

# *Municipality of Anchorage*

## MEMORANDUM

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**DATE:** August 28, 2008

**TO:** Planning and Zoning Commission

**FROM:** Tom Nelson, Planning Director

**SUBJECT:** Case No. 2007-153; Issue Response for Chapter 21.07, sections 060, 070, and 090 of Title 21 Rewrite

**1. Issue:** 21.07.060, *Transportation & Connectivity*

This section needs to address the cumulative traffic impacts and how to apportion them among sequential development projects, so that the first-up projects don't soak up all the traffic capacity without contributing to the upgrades that will be necessitated as additional developments are proposed.

**Staff Response:** Traffic planning processes, including the Long Range Transportation Plan and the Official Streets and Highways Plan, examine build-out possibilities and plan for appropriate street designations, capacity upgrades, and other transportation impacts. When a development is required to do a Traffic Impact Analysis (TIA), they determine the traffic impacts of their proposed development and mitigation measures to maintain the pre-development level of service. Future developments may need to go through the same process. Thresholds for requiring a TIA can be found in the Traffic Department's Traffic Impact Analysis Policy at

<http://www.muni.org/iceimages/traffic/TIA%20Requirements%20Outline%2012-11-06.pdf>. Developments that do not require a TIA still receive a traffic department review.

**Staff Recommendation:** No changes recommended.

**2. Issue:** 21.07.060, *Transportation & Connectivity*

The division (Environmental Services Division) recommends that noise impact on surrounding areas be considered with the traffic impact analysis and the traffic mitigation measures.

**Staff Response:** Traffic noise is not mentioned in the Traffic Department's Traffic Impact Analysis Policy. This issue could be addressed outside of Title 21, through changes to that policy. Note that noise issues caused by a nonresidential development (including the traffic it

causes) near a residential development can be mitigated through the Neighborhood Protection Section (21.07.070).

**Staff Recommendation:** No changes recommended.

**3. Issue:** 21.07.060.E.2.c, *Sidewalks*

It is reasonable to require sidewalks along all new local streets.

Sidewalks should also be required along all reconstructed streets, and along all rehabilitated streets. Rehabilitation work often lasts ten years or more and it is most efficient to add pedestrian facilities while working on the road bed.

It is not clear why only the R-4 and R-4A residential districts are called out for requiring sidewalks when 125 foot of frontage is developed or redeveloped. Surely, R-3 and even R-2M districts would benefit from the same requirement.

Include sidewalks on local streets regardless of street frontage of a given property. Delete 125 foot standard.

**Staff Response:** The intent of this section was not to exempt reconstructed/rehabilitated streets from installing sidewalks. We are working with the Traffic Department and the Project Management and Engineering Department to clearly define “reconstruction”. If a street is just being resurfaced, adding sidewalks would not be a logical part of the project.

The difficult question was what should happen when an infill project or redevelopment project happens along a street without a sidewalk. The applicability of the Transportation and Connectivity section is to all development in the municipality. If a single-family homeowner puts an addition on the house, should she or he have to add a section of sidewalk along their lot, with no other sidewalk sections on the block? Staff felt that the answer in that situation is no. We discussed what sort of redevelopment or infill should trigger adding sidewalks in situations where there are none.

**Staff Recommendation:** HOLD

**4. Issue:** 21.07.060A., *Purpose*

Insert the word “safe” in the line to create “is to support the safe creation of a highly connected...”

**Staff Response:** Staff presumes the commenter means that the transportation system should be safe, rather than the creation of it (that should be safe as well, but is not regulated through Title 21). Staff does not object to clarifying this.

**Staff Recommendation:** Page 34, lines 13-15, amend to read, “The purpose of this section 21.07.060 is to support the creation of a safe and highly connected transportation system within the municipality in order to provide choices for drivers, bicyclists, and pedestrians;...”

5. **Issue:** 21.07.060A., *Purpose*

Insert “neighborhoods and” between the words “serve” and “regional”.

Last line states intent to “free up arterial capacity to better serve long-distance regional needs”. This sounds like promotion of commuting; but in the intended compact land use areas such as the major employment centers and the transit corridors, that language works in opposition to the intent of multi-modal short-trip travel. It could be used to limit bus routes and make it more difficult for short, direct local trips. Delete that phrase, or modify it 6 Add language: Improvements to the transportation network shall meet the intent of improving both local and regional connectivity and supporting adjoining land uses; and where high-volume, fast-moving, or heavy vehicle traffic is contemplated, transportation projects must adequately serve local circulation and minimize impacts to adjoining uses.

**Staff Response:** Arterials are not generally intended to serve neighborhoods. The Official Streets and Highways Plan says, “The first and most important function of arterials is to move large volumes of vehicles and goods. Usually they accommodate longer trips, as from one part of the community to another. Access to adjacent lands should be a secondary consideration for an arterial.” The statement is not a promotion of commuting, but a recognition of the fact that cross-town trips will continue to occur, even with more compact and pedestrian friendly land development. The statement needs to be taken in balance with the other statements made in the section about the section’s purpose.

**Staff Recommendation:** No changes recommended.

6. **Issue:** 21.07.060C., *Traffic Impact Mitigation*

Add a new subsection 4 that acknowledges that in some areas, roads and other travel improvements cannot be retro-fitted or built to accommodate the cumulative load of vehicle traffic in an area at acceptable levels of service, safety, or environmental impact, within the near or intermediate term of five years. The factors to be considered in making this projection include: adequacy of ROW or easements, terrain, soils, complexity/timetable for infrastructure construction, and lack of surety of funding. In these instances, the traffic mitigation from a proposed development may include reduced density or size of the development; phasing of the development to match infrastructure improvements; off-site improvements; or employer-funded transit service or similar strong, effective inducements to reduce vehicle traffic.

**Staff Response:** The developer is required to pay for and complete any required mitigation measures, so if the developer lacks surety of funding, then the development cannot proceed. If more ROW is required, then the developer would need to purchase the ROW. If a road exists already that is being retro-fitted, it is unlikely that the terrain or soils would prevent it from being widened. The proposed section seems unnecessary. However, in section C which addresses possible mitigation measures, one of the possible measures mentioned in the Traffic Department’s TIA policy should be included.

**Staff Recommendation:** Page 35, lines 16-20, amend to read, “Mitigation measures shall be acceptable to the traffic engineer and may include, without limitation: an access management

plan; transportation demand management measures; a reduction in the intensity or size of the proposed development; street improvements on or off the site; placement of pedestrian, bicycle, or transit facilities on or off the site; or other capital improvement projects such as traffic calming infrastructure or capacity improvements.”

**7. Issue:** 21.07.060C.1.-3., *Traffic Impact Mitigation*

Mitigation measures must include ‘no-build’ and lower density options. Insert these options because the larger neighborhood should not have its safety impacted by inadequate infrastructure when development occurs beyond the capacity to handle it. Development must carry the responsibility to not impact the safety of those already there. With areas of steep slopes and limited space for the usual mitigation measures, the ‘no-build’ and lower density option must be considered.

**Staff Response:** See previous issue and proposed amendment.

**Staff Recommendation:** See Issue #6.

**8. Issue:** 21.07.060C.1.a., *Traffic Impact Analysis Required*

The State of Alaska has codified their requirements for a Traffic Impact Analysis. A policy is not subject to the same level of scrutiny as the code is and is subject to change much more frequently. Section 21.07.060C.2.b requires that a TIA follow state regulations as defined in 17 AAC 10.095. Why add to the problem with our own TIA policy when we only require that they meet the state requirement?

**Staff Response:** Developments along state-owned roads must meet the state TIA requirements. Developments not on state-owned roads must meet the municipality’s TIA requirements. The state-owned roads within the municipality are all either highways or major roads. The city-owned roads vary from being major roads to being small local roads and alleys. The Traffic Department has developed its criteria for TIAs based on the information they need to adequately review a development proposal.

**Staff Recommendation:** No changes recommended.

**9. Issue:** 21.07.060C.1.c., *Traffic Impact Analysis Required*

Please clarify under what conditions the traffic engineer could waive a Traffic Impact Analysis.

Is a traffic loophole that I would delete. A TIA (Traffic Impact Analysis) is standard for any new substantial development to help determine what measures should be taken to remedy traffic impacts to the surrounding neighborhood. I have seen abuse of waivers in the past when the city manager is allowed to waive a regulation to allow alcohol in the parks which is normally prohibited. It appears that this section on TIAs will allow the city traffic engineer to waive the TIA if he/she deems it unnecessary. Waiving a transportation analysis is irresponsible considering our goals to mitigate the impact of traffic from new development.

**Staff Response:** It is difficult to list out criteria for situations where the traffic engineer may waive a TIA. The Traffic Department’s TIA policy states that the Traffic Engineer may require a TIA for development under the usual TIA threshold based on “location and engineering judgment”—it seems reasonable that any waiver would be based on the same sort of reasons.

TIAs usually cost between \$30,000 and \$45,000. If the Traffic Department, based on their professional judgment, deems a TIA to be unnecessary, why should such a cost be imposed? Even without a TIA, the Traffic Department reviews the development and can still require impact mitigation.

**Staff Recommendation:** Page 34, lines 37-38, amend to read, “The director, unless the traffic engineer, based on location and engineering judgment, deems it unnecessary through a waiver, requires a TIA for:”

**10. Issue:** 21.07.060C.1.c. & C.3., *Traffic Impact Analysis Required and Traffic Mitigation Measures*

TIA criteria should also include:

1. infrastructure to precede development (roads, trails, separated pathways),
2. reduced density be considered as a mitigation factor when road design cannot accommodate increased traffic

**Staff Response:** See Issue #6.

**Staff Recommendation:** See Issue #6.

**11. Issue:** 21.07.060D., *Streets and On-Site Vehicular Circulation*

A key factor in maintaining a physically active lifestyle is access to area parks and community space which includes sidewalks and green spaces. Several segments of the public review document address pedestrian mobility. The division (Health Planning and Preparedness Division) supports the inclusion of continuous pedestrian access for single- and two-family development. In addition we applaud the inclusion of flexible standards for required pedestrian- and bicycle-friendly amenities that improve access while enhancing the community.

