

Attachment 4

Public Comments

(as of February 3, 2023)

Title 21 Text Amendment to Site Access Regulations

**Public Hearing Draft
PZC Case No. 2023-0011**

**Anchorage 2040 Land Use Plan
Implementation Action 4-3**

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THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Transportation and
Public Facilities

Program Development and Statewide Planning
Anchorage Field Office

4111 Aviation Avenue
P.O. Box 196900
Anchorage, AK 99519-6900
Main number: 907-269-0520
Fax number: 907-269-0521
Website: dot.state.ak.us

January 12, 2023

David Whitfield, Current Planning Manager
MOA, Community Development Department
Planning Division
P.O. Box 196650
Anchorage, Alaska 99519-6650

[Sent Electronically]

Re: MOA Zoning Review

Dear Mr. Whitfield:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has reviewed the following zoning cases and has the following comments:

• **2023-0011 – Title 21 Text Amendments**

DOT&PF would like to remind the Municipality that all State regulations, codes, and standards regarding access and effects to State facilities remain unchanged. Future platting, zoning, and development actions may require increased scrutiny from DOT&PF review until the effects of the proposed Title 21 changes on DOT&PF facilities are fully understood. DOT&PF would encourage the Municipality and developers to reach out early in the project development process for site plan reviews and access questions.

All properties accessing DOT&PF roads must apply to Right-of-Way for a driveway permit, subject to provisions listed in 17 AAC 10.020. Any previously issued driveway permits become invalid once the property undergoes a platting action and must be reissued.

We recommend the petitioner verify all section line easements and DOT&PF road rights-of-way adjacent to their property. For assistance, the petitioner may contact the Engineering group within the Right of Way section in DOT&PF at (907) 269-0700. The petitioner is liable to remove any improvements within the easements and rights-of-way that impede the operation and maintenance of those facilities even if they are not shown on the plat, so it is in the petitioner's best interest to identify the exact locations and widths of any such easements or rights-of-way before they improve the property.

"Keep Alaska Moving through service and infrastructure."

If any section line easements or road rights-of-way exist within the bounds of their plat, we recommend the petitioner dedicate them. If there is an existing right-of-way or easement, the petitioner is unable to develop that portion of the property yet continues to pay property taxes on it; dedicating will remove that cost to the petitioner.

If there are any questions regarding these comments, please feel free to contact me at (907) 269-0522 or mark.eisenman@alaska.gov.

Sincerely,



Mark Eisenman
Anchorage Area Planner, DOT&PF

cc: Scott Thomas, P.E., Regional Traffic Engineer, Traffic Safety and Utilities, DOT&PF
Sean Baski, P.E., Highway Design Group Chief, DOT&PF
Jacob Ciuffo, P.E., Regional Hydrologist, Hydrology DOT&PF
James Starzec, AMATS Transportation Planner, DOT&PF
Matt Walsh, Property Management Supervisor, Right of Way, DOT&PF
Corliss Kimmel, Office Associate, Current Planning, MOA
Noah King, P.E. Project Manager, DOT&PF

Davis, Tom G.

From: Allen Kemplen
Sent: Wednesday, February 1, 2023 4:23 PM
To: Davis, Tom G.
Subject: Comments on Site Access Regulations
Attachments: FVCC_Comments_SiteAccess_Revised.pdf

[EXTERNAL EMAIL]

Hello Tom,

Attached are revised comments on the proposed changes to Title 21's Site Access Regulations.

I want to thank you for taking time to meet and discuss what is being proposed.

I may have gotten carried away in my response but felt folks would benefit from a broader, more holistic assessment of the proposed changes. I've tried to highlight in bold the more specific recommendations that could be incorporated without too much trouble.

Always trying to advocate for Anchorage as a more livable Winter City.

Thanks for all your hard work.

Respectfully,

Allen

Comments proposed Title 21 changes regarding Site Access Regulations.

Context

The Anchorage Assembly recently approved the elimination of all minimum off-street parking requirements in Title 21, our land use development code ordinance. This policy change will alter the movement of people and vehicles between the private lots and the public rights-of-way. The current action by the Planning Division is to address the nature of these changes.

Access to/from the public rights-of-way within an urbanized area varies by nature of the land use and prevailing attributes of the public realm. Access relative to strip commercial for example will have different characteristics than access relative to a mixed-use, residential or institutional land use. Access from a high-speed arterial is going to be different from that of access to/from a primarily urban pedestrian or suburban vehicular street.

The proposed zoning code amendments add a new Section 21.07.010E, General Provisions – Urban Neighborhood Development Context Area. Its stated intent is to “*...provide a basis for tailored pedestrian frontage, driveway, and other development standards...*” identified in other parts of Chapter 21.07 to establish a better fit between urban neighborhoods and new development.

Discussion

Subarctic Community Anchorage has unique operating characteristics that come by its nature as the only major metropolitan area on the North American continent located in a predominately sub-arctic environment. See Attachment A for supporting detail explaining this physical reality. Since our Winter conditions last twice as long the other major seasons, one could reasonably expect our built environment be designed and constructed with full recognition of this unique set of circumstances.

The recent response to the back-to-back major snow events in mid-December causes one to take a step back and look around at our city. Many of our bus stops are still inundated with high, hardened snow berms. The disregard of non-motorized infrastructure snow removal communicates a message that the users of these public facilities do not really matter in the city’s scheme of things. What this means to the average person is that the city forces me to have a vehicle to get to work, shopping and to live a life.

And now we no longer require a minimum set-aside on private lands the necessary storage space for vehicles. What does this mean to the average person? Nothing really in the short term. And given the slow shrinkage of the State and local economy, one is not likely to see much development in the next few years. Assuming we are able to bounce back, the changes won’t be really noticeable until five to ten years down the road. But they will have an impact. What are they likely to be?

Leaving decisions about off-street parking to the private developer will very likely result in higher density development as the space formally used for storage of vehicles is converting to higher value uses. Depending on what market segment is targeted by the developer, there may be significantly fewer people accessing the development via a personal vehicle. Or not.

A developer focusing on middle-income households and above will prepare a site design that accommodates adequate off-street parking. These targeted market segments have sufficient disposable income to afford the higher per square foot costs due to absorbing the costs of off-street parking. The exact number of parking stalls provided will be a function of the particular development circumstances. Much of the proposed changes to the Site Access Regulations appear tailored to accommodating this type of development.

A developer attempting to address the needs of low to moderate income households will likely prepare is likely to provide little to no off-street parking in order to minimize site development costs. This will keep the price per square foot within the affordability range of the lower-to-moderate income market segments. It is likely, given the availability of free on-street parking stalls, that the developer will maximize revenues and build out the site to the maximum extent allowable by code. Residents of these sites will very likely be required to park their vehicle in the immediately adjacent public rights-of-way. This will increase the number of person trips on the non-motorized infrastructure with the distance a function of how far away they have to park. **Thus, the sidewalks and pathways providing access to and from the site become of significant importance.**

What does the proposed Site Access changes do? They reduce the width of the walkway leading from the street sidewalk/pathway to the private structure. This would likely mean the effective width during our winter shrinks even further due to snow accumulation. One could reasonably foresee an increase in the difficulty factor as a person navigates their way to and from the street. Could be tough for moms with babies and the physically challenged but able-bodied youth and adults should have no problem. **Recommendation for our part of town is to retain the current required walkway width from the public rights-of-way to the structure.**

It does not appear to address at all the walkway from the alley to the main building. This appears to be an overlooked area. Seems reasonable to expect some requirement for pedestrian infrastructure from the alley as it is likely that if the developer does provide off-street parking, that it would be from the alley. The purpose of the alley is to serve as a corridor for the utilitarian functions necessary for use of the properties. Within the Urban Neighborhoods Area where alleys are in place, the regulations should be moving any accommodations for parking to the alley. **Recommendation for our part of town is to include a section detailing walkway requirements from the alley or rear off-street parking stalls to the structure.**

There really should be no street frontage driveways. Any vehicle access should be required to be from the alley. There is a very practical reason for this. The amount of on-street parking is going to increase. There is only so much of curb frontage per block. It makes the most sense to maximize the amount of available curb for parking. But a driveway will take up at least 12' of curb space when you consider the turning movement radius. On a typical 300' foot block with 50' frontages, there are six lots. If all get a driveway from the street that eliminates 72' of curb side parking space on each side of the street. We could see a reduction of over 24% in available space for on-street parking. This reduction could occur when demand for the space is increasing. **For our part of town, it is recommended no front driveways where alleys are present as the default.** One could be allowed due to unusual circumstances and/or site constraints subject to Administrative Review.

Deep Shadows

There is a reality that does appear to be adequately addressed. The sidewalk can be negatively impacted by the shadows cast by the site's vertical structures. This is particular evident between the Autumn and Spring equinoxes when the sun moves to a lower height on the southern horizon. These shadows will reduce the influence of passive solar exposure and will create colder ambient air conditions impacting any sidewalks or walkways. For example, ice formation will occur more frequently under such shadow conditions particularly when we experience variable conditions associated with persistent freeze/thaw weather patterns. Icy walkways can easily trip up the unwary pedestrian or bicyclist resulting in a loss of balance and a quick visit to the ground.

