

Planning and Zoning Commission

April 11, 2022

Case #: **2022-0026**

Title: **Title 21 Text Amendment to Off-Street
Parking and Site Access Regulations**

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

Comments submitted after the packet was finalized.
(See below.)

Additional information:

Other:

1. Turnagain Community Council
2. South Addition Community Council Planning Committee

Sent by email: X yes no

TO: Mr. Tom Davis, Senior Planner
Municipality of Anchorage, Planning Department
Planning and Zoning Commission

FROM: Turnagain Community Council President Anna Brawley

DATE: April 8, 2022

RE: **Turnagain Community Council Comments on
Proposed Title 21 Parking Requirements, Driveway Standards
and Site Access Changes, Public Review Draft**

Sent via email

Comments were approved by Turnagain Community Council on April 7, 2022 (15 votes yes, 0 no)

Thank you for the opportunity to submit comments on the proposed changes to Title 21 regarding site access, driveway standards and reduced parking requirements. Turnagain Community Council (TCC) appreciates the intent behind the proposed access, driveway and parking changes to reduce unnecessary parking requirements, increase the density of housing to meet Anchorage's housing needs, and improve safe pedestrian access along our streets.

We also acknowledge that none of the specific areas targeted for the proposed parking requirements and site access changes are within TCC boundaries (at least in this amendment packet): Traditional Urban Neighborhoods, Edge Urban Neighborhoods, and Transit Supportive Development Corridors (although one in Spenard is immediately adjacent).

Finally, *we greatly appreciate the time and efforts by Tom Davis and Elizabeth Appleby from the Municipality of Anchorage Planning Department* in working with Turnagain Community Council and our Land Use Committee, and responding to the questions that we have posed.

That said, Turnagain Community Council has concerns regarding the proposed Title 21 amendments to reduce driveway/parking/access requirements to allow for increase housing density — and the consequences of these changes, including:

- 1) Creates additional *on-street* parking without regard to safety and snow removal;
- 2) Reduces the *ability for public and community council review and input* on new developments proposals;
- 3) *Places more burden on residents and enforcement* (which is not keeping up with existing problems, let alone able to address new ones); and
- 4) *Defers fixes to these problems “down the road”* with subsequent changes required to Title 21 and Title 9.

1. Creates additional *on-street* parking problems without regard to safety and snow removal.

In many of our older residential neighborhoods, narrow streets are not built to accommodate on-street parking — and many streets have little or no pedestrian amenities.

- There are already significant safety and snow removal issues where inadequate on-site parking has led to unsafe on-street parking, with ramifications for vehicle safety, emergency vehicle access, pedestrian and bicycle safety, and snow removal.

- Small lot sizes and changes to increase housing density through Accessory Dwelling Units further restrict the ability to provide adequate residential on-site parking. Many of us note that there are already larger numbers of people living in domiciles designed for fewer people and vehicles, with associated larger numbers of vehicles being parked along streets.
- This winter has exemplified challenges with snow removal and on-street parking; it should also be noted that we have yet to find a solution to keeping sidewalks and pathways adjacent to roadways clear during the winter for safe pedestrian access.

2. Reduces the ability for neighborhood, public and community council review and input on new development proposals.

- The proposed changes allows for administrative approval or use by right in many cases, which reduces the ability of neighbors, community councils and other members of the public from providing input on new development proposals during the review and implementation process.
- “Neighbors know their neighborhood.” Those who live in areas where reduced parking requirements are proposed have the best perspective on how resulting additional on-street parking and modified site access could impact safety, pedestrian movement, snow removal and traffic. This valuable community input is essential during the early stages of a development proposal in a neighborhood where the proposed Code changes could be applicable — but would be bypassed, if administrative approval and use by right is allowed.

3. Places more burden on residents and enforcement (which is not keeping up with existing problems, let alone able to address new ones).