**12. Issue:** 21.07.060D.3., *Street Connectivity*

Existing Cul de sacs should have connections to other cul de sac or collector streets; please retain paragraph about cul de sacs. We are trying to connect people instead of isolate them. If someone can walk to an adjacent property instead of drive, all the better

**Staff Response:** Subsection 21.07.060D.3.b.iv. requires a pedestrian access easement from the end of a cul-de-sac to the neighboring property, assuming the configuration of the neighboring property can accommodate such access.

**Staff Recommendation:** No changes recommended.

**13. Issue:** 21.07.060D.3.a., *Purpose*

Add words to give local neighborhoods protection from cut-through traffic:

“...to provide multiple direct connections for local neighborhood residents to and between local destinations such as parks, schools, and shopping provided that traffic speeds and volumes are moderated to retain pedestrian safety and quality of life for properties adjoining the connecting streets. These connections should knit separate development together, rather than forming barriers between them, but should not serve cut-through traffic from outside the local neighborhood, nor serve for routine freight movement.

Please add language to ensure that flow on neighborhood streets is for local neighborhood residents with traffic calming appropriate for pedestrian safety and the quality of outdoor use of the neighborhood, and with restrictions on freight or commercial traffic.

**Staff Response:** The department recognizes that cut-through traffic is undesirable for neighborhoods and should be discouraged. The design of new subdivisions needs to find a balance between connectivity and not promoting cut-through traffic. Unfortunately, those road patterns that offer the most choices and convenience for residents of a neighborhood also can create opportunities for cut-through traffic. Fortunately, more connectivity promotes alternate transportation choices, and spreads traffic out among a number of routes, thus reducing traffic congestion and the frustration that leads to drivers choosing to cut through neighborhoods. The department proposes the following amendment to address the issue of cut-through traffic.

**Staff Recommendation:** Page 35, lines 32-41, amend to read, “Street and block patterns should include a clear hierarchy of well-connected streets that distribute traffic over multiple streets and avoid traffic congestion on principal routes. Within each residential development, the access and circulation system and a grid of street blocks should accommodate the safe, efficient, and convenient movement of vehicles, bicycles, and pedestrians through the development, and provide ample opportunities for linking adjacent neighborhoods, properties, and land uses. Local neighborhood street systems are intended to provide multiple direct connections to and between local destinations such as parks, schools, and shopping. These connections should knit separate developments together, rather than forming barriers between them. This section is not intended to increase speed limits in neighborhoods, create opportunities for cut-through traffic, or encourage freight movement through residential areas.”

**14. Issue:** 21.07.060D.3.b., *Internal Street Connectivity (Connectivity Index)*

The connectivity index is a new concept which should be thoroughly discussed with the development community prior to adoption. Establishing an index of 1.4 may be too low or too high and should be tested against existing developments to determine how the index would have impacted those developments. Figure 21.07-1 shows a development that would not meet the requirements of this section, yet the design seems to work. In fact theoretically, it would

seem that if the links are stretches of roads that connect to intersections of nodes, a ratio of 1.4 would be virtually impossible to attain except in small developments. Perhaps it would be possible to develop Figure 21.07-2 to show how Figure 21.07-1 could be brought into compliance.

The connectivity index standard is 1.4 or greater. As noted in Section 21.07.060D.3.b.ii the configuration in the illustration shows 9 nodes (stars) and 11 links (circles);  $11/9=1.22$  not 1.4. Please provide an illustration exhibiting the correct connectivity. Please note that this requirement does not work for a smaller grid style block layout either. Example: development of a single city block would result in four nodes and four links for a CI of  $4/4=1.0$ . Request that the standard be lowered to 1.0 or 1.2.

**Staff Response:** Department staff is researching connectivity in Anchorage and fine tuning the connectivity index and the illustration.

**Staff Recommendation:** HOLD

**15. Issue:** 21.07.060D.3.b.iv., *Internal Street Connectivity (Connectivity Index)*

Delete “to the extent reasonably feasible.” The rest of the paragraph explain what’s not feasible. A general loophole for other claims is not needed.

Add at end of b iv: “Mid-section connections shall be required at intervals of ¼ mile to achieve and promote pedestrian access.”

**Staff Response:** Staff does not object to the first comment.

The language suggested in the second part does not make sense as part of a standard about cul-de-sacs.

**Staff Recommendation:** Page 36, lines 15-22, amend to read, “Whenever cul-de-sac streets are created, at least one 10 foot wide pedestrian access easement shall be provided[, TO THE EXTENT REASONABLY FEASIBLE,] between each cul-de-sac head or street turnaround and the sidewalk system of the closest adjacent street or pedestrian walkway. This requirement shall not apply where it would result in damage to or intrusion into significant natural areas such as stream corridors, wetlands, and steep slope areas, or if the configuration of existing adjacent development prevents such a connection.”

**16. Issue:** 21.07.060D.3.c.i., *External Street Connectivity*

Add to end of paragraph: “...include opportunities for such connections onto public lands such as parks where access needs may not yet be identified.” There have been instances in which the developer claimed that park land is generally undeveloped so access wouldn’t be needed now or in the future.

**Staff Response:** The proposed addition changes the meaning of the sentence so that connections to adjoining developed lands are only required if the adjoining lands are public lands. That is not the intent of this section. Staff proposes the following amendment to

clarify that connections to municipal parks may be appropriate. Note that connections to Chugach State Park are already accommodated in chapter 21.08.

**Staff Recommendation:** Page 36, lines 24-28, amend to read, “The arrangement of streets in a development shall provide for the alignment and continuation of existing or proposed streets into adjacent [ADJOINING] lands in those cases in which the adjacent [ADJOINING] lands are undeveloped and intended for future development or in which the adjacent [ADJOINING] lands are developed and include opportunities for such connections. Connections to adjacent municipal parks shall be required unless waived by the director of the Parks and Recreation Department.”

**17. Issue:** 21.07.060D.3.c.iii., *External Street Connectivity*

The requirement that signs indicate future road connections is good. A similar requirement should be in place for trails.

Please add a section on Standards for Bicycle Facilities back in or refer to the bike plan.

**Staff Response:** Bicycle connectivity is mentioned in the purpose statement of the section. A convenient on-street bicycle network depends on a convenient street network (one of the goals of this section) and bike lanes where appropriate, which is being determined through the bicycle plan. Off-street bicycle facilities are accommodated through trails, the trails plan, and other pedestrian sidewalk, walkway, and trail facilities, as required by this section. A specific reference to bike facilities or the bicycle plan does not add meaningful content to the section.

**Staff Recommendation:** No changes recommended.

**18. Issue:** 21.07.060D.3.f., *Neighborhood Protection from Cut-through Traffic*

Change the words shopping centers to retail centers?

Need performance standard to balance impacts to neighborhood with more traffic. Insert language regarding speed:

“...while maintaining speeds appropriate for the neighborhood character and minimizing cut-through vehicle traffic...”

“...traffic calming measures shall be used to moderate vehicles speeds and discourage use of the local street system for cut-through traffic...”

**Staff Response:** The intent of the phrase “shopping center” was not to imply “mall” or “town center”. Perhaps the phrase “shopping areas” would be more appropriate.

It is not a given that connectivity will create more traffic. Some neighborhood locations would have less traffic if the neighborhood had better connectivity.

Road speeds are not regulated through Title 21, and nothing in this section affects road speeds. Traffic calming measures often include speed reducing measures, but it is not necessary or appropriate to include that language here.

**Staff Recommendation:** Page 37, lines 25-28, amend to read, “Street connections shall connect neighborhoods to each other and to local destinations such as schools, parks, greenbelt trail systems, and shopping areas [CENTERS], while minimizing neighborhood cut-through vehicle traffic movements that are non-local in nature.”

**19. Issue:** 21.07.060E., *Standards for Pedestrian Facilities*

This section should cross-reference the pedestrian plan, which has both some design standards and some priorities for locating ped projects. There may be additional design subsections that need to reference the Ped Plan.

It is important to provide a safe mode of travel for pedestrians as they travel in the urban areas of the municipality. The division (Health Planning and Preparedness Division) supports the improvement requirements of class A zoning districts and collector streets that include street lighting and sidewalks on all streets regardless of the number of trips.

**Staff Response:** Department staff is reviewing the Pedestrian Plan to determine whether a reference is appropriate. Priorities for locating projects is not appropriate for Title 21, but the design standards may be.

**Staff Recommendation:** HOLD

**20. Issue:** 21.07.060E.2., *Sidewalks*

Add a subsection that acknowledges that installation of controlled pedestrian crossings should be triggered by the traffic volume and speed. If there are specific standards in the Ped Plan, reference them. Reference school pedestrian zone goals. If not, use national standards to insert standards here. E.g.: “for roads with peak hour traffic exceeding xxx vehicles, and or roads with traffic speeds over 25 mph within xx of a school, controlled pedestrian crossings shall be installed at trail crossings and signalized intersections. On collectors and minor arterials, pedestrian crossings shall be installed at intervals of xxxx.” On major arterials and freeways...”

**Staff Response:** Title 21 does not govern the standards for developing roadways. It does set the standards for right-of-way width, but what goes in the right-of-way, including pedestrian crossings, is determined by the Official Streets and Highways Plan and the Design Criteria Manual.

**Staff Recommendation:** No changes recommended.

**21. Issue:** 21.07.060E.2.b., *Sidewalks*

The requirement for sidewalks on both sides of arterials was deleted. This should be reinstated.