Deep shadows can be mitigated in a number of ways. One could, for example, bounce sunlight off vertical surfaces not in the shadow zone and thus re-direct the passive solar warmth to the horizontal access surfaces. **As such, modifying the Reflected Sunlight option in the Pedestrian Amenities to more specifically focus the improvement on walkways/sidewalks is recommended.** However, the use of Winter City Design Guidelines could be more effective. **It is recommended recognition of the issue be acknowledged in the Site Access Regulation with appropriate language guiding the reader to where the Design Guidelines may be located.**

Different Neighborhood Forms

The general development pattern in the Anchorage Bowl for the past sixty years has followed a predominant Euclidean zoning approach meaning land use types have been geographically separated. This has occurred to such an extent that there are few urban neighborhoods where there is a healthy mix of housing and employment such that residents can conveniently use non-vehicular methods to access desired goods, services and employment. The result is that for most households, a vehicle is a mandatory requirement especially for the gainfully employed. Thus, the urban neighborhoods with a predominance of low to moderate income households will witness over time a steady degradation of the public realm as the number of on-street parked vehicles steadily rise in number.

The significant number of streets with rolled curbs will experience an increase in vehicles using the street sidewalks for parking in order to accommodate the increased demand for on-street parking. During our lengthy subarctic winters this situation will be made worse as the Municipal Snow Management Plan allows for use of the pedestrian infrastructure as snow storage sites. Depending on the resources made available for snow removal, it can be weeks if not months before non-vehicular travelers again have dedicated access to and from the site. During this period of time, they are forced to compete with vehicles for the shrunken width of street space. This creates a safety hazard and becomes a public health issue. This situation will be made even more difficult for every driveway. **Each driveway allowed on the street results in a loss of at least one on-street parking stall.**

Changing Mobility Options

Given the rising costs of personal transportation (oftentimes the second largest expenditure of a household budget after shelter), urban areas are witnessing an increase in Transportation as a Service (TaaS) business models. This is reflected in the growth of businesses such as Uber and Lyft. There are other mobility options such as Lime personal scooters and increasingly convenient electric bikes. The imperatives of climate disruption are forcing the vehicle fleet to shift from being powered by internal combustion engines to being powered by electric batteries. The changing nature of mobility has impacts relative to site access.

It does not appear the proposed changes adequately address storage space for non-vehicular modes. Parking stalls for motorized vehicles are no longer required and the Site Access regulations require a walkway on site, shouldn't there be accommodations made for non-vehicular parking and storage? Personal mobility devices take up space. If the intent is to create an urban form that is bikeable and to provide safe pedestrian movement, shouldn't space on site be made available for bicycles, scooters and other forms of small non-vehicular mobility? **It is recommended the proposed changes address movement and storage of these non-vehicular devices.** This speaks to the need to retain existing on-site walkway width as walking a bike within the site while accommodating others users requires more than a 3' walkway width.

The Regional Connection

Anchorage's development, for the most part, has patterned itself after a suburban and auto-intensive lifestyle. The physical constraints of water, federal and state lands limit its continuation as greenfield development opportunities within the Anchorage Bowl becomes harder to achieve. Future community growth would likely come from in-fill development except for the availability of cheaper lands north through Eagle River/Chugiak and particularly the Mat-Su. The Mat-Su Borough has structured its land use development code to make suburban development rather affordable for the typical average median income household. Since much of the higher wage employment is within the Anchorage Bowl, there exists a strong demand for commuter travel during shift changes.

Parking for these commuters is very likely to emerge as a public policy issue as land in the Bowl is redeveloped under the new standards. In order to minimize off-site parking issues within the public rights-of-way, it may become necessary for a more aggressive approach to reducing demand for said parking. This could mean a greater emphasis on Bus Rapid Transit, some form of commuter rail and/or implementation of Transportation System/Demand Management (TSM/TDM) actions.

Access to/from the private lots to the public rights-of-way will likely be different based on the general land use type, development intensity and the type of right-of-way. Access from a commercially oriented strip mall on a major arterial will emphasize safe and efficient movements of vehicles. Access from a low-speed, densely developed urban core will likely emphasize pedestrian and non-motorized users.

Link with Dimensional Standards

Site access is often impacted by the Code's Dimensional Standards. It is acknowledged these are specifically excluded from consideration as part of the current effort. However, it should be recognized in the narrative that for certain parts of the Urban Neighborhood Areas that changes to dimensional standards may be warranted. For example, the Fairview neighborhood is seeking to convert Hyder Street to a pedestrianized street with new adjacent structures built to edge of the public rights-of-way. This would be similar to site access within the Central Business District for illustrative purposes. **A reference to Neighborhood Plans and Overlay Zones would help clarify there are other tools to be referenced during the development process, particularly for those sub-areas that can readily accommodate a build-to approach to site development.**

Unresolved Snow Storage

Currently, off-street parking stalls on commercial lots are often used for snow storage, particularly since there are seasonal variations in parking demand with fewer vehicles on the road network during the winter months. Many residential driveways and off-street parking stall spaces are reduced in effectiveness due to the need for storage of snow.

The existing road network in the Anchorage Bowl outside of the urban core is limited to a few major arterials. The lack of a good grid network means these facilities are being asked to serve regional traffic needs while providing a safe experience for non-motorized trips. The available rights-of-way are typically not enough to accommodate all the user groups and their requirements for travel space. This is particularly the case during the winter months when a significant share of the public realm is converted to ad-hoc snow storage space. During such times, the loss of access to pedestrian and non-motorized infrastructure results in significant hardships and public safety hazards. This impacts the ability of pedestrians and bicyclists to safely access bus stops. This situation will be compounded as the removal of off-street parking stalls will force higher use of the public streets for parking.

It may become necessary to implement a much more aggressive approach to management of the rights-of-way, particularly in the winter months in order to ensure safe access is available for all users.

It is in the best interests of the Municipality to guide future development through the Site Access Regulations such that barriers to non-vehicular mobility are reduced and not increased. If the Municipality truly desires to reduce the need for households to find affordable housing in the Mat-Su Valley, reducing the need for personal ownership of a vehicle within the Anchorage Bowl is a key step. It is suggested that greater attention is warranted within the land use development code to ensure safe and convenient year-round access for all users of the public rights-of-way.

Non-Vehicular Mobility Network

We come back to the issue of access. Access to what, by what mode and from what type of rights-of-way? The existing approach to urban mobility is not working for all users of the public rights-of-way. This is particularly evident during the winter months when the needs of non-motorized travelers are sacrificed for snow storage so vehicles can keep moving.

It may be time to accept the fact we need to take a different approach. One that accepts the reality of how our existing public rights-of-way within the Anchorage Bowl are designed. Since most non-vehicular travelers move at much lower speeds and accommodating these lower speeds on the main thoroughfares are every difficult, perhaps we could consider separating the travel modes given the limited ability of making the Collectors and Arterials meet the needs of every user group.

It is recommended that a complementary, lower speed transportation network be established in the Anchorage Bowl. One that does not attempt to be all things to all travel modes. It would instead be a transportation network that is designed for the lower travel speeds of non-vehicular travelers. This would result in certain corridors and streets being designed to different standards. An example would be a greater use of pedestrian streets. Woonerfs are one approach. Vehicles can still use the street but at the speeds of the non-vehicular travelers.

These slower streets would then have likely different access needs, particularly as it relates to the interface boundary between the private lots and the public realm. For example, there would be no sloping driveways across a sidewalk on such streets. Within areas of mixed-use development, one could readily visualize a greater use of colonnades along the street. Attachment B are comments made previously to Planning staff regarding issues with the R-4 zoning category. Changing the front set-back requirements through the Dimensional Standards section of the code would likely be required. The building would be setback from the edge of the right-of-way an appropriate distance for a height of one or one and a half story. Above this height the setback could be reduced to zero, depending on the land use context.

Form Based Code

Form-Based Code (FBC) approach allows one to visually grasp the complex inter-relationships at play between land use types, access needs and the public rights-of-way. The FBC approach allows for the crafting of a framework where the defined variations in urban space are identified and clearly articulated in a visual way. The graphics are supplemented with sufficient narrative and necessary tables. The type of street interface forms desired by a particular neighborhood can be determined through the use of Visual Preference Surveys. See Attachment C for an example of one done for the Fairview neighborhood.

It is suggested that a Form Based Code Overlay approach with Winter City Design Guidelines may be an effective method of differentiating areas of the Anchorage Bowl where a more traditional urban neighborhood type of development is the goal. The Fairview Community Council is on the public record as encouraging such an approach and has produced working drafts of such documents. It is hoped Planning staff and the Planning and Zoning Commission can find the wherewithal to support such grass-roots efforts to make our part of town more Winter City friendly while advancing our economic and community revitalization. **It is recommended the proposed Site Access Regulations be sufficiently flexible such that it can accommodate upcoming Form Based Code Overlay Zones.**

Map - Visualizing Complete Neighborhoods

For the areas identified in the draft proposed Ordinance, the urban neighborhoods map could be strengthened with a bit more recognition of which ones have a defined urban form already in place. Labeling the different urban neighborhoods through use of some classification category scheme would be useful. One of the difficulties with Title 21 applications is making it work for the multiple urban micro-spaces within the Anchorage Bowl. Again, this is where using the approach promoted by Fairview (Overlay Zone and Design Guidelines) allows for different parts of town to strengthen their own sense-of-place particular to their existing and desired urban forms.