- If public input is removed from the project approval process where reduced parking and driveway areas, and modified site access is allowed (see #2 above), this then puts the burden on neighbors, community councils and municipal enforcement to address parking violations as they occur in specific neighborhoods.
- Several of the proposed mechanisms for reducing parking demand, such as rideshare agreements, peak parking, parking pricing/reducing rent in exchange for giving up a parking space, and providing public transit passes have not likely been tried in Anchorage and seem difficult to monitor and enforce, particularly in rental units where turnover is likely to be higher.
- Reducing parking requirements to encourage other end goals, such as enhanced pedestrian amenities and bicycle parking, is admirable, but creating more on-street parking problems without a demonstrated decrease in parking demand and adequate enforcement is not an acceptable tradeoff.

4) Defers fixes to these problems “down the road” with subsequent changes required to Title 21 and Title 9.

TCC submitted a number of questions to the Municipal Planning Department late last year and staff responded to our inquiries in February — which was very much appreciated and helpful. A response by the Planning Department to one of our questions states:

“The street design, maintenance, and on-street parking enforcement deficiencies have limited the

size of the proposed decrease in the area-specific parking requirements. The proposed ordinance does not reduce parking requirements so much that it depends upon on-street parking enforcement or changes to existing snow clearing practices, etc. For more progressive changes to the parking requirements to occur in certain urban neighborhoods, such as cutting parking requirements in half or removing them, this project team has come to recommend there be a separate, later conversation (after this Title 21 amendment project) about how we can manage our rights-of-way more efficiently.”

This is a classic case of “putting the cart before the horse” scenario, and makes Turnagain Community Council extremely concerned about when, and if, these companion changes to Municipal Code will occur — and what sort of parking problems are created by the proposed parking reduction and site access modifications in the meantime.

Recommendations

Turnagain Community Council recommends that:

- 1) The adoption of the proposed changes to Title 21 regarding reduced parking/driveway requirements and modified site access **be delayed** to:
 - a. Assess the needed companion Title 21 and Title 9 changes;
 - b. Work with interested community councils regarding proposed language that eliminates the opportunity for public notice/input and allows administrative and by right approval;
 - c. Assess the potential to apply these changes on a case-by-case basis; some situations, such as commercial parking, may have a clear excess of parking, whereas some residential situations may create safety issues without site-specific consideration.
- 2 If the proposed Code amendments currently being considered are approved, that those changes to Title 21 and 9 get underway now, to reduce the duration of unresolved on-street parking problems; and/or
- 3) The Municipality pick some target areas for initial implementation of these changes, where existing on-street parking problems are minimal and the effects of implementation against goals can be monitored.

Thank you,

Anna Brawley

President, Turnagain Community Council

South Addition Community Council Planning Subcommittee

John Thurber, Daniel Volland, Tamas Deak, Cheryl Richardson

April 10, 2022

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Attn: Tom Davis (davistg@muni.org, (907) 343-7916

From: Tamas Deak, subcommittee lead

RE: Off Street Parking and Site Access Amendment Project, PZC Public Hearing Draft

Tom,

Per your request we are providing our comments regarding the P&ZC Public Review Draft for the above referenced project.

Please, note that these comments were crafted following the review of the review published on the website and the presentations you conducted during the January and then the March 2022 general meeting of the South Addition Community Council as well as the special work session we held with interested community members on April 5th, 2022. We thank you for your willingness to discuss and educate about the code changes proposed.

It is clearly obvious that a major planning team effort is captured in the P&ZC public review draft. I counted an astonishing eighty-five changed pages of code or code of regulations. SACC is not in the position to provide detailed analysis for all of the proposed amendments instead we focus on the changes that have specific relevance to the neighborhood character of the South Addition Community Council area.

We acknowledge and appreciate that the proposal establishes a Neighborhood Development Context Area called Traditional Urban Neighborhood (TUN) Context Area under 21.07.015.C.1 to address the unique characteristics and established context of older neighborhoods like South Addition.

Our comment is that, while the boundaries generally define the subject area properly for South Addition, a few adjustments are necessary. Most notably the neighborhood around Inlet View School is defined as an edge urban neighborhood. We recommend that all blocks north of Westchester Lagoon or at least the gridded blocks with alleys to be included in the traditional urban neighborhood context area and that the map is updated to reflect this. These are established, fully developed neighborhoods with characteristics more akin to the proposed TUN area.