**Staff Response:** Arterials are designed and built with a sidewalk on one side and a trail on the other.

**Staff Recommendation:** Page 37, line 44, add a new 2.b. and re-letter remaining:  
“Sidewalks shall be installed on both sides of all arterial streets. In some situations, a trail may replace a sidewalk on one side.”

**22. Issue:** 21.07.060E.2.c., *Sidewalks*

AHBA request that the threshold for providing sidewalks be based on the housing density proposed in a new development. We recommend that the following schedule be reviewed and adopted. New developments, with only local streets, of 17 or less dwelling units no sidewalks are required; from 18 to 36 units a sidewalk shall be provided on one side of the local street; for developments of 37 or more units sidewalks shall be provided on both sides of the street.

**Staff Response:** One of the major themes of recent planning documents is the goal of making Anchorage a more walkable community. Sidewalks are vital for safe pedestrian movement, particularly for children walking to school. Providing safe transportation alternatives will benefit public health, improve air quality, and reduce traffic congestion.

**Staff Recommendation:** No changes recommended.

**23. Issue:** 21.07.060E.2.d., *Sidewalks*

On these collectors with one-side only sidewalks, insert “but pedestrian crossings shall be provided at intersections, with controlled crossings for collectors with peak hourly traffic exceeding xxx vehicles.”

**Staff Response:** Appropriate pedestrian crossings are designed through a road project, following the guidance of the Design Criteria Manual.

**Staff Recommendation:** No changes recommended.

**24. Issue:** 21.07.060E.2.e., *Sidewalks*

The option for one-sided walkways in steep slope areas should not be adopted without discussing the fact that the Transportation Dept. attempts to have all roads built with no more than an 8% grade, thus the sidewalks would also be no more than 8%. While reducing excessive slope disturbance is a consideration in some areas, this must not end up being a loophole for inadequate pedestrian facilities. Additionally, there must be flexibility to have the walkway on the uphill side of slopes with the houses on the downhill side of the road in order to increase safety for pedestrians. Please be aware that the MOA adheres to the US Forest Service guidelines for trail construction which allows up to 20% grade for short segments of trails.

**Staff Response:** While the road grade is limited, the side slope may be quite steep, and increased grading for pedestrian facilities on both sides of a road may drastically increase the slope disturbance and potential erosion and drainage problems. In large lot areas along local streets, there is much less traffic than in more dense areas, so a sidewalk on only one side of the road may be justified.

**Staff Recommendation:** No changes recommended.

**25. Issue:** 21.07.060E.4.b.i. and iii., *On-site Pedestrian Walkways*

In keeping with the above, request providing walkways to those streets with sidewalks.

**Staff Response:** Subsection 21.07.060E.4.b.i. requires walkways from primary entrances to all abutting street frontages, whether or not there is a sidewalk along the street.

**Staff Recommendation:** No changes recommended.

**26. Issue:** 21.07.060E.4.d.i. & iii., *Walkways and Parking*

Requiring that walkways and parking areas be delineated through a change in paving materials distinguished by color, texture, textured edge, other edge or striping will significantly increase the cost of construction and maintenance. It would seem that simply requiring striping would be sufficient to address the intent of this section.

**Staff Response:** The standard requires two elements to demarcate a pedestrian area from a vehicular area: 1) a physical buffer such as bollards or a curb; and 2) a change in paving materials distinguished by a list of options, including striping. Striping is not a logical method to distinguish a change in paving materials. Staff proposes an amendment to clarify that striping is an option to satisfy the second demarcation element required. The developer chooses which options to employ.

**Staff Recommendation:** Page 39, lines 7-13, amend to read, “Where an on-site pedestrian walkway system or required pedestrian area abuts a parking lot or internal street or driveway, the pedestrian facility shall be clearly marked and physically separated from the parking lot or drive, through the use of an upright curb of six inches in height, bollards spaced a maximum of six feet apart, or other physical buffer approved by the traffic engineer; and a change of paving materials distinguished by color, texture, textured edge, or other edge, or striping.

**27. Issue:** 21.07.060E.4.d.i. and 21.07.080G.3.a. , *Walkways and Parking and Protection of Landscaping*

Where 6" curbs are used at South Anchorage High School, they present a potential damage to parking vehicles. The District posted warnings about the high curbs. Also, curb cuts for ADA would require at least 6 foot ramps. Have the authors tested the 6" heights in parking conditions?

**Staff Response:** Six inches is the standard curb height in the Design Criteria Manual. The Permit Center has 6 inch curbs and has had no problems. The Federal Highway Administration notes that 6 inches is the standard curb height.

**Staff Recommendation:** No changes recommended.

**28. Issue:** 21.07.060E.5.b., *Trails*

Eliminate this provision. It may preclude trail segments that could become part of a future network.

**Staff Response:** As trail origin and destination points will be planned through the Areawide Trails Plan, staff does not object to deleting this provision.

**Staff Recommendation:** Page 39, lines 29-30, delete 5.b. and re-letter remaining.

**29. Issue:** 21.07.060E.6.a., *Restrictions on Use*

This paragraph is in direct conflict with some of the landscaping requirements that require trees around the perimeter of the site. Also the MOA and the DOT are probably the largest violators of this proposed ordinance with their traffic signal boxes. What does the MOA plan to do with theirs and when will it be funded? Has the MOA discussed with ML&P moving their utility poles out of the sidewalk? AGC would suggest that the MOA delete this paragraph in its entirety or modify it to reflect that the trees in a sidewalk enhance the visual experience of Anchorage but they do require space which interferes with pedestrian flow. Similarly road signs impede pedestrian flow but are invaluable to drivers looking for directions.

Where a transit stop or shelter exists does the developer have to increase the width of the sidewalk at that point so that there is no encroachment?

**Staff Response:** A sidewalk, walkway, or trail may be wider than the minimum clear width. Elements such as street trees, signs, utility poles, etc... may be installed in the sidewalk, as long as the minimum clear width for pedestrian passage is maintained.

**Staff Recommendation:** No changes recommended.

**30. Issue:** 21.07.060F., *Pedestrian Amenities*

The draft focuses on a vision of a pedestrian-friendly Anchorage, which we support, however, the draft lacks adequate provisions for safe bicycle commuting, such as bicycle lanes along major arterials used by those who ride to work, not just for recreation. The draft makes few mentions of bicycle commuting except in the broad purpose statements; there is no minimum number of bike rack spaces required, and no required bike lanes. The sidewalk and buffer width requirements proposed are ample, and larger than those seen in walkable older neighborhoods in Seattle and Spokane; these dimensions could be eased up where appropriate to allow for more bike lanes in the roadways.

Consistent with our earlier comment, we urge the MOA Planning Department to include the following section:

21.07.060(F)(16) Bicycle Lanes Encouraged

Locations for bicycle lanes are identified in the Areawide Trails Plan and information about the design standards are included in the Design Criteria Manual. Bicycle lanes are encouraged

in the design of all arterial, collector, and local streets where low traffic speeds and volumes allow bicyclists and motorists to share the road safely.

**Staff Response:** Title 21 does not govern the standards for developing roadways. It does set the standards for right-of-way width, but what goes in the right-of-way is determined by the Official Streets and Highways Plan and the Design Criteria Manual. The municipality is currently working on a Bicycle Plan which addresses bike commuting. Bicycle parking (number of rack spaces required) is addressed in the section on Off-Street Parking and Loading.

**Staff Recommendation:** No changes recommended.

**31. Issue:** 21.07.060F., *Pedestrian Amenities*

Add 16. Snow Melt Well: An underground snow melt system accessed by a liftable cover that transforms snow into liquid for sub-surface drainage. A snow-melt well shall have a minimum horizontal dimension of four square feet.

Snow management is an ongoing concern and as densities increase within the Anchorage Bowl, the municipality should be encouraging the use of alternative approaches such as Snow Melt Wells which are common in northern Japan. This option also frees up space on any particular site for other amenities. Mitsubishi Electric has developed this technology for both a stand-alone surface application as well as an in-ground sub-surface application.

Add 17. Winter Space Enhancement: An approach that improves lands exposed to extensive durations of predominant shadow, typically located on the northeast corner of a site, with improvements that take advantage of the lower ambient air temperatures and reduced solar exposure.

An enhancement approach shall address in a methodical fashion applicable techniques that create a warmer sense of place.

An enhancement approach shall consider the following options at a minimum: Heat kiosk, Ice sculpture, Snow sculpture, Ice or snow slide, Lighting treatments, Vibrant colors.

One of the characteristics found in mature northern communities is a cultural acceptance of their unique Nordic climate. While they seek to maximize solar orientation in the design of their communities, they also have learned to celebrate their special winter attributes. This recognition that northern communities must do more than just endure winter conditions but instead learn to embrace them is an important measure of maturity in Winter City thinking. The rewrite of title 21 should reflect this type of growth for our community.

**Staff Response:** Snow Melt Well: It is not clear to staff how Snow Melt Well is an essential pedestrian amenity in Anchorage. Japan developed the snow melt well technology in part because its winter areas have a snowier climate and milder winter temperatures than Anchorage (i.e., snow is easier to melt.). Areas in which there are Snow Melt Wells such as the communities of Sapporo and Nayoro in Hokkaido typically receive three to five times that amount of snow than Anchorage does. Snow melt wells are most often used for very large paved surfaces such as vehicle parking and loading areas because these large areas would produce such large snow piles. The draft Title 21 Rewrite establishes that snow storage areas

for parking facilities shall not overlap with required pedestrian spaces. Pedestrian walkways have relatively little area needing clearing. Usually collecting snow from pedestrian walkways and plaza areas does not result in such large piles of snow as to limit pedestrian use of an area. It is questionable to staff how a snow melt well could be a pedestrian amenity, because in Anchorage's climate with less snow but more freeze-thaw ice glaciation problems, ice-free (heated) walking surfaces have greater benefits by ensuring the walking surface is clear of winter precipitation accumulation.

