feet or less preserves the human scale of the building, and keeps the doorway within a pedestrian’s field of vision. This encourages a better walking environment and interpersonal connections between residents and passersby. Having eyes on the street creates an implicit sense of security. By contrast, a greater separation from the grade plane than five feet removes the main floor of the dwelling from the street, and the street from the gaze of the resident.</p> <p>While an entry height of five feet or less would be ideal, the proposed six-foot limit coordinates better with the Title 21 definition of a first story above grade. Having an entry floor height of greater than six feet means the floor below is no longer considered a basement but rather a story above grade, making the entrance a second-story entrance. The goal is to ensure that new construction appears similar in scale to neighboring older buildings and contributes to the overall character of the neighborhood.</p> <p>A staff review of the proposed six-foot height limit in response to the comment found that it adds flexibility to address certain kinds of lots. Some lots may have significant topography such that a stair height requirement could make it difficult to develop the lot. Allowing the choice to measure stair height from grade plane as measured by Title 21, as an alternative to measuring from finished grade plane at the stair, would remove this problem.</p>

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		<p>The code amendment can also offer the alternative equivalent compliance procedure to provide further flexibility if the designer can propose an alternative design the meets the intent of the stair height provision.</p> <p>Recommendations: Move forward with the proposed six-foot front entry stair height limit in 21.04.020.F.2. (Page 2, lines 26-27 of the Public Hearing Draft), with the following changes to increase flexibility:</p> <ol style="list-style-type: none">1. Amend the stair provision to allow for the stair height to be measured from the greater of “finished grade” at the stair or “grade plane” for the overall building as measured by Title 21.2. Add a provision to allow applicants to propose an alternative from the maximum stair height, through the “alternative equivalent compliance” procedure established in 21.07.010D.
<i>END OF COMMENT ISSUE-RESPONSE TABLE</i>		