Map - Visualizing a Non-Vehicular Network

The urban neighborhoods map does not show all the relevant transportation links. The urban neighborhood areas map could be improved by identifying our larger green infrastructure elements, particularly the trail network. It currently only shows the major vehicular streets. There could also be utility in identifying the Primary Transit Corridors. Seem appropriate to give non-vehicular travelers and users of public transit a higher level of planning consideration in the mapping illustrations.

Map – Adjusting the Fairview Boundary

It appears the proposed Urban Neighborhood Area map excludes a small section of our neighborhood west of Orca Street and north of 10th Avenue. The current zoning is Light Industrial and is a remnant of past land uses and a larger light industrial sub-area. However, Merrill Field has systematically eliminated light industrial as a dominant use through acquisition of properties on the east side of Orca Street and elimination of the public rights-of-way for Orca north of 8th Avenue. The dominant use within this sub-area is now residential. **It is requested the map be adjusted to reflect this physical reality.**

Summation: It appears the proposed Ordinance changes are a continuation of incremental adjustments to a land development ordinance that is perceived as overly prescriptive, excessively complex and burdensome to affordable development in the Anchorage Bowl. The ongoing movement of households, their families and tax base revenues to other locations, particularly the Mat-Su Valley is sometimes cited as an example.

It is suggested there is merit in engaging the public in a more robust discussion of how Anchorage is a unique sub-arctic metropolitan area and how future growth and economic prosperity is dependent on well the community learns to embrace the reality of being a Winter City. The evidence to date indicates an inordinate emphasis on trying to make Anchorage look and feel like an urban area in the Lower 48 where winters are much shorter and the issues significantly different.

It is suggested there is merit in exploring alternative street designs and differentiating between rights-of-way focused on moving vehicles safely and efficiently and those rights-of-way designed for lower speed non-vehicular travelers. There is not enough width in existing rights-of-way to accommodate all user groups particularly given our subarctic location. This has direct relevance to the issue of access to/from individual lots and the public rights-of-way. Access needs are significantly different when there is less need for on-site vehicle storage. There is a greater need for improved pedestrian and non-vehicular facilities.

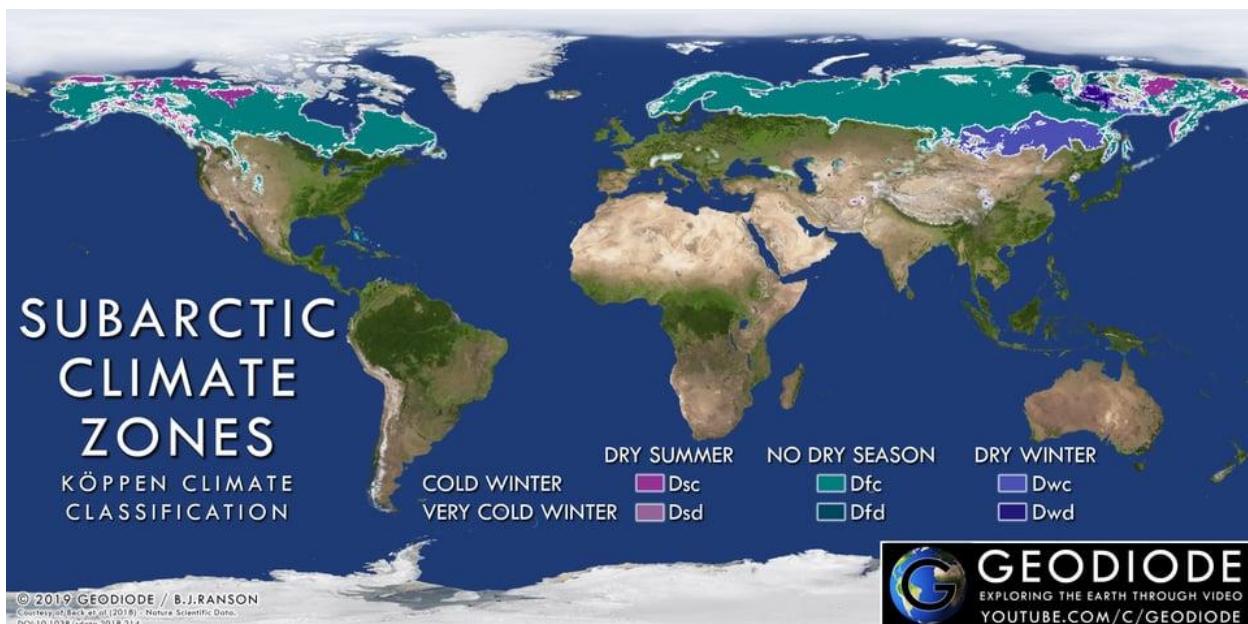
Thank you for the opportunity to comment.

Respectfully Submitted

Allen Kemplen, AICP-CTP
President
Fairview Community Council

Anchorage as a Sub-Arctic Community

The subarctic climate is found exclusively in the Northern Hemisphere between 50 and 70 degrees of latitude, in the interior of continents. There are no subarctic conditions in the Southern Hemisphere due to the absence of large land masses at the equivalent latitudes. The characteristic features of a subarctic climate are short, mild summers with temperatures that can go as high as 30 C and long, cold winters with the temperatures going as low as -40 C.



Subarctic North America

The Subarctic area of the North American continent covers most of Canada and Alaska. (see Figure 1) It is the northern section of the near-arctic realm with four sub-realms as defined in the Bioregions 2020 framework -- Greenland, Canadian Tundra, Canadian Boreal Forests, and Alaska -- containing nine bioregions in total. Greenland consists of a single bioregion defined by ice with coastal tundra, and the Canadian Tundra is also defined as one large bioregion. Alaska contains three bioregions, including the Far Northern Pacific Coast, which combines temperate conifer forests and coastal ice fields and is home to grizzly bears, wolves, puffins, salmon, and orca whales.

Subarctic climate in United States

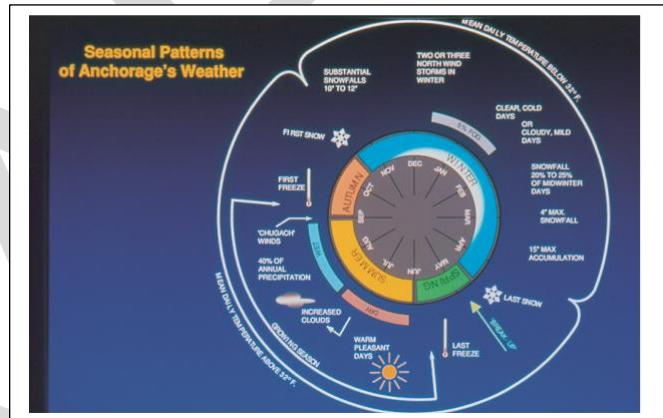
Alaska, located in the topmost northwest part of the continent, has arctic and subarctic climates. While much of the economic wealth produced by the State's economic activity is located in the far north Arctic region, the majority of the population is located in the sub-arctic region. Most of Alaska's population is located in the south-central part of the State. The Alaskan summers are short and cool, with temperatures averaging 17 C. The winters are shaped by the degree of earth's tilt as it circles around the sun. Shadows come early to the sub-arctic and they stay late. They follow the Sun and are linked on a practical level with the Autumn and Spring Solstices. **Winter** is seven months long and composed of four sub-seasons: *Early Winter* (mid-October through end of November) when less

sunlight is noticeable and temperatures start to creep below freezing on a regular basis. *Deep Winter* (December through mid-January) when darkness dominates during the long nights and short days and temperatures are quite below freezing. *Late Winter* (mid-January to early March) when the Sun begins to return to the northern lands, temperatures start to rise and Alaskans prepare for the upcoming non-winter. *Break-Up* (mid-April to May) when the heat of the ever-rising Sun melts the winters accumulation of snow and ice. Temperatures are consistently above freezing during the day, causing rapid transformation of winter and challenging how one drains the water. By the end of May, the ground has warmed sufficiently to allow for plantings to occur.

Alaska historically has very little precipitation, most of which comes in the winter in the form of snowfall and during the post-summer period into the November storms rising up from the western Pacific. Short Summers (typically three weeks on each side of the summer solstice) are mostly dry with only occasional rain during the periodic thunderstorm. On clear nights during the Alaskan winter, and depending on sunspot activity levels you can have some pretty spectacular displays of the northern lights. The only other part of United States that has a subarctic climate is the High Rocky Mountains in Colorado, Wyoming and Montana, with similar temperatures to those in Alaska.

The North American continent has only one major metropolitan area (>200,000 population) in the sub-arctic – Anchorage, Alaska. This means there is no other similar sized community in North America that shares its unique urban challenges. The reality of this physical placement on the planet means the Anchorage community must develop innovative solutions to its sub-arctic circumstances.

Anchorage's location is unique in another way. If one looks at the planet at night as an astronaut on the International Space Station might, they would notice how the world is lit up in certain regions. Europe, East Asia and the continental United States of America shine with economic dynamism. Geo-strategically located between the three major economies of the world is – Anchorage, Alaska. This physical reality is reflected in the significant military presence in the State and the robust economic activity produced by air cargo traffic at Anchorage International Airport. Anchorage has established itself as a logistics hub for commerce. But it has not yet made the transition to becoming a logistics cluster of associated air hub trade and commerce. Such a transition is a hard thing to accomplish and history shows that not every urban area is able to pull it off. The difficulties would be compounded by the realities of its sub-arctic location.