**Winter Space Enhancement:** The Pedestrian Facilities section (21.07.060F.) provides definitions of pedestrian facilities that may be either required or incentivized in other parts of Title 21. Before adding new pedestrian facilities, staff must examine how they would be integrated in other parts of the code. Staff will explore the concept and its potential use as an incentive or menu item in other parts of the code, as well as potential technical edit to the suggested language.

**Staff Recommendation:** HOLD

**32. Issue:** 21.07.060F.1., *Purpose*

A safe pedestrian travel route is very important for students who walk to school. A blanket statement requiring developments to support safe and clear routes for students walking to schools would be desirable.

**Staff Response:** Previous subsections of this section 21.07.060 require more sidewalks which will help in creating safe walking routes to schools. This section F. provides definitions of pedestrian facilities that may be either required or incentivized in other parts of Title 21.

**Staff Recommendation:** No changes recommended.

**33. Issue:** 21.07.060F.11., *Atrium, Galleria, or Winter Garden*

Need further definition of winter garden and galleria.

**Staff Response:** The word "atrium" in the standards (a.-f.) is intended to cover all three spaces, but staff will amend to avoid confusion.

**Staff Recommendation:** Pages 43-44, lines 34-42 and 1-9, amend to read:

"a. An atrium, galleria, or winter garden shall be developed and maintained as a temperature controlled, publicly accessible space furnished with features and amenities that encourage its use.

b. An atrium, galleria, or winter garden shall contain at least one pedestrian feature for each 200 square feet of gross floor area. Pedestrian features include formal seating such as benches or chairs which accommodate at least two people; informal seating such as steps, pedestals, low walls, and similar areas suitable for sitting which accommodate at least four people; 10 landscaping units; and objects such as fountains, kiosks (no more than one), and art work.

- c. An atrium, galleria, or winter garden shall be co-located with primary entrances and pedestrian activity areas, and either adjoin or directly connect to a publicly accessible sidewalk or open space.
- d. The publicly accessible portion of the atrium, galleria, or winter garden shall be at least 400 square feet, with a minimum dimension of 16 feet.
- e. At least half of an atrium, galleria, or winter garden's ceiling area and at least a portion of its wall area shall consist of transparent glazing.
- f. An atrium, galleria, or winter garden shall be exposed to direct an/or reflected sun for at least four hours daily for eight months of the year.”

**34. Issue:** 21.07.060F.13., *Reflected Sunlight*

This description of reflected sunlight benefits needs to consider the dawning era of climate change. There are micro-climates in the urban landscape that will be too hot in 80 degree plus days. Address design for heat dissipation in summer.

This section conflicts with Section 21.07.140C which prohibits glare from crossing the property line.

**Staff Response:** We see very few, if any 80 degree days, and the benefits of these areas during the spring and fall make up for a few days when they may be too hot.

Not all reflection is glare. The standard provided in 13.b. is to address excessive glare.

**Staff Recommendation:** No changes recommended.

**35. Issue:** 21.07.060F.15., *Bicycle Parking Facilities*

Bicycle parking shall be located ... no farther from a primary entrance than the closest motor vehicle parking space.” This is probably more restrictive than it needs to be. Someone riding a bike is reasonable mobile and it would be a shame to move a handicapped parking spot farther from an entrance to allow a bike rack to be closer. This would also require multiple bike racks for strip malls with several entrances. Perhaps a maximum distance of 50’ or so would satisfy cyclists. We should envision a time when there will be many car lengths of bike racks needed in some locations.

**Staff Response:** This provision is a common practice in other communities (e.g., Minneapolis, MN) though not universally used by all other communities with bicycle parking standards. Some communities allow exceptions for accessible parking spaces, designated carpool or vanpool spaces, and designated passenger loading zones. Other communities establish a maximum distances, typically 50 feet, from a main entrance, which may be too constraining for some sites.

Staff believes that the draft standard which is used in many communities is practical in most situations because locating bicycle racks is much easier to accommodate than a parking space, as they can be combined with walkways, arcades, or plazas. In addition, for security reasons,

many people would be more inclined to use a bike rack that is closer to an entrance. Staff is proposing an amendment to add a little more flexibility to the provision.

**Staff Recommendation:** Page 45, lines 14-17, amend to read, “Bicycle parking shall be located in an area visible from a primary entrance area or a sign leading thereto shall be visible from the primary entrance, and shall be no farther from a primary entrance than the closest motor vehicle parking space, not including designated accessible parking, carpool, or vanpool spaces.”

**36. Issue:** 21.07.060F.15. and 21.07.090, *Bicycle Parking Facilities and Off-Street Parking and Loading*

Is bicycle parking required under any part of this code? It should be a required element at parks, schools, and most commercial and institutional destinations in the major employment centers and shopping centers. Are there bonuses for covered bicycle parking?

**Staff Response:** Bicycle parking is addressed in the section on Off-Street Parking and Loading. At this time, no bonuses are offered for covered bicycle parking.

**Staff Recommendation:** No changes recommended.

**37. Issue:** 21.07.060F.3., *Walkway*

Proposed requirement that walkways be hard-surfaced may contradict the statement “improved or not” in line 18 of this section. And it may not be necessary or desired in sensitive environmental areas, steep areas, or for certain uses like equestrian use. Are these exceptions covered in 21.08?

**Staff Response:** The surfacing requirements are in chapter 21.08, which allows a walkway to be surfaced or unimproved, depending on its location and function. A clarifying amendment is appropriate.

**Staff Recommendation:** Page 40, line 27, amend to read, “Walkways shall be [HARD-]surfaced in accordance with subsection 21.08.050H.”

**38. Issue:** 21.07.060F.4., *Primary Pedestrian Walkway*

Question, what is the width of “two couples” and what else is needed to permit them to pass? Section 21.07.060E.4.c establishes 5 foot as a minimum width why not insert that here also?

Since section 21.07.060F.4 dealt with minimum width, should we presume the eight foot requirement here should be for height and not width? AHBA has concern over how “Primary Pedestrian Walkway” is used here.

**Staff Response:** Subsection E.4.b. establishes the clear width (width of two couples) as eight feet. This is an “enhanced” walkway, for which bonuses are given in other sections, so it requires a wider clear width than a “regular” walkway.

**Staff Recommendation:** No changes recommended.

**39. Issue:** 21.07.060F.4.c., *Primary Pedestrian Walkway*

Question if there is no on-street parking permitted due to street classification is the owner required to provide a 10 wide landscaping strip? What happens to the requirement to have 30 percent of the building within 10 foot of the front property line in mixed use districts? Section 21.07.060F.4.b uses 4 feet, request that that wording be used and this section be deleted.

**Staff Response:** Staff is working on clarifying the relationship between required pedestrian areas and rights-of-way.

**Staff Recommendation:** HOLD

**40. Issue:** 21.07.060F.4.d., *Primary Pedestrian Walkway*

Is it really necessary to provide seating or low walls/steps or spaces for standing every 50 ft of a primary walkway? This seems excessive and since the MOA has such a hard time building any pedestrian facilities, this requirement almost ensures that other loopholes will be found to not build a walkway at all. Remove this requirement, revise it, or make it an option for extra credit.

The requirement to have two places to sit, stand or lean every 50 feet will require a 5 foot bench or rail or steps every 20 feet. Is this density of exterior accommodations that necessary? Can we expect the Municipality to reciprocate and provide a similar density of accommodations along its trail and walkway system? No we cannot, the cost would be prohibitive, and the same applies to new and refurbished buildings. The number of such features depends on the application and site, and must be left to the design professionals.

**Staff Response:** This is an option provided that design professionals may choose in order to get bonuses in other sections of code.

**Staff Recommendation:** No changes recommended.

**41. Issue:** 21.07.060F.6.a., *Plaza or Courtyard*

Remove or make more flexible the requirement for plazas to have pedestrian features for every 200 sq ft. The design of a plaza could be limited by this section depending upon the larger purpose of the plaza and its surroundings.

**Staff Response:** The intent is to make the plaza usable for relaxation, conversation, eating, etc. Without pedestrian features, a plaza could be created that is not functional for those purposes.

**Staff Recommendation:** No changes recommended.

**42. Issue:** 21.07.060F.6.d., *Plaza or Courtyard*

The requirement for a plaza to be positioned so it receives four direct or reflected sunlight on Mar 21st and Sept 21st is a limitation that will work against the goal for building plazas.

Town Square will likely have the Ruth Moulton Plaza in its redesign, but there is no guarantee that the sun rights to that park, which are already in code, will or maybe have already been violated by the buildings that are being constructed. What will guarantee that future construction will not impact this requirement? Promote the desire for sunlight to plazas but unless there will also be height and sun restrictions on all future buildings around a plaza, this requirement cannot be met.

**Staff Response:** At this time there is no guarantee that future development will not block sunlight to a plaza that initially met this requirement. Future development may come six months after the development of the plaza, or 20 years after. Staff is considering some refining language that would encourage the location of the plaza to areas of the site that are less likely to be affected by neighboring development.

**Staff Recommendation:** HOLD

**43. Issue:** 21.07.060F.9.c., *Pedestrian Shelter such as a Canopy, Awning, or Marquee*

Why the restriction of 3 feet for a street tree? Since trees spread more than 3 feet in any direction it would seem better just to restrict pedestrian shelters from the vicinity of street trees

**Staff Response:** Many trees do have a spread radius of greater than three feet, but three feet gives enough space for the tree to grow on that side, and be pruned. The department sees no reason to have to choose between street trees and pedestrian shelter.

**Staff Recommendation:** No changes recommended.

**44. Issue:** 21.07.070, *Neighborhood Protection Standards*

The purpose statement should include the point that this section is also necessary to conform to the goals and policies of the 2020 Plan. The protection of neighborhood character and reducing impacts from nonresidential uses is a key element in 2020.