We also want to offer a few observations regarding the details of the amendment in the Development and Design Standards chapter under 21.07.060.F

South Addition Community Council Executive Committee

John Thurber, Daniel Volland, Cathleen Hahn, Patrice Parker, Fran Durner, Tamas Deak, Harry Need
C/O John Thurber, southadditioncommunitycouncil@gmail.com

Table 21.07-2 sets the pedestrian frontage standards for TUN. The maximum setback is a tenuous concept at best in South Addition.

One of our concerns is that it does not provide specific exemptions for properties that require it. The proposal does not address existing, older residential buildings that may be remodeled, but by the standards of their vintage have smaller windows. It does not address lots that are located along the Chester creek bluff in South Addition and Fairview especially parcels with no alley access both for maximum setback and garages. Similar bluff conditions exist in Mountain View and Government Hill as well.

Overall, we recommend eliminating the maximum setback requirement in the TUN. The lots are smaller and we need to allow the designers to use their best judgement to locate buildings on the lot. For example, a west or south facing frontage may want to pull the building back all the way towards the back where garage access exists from the alley. This is a design decision that is best not to legislate. The building can have "eyes on the street" even if it is set back farther, the most important feature to avoid on the street is large barrage frontages, which will be possible by requiring alley access for the garages.

We want to offer a few observations regarding the off-street parking requirements proposal under 21.07.090.E as well.

We can concur that table 21.07-7 may offer a simpler solution to acknowledge that many of the Neighborhood development Context areas offer a by-right reduction opportunity due to better developed street infrastructure and transportation choice. We are not equipped to verify whether the reduction is best the proposed 20% or at a different number for South Addition, but want to ensure that the by-right reductions reflect vehicle usage.

The proposed parking reduction code change appears to be comprehensive and thorough in addressing needed clarifications and updates in the land use code. Although parking reduction may be applicable in some areas of South Addition, they do not pose a significant concern for the neighborhood.

One point to note is the elimination of on-street parking counted against on-site parking. We want to encourage parking reductions while also want to ensure that the by right reduction of parking can be adequately absorbed on the surrounding streets. We think that additional reduction considered on a case-by-case basis to use on street parking is still applicable. New developments should not rely on the on-street spaces granted to another parcel if their parking demand is adequately met on-site, so this approach can achieve greater reductions.

SACC has expressed its concerns regarding neighborhood character and how that relates to the regulation of driveways. This issue came to a head with developments on G Street that were granted full street driveway access to double garages that take up the frontage of the redeveloped lots and completely changed the streetscape and character of the area instead of providing access from the alley. The proposed amendments make marked improvements to existing code under 21.07090.H.9.b under ii., especially by setting a maximum 12' width for driveways in TUNs.

It does not make sense to allow wider than 12' driveway widths on both frontages for a corner lot. Both frontages are on s street and represent the same character issue. Our take is the all driveway widths from the street in TUNs shall be limited to 12'.

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Additionally, inclusion of iii. in its current form completely ignores the issue we have been raising for years. This "iii." section relies on the discretion of the traffic engineer to allow projects to deviate from the proposed rules on parcels that have alley access but choose to pursue an alternative driveway configuration from the street for any reason. The standard variance process is more adequate for these special conditions, and we strongly urge you to keep the bar high by requiring a public process, like a variance.

Our position is that under no circumstances should an exemption be given to multi-family and townhouse developments from alley access in South Addition and to limit on street driveway widths to maintain neighborhood character. Perhaps the proposal could be tied to zoning by excluding R2 zoned areas in the TUNs to foster multifamily residential development in the R3 and R4 zoning districts, where such exemption may be more readily warranted.

Lastly, we would like to acknowledge your work to address a previous SACC concern regarding sidewalk grades at driveways. The proposed language is included under 21.07.090.H.11.b.ii to ensure that the walkways remain accessible after new development with new driveways are completed.

We acknowledge Planning's collaboration with SACC on this complex code amendment and look forward to further refine and improve it prior to adoption.
Thank you.

Sincerely,



Tamas Deak,
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