Proposed Changes to the R4A zoning category

We wish to suggest the Planning Division work cooperatively with the Fairview Community Council (FVCC) to craft a more nuanced approach to revision of the R4A zone. Such an approach is needed in order to accurately reflect underlying differences in platted development in different parts of town. The current approach may not achieve the intent of planning staff. Wholesale zone code changes applicable across the Anchorage Bowl with its varying platted properties can be perceived as a blunt ax approach to a problem. It may be appropriate to use a bit more refined approach.

We suggest past ineffectiveness of the R4A zone category is due to the lack of a vision for how such density and associated characteristics fit into the urban fabric. For example, the R4A zone is what one might expect to see within a City Center sub-area. A cursory review of development patterns will show the Anchorage Bowl has a long way to go before market demand supports such dense development. Absent significant public subsidies, private land markets will continue to meet demand by exporting development to the Mat-Su where land rents are substantially lower and land development regulations are minimal.

The one area where it may be reasonable to attract the interest of private developers is where a cohesive vision exists conducive to such densities. The Anchorage Land Use Plan (ALUP) is a very high level guiding document providing a general framework - too general for risking investment capital by itself. Implementation of the ALUP requires a corridor or sub-area strategy. The Neighborhood Plans are a welcome step as are the nodal plans such as those for Downtown and the U-Med District. But these are still a bit too high level for advancing specific profit oriented development. The Reinvestment Focus Areas identified in the ALUP would appear to be a way forward but to date there does not appear to be any with detailed Action Plans. It is at the Action Plan level that one may attract the interest of private capital.

An Action Plan approach would focus on what specific steps are to be advanced by whom within a relatively short planning period – typically no longer than five years. The Action Plan should also be developed in a cooperative manner with major stakeholders and would include signed Memorandums of Agreement committing participating parties to the allocation of capital along with specific and ancillary development actions.

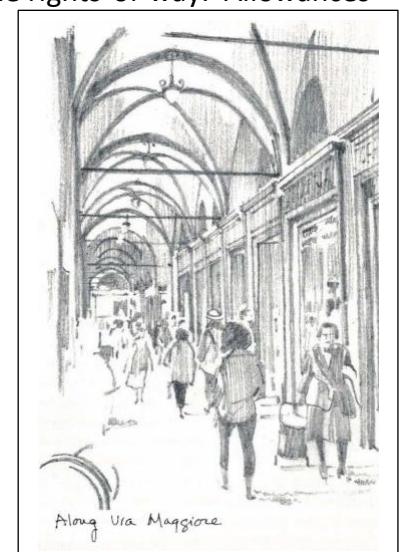
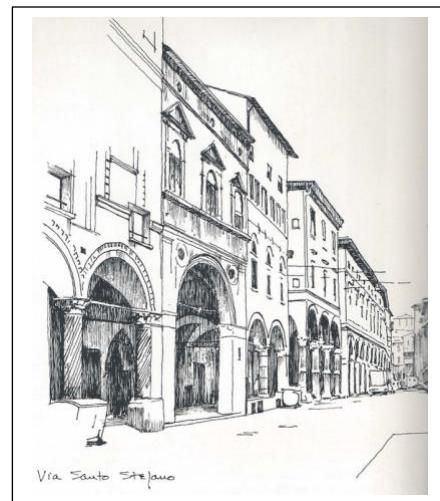
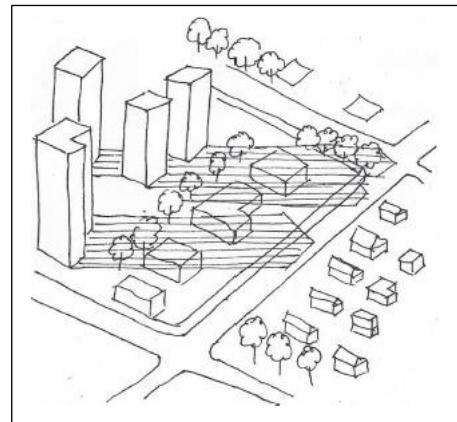
The Action Plan would focus on a specific corridor or sub-area and break things down to specific parcels and development schedules.

R4A densities require fairly high rents to justify the costs of such dense development. Dense development has to have some particularly redeeming qualities, proximity to high quality development of similar density or access to unique public amenities. Investors need to have reasonable assurances their investments will produce acceptable returns for the length of the investment period. Given the above, it seems the R4A re-zoning effort would be more productive if was crafted in a different way. For example, one could include a R4A-F sub-category. The “F” standing for Fairview. This particular sub-section would be linked to on-going efforts to develop the Fairview Innovation Area and associated Fairview Greenway.

Proposed Changes to the R4A zoning category

We wish to make the following more specific comments:

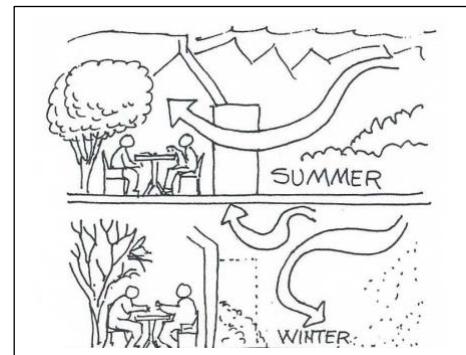
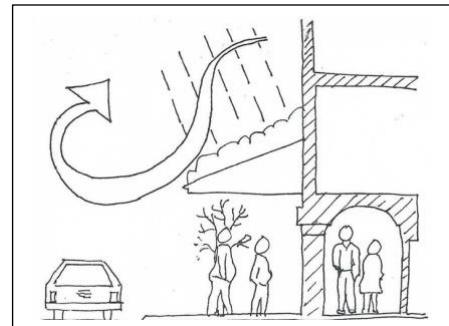
1. Shadowing impacts – a) The height of the structures envisioned within this zoning category will cast significant shadows in our sub-arctic environment. For the Fairview area, we request application be limited to those blocks where lots have been developed with an east-west orientation as such lot design means the shadows will fall primarily on the north side lots which would share the zoning category. This would minimize the negative impacts on adjacent lots. b) The shadowing impact will be felt even with the above placement and as a result we request inclusion of language requiring the city center density development to incorporate a certain percentage of vertical surfaces on upper levels with reflective materials placed so as to “bounce” sunlight into the shadow footprint created by the structure. Such an approach will significantly increase the amount of ambient light within the areas of cast shadow and reduce the impacts of deep shadow.
2. Pedestrian orientation – a) The proposed density will experience a significant amount of pedestrian movement at street level. As such , the removal of any front setbacks will leave little room for pedestrians given the typical 60' rights-of-way present in the urban core. We request the proposed language be changed to require first floor colonnades as shown in the figures. The second floor of the structure can extend to the edge of the rights-of-way. Allowances should be made to allow for the inclusion of small patios on upper levels, especially on south and west facing walls. b) we request the first floor wall should be set back 10' from the right-of-way and that the walls be required to have at least a 60 percent transparency. This will create a visually stimulating pedestrian environment, provide protection from inclement weather conditions and minimize the need for snow and ice removal
3. Pedestrian protection – a) It is suggested that street awnings or other horizontal/angled feature be required on exterior facades for the lower levels.. These elements will break up the wind downdrafts that currently plague



Proposed Changes to the R4A zoning category

the area around the Atwood Building and the new Convention Center.b) We request incentives be included that encourage the developer to install removable transparent barriers on the colonnades street side. This would allow the space to be closed off during the winter months and provide enhanced protection for pedestrians and, if applicable, for patrons of street level restaurants and/or small shops.

4. Building/Street Environment - We suggest that application of such densities would be more likely to be embraced by the private sector if there were corresponding changes to the urban street environment. Such densities need substantive public amenities within close proximity so that residents have ready access to an attractive and pleasant public realm. As such, we request that within the urban core the revised R4A be targeted toward those rights-of-way designated as pedestrian streets.
5. Building/Street Environment – We request the Planning Division initiate a vibrant public discussion about urban design in our sub-arctic community. Anchorage is competing with other metropolitan areas for investment capital and in order for Anchorage to be competitive, our City needs a much stronger and more positive :"Winter City Sense of Place." We strongly encourage the Municipality to facilitate development of an Action Plan for the Council's proposed Innovation Area as soon as is reasonable. It is our assertion an opportunity exists for our City to attract global investment capital but we need to promote an attractive and compelling urban designr.
6. Building/Street Environment – The proposed height and width for development will create very unpleasant street environments unless mitigating actions are included. Research has documented that a building height of three stories and width of 36 feet, with a street width of 72 feet, are the maximum dimension for a building of human scale. The smaller intimate scale requires a building height of 24 feet and a street width of 48 feet. See note below for source. Fortunately for the ALUP and the desire for higher densities within the Anchorage Bowl, the human eye can be tricked through the judicious use of visual cues. Such visual cues are described above and illustrated in the images.



Proposed Chnages to the R4A zoning ctegory

We greatly appreciate the opportunity to review and comment on proposed land use development code changes that have the potential to significantly impact the built environment in our part of the City. We hope our input is perceived as constructive.