Please be aware that while location and placement will determine whether noise impacts the surrounding areas, physical barriers/buffers may also be necessary. Landscaping and screening often do little to mitigate noise.

**Staff Response:** Staff does not object to including a reference to Anchorage 2020.

**Staff Recommendation:** Page 45, lines 22-28, amend to read, “This section provides for transitions between nonresidential and residential uses, through discretionary approval criteria that may be applied in combination with other development standards in this chapter 21.07, in order to provide significantly more protection for neighborhoods from the impacts of adjacent development and to conform to the goals and policies of the comprehensive plan. This section makes available a menu of additional tools to use in discretionary approvals to protect residential neighborhoods from potential adverse impacts of adjacent nonresidential uses, including limitations on hours of operation, noise, and lighting.”

**45. Issue:** 21.07.070B., *Nonresidential Development Adjacent to Existing Residential Use*

It is important to differentiate between nonresidential development within and adjacent to residential, versus 300 feet away. Consider the Muldoon Wal-mart: substantial screening and buffering was essential to reduce impacts of a mega-non-residential development immediately adjacent to residences. In Legacy Pointe, substantial screening and buffering was also required. This section is discretionary, and therefore inadequate for large non-residential developments within residential areas. There should be a mandatory minimum of buffering/screening, in addition to the bulleted list of optional conditions of approval.

Add a new bulleted subsection #1 as follows, for nonresidential development within or adjacent to residential development:

New 21.07.070 B (1): compatible scale and lot coverage within or adjacent to the residential area, or immediately across a roadway. Screening (Level 4) perimeter landscaping outside of a sight-obscuring fence is required if floor area ratio, or lot coverage including impervious surface of the non-residential development is 1.5 to 2 times the average of the surrounding residential area, or if height exceeds the maximum for that zone. Double widths of L4 landscaping, or wider as needed to provide visual obscurity and proportionality, are required or non-residential development with FAR or lot coverage greater than 2x the surrounding or adjacent residential zone(s).

Then continue with the paragraph of optional conditions of approval, but number it as B (2) with itemized conditions.

In this list, revise the current B (4) to read “Location and screening of loading and delivery areas garages, vehicle fleet parking, or vehicle maintenance area.”

Add to this list a new item 11. “Location and orientation of changeable type or illuminated signs to protect residential character and privacy and views from residential units.”

Conditions for conditional use could also include building design, parking requirements, sign requirements and the ability to enforcement requirements.

**Staff Response:** This section is not the only provision to mitigate impacts between residential and nonresidential uses. Some district-specific standards, some use-specific standards, and some other design and development standards in this chapter address the same issues (for example, some industrial uses are not allowed within 200 feet of a residential district). As noted in the department’s issue response for chapter 21.05, staff is considering standards for large nonresidential developments within residential districts. Staff will consider the suggestions made in this comment. This section allows the decision-making body to add conditions to an approval to target specific negative impacts of the particular proposed development in a way that broad-brush regulations are unable to do.

**Staff Recommendation:** No changes recommended.

**46. Issue:** 21.07.070B., *Nonresidential Development Adjacent to Existing Residential Use*

AGC would suggest that the MOA define “decision-making body”. Also a definition or guidance of the meaning of “any potential adverse impacts on residential property” should be

provided. Does this section limit itself to such things as health, safety, and noise or does it extend to such things as aesthetics (i.e. I don't want my view impaired), personal values (I don't want the serenity of my home disturbed by such development) or even religion (I don't believe in . . . ) As written it is overly broad.

**Staff Response:** "Decision-making body" is defined in chapter 21.14.

This section allows the decision-making body to add conditions to an approval to target specific negative impacts of the particular proposed development in a way that broad-brush regulations are unable to do. While the list of issues the conditions may address is not all inclusive, it sets the tone for the type of impacts that could be addressed.

**Staff Recommendation:** No changes recommended.

**47. Issue:** 21.07.090, *Off-Street Parking And Loading*

This Revision is missing a prime chance to influence the mode share and to encourage a different pattern of driving downtown and in other major commercial and employment centers. Ample parking supply encourages people to drive without a second thought. Tighter parking plus enhanced transit and pedestrian should be a goal. Also, the use of compact and mini-car and motor scooter parking in the closest parking spots to destinations would be an innovative way to achieve a shift toward more fuel efficient, less intimidating cars in the urban centers.

**Staff Response:** It is unclear whether the commenter is in favor of the current method of handling parking downtown or not. Currently in the downtown zoning districts, on-site parking is not required. The code rewrite proposes to reduce off-street parking requirements for many common uses, prohibits excessive parking by creating a maximum number of spaces allowed, and offers a number of parking reduction options to further the efficient use of land. The recommended parking space requirements are lower for some uses than others, depending on information regarding the parking demand typically generated by each use. If the parking requirement were set significantly lower than current demand for parking, it could result in overspill of parked cars onto adjacent properties and ROWs, compromising safety, convenience, and the intent of the zoning ordinance to mitigate impacts of development on neighboring properties. In most areas Anchorage roadways are incapable of or not designed for safely accommodating overspill through on-street curb parking. In areas where on-street curb parking is available, the draft code makes properties eligible to count on-street parking toward the parking requirement, subject to the approval of the traffic engineer. The code also increases the pedestrian facility requirements. See also Issue #51.

**Staff Recommendation:** No changes recommended.

**48. Issue:** 21.07.090, *Off-Street Parking And Loading*

As discussed above, the draft neglects bicycles. We would prefer that the draft require a larger number of bicycle parking spaces for nonresidential, mixed use, and multi-family developments than what is currently proposed (4 bikes per 40 cars).

**Staff Response:** The Bicycle Plan project team provided the following comment:

“The proposed bicycle parking standard contained in the Title 21 revisions appears to be reasonable and would for the most part provide an improvement over the number of voluntary spaces provided by Anchorage businesses. Although some cities require bicycle parking equaling 5 percent or more of the total vehicle parking this would push the number of required bicycle parking far above what it typically provided in Anchorage at this time. This may be especially true with respect to high rise office buildings. The Conoco Phillips building located in downtown Anchorage may be one of the largest generators of bicycle traffic due to the company’s active employee alternative transportation program. The number of bike parking spaces provided is above what would be required by the proposed Title 21 standards (55 compared to 44 spaces). Requiring 73 spaces, as would be required by a 5% standard, would be excessive.”

Department staff is concerned that required bike racks be of a style that can accommodate modern bicycles. Staff will be proposing an amendment in the future to address this issue.

The Planning Department staff would add that the ongoing Bicycle Plan process provides near term opportunities to further examine the need for parking spaces by use type, and the bicycle parking standards that other cities use, as well as to gather further public comment on the issue. Once adopted, the Bicycle Plan could provide the basis for further revisions to bicycle parking provisions in the municipal code.

**Staff Recommendation:** No changes recommended at this time. As noted, an amendment addressing rack standards will be proposed later.

**49. Issue:** 21.07.090, *Off-Street Parking And Loading*

We urge the adoption of parking garages and parking decks with mixed uses on the second and third floors. This is common in parts of Seattle, and makes efficient and more interesting use of space without building too much vertical.

**Staff Response:** In section 21.07.090M, on page 96 of the public hearing draft, there is an incentive for “active” (meaning non-parking) uses on the second and third floors of parking garages in certain locations.

**Staff Recommendation:** No changes recommended.

**50. Issue:** 21.07.090, *Off-Street Parking And Loading*

We are concerned with features of the draft that reduce the minimum required parking spaces for residences in center city neighborhoods by 10% due to “demographic characteristics,” and reduce the required number of spaces for low-income designated housing by 40%. These provisions are at best elitist, and are an invalid basis for the reduction. The other reasons cited, i.e. “traditional street grids and development patterns,” are more reasonable. In working through this draft, our city leaders are urged to respect the diversity of our population and our neighborhoods without making inappropriate assumptions that could affect the course of development in ways that divide neighborhoods and people.

**Staff Response:** The proposed parking reductions are based on census data and on-the-ground research by planning staff, not on assumptions. “Demographic characteristics” in part refers to household size, income and age of members—factors that are known to substantially affect need for parking spaces. However staff recognizes that the word “demographic” could be inferred to refer to other population characteristics that are not relevant to parking policy. Staff would not object to changing the word demographic to “household” on page 76, lines 34-35. Staff also notes that fewer required parking spaces reduces dwelling costs, thus providing more affordable housing.

**Staff Recommendation:** Page 76, lines 33-36, amend to read, “c. This reduction recognizes proximity to employment centers, characteristics such as traditional street grids and development patterns, household [DEMOGRAPHIC] characteristics, emphasis on walkable northern city environments, and lower parking demand in these areas.”

**51. Issue:** 21.07.090, *Off-Street Parking And Loading*

Add to the appropriate sections: Require 10 to 20 percent of parking to be compact and mini-car and motor scooter parking in prime locations at destinations in major commercial, institutional and civic destinations.

**Staff Response:** Larger vehicles tend to park in small-vehicle spaces which are in convenient locations in parking lot areas. This impacts safety and access in the parking lot. The large vehicle will often encroach into a neighboring compact space, creating a domino effect down the row eventually making at least one compact space unusable—which conflicts with the policy intent to provide compact spaces in the first place. Surveys of older multifamily parking lots indicates that small space sizes may encourage residents to park off-site, where there may be more space available on neighboring parking lots not being used at night. The problem is worse in Anchorage because there is still a relatively large percentage of large vehicles, and seasonal snow and light conditions make it even more difficult. For many parking lots around town it would be difficult to enforce a requirement that only small cars can park in a space.

Nationally, the Urban Land Institute (ULI), has, based on research sources, concluded that compact space designations have not lived up to their policy purpose. Since the concept originated, the variety of vehicle sizes has increased and manufacturers have downsized larger passenger cars and some trucks, minivans and SUVs. Meantime, the size of smaller vehicles such as the Civic has increased, blurring the definition of what is “compact”. The compact car requirement is no longer self-enforcing.

A requirement that a certain percentage of spaces be compact spaces would be inappropriate for retail or customer service uses with higher turnover of vehicles or in which customers return to vehicles with loads, such as groceries. Low turnover uses such as full-time employee-only parking may use stalls as narrow as 8’6”, according to research sources.

The ULI and other traffic engineering sources recommend that parking stall size vary by the rate of parking turnover and the type of use rather than expected type of vehicle. For lower turnover uses, such as university student parking, residential parking, or full-time employee-only parking, a stall width of 8’6” to 8’9” is suggested as being adequate. The 8’4” standard

in the draft code is a carryover from a decades old provision in the existing Title 21, and was not intended for the purpose of allowing the full mix of vehicle sizes in low-turnover uses. The 8'6" standard recommended for low-turnover uses may vary based on climate and auto fleet mix. Because of the local situation, staff recommends continuing to allow smaller spaces only as a certain percentage of the overall required number of parking spaces, and only for certain low turnover uses. Staff recommends changing the language of the draft requirement to express that the smaller sized stall is not for compact vehicles, but is rather to accommodate low-turnover uses.

**Staff Recommendation:** Page 81, lines 28-39, amend to read:

**“1. Smaller [COMPACT] Parking Spaces for Low Turnover Uses**

**a. *General Parking Spaces***

If approved by the traffic engineer, up to 10% of the total number of required parking spaces may be smaller [COMPACT] spaces.

**b. *Employee and Resident Parking***

If approved by the traffic engineer, up to 25% of the total number of required parking spaces may be smaller [COMPACT] spaces[, PROVIDED THE PARKING SPACES SHALL BE SIGNED FOR EMPLOYEE OR RESIDENT PARKING ONLY].

**c. *Smaller [COMPACT] Space Standards***

Smaller [COMPACT] spaces shall be a minimum of eight feet six [FOUR] inches wide and meet the requirements of table 21.07-9, *Parking Angle, Stall, and Aisle Dimensions*. All spaces with a width of less than nine feet shall be signed for employee or resident parking only, or for other similar low turnover uses. [COMPACT CARS ONLY.]”

**52. Issue:** 21.07.090A., *Purpose*

Add to explanation: Parking availability, cost, and proximity to destination are a powerful determination of travel choice, particularly in compact urban centers. The Municipality has not used parking supply as an instrument to influence mode choice, but in the future this may affect parking requirements.

**Staff Response:** These sentences are not goals or purpose statements, but the general ideas are addressed in purpose statements 5 and 6.

**Staff Recommendation:** No changes recommended.

**53. Issue:** 21.07.090A., *Purpose*

Add a new purpose: Encourage the choice of non-vehicular modes of travel by reducing or pricing parking while enhancing pedestrian and transit services and infrastructure.

**Staff Response:** This section does not require parking to be purchased, nor does it enhance transit services or transit infrastructure. Pedestrian infrastructure enhancements are handled

in a different section of the code. Thus this suggested purpose statement would be misleading and inappropriate.

**Staff Recommendation:** No changes recommended.

**54. Issue:** 21.07.090A., *Purpose*

While there appears to be downward movement in the required minimum parking standards from ITE standards, the change has been incremental, and it is not clear how it will affect built out neighborhoods where homes are being remodeled and replaced.

**Staff Response:** The comment implies that ITE (Institute of Traffic Engineers) establishes national standards for the right number of parking spaces for various uses. ITE does not establish standards for number of spaces—it only publishes summaries of the results of many parking demand surveys, nationwide, in a variety of locations (urban, suburban, rural, etc.) ITE warns users that for many use its data is incomplete, and recommends conducting local surveys. The changes will have the most effect in commercial and multifamily areas. Single- and two-family homes will not be required to bring their parking into compliance (see section 21.12.020). The parking requirement for single-family homes is not proposed to change.

**Staff Recommendation:** No changes recommended.

**55. Issue:** 21.07.090E., *Off-Street Parking Requirements*

The Parks and Recreation Department believes that the proposed off-street parking space requirement for playfields may exceed that needed in most cases.

**Staff Response:** Staff is continuing research into the appropriate parking requirement for some uses. This research and a recommendation will be provided to the Commission as soon as possible.

**Staff Recommendation:** HOLD

**56. Issue:** 21.07.090E., Table 21.07-5, *Off-Street Parking Requirements*

Off-street parking for aircraft sales is listed but no such listing is made for hanger space. Suggest that the policy derived during the Fed-Ex hanger construction be retained at one parking space per 1,000 sq. ft. Also need to establish parking for heavy equipment service and repair.

**Staff Response:** Staff is continuing research into the appropriate parking requirement for some uses. This research and a recommendation will be provided to the Commission as soon as possible.

**Staff Recommendation:** HOLD

**57. Issue:** 21.07.090E., Table 21.07-5, *Off-Street Parking Requirements*

Parking Requirement for Educational Facility: Student capacities of "each classroom or teaching station" can vary greatly with utilization rates, class scheduling (especially in middle schools), and whether home-base or auxiliary. So the use of "seats" as a measure is not appropriate. It would be better to use a quantity per teaching station. This would vary from elementary to middle schools because some teaching stations in middle schools (Family & Consumer Science", for example) do not occur in elementary and have different capacities than the standard classroom.

If using teaching stations or classrooms as a basis of measurement, assign a quantity to the space and not "seats". See new comments of 6/6/08 about CEFPI.

Parking Requirement for Educational Facility: This is a large departure from the previous 50sf of the MPR. Elementary schools: For ASD's standard 26-classroom school, it would mean either 130 spaces or, if using teaching stations, 140 spaces. Currently, MPRs are programmed for 2,500sf giving 50 parking spaces. Our November 2000 Elementary Educational Specifications called for 50 spaces for staff, 1 postal carrier space, and code requirements for ADA and visitors with overflow using bus parking spaces. Middle schools: For ASD's proposed standard 1,200 student middle school with 72 teaching stations, this would require 360 parking spaces. In comparison, the new Clark Middle School will have 332 spaces with no spare room on the site for more due to a substandard site size. Previously, based on the MPR of 8,500 sf, 170 spaces were required. Keep in mind that buses provide transportation for a substantial number of students not walking to school. In a time when the Municipality is calling for smaller school site sizes, increased parking requirements is contradictory.

Retain the previous 1 space per 50sf in the MPR.

Parking Requirement for Educational Facility: Using the requirement of 1 parking space per 4 seats in each classroom or teaching station (T.S.) would result in  $4 \times 70 = 280$  for a 1600-student school; or  $4 \times 87 = 348$  for a more-standard 2000-student school. This seems to be under sizing the need. In comparison, the 1600-student South Anchorage High School has 714 spaces total, including 42 for event parking in bus spaces, 458 for students, 138 for staff and 76 for visitors. Of course, SAHS has more student drivers than other high schools may. Using the existing Title 21.45.080, middle ("Junior") high and high schools require one parking space for every 6 seats in the main auditorium or assembly room, or 3 parking spaces for every classroom plus one parking space for each staff member or employee, whichever is greater. South Anchorage High Schools designers determined that the most was:  $70 \text{ T.S.} @ 3\text{ea} + 115 \text{ staff} @ 1\text{ea} = 325$ . The only way high schools could meet the existing and proposed amount would be to have "closed campuses" - and that is not going to happen any time soon, if ever.

**Staff Response:** Staff is continuing research into the appropriate parking requirement for some uses. This research and a recommendation will be provided to the Commission as soon as possible.

**Staff Recommendation:** HOLD

**58. Issue:** 21.07.090E., Table 21.07-5 and 21.07.090J.9.c. and d., *Off-Street Parking Requirements and Signs and Striping*

The word "handicap" is a derogatory term describing a beggar with a disability holding a cap for alms. "Disabled" is synonymous with "handicapped".

Change the three instances that it occurs in this Chapter to "disabled" or "accessible", as in "accessible sign detail", or "ADA-compliant".

**Staff Response:** Staff has no objection to using the term "accessible."

**Staff Recommendation:** Page 68, under "Minimum Spaces Required" for "Nursing facility", amend to read, "1 per 4 beds, based upon maximum capacity. If the facility is used exclusively for the housing of the elderly or persons with disabilities, [DISABLED, OR HANDICAPPED,] the zoning board of examiners and appeals may allow a portion of the area reserved for off-street parking to be landscaped if the board finds that the landscaping is suitable and is in the best interests of the residents of the neighborhood."

Page 93, line 36, amend to read, "An accessible-parking [HANDICAPPED] sign detail shall be included in the plan submittal per M.A.S.S."

Page 93, lines 37-39, amend to read, "All accessible spaces and aisles shall be striped with [HANDICAP] blue paint, including the total length of the curb encompassing the accessible parking space and accessible aisle."

**59. Issue:** 21.07.090E.4.c.iii., *Exceptions*

Requiring that "all" four criteria be met is too restrictive. Request that "all" be deleted and that "at least two" be inserted.

**Staff Response:** The first criteria (A) may leave too much room for discretion in determining what is a "unique or unusual" characteristic that makes an establishment different from other establishments of the same use type. It also sets an insurmountably high bar for gaining an exception if the establishment is not "unique" compared to other establishments of the same use types, even if such establishment provides a credible parking demand study that demonstrates that the maximum number of parking spaces established in the ordinance cannot accommodate the demand. Although the maximum parking ratio being recommended in the public hearing draft has been calibrated to be practical for most uses, there may be use types that merit a higher parking maximum but aren't recognized in the draft code. In these cases, the applicant should have the opportunity to provide a parking demand study that shows the merit of an exception.