A great Winter City is built on the experiences of the people living and working within it. It is our hope that, by working together towards a common goal of a more livable Winter City we can make substantive progress and Anchorage will truly become a City built to be enoyed by people all year round..

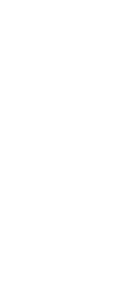
Respectfully,

Allen Kemplen
President
Fairview Community Council

Cc: Fairview Executive Board

Source Note: "Great Streets", Allan B. Jacobs, Massachusetts Institute of Technology, 1993, Page 278, Several of the images above are from this resource document.

Fairview Design Initiative—Visual Preference Survey Results

(-3)	(-2)	(-1)	(0)	(+1)	(+2)	(+3)
Strongly Unappealing	Unappealing	Somewhat Unappealing	Neutral	Somewhat Appealing	Appealing	Strongly Appealing
						
						
						
						
						
						
						
						
						

Commercial

DRAFT

Fairview Design Initiative—Visual Preference Survey Results

(-3) Strongly Unappealing	(-2) Unappealing	(-1)	(0)	(+1)	(+2)	(+3) Strongly Appealing
		<img alt				

Residential

DRAFT

Kimmel, Corliss A.

From: Walters, Michael S.
Sent: Monday, January 9, 2023 2:38 PM
To: Blake, Lori A.; Kimmel, Corliss A.
Subject: 2023-0011 Request for Reviewing Agency Comments

All:

ROW has the following comments for case number 2023-0011:

From a Right of Way perspective, reducing parking requirements by developers will only place increase burdens on Municipal Agencies. With on street parking there is reduced areas for snow storage. Alaska is a winter state. Snow removal should be a high priority when developmental standards are implemented. One may reduce the amount of on property parking for a development, but the parking needs need to be supplemented in nearby parking lots or garages. Until this town embraces MASS Transit, regional paring structures, and pedestrian corridors; reducing the requirement for on property parking and placing it on the nearby adjacent streets will be an unnecessary burden on the community and taxpayer.

Regards,

Michael S Walters
Senior Plan Reviewer
Right of Way Section
michael.walters@anchorageak.gov
Office: 907-343-8226
Cell: 907-727-7637
Fax: 907-249-7910



Anchorage2040

From: Wilson, Karleen K.
Sent: Tuesday, December 27, 2022 2:58 PM
To: Anchorage2040
Cc: Wilson, Karleen K.
Subject: 2023-011 Comments

No comments from Addressing.

Karleen Wilson
MOA Addressing Official
907.343.8168
[MOA Official Address Map](#)

MUNICIPALITY OF ANCHORAGE



Development Services Department

Private Development Section

Mayor Dave Bronson

MEMORANDUM

Comments to Planning and Zoning Commission Applications/Petitions

DATE: January 11, 2023

TO: Planning Department

FROM: Judy Anunciacion, Private Development Engineer

SUBJECT: PZC Case 2023-0011

Case 2023-0011 – Title 21 Text Amendment to Site Access Regulations: Request for Public Comment for February 13, 2023, PZC Public Hearing

Department Recommendations: The Private Development section has no objection to the proposed text amendments to the site access regulations in the Title 21 Zoning Ordinance.



MUNICIPALITY OF ANCHORAGE

Traffic Engineering Department



MEMORANDUM

DATE: January 23, 2023

TO: Current Planning Division Supervisor,
Planning Department

THRU: Kristen A. Langley, Traffic Safety Section Supervisor,
Traffic Engineering Department

FROM: Randy Ribble PE, Assistant Traffic Engineer

SUBJECT: 2023-0011 Title 21 Text Amendment to Site Access Regulations.

Traffic Engineering has reviewed the proposed ordinance for text amendments to Title 21 regarding site access requirements. The department recommends approval of the proposed text amendments with no changes or modifications.

MEMORANDUM

DATE: January 23, 2023

TO: Dave Whitfield, Planning Manager, Planning Section, Planning Division

FROM: Alex Prosak, P.E., Civil Engineer II, Planning Section, AWWU 

RE: Zoning Case Comments

Decision date: February 13, 2023

Agency Comments due: January 23, 2023

AWWU has reviewed the materials and has the following comments:

2023-0011 PZC Case No. 2023-0011, Title 21 Text Amendment to Site Access Regulations: Request for Public Comment for February 13, 2023, PZC Public Hearing.

1. AWWU has no comments or objections to this Title 21 amendment.

If you have any questions pertaining to public water or sewer, please call 786-5694 or send an e-mail to alex.prosak@awwu.biz.





**Municipality of Anchorage
Project Management and Engineering
MEMORANDUM**



DATE: January 23, 2023

To: Dave Whitfield

FROM: Kyle Cunningham

SUBJECT: Cases 2023-0011: Comments from Watershed Management Services.

Watershed Management Services (WMS) has the following comments for the February 13, 2023 Planning and Zoning Commission hearing:

- 2023-0011 – Title 21 Text Amendment to Site Access Regulations;
 - WMS has no comments on or objections to this case.

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Title 21 Site Access Amendment (PZC Case 2023-0011): Expert Focus Group Consultations

Attendees: (distributed over three meetings to accommodate participants' schedules)

- Monday, January 23, 2023: Melissa Branch, Brandon Marcott
- Tuesday, January 24, 2023: Tamás Deák, Bri Keiffer, Andre Spinelli
- Friday, January 27, 2023: Mélisa Babb, Stephanie Mormilo

Agenda Items:

Agenda items are in the public hearing draft section 21.07.060F., *Pedestrian Frontage Standard*, and 21.07.090H.8 through H.11., *Access and Circulation Standards*, provided in Attachment 1: *Annotated Code Amendments* on pages 8-10 and 18-25 respectively. Agenda items include:

1. 21.07.090.H.9.b., *Alley Access Requirement* (Attachment 1, page 19, lines 11-28):
 - No substantive changes from 2022 public hearing draft version of this ordinance.
 - Retaining the administrative exception in iii. is not supported by some stakeholders.
2. 21.07.090H.9.e., *Residential Garage Setback (NEW)* (Attachment 1, page 20, lines 5-9):
 - New. See also 21.07.090H.2., *Applicability* (page 18, lines 5-7), for background.
 - Without parking minimums, how to avoid undersized, informal parking spaces in residential driveways that result in vehicles hanging out into the sidewalk?
3. 21.07.060F., *Tables 21.07-2 and 21.07-3, Row A* (Attachment 1, pages 9 and 10):
 - Row A on page 9 deletes a max front setback requirement that was in the 2022 draft, leaving only the requirement that 50% of the building façade not have parking in front. It also replaces a *Driveways* requirement from the 2022 draft that limited how much of front setback area could be parking.
 - In suburbia, page 10 would require 20% of the building facade not have parking in front.
4. 21.07.090H.10.d., *Vehicle Maneuvering* (Attach. 1: Page 20, line 25 through page 21, line 21)
 - Paragraph iii. is changed from the previous public hearing draft to exempt alley parking spaces from on-site maneuvering requirements, by-right, no limits on the # of spaces.
5. 21.07.090H.11.d., *Minimum Driveway Width* (Attachment 1, page 23, lines 19-38)
 - Paragraph i. and ii. clarify what requirements do not apply to internal driveways.
 - Paragraph iv. and v., exceptions allowing 1-lane internal drives for residential only.
6. 21.07.060F., *Tables 21.07-2 and 21.07-3, Row B* (Attachment 1, pages 9 and 10):
 - In urban neighborhoods, Row B on page 9 would reduce maximum allowed garage width as a percentage of facades, except 2-family would keep current allowances.
 - In suburbia, Row B on page 10 carries forward current garage width allowances.
7. 21.07.060F., *Tables 21.07-2 and 21.07-3, Row C* (Attachment 1, pages 9 and 10):
 - In urban neighborhoods, Row C on page 9 would reduce allowed garage projection. Projecting garages would be prohibited on lots with alley access.
 - In suburbia, Row C on page 10 carries forward current garage projection allowances.

Combined Expert Focus Group Notes from January 23, 24, and 27, 2023

Comments from the meeting are organized by the four main recommendations for ease of reading. See the comment-response table for how staff responded to comments.

1. Create an Urban Neighborhood Context Area

Clarity of the Map:

- Make the map clickable in Code with a hyperlink to lead to a larger map to see exactly where properties would fall easily. Make sure the map in the code can be readable for times when the online interactive map is unavailable.

Delineation of Urban Neighborhood Contexts:

- Concern with the urban neighborhood development context area being in code, and the complexity this map could bring. This urban neighborhood development context area map is useful especially in comparison to the Land Use Plan Map, however it is question if the map needs to be in Code since we already have zoning map and the land use map. The proposed tables with urban and non-urban code requirements could instead be applied by zoning district. For example, why shouldn't new development in Sand Lake and South Anchorage must meet more pedestrian requirements than in the past? It feels like the citizens of Anchorage are asking for more walkable and bikeable streets? There are big parking lots in front of buildings in South Anchorage that could be redeveloped. All commercial and high density residential zones should meet the higher pedestrian standards.
- People want to see more urban development until it means that they lose their own parking. They want everyone else to comply, but not have themselves comply. There are parts of town where using the existing alley was not practical, even in urban neighborhoods.

2. Improve Site Access for Pedestrian and Alternative Transportation

Pedestrian Frontage Standard: Parking Placement

- Row A in Table 21.07-2, limiting the how much of the building façade width can have parking in front, eliminates the ability to have a 3 car garage on a 50 foot wide lot. Homebuyers want the 3 car garage.
- In Row A, what is the rationale for the 50% maximum? How do we know if the 50% is the correct approach to solving the problem of parking in front of buildings?
- Row A consolidating parking placement limitations, and including commercial uses is a positive move.
- Informal parking occurs in residences after the c/o, in landscaping and dirt or gravel areas, making a mess of the street. People will park on grass if they must. This particular

question doesn't address it. This just addresses how much of property is paved or non-paved. No objection to these changes.

- In the CIHA Nave redevelopment, there is a paved area around the building for pedestrian access and had them remove a driveway, but people still drive on the paved areas if they are flat and appear to be drivable. However, a building without parking in front of it is more attractive, inviting, and gives better wayfinding.
- Maybe require a barrier for pedestrian paved areas.

Garage Façades

- Concerns with the limitation on garage projections for house designs with the garage placed on the side of the building – in order to do that the garage has to project. Prohibiting projecting garages would not allow the designer to do that. It adds design standards on a house that can be constraining.
- Example of a large house where you see the front door and the garage and then the side of the house living area faces the view. Consider applying the projection restriction to only street-facing garages.
- Limiting width of garage doors is most important. Limit width instead of setting design-limitations on garage projections. A garage could also have a nice garage door with lights and windows. Prohibiting projections seems highly reactive to snout houses.
- There should be no garage projection allowed in urban contexts, for any uses, especially now that parking is no longer required. The garage should be set back from the main entry. The proposed code still allows for the garage to be in front of the main entry. It is poor design for the garage to be in front of the main entry and there isn't any good argument in the urban environment for it. The main entry for pedestrians should be the prominent entry. In the urban context, garages in front of pedestrian entrances should not be promoted.
- I like to see a garage minimized on a street frontage. I always got requests from developers to have wider driveways. People want to have as much parking in front of their building as possible. If they cannot have a wider driveway, people would put in gravel pads on their lawn. Most of the home developers I was working with wanted more exemptions – wanted to give more parking. That is why maximum setback was in the previous version of Code to prevent people from having a smaller driveway and parking on the lawn.

Garages to be set back the length of a standard parking space (about 20 feet)

- Request for additional clarification on whether the garage setback would be from lot line or centerline of right-of-way.

- Discussion on Fairview existing developments where cars extend into sidewalk. Be careful about having driveways where a vehicle cannot fit into it without extending into the street.
- It looks like this requirement is to solve an unintended consequence. Questionable if this issue occurs enough to address in the zoning code. Would be better if MOA just built streets with curb and limited driveway access. Most residential garages are already 20 feet. Builders will probably have place the driveway and garage off the alley, not the side street with the small setback. It would be painful to say you can't add to your garage or you can but just not have a garage door.
- The builder and designer will think through the design enough to understand the need to not have cars on the street or sidewalk. If they did create this scenario they would understand they would be parking either in the garage or on the street.
- Would this apply if the garage is on an alley? There are projects that come to mind that the 20-foot garage setback would not have worked. The driveway in front of the garage ended up being 10-14 feet long. In urban environments, allow the garage door to be closer to the street.
- Not everybody parks in their garage. A lot of people end up parking in their driveway. They end up parking there anyway even if they hang out into the sidewalk or roadway. That space would also accommodate visitors and delivery drivers. Would not want to require this on alley sides, but do have site distance setback for turning minimum. In the past, the MOA Traffic Engineer made people sign that there is no parking if it is a problem. There either needs to be parking for a vehicle or no parking for any vehicles; it cannot be in-between. Driveways should be less than 4 ft long or more than 20 ft. Signage could be used.
- Garages facing alleys need a 4' offset from the alley to allow adequate turning and maneuvering and sight distance.
- Consider not applying the minimum setback for garages to private streets internal to developments. Garages sometimes are placed closer to private streets.

3. Right-size Driveway, Alley Access, and On-Site Circulation Requirements

Limitations on Driveway Width in Urban Neighborhoods:

- I like the limitation on the width of the driveways in urban neighborhoods, which [wider driveways] has been very problematic for street maintenance in these areas.
- I am more concerned with maximum driveway widths than minimum widths.
- With elimination of parking requirements, each driveway is arguably taking away from snow storage and on-street parking spaces.
- Questionable if many developers will want to go too narrow on driveways. A concern with the 10-foot driveway is that snow storage can make the driveway much narrower

in the winter and then have site distance obstructions. That is why MOA previously had 14 feet minimum. MOA is more concerned with where the driveway comes into the street, which would be 12 feet and then could be 10 feet on the site. Snow makes these driveways get narrower quickly. Residents would get used to that.

- Developers want a bigger driveway, and as much parking as possible in front of the building.
- If there is landscaping and a curb line, sometimes it is difficult to open a door in a narrow driveway. Part of that 12-foot minimum is so that doors can open and people can maneuver. The 10-foot lane is awesome when you are driving on it but need more room when you are getting out of the car on it. Another participant said that all that makes sense to me. I was thinking something similar.
- Make clear for minimum driveway width regulations that Fire Code requirements would still apply in addition to the Title 21 width requirements. AFD will still like to see a 20-foot drive for 2-way traffic. Those things limit how low you can go on the width.

Alley Access Requirement:

- Keep 21.07.090H.9.B.iii. that allows for driveway access approval by the Director and Traffic Engineer for special cases. Several participants agreed that part of code makes total sense and supported that code text being left in.
- Give the Director the ability to approve exceptions in unique situations. Smaller scale projects have a lower threshold at which extra process for relief can stop the project. Not leaving the exception approval administrative could stop some smaller-scale projects that would require a Variance for different access. Having flexibility in unique situations is important. Developers may not go through with projects due to the cost of a variance.
- A participant gave an example of where an exception to alley access makes sense in Spenard. In that area, the road is only 25 feet wide, and the alley is not constructed because of a large ravine. The alley doesn't connect to all lots (middle lots) and does to the ones on the side. That is an example of property I would ask for an exception since the ravine is steep to build the alley. There are lots with grade separation issues. The exception should address topography or grade as a factor.
- Another example provided was Coastal Place, a multifamily development in Bootleggers Cove that used access to both the alley and front parking garage. Another example was a Fairview CompACT design competition entry that had a duplex taking access from the alley and a third unit in an ADU on the site taking access with a 12-foot front driveway to the street.
- The requirement for alley access should apply anywhere in town where there is an alley. Encourage alley access in all parts of the Municipality, not just urban neighborhoods.

Make a reasonable attempt in all areas to access from the alley, when it's available. However, alley access should not be required if the alley is not developed.

- There are places with existing alleys, but they were not developed to any sort of standard and adding more traffic would be very problematic. The rest of the neighborhood also had developed with direct access from the street. I would give exceptions in those instances. For instance, there are some gravel alleys in the Klatt area.
- The issue seems to be that there is no mechanism in administrative relief process to give public notice and make this decision through a public process. The alley access waiver should be elevated to a public process, with notice and opportunity to comment by neighbors. Neighbors want to know in advance, not after the fact.
- Neighborhood representatives wanted that exception to be available, but to have a higher bar to receive the exception. Participants discussed the idea of a mailed notice would be sent to everyone within 500 feet, with opportunity to comment to the Director. The Director would have the opportunity to understand the neighborhood viewpoint about the exception. The existing Title 21 Administrative Variance process in Code that requires mailings. A potential compromise could be to have the administrative exceptions to alley access be a type of Administrative Variance.

Limitations on Shared Driveway Widths Across Lot Lines (i.e. duplexes) in Urban Neighborhoods:

- Staff asked about shared driveways across a lot line. The Code amendments propose a limit to the combined width of these shared driveways of 24 feet in urban neighborhoods. Would 24 feet cause issues? Answer from one participant: The Municipality has allowed paired driveways. A limit of 28 feet was what MOA aimed for in the past. The issue is if MOA restricts the driveway width, people end up driving on the lawn or curb if there is room.

Backing out directly into alley from parking space:

- Drivers need to be able to back out a little to see what is coming in the alley.
- Not aware of any cases where the applicant couldn't use the full alley for their turning and maneuvering aside from one commercial development using it for loading. Do not see it being as big an issue for residential uses. There could be problems with some commercial uses, where commercial developments would obstruct the alley for the other users. People are allowed to obstruct an alley for a period of time, by Code, for loading and unloading. So there could be a built-in conflict with parking accessed from the alley.

Commercial driveways:

- Staff noted that the minimum width of commercial driveways has not been proposed for changes. Attendees agreed with this because commercial driveways often need to account for larger loading trucks, etc. An attendee stated they were not sure how a narrower driveway could work for commercial uses or be necessary.

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Title 21 Site Access Amendment (PZC Case 2023-0011):

Urban Neighborhood Focus Group Consultation

Friday, January 27, 2023

Attendees: Lindsey Hajduk, Allen Kemplen, John Thurber, Tom Davis (staff)

Attendees:

- Lindsey Hajduk, Allen Kemplen, John Thurber

Agenda Items:

This amendment distinguishes urban neighborhoods from suburban neighborhood contexts, and consolidates, simplifies, and revises existing Title 21 site access standards in the following public hearing draft sections, as provided in *Attachment 1: Annotated Code Amendments*:

- 21.07.010E., *Urban Neighborhood Development Context Area* (Attachment 1, pp. 3-5).
- 21.07.060F., *Pedestrian Frontage Standard* (Attachment 1, pp. 8-10).
- 21.07.060G., *Pedestrian Amenities Menu* (Attachment 1, pp. 11-17).
- 21.07.090H.8 through H.11., *Vehicle Access and Circulation* (Attachment 1, pp. 18-25).