The second criteria (B) is not clear enough in that all it is asking for is a parking demand study providing the needed evidence. As drafted it may come across as more daunting than it really is.

The fourth criteria (D) may also create a difficult-to-interpret potential hurdle to gaining an exception on lines 11-12, where it states that the site plan must be, in the judgment of the Planning Director, "supportive of the mixed-use concept...". This can be interpreted by reviewers to mean that the development itself must be mixed-use or near other dissimilar uses.

In fact, criteria (D) adequately addresses the issue of parking demand, pedestrian and transit oriented development in its last phrase.

For these reasons, staff recommends deleting criteria (A), clarifying criteria (B) to state that a parking demand study must demonstrate that the maximum number of parking spaces allowed, preserving criteria (C), which ensures that the amount of parking is to be increased no more than what the parking demand study deems is necessary, and editing (D) to remove the confusing reference to mixed use.

With such modifications and edits staff recommends that all three remaining criteria (B), (C) and (D) should be required in order to get an exception for more than the maximum allowed parking. Each criteria covers a completely different but essential topic of concern, and having the three with the edits suggested does not create an insurmountable hurdle for exceptions. If this section didn't exist, a variance would be needed, which has more criteria. This is basically allowing a variance with fewer criteria.

**Staff Recommendation:** Page 74, lines 11-22, amend to read:

“(A) [THE PROPOSED DEVELOPMENT HAS UNIQUE OR UNUSUAL CHARACTERISTICS WHICH CREATE A PARKING DEMAND THAT EXCEEDS THE MAXIMUM RATIO AND WHICH TYPICALLY DOES NOT APPLY TO COMPARABLE USES; AND,]

The applicant provides a parking demand study of similar sites in the municipality that demonstrates that parking demand cannot be accommodated within the maximum number of parking spaces allowed or through any of the available parking alternatives such as [BY] on-street parking or shared parking with nearby uses; [AND,]

(B) The request is the minimum necessary variation from the standards; and,

(C) If located in a mixed-use district, [THE USES IN] the proposed [DEVELOPMENT AND THE] site plan is [DESIGN ARE], in the judgment of the director, [HIGHLY] supportive of [THE MIXED-USE CONCEPT AND SUPPORT] high levels of existing or planned transit and pedestrian activity.”

**60. Issue:** 21.07.090F.1.a., *Recordation*

Recording a parking agreement prior to the issuance of a land use permit or a building permit will serve to slow up the building process. It would make more sense to require the recording of the agreement prior to the issuance of an occupancy permit because at that time the developer is motivated to record the permit since no economical benefits can accrue from their development until the recording is complete. Requiring the recording at the start of the process means that all else must wait for the legal process to work.

**Staff Response:** The actual recording of the agreement takes a day and will not slow down any development process. The working out of the agreement may take some time, but the municipality cannot issue a building or land use permit without knowing how the parking will

be handled. Imagine if a building is built and is waiting for a certificate of occupancy, and no parking agreement is in place and negotiations fall apart.

**Staff Recommendation:** No changes recommended.

**61. Issue:** 21.07.090F.1.b., *Content*

If a contingency plan includes payment to the MOA for the full cost of providing the required parking, will the MOA be required to use that money to develop the required parking? Unless there is some tie between the payment of the contingency fund and the use of those funds for the stated purpose, the payment becomes a legalized form of extortion.

**Staff Response:** The payment to the municipality would only happen if the municipality was providing the required parking.

**Staff Recommendation:** No changes recommended.

**62. Issue:** 21.07.090F.13., *Affordable Housing*

This is reverse discrimination ... assumption here is that people on low to moderate incomes or live in subsidized housing do not own or operate motor vehicles...this is quite the contradiction. Many of the pacific rim minorities' whom I have sold homes to have more than the immediate family members living with them and anywhere from 2-6 vehicles as they need the extra bodies just to pay the rent, utilities, etc. This also could be in violation of the Federal Fair Housing Act , it certainly lends a case to investigate more.

The definition for affordable housing is broader than the LIHTC, but wouldn't preclude it from qualifying. The lifetime commitment might scare off most everybody but the usual suspects. Is there a minimum number of units you have to designate to get the incentives, or is it all or nothing? Since most of the state or federal programs don't require that long a commitment, you may not get much interest if its the whole project versus a few units.

I didn't see a reference to a specific gross income calculation method? Would that show up in the program rules?

Under 13., I think the first sentence should read "Affordable housing developments, which have units that are....." as it sounds like the parking spaces are designated to a unit and a 40% reduction would be a development benefit. The same comment would apply to the second sentence also.

In 13 b., what does tenure mean? Would it be easier to say the same quality and amenities as the other units in the development? That way it would include both the exterior and the interior features.

Just out of curiosity, would a 40% reduction in parking spaces allow an owner to have less than one space per unit?

Question the use of "extremely" as a qualifier for low income households. The State of Alaska and Federal government have qualifying guidelines for what constitutes median,

moderate and low income levels. AHBA fails to see the need to further stigmatize low income families with this kind of language.

**Staff Response:** National and local research has provided enough evidence to indicate that households with incomes that would meet the HUD definition for low income households have on average fewer vehicles and a lower demand for parking spaces. This evidence indicates that deed-restricted affordable housing merits a lower parking requirement. Assumptions and worst-case anecdotes such as put forth in the comment would otherwise lead us to inflate the parking requirement beyond what is actually required by most households that meet the HUD definition of low income. The proposed parking reductions are intended to make the parking requirement flexible to recognize certain locations or types of development projects that produce lower parking demand, rather than forcing these areas to provide more parking than they need in order to meet a one-size-fits-all standard. A single parking space may cost \$7,000 - \$40,000 to construct, depending on whether it is in a parking lot, garage, or structure. Each space leaves less room for usable yard or income-generating use. Unused paved parking areas spread apart housing and trip destinations and reduce the local population market within walking distance to support the transit and neighborhood services lower income households need. Nationally, parking reductions for affordable housing has become common and is promoted by federal and state agencies as a “best practice” for communities to incentivize affordable housing. Studies have shown reducing the parking requirement can reduce the cost of providing affordable housing by as much as 20-30%, and does not require lower income households to subsidize parking spaces that they will not need.

The public hearing draft language that appears in 21.07.090F. is the result of a working draft definition for “affordable housing”. Staff will continue to work with the municipal Department of Neighborhoods and make contacts at local AHFC and HUD offices as well as with local affordable housing providers such as CIHA to review the draft Title 21 definition of “Affordable Housing” in Chapter 21.14, and will resolve issues related to the definition in that chapter. It was the understanding of staff that the term “extremely low income” was a HUD term. If, during its review of the affordable housing definition, staff finds that some of the language in 21.07.090F.13. is inappropriate or unnecessary, staff will then recommend changes to the terms or qualifiers for housing units eligible for a reduction. Staff intends to resolve this in the Chapter 14 issue-response.

The draft parking reduction for affordable housing does not set a required “magical” threshold for the minimum number or percentage of units in a development that must be affordable in order for the development to be eligible for the parking reduction. A housing development is eligible for a reduction for each dwelling that is affordable. For example, a mixed-income housing project with twelve units may include a mix of two affordable units plus ten market-rate units. Such project would eligible for a reduced parking requirement for two of the units. This does two things well: (a) it allows mixed-income projects, where a few units of affordable housing are integrated into a housing community of market rate units, to get credit for a parking reduction; and (b) it increases the reward with each increase in the number of affordable units that a development provides.

The development/design standards for affordable housing that can be eligible for density bonuses in 21.04 and parking reductions in 21.07.090F. are recommended to be moved to

become a new subsection of 21.07.100, Residential Design Standards. Therefore, the standards should be deleted from 21.07.090F.13.a-c. Staff will address issues related to tenure and quality of affordable housing units in the issue-response covering 21.07.100.

**Staff Recommendation:** Page 78, lines 2-9, amend to read, “The affordable housing unit[S] shall be consistent with the [FOLLOWING] standards of subsection 21.07.100H., Standards for Affordable Housing.[:

A. THE AFFORDABLE HOUSING UNITS SHALL BE INTERMINGLED WITH ALL OTHER DWELLING UNITS IN THE DEVELOPMENT;

B. THE TYPE OF TENURE AND OWNERSHIP OF THE AFFORDABLE HOUSING UNITS SHALL BE THE SAME AS THAT OF THE REST OF THE HOUSING UNITS IN THE DEVELOPMENT; AND

C. THE EXTERIOR APPEARANCE OF THE AFFORDABLE HOUSING UNITS SHALL BE INDISTINGUISHABLE FROM THE OTHER UNITS IN THE DEVELOPMENT.]”

**63. Issue:** 21.07.090F.14., *Senior Housing and/or Supportive Housing*

We did away with our separate definition of senior housing, and adopted the federal definition. We let the sponsor decide which sub-definition they want to choose. We just require them to declare which definition they are using. That way, our funds can be used in combination with other federal programs that have a statutorily mandated definition and we are no longer interpreting federal law.

I'm not sure that the definition for senior housing as written, is consistent with the Fair Housing Act. The statute says "intended for and solely occupied by persons 62 years of age or older." If you want to say at least one member has to be a senior I think you have to use the 55 years or older definition under the statute. That, however could also let someone make 20% of the units not "senior" housing. Have they run this definition by an attorney familiar with Fair Housing law or the FHEO office in Seattle?

**Staff Response:** Staff will resolve issues related to the definition of “Senior Housing” in the issue-response to Chapter 14. Staff will also explore with the Department of Neighborhoods a definition for “Supportive Housing” that can be used in 21.14.

**Staff Recommendation:** No changes recommended (in this chapter).

**64. Issue:** 21.07.090F.16.a., *Shared Parking Study*

As stated previously, AGC recommends that this last sentence be deleted since it is impossible to demonstrate. Shared parking should reduce offsite parking requirements unless something happens to dissolve the agreement.