Items re: Changes to Driveway Standards:

1. 21.07.090.H.9.b., *Alley Access Requirement* (Attachment 1, page 19, lines 11-28):
 - Refers to the Urban Neighborhood Area map in 21.07.010E. instead of the *2040 Plan*.
 - It now states that “vehicle access shall take place from the alley, except...”
 - One 12-foot-wide front driveway per 50-feet of frontage is allowed as an exception.
 - Approval process for bigger exceptions should be elevated to require public notice.
2. 21.07.090H.10.d., *Vehicle Maneuvering* (Attach. 1: Page 20, line 25 through page 21, line 21)
 - Paragraph ii. exempts up to four multifamily parking spaces from on-site turnarounds.
 - Paragraph iii. exempts alley parking spaces from on-site maneuvering requirements.
3. 21.07.090H.11.b., *Curb Openings and Public Walkway* (Attachment 1, page 22, lines 20-23)
 - In Urban Neighborhood Context Area, sidewalks must be restored to level walking grade “to the extent reasonably feasible.”
4. 21.07.090H.11.d., *Minimum Driveway Width* (Attachment 1, page 23, lines 19-38)
 - Paragraph i. and ii. clarify certain requirements do not apply to internal driveways.
 - Paragraph iv. exception allowing 1-lane 2-way driveway for small multifamily infill.
 - Paragraph v. exception reducing minimum driveway widths to 10 (1-lane) or 20 feet.

Items re: Changes to Pedestrian Frontage Standards:

5. 21.07.060F., *Table 21.07-2, Rows A & B: Front Parking Lots and Garages* (Attachment 1, p. 9):
 - For urban neighborhood lots that have alleys, no parking lot is allowed in front of any residential or commercial building, excepting residences’ 12-foot-wide driveways.
 - For urban neighborhood lots without alleys, at least half of the building façade must not have parking facility in front of it. This limits how much of the front yard in

- between the building and the sidewalk can be parking and encourages buildings to engage the street with parking lots located beside or behind.
- In urban neighborhoods, Row B limits the maximum allowed garage width to 40% of façade width, except 2-family (duplexes) would keep current allowances in the R-2 zoning districts.
 - For urban lots with alleys, current 10-foot garage door width maximum for lots with alleys is removed.

6. 21.07.060F., *Table 21.07-2*, Rows D, E, and F: Street Facing Windows and Entries (Attachment 1, page 9):
 - Row D: Expands the window requirements for mixed-use developments and developments that received reduced parking reductions to apply to most other commercial uses.
 - Row E: Increases residential the window requirements in the Urban Neighborhood Context Area.
 - Row F: Retains the covered, visible entry requirement for residential uses, and expands the requirement for a visible front entrance to most commercial uses.
 - Table Footnote 2: Consolidates the rules for measuring window area are consolidated and clarified in Title 21 rules of interpretation, for consistent application for all uses.
7. 21.07.060F., *Tables 21.07-2 and 21.07-3*: Tailoring Standards by Neighborhood and Street Typologies (Attachment 1, pages 9-10):
 - Revising the Urban Neighborhood Context Areas map to recognize which urban neighborhoods have a more defined, or traditional, urban neighborhood form.
 - Revising the Urban Neighborhood Context Areas map to show all the relevant transportation links, and to differentiate street types oriented to pedestrians and transit usage.
 - e.g., Transit-supportive Development Corridors
 - e.g., *Spenard Corridor Plan* Street-Edge Character types: Main Street, Mixed-use Street, Transit Corridor.
 - Tailoring Pedestrian Frontage Standards by neighborhood context, land use, and street types based on the enhanced map.
 - e.g., an increased window requirement on commercial pedestrian streets.
 - Incorporation of additional standards and incentives related to Anchorage's sub-arctic climate.
 - e.g., replacement of minimum setbacks with maximum setbacks.
 - e.g., requiring pedestrian protection features such as colonnades.

Neighborhood Focus Group Consultation Meeting Notes

Comments from this meeting are organized by the four main recommendations of the Public Hearing Draft Site Access Amendments described in the Staff Report Memorandum. See the comment-response table for staff responses to the comments.

1. Create an Urban Neighborhood Context Area

Neighborhood Overlay Districts / TND Districts:

- Add language to the site access amendments that gives precedence to anticipated future overlay zoning for traditional urban neighborhoods. The goal is that form-based codes such as envisioned in the Fairview Neighborhood Plan will provide tailored regulatory regime that fits the TND contexts. Allow the site access amendments to be superseded by these specific overlays that are called for in the Comp Plan and neighborhood plans.

Delineation of Urban Neighborhood Contexts:

- Support for delineating and recognizing urban neighborhood contexts in Title 21. Urban neighborhoods are built to have and want to have a much greater orientation toward pedestrian space than in many outlying suburban neighborhoods. The proposed Urban Neighborhood Development Context Area covers a lot of different types of urban neighborhood environments. Sooner or later Title 21 needs to provide further delineation of traditional urban neighborhoods as distinct from other urban neighborhoods than the overall general category of Urban can provide.
- The Assembly adopted neighborhood plans to recognize distinct neighborhoods and adjust the code to reflect those.

2. Improve Site Access for Pedestrian and Alternative Transportation

Pedestrian Frontage Standard:

- Clarify what the interface between the building and the street is supposed to be like. What does it look like? What does it include—pedestrian spaces? Landscaping? The public hearing draft pedestrian frontage standard is not clear about intended outcomes. It is hard to visualize the possible outcomes of the 50% standard in Row A of Table 21.07-2. Establish more definitive statements about traditional urban neighborhoods with alley access. Give better visual guidance regarding what we want the outcomes to be.
- It is difficult to know how well the 100% standard (i.e., no parking in front of any part of the building) would work in context of some multifamily development examples in Spenard. Will the 100% or even 50% standard work on small infill lots?
- Eliminate minimum setbacks: Since the MOA has eliminated parking minimums, it should also eliminate minimum setbacks in the traditional urban neighborhoods and commercial districts such as in Fairview.

Sidewalks: Sidewalks should be required in more zoning districts than just the highest density zones. For example, recent high-end multifamily developments in Bootleggers Cove, zoned R-3, should have been required to add sidewalks.

Garage Facades: No garages should be allowed on front facades of new development, on traditional urban lots with alley access in Fairview and South Addition. New development should trend away from garages in front.

3. Right-size Driveway, Alley Access, and On-Site Circulation Requirements

Alley Access Requirement:

- Support removing the by-right entitlement to have 12-foot wide front driveways, and change that to an exception for hardship cases. Alley is intended to provide for utility uses, including parking. As the urban form is evolving to reduce driving and parking, the city should change the intended way of accessing lots to put vehicle access in the back, and emphasize non-motorized access in front and people oriented spaces along the street edge.
- Allow new multifamily development (e.g., a 3- or 4-plex, in the Spenard neighborhood context to have some driveway access to the street. There are also existing single-family homes and developments that have driveways.
- Provide an incentive for developments that use only the alley for vehicle access. Allow buildings to encroach into the front minimum setback, to be closer to the street and provide more buildable space on the lot.
- There are a lot of unpaved and poorly improved alleys in Spenard. The infrastructure is lacking. Won't requiring more parking facilities accessing the alley create problems?



Municipality of Anchorage



Planning Department

Comment Response – Title 21 Site Access Text Amendments

Responses to Comments

The table that follows summarizes the Department's responses to written comments received and comments made during the focus group meetings for the Title 21 Site Access Text Amendments proposed in Planning and Zoning Commission Case 2023-0011:

Public Comment	Response
1. Create a new administrative variance for exceptions to alley access. This would require public notice and comment, but would not require a public hearing. It strikes a balance to respond to neighborhood concerns while not being overly restrictive to special situations (Focus Group Comment).	<p>The Department agrees and suggests two amendments to the Public Hearing Draft to delete the administrative exemption in the Alley Access Requirement code section and instead add alley access as a new category for Administrative Variances. These code changes are reflected in Amendments #1 and #7 in the staff report.</p> <p><u>Amendment #1:</u></p> <p>J. Administrative Variances</p> <p style="text-align: center;">*** *** ***</p> <p>7. <u>For Front Driveways on Multifamily or Townhouse Lots with Alleys</u> <u>Where a multifamily or townhouse development site is served by an alley in the Urban Neighborhood Development Context (21.07.010E.), the director and traffic engineer may grant an administrative variance from subsection 21.07.090H.9.b., Alley Access Requirement, provided:</u></p> <p>a. <u>There exist physical circumstances of the subject property such as topography, absence of alley improvements, exceptional lot configuration not shared by landowners in general, or adjoining street traffic patterns, and the traffic engineer determines that alley improvement and/or vehicle access are not feasible or would create a traffic impact or safety hazard;</u></p> <p>b. <u>Because of these physical circumstances, the strict application of the alley access requirement in 21.07.090H.9.b. would create an exceptional or undue hardship upon the property owner, and would deprive the owner of rights commonly enjoyed by other properties in the same zoning district;</u></p> <p>c. <u>The hardship is not self-imposed, the conditions and circumstances do not result from the actions of the applicant,</u></p>

Public Comment	Response				
	<p style="text-align: right;"><u>and such conditions and circumstances do not merely constitute inconvenience; and</u></p> <p class="list-item-l1">d. <u>The administrative variance granted for additional driveway access shall be the minimum the traffic engineer determines is necessary to provide access for the development.</u></p> <p><u>Amendment #7:</u></p> <p class="list-item-l1">iii. <u>The director and traffic engineer may approve an administrative variance from the requirements of this subsection, as provided in 21.03.180J.7.</u></p>				
2. Make the Urban Neighborhood Context Area Map easier to read (Focus Group Comment).	<p>The Department agrees and recommends Amendment #2 in the staff report:</p> <p><u>Amendment #2:</u> Refine Subsection 21.07.010E.3., <i>Urban Neighborhood Development Context Area Established, Map 21.07-1</i>, to clarify the streets and other landmarks in the map that form the boundaries of the Urban Neighborhood Development Context Area in the map. Edit the text of the map description in E.3. as necessary to assist with the clarification.</p>				
3. In Section 21.07.060F., <i>Pedestrian Frontage Standard</i> , clarify the illustration. Also clarify Row A in <i>Table 21.07-3</i> to clarify what is allowed and prohibited between the building façade and the street. (Focus Group Comment).	<p>The Department agrees and recommends Amendment #3 in the staff packet:</p> <p><u>Amendment #3:</u> Adjust the left-hand illustration above Table 21.07-2, to depict the intent for there to be pedestrian space and landscaping rather than parking in front of the building. Revise the left-hand column of Row A in Tables 21.07-2 and 21.07-3 (Attachment 3as follows):</p> <table border="1" data-bbox="752 1586 1449 1839"> <thead> <tr> <th data-bbox="752 1586 1449 1664">Site Elements for Pedestrian-Oriented Frontages</th> <th data-bbox="752 1664 1449 1839">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="752 1664 1171 1839">A. Minimum required ground-floor, street-facing building elevation with <u>on-site walkways, pedestrian amenities, or landscaping in front—and no off-street automobile parking or circulation [WITHOUT DRIVEWAYS OR PARKING FACILITIES IN FRONT].</u></td> <td data-bbox="1171 1664 1449 1839"> <u>50% of building elevation width¹</u> <u>Lost with alley access: no parking allowed in front of building except in driveways for individual dwellings</u> </td> </tr> </tbody> </table>	Site Elements for Pedestrian-Oriented Frontages	Standard	A. Minimum required ground-floor, street-facing building elevation with <u>on-site walkways, pedestrian amenities, or landscaping in front—and no off-street automobile parking or circulation [WITHOUT DRIVEWAYS OR PARKING FACILITIES IN FRONT].</u>	<u>50% of building elevation width¹</u> <u>Lost with alley access: no parking allowed in front of building except in driveways for individual dwellings</u>
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4. The driveway width exception in the footnote 1 of <i>Subsection 21.07.060F.4., Table</i>	<p>The Department agrees and recommends Amendment #4 in the staff packet:</p> <p><u>Amendment #4:</u></p>				

Public Comment	Response				
21.07-2 in for duplexes should be more flexible. (Focus Group Comment).	<p>¹ Exception: On lots without alley access in R-2A, R-2D, and R-2M zoning districts, two-family (duplex) developments may have a minimum of <u>20%</u>[25%] in A. above and a maximum of 67% in B. above.</p>				
5. Remove the prohibition against projecting garages in urban neighborhoods with alleys in Subsection 21.07.060F.4., <i>Table 21.07-2.</i> (Focus Group Comment).	<p>The Department agrees and recommends Amendment #5 in the staff packet:</p> <p>Amendment #5: Subsection 21.07.060F.4., <i>Table 21.07-2.</i> (Attachment 3, page 9)</p> <table border="1" data-bbox="670 756 1356 1009"> <tr> <td style="text-align: center;">Site Elements for Pedestrian-Oriented Frontages</td> <td style="text-align: center;">Standard</td> </tr> <tr> <td>C. Maximum allowed distance a garage may project out in front of the rest of the street-facing residential building elevation <i>(No change to this language in right-hand column.)</i></td> <td>[NONE ALLOWED ON LOTS WITH ALLEY ACCESS] <i>(No change to the rest of the standard in right-hand column.)</i></td> </tr> </table>	Site Elements for Pedestrian-Oriented Frontages	Standard	C. Maximum allowed distance a garage may project out in front of the rest of the street-facing residential building elevation <i>(No change to this language in right-hand column.)</i>	[NONE ALLOWED ON LOTS WITH ALLEY ACCESS] <i>(No change to the rest of the standard in right-hand column.)</i>
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6. Amend Subsection 21.07.090H.9.d., <i>Paired Residential Driveways Allowed</i> , by increasing the maximum combined width of the paired driveway from 24 feet. (Focus Group Comment).	<p>The Department agrees and recommends Amendment #8 in the staff packet. This relaxation of the proposed standard to 28 feet reflects existing/past practices in Traffic Engineering administrative review of paired driveways, in consideration of street snow clearing operational needs.</p> <p>Amendment #8: Amend Subsection 21.07.090H.9.d., <i>Paired Residential Driveways Allowed</i> (Attachment 3, page 19, lines 37-40), by changing the maximum combined width of the paired driveway from 24 feet to, “<u>28 feet, provided other standards of this section are met.</u>”</p>				
7. Amend Subsection 21.07.090H.9.e., <i>Residential Garage Setback</i> to ensure adequate review of garages that are not set back a standard parking space. This will avoid potential issues with a vehicle parked in a driveway and sticking into the street. (Focus Group Comment).	<p>The Department agrees and recommends Amendment #9 in the staff packet. The first replacement sentence below improves the flexibility of the proposed standard, clarifies its intent, and makes it generally applicable. The second sentence below clarifies the current practice of the Municipality to require garage doors to be set back 4 feet from streets and alleys to ensure adequate site distance.</p> <p>Amendment #9: Amend Subsection 21.07.090H.9.e., <i>Residential Garage Setback</i> (Attachment 3, page 20, lines 5-9), by replacing its content with the language below:</p> <p class="list-item-l1">e. <u><i>Garage Door Setbacks. Street-facing garage bay doors that are proposed to be set back from the public right-of-way by less than the length of a standard parking space (as defined in table 21.07-8, Parking Angle, Stall, and Aisle</i></u></p>				

Public Comment	Response
	<p><u>Dimensions)</u> shall be reviewed and approved by the Traffic Engineer, unless there is a sign posted for “no parking”. Garages shall be set back from public rights-of-way including alleys by at least four feet unless the traffic engineer approves otherwise, to ensure adequate site distance for turning and maneuvering.</p>
8. Make sure minimum driveway widths meet fire safety and other regulations. It should be clear that Title 21 is not the only stipulation for driveway widths at construction. (Focus Group Comment).	<p>The Department agrees and recommends Amendment #10 in the staff packet. This amendment adds a reference to other applicable codes covering minimum driveway widths.</p> <p><u>Amendment #10:</u> Clarify Subsection 21.07.090H.11.d.vi., <i>Minimum Driveway Width</i> (Attachment 3, page 23, lines 35-38) by adding the following: <u>Minimum driveway widths are also subject to other applicable codes, including the Fire Code.</u></p>
9. The Right of Way Section had concerns for the recent reduction in off-street parking and snow removal but did not provide specific direction for the site access code amendments. Right of Way wrote, “snow removal should be a high priority when developmental standards are implemented”. Right of Way also called for mass transit, regional parking structures, and pedestrian corridors to avoid a burden on the community and taxpayer as related to reducing minimum parking requirements.	<p>These comments are noted. These comments apply to parking. The Assembly recently approved funds for a Street Management Study that may address some of these concerns.</p>
10. Allen Kempelen, President of the Fairview Community Council, provided written comments as an individual. These comments call for	<p>These comments are noted. The creation of the Urban Neighborhood Context Area does not prevent future area-specific overlay zones or revised zoning districts that can provide regulations for different urban neighborhoods and pedestrian streets, as called for in the <i>Anchorage 2040 Land Use Plan</i> and area-specific plans such as the <i>Fairview Neighborhood Plan</i> and <i>Spenard Corridor Plan</i>. The recognition of urban neighborhoods in the public hearing draft amendments is a step</p>

Public Comment	Response
Anchorage to become a model subarctic city. There was a recommendation to ensure the specific overlay zone called for in the <i>Fairview Neighborhood Plan</i> may still be implemented at some point in the future.	forward that could support further delineation of different urban neighborhoods and pedestrian street-environments in Title 21.
11. Traffic Engineering Department, Anchorage Water and Wastewater Utility (AWWU), Private Development, and State of Alaska Department of Transportation and Public Facilities (DOT&PF) provided written comments of support, no comment, or no objection.	These comments of support, no comment, or no objection are noted.

Staff Correction Amendments

Amendments #6 and #11 in the staff report are Department corrections to the Public Hearing Draft of the Title 21 Site Access Amendments.