**Staff Response:** It is a standard practice throughout the country and currently in Anchorage for shared parking studies to be required to demonstrate that the shared parking facility will accommodate the anticipated parking demand. Shared parking studies are conducted by

licensed engineers and are well positioned to do this very thing. If, through showing the composition of tenants, the anticipated rate of parking turnover, the anticipated peak parking and traffic loads, and the other information required by the previous sentences, the applicant cannot show that the parking reduction request will not result in spillover to other parcels or the ROW, then the request should not be approved. A clarifying amendment is proposed.

**Staff Recommendation:** Change to read, “The applicant shall submit a shared parking analysis to the director that demonstrates the feasibility of shared parking. The study shall be provided in a form established by the traffic engineer and shall be made available to the public. The study [IT] shall demonstrate that any parking reduction requested will not result in the spillover of parking onto other properties or public streets, by [ADDRESS], at a minimum, addressing the following: the size and type of the proposed development, location of required parking, the composition of tenants, the anticipated rate of parking turnover, and the anticipated peak parking and traffic loads for all uses that will be sharing off-street parking spaces. [THE APPLICANT SHALL ALSO DEMONSTRATE THAT ANY PARKING REDUCTION REQUESTED AS PART OF THE SHARED PARKING STUDY WILL NOT RESULT IN THE SPILLOVER OF PARKING ONTO OTHER PROPERTIES OR PUBLIC STREETS.]

**64. Issue:** 21.07.090F.17.b., *Location*

600 feet is too far...400 feet is still bad, but more desirable

**Staff Response:** 600 feet is two downtown blocks, not counting the road right-of-way between those blocks (50-60 feet). The department considers this a workable distance, as long as there is no collector, arterial, or highway between the entrance to the use and the parking.

**Staff Recommendation:** No changes recommended.

**65. Issue:** 21.07.090F.5., *Residences in Walking Distance to Downtown*

It is a major advancement that the original South Addition neighborhood automatically is exempt from 40 percent of parking requirements. Now, that requirement should also apply to the rest of the surrounding neighborhoods of Fairview and South Addition, and there should be a mechanism to include neighborhoods inside and near town and neighborhood centers.

New construction in these neighborhoods has too frequently resulted in more asphalt and parking than surrounding homes.

Thank you for reducing parking requirements for mixed use development another 5 percent to a total of 10 percent. Even so, evidence supports cutting mixed use parking requirements by 50 percent:

Downtown Anchorage is as close to mixed use development as can be found in Anchorage. Already, we know that 31% of downtown residents walk to work, and 14% take a bus. These numbers alone argue for more than a 5% parking reduction for mixed use districts.

Furthermore, Seattle’s transportation director indicated that families moving into Belltown condos typically requested two parking spaces, but that many gave up one of the spaces after their first year because of reduced car use.

Parking requirements also appear to require too many spaces for residential development.

Most cities require only two parking spaces for single family, duplex and town houses.

Anchorage on the other hand, requires a third parking space when the home goes over 1800 square feet.

As walking and transit become more practicable in Anchorage, there will be less need for parking. How can this section respond to new information as transit service increases and driving diminishes? Excessive parking requirements waste land.

Modify to read Residential uses located near the DT districts, and specifically north of Chester Creek, west of Orca Street extended, south of Ship Creek to the Cook Inlet are eligible for a reduction of up to 40% of the minimum number of required parking spaces.

Selecting Gambell Street as the eastern boundary is not based on a physical characteristic of the urban form. It appears the boundary is instead based on a subjective political line that is subject to change. The land use code should be more reflective of the underlying physical attributes running with the dominant platting pattern. The east side of Fairview is certainly within walking distance of the downtown area, especially along 9th Avenue. In addition, up to 20% of the households in the Fairview area use non-vehicular modes to move about the community and this high prevalence of non-auto use should be explicitly recognized in this section.

**Staff Response:** Staff is gathering and reviewing car ownership rate and parking demand survey information from survey sites in the areas that the commentator(s) suggest making eligible for the 40% reduction. Staff will bring its research findings and recommendations to the Commission as soon as possible.

**Staff Recommendation:** HOLD

**66. Issue:** 21.07.090G., *Off- Street Loading Requirements*

This section could use a “purpose” statement. For many uses the intent is clear, but for some, the intent of a loading “Berth” is unclear. For a typical strip mall, stores “unload” by backing a delivery van up to their door. It’s unclear how a designated loading area would apply.

**Staff Response:** The area behind the strip mall where a delivery van unloads is the “loading berth”. The purpose is to provide adequate area for delivery vans and trucks and to account for their needed circulation areas. This purpose is stated in the general purpose statements of 21.07.090.

**Staff Recommendation:** No changes recommended.

67. **Issue:** 21.07.090H.9.e. and i., *Relationship to Adjacent Properties and Parking Lots and Parking Lot Connections*

These two sections appear to be covering similar aspects, request that these two be combined.

**Staff Response:** Staff has no objection.

**Staff Recommendation:** Page 86, lines 10-12 and 25-28, delete 9.e. (re-letter remaining sections) and amend 9.i. to read:

**“Parking Lot Connections and Relationship to Adjacent Properties**

The plan shall show existing parking and circulation patterns on adjacent properties and potential connections. Required parking areas serving a site, whether located on that same lot or on an adjacent lot, may be connected by means of a common access driveway within or between the interior of such lots. ”

68. **Issue:** 21.07.090H.11.a.ii., *Snow Storage in all Zoning Districts*

How was the height limit of 15 feet determined?

**Staff Response:** That is the approximate convenient height for a front end loader. The Street Maintenance Department noted that their loader at the Mountain View snow disposal site is able to pile snow between 13’6” and 14’6” high.

**Staff Recommendation:** No changes recommended.

69. **Issue:** 21.07.090H.11.a.iii., *Snow Storage in all Zoning Districts*

Many parking lots are designed to address the maximum number of spaces needed for the maximum capacity of a building. Since this theoretical threshold is rarely needed, shouldn’t an owner be allowed to store snow on the portion of the lot not needed in the normal course of business?

**Staff Response:** The minimum requirements for parking spaces for many uses are being changed to reflect actual needs and to result in less excess parking. This allows more efficient land use. Thus there will not be the excess parking capacity available for six months of snow storage.

**Staff Recommendation:** No changes recommended.

70. **Issue:** 21.07.090H.12., *Parking Facility Maintenance*

Requesting a specific type of apparatus for cleaning a parking lot is not the place of local government. As stipulated this requirement would be especially troublesome for parking garages adjacent to residential uses, such as the parking garage in midtown off of C Street south of Benson.

**Staff Response:** It is very important that parking lots be cleaned in such a way as to minimize the amount of dust sent in to the air. The city, which is responsible for air quality, has a key interest in the manner in which parking lots are swept.

The requirement applies to surface parking lots, not structured parking, so the parking garages would not have to comply.

Watershed Management Division staff is reviewing this section.

**Staff Recommendation:** HOLD

**71. Issue:** 21.07.090K., *Bicycle Parking Spaces*

What are the dimensions of a bicycle parking space?

**Staff Response:** Outdoor bicycle parking spaces are provided by standardized bike racks—each bike rack accommodates a certain number of bikes. Other options include providing bike lockers, which are like boxes—one for each bike. Set dimensions are not needed.

**Staff Recommendation:** No changes recommended.

**72. Issue:** 21.07.130E., Table 21.07-14, *Lighting Zones Established*

References to “curfew” would be clearer if they were changed to “reduced lighting period” discussed in section H (p.128). I didn’t find any other reference to a “curfew.”

**Staff Response:** Staff does not object to this revision.

**Staff Recommendation:** Page 123, Table 21.07-14, in LZ-1 through LZ-3, change “After curfew,…” to “During the reduced lighting period (see 21.07.130H.), …”.

**73. Issue:** 21.07.130E., Table 21.07-14, *Lighting Zones Established*

Add Far North Bicentennial Park to the list of Representative Locations for zone LZ-0

**Staff Response:** Table 21.07-14 lists undeveloped areas of Chugach State Park and Chugach National Forest as representative locations for LZ-0. The intent of the LZ-0 classification is for areas in which human activity is subordinate in importance to nature, the vision of human residents is adapted to total darkness, and little or no lighting is needed except for safety and security. Both of these large parks are located outside of the Anchorage Bowl and contain extensive wilderness areas. Conversely, Far North Bicentennial Park is located within the Anchorage Bowl, has existing or planned major roads and institutional uses along several of its boundaries, a road cutting through it, a lighted downhill ski facility, and considerable human activity on its trail system, even though the park also contains wildlife habitat. An LZ-0 designation may be too restrictive for the overall park area although this designation might be considered for certain areas of the park in the future. Other major park and natural open space areas located within the Bowl are also proposed to be designated as LZ-1, including Kincaid Park and the Anchorage Coastal Wildlife Refuge.

**Staff Recommendation:** No changes recommended.

**74. Issue:** 21.07.130E., Table 21.07-14, *Lighting Zones Established*

The School District, in its designs, is mindful of light pollution into neighborhoods. It also must strive to meet the CPTED goals of crime prevention. Verify that the lighting zones for PLI comply with CPTED.

**Staff Response:** The draft exterior lighting standards are based on the Illuminating Engineering Society of North America (IESNA) guidelines and the model lighting ordinance that is being jointly developed by IESNA and the International Dark Sky Association. These guidelines promote effective lighting and better visibility through reduced glare and light trespass, and use of whiter light sources which improves color recognition. These measures work toward the crime prevention goals of CPTED. Most schools are proposed to be designated within Lighting Zone 2, but that designation will be re-evaluated once additional field testing is completed.

**Staff Recommendation:** No changes recommended.