

Anchorage School District REVIEW OF TITLE 21 REWRITE

Chapter	Subject	Comment	Recommended action
Table 21.02.1, Page 2, last line	Public Facility site design review	"Public Facility Site Selection and Project Landscaping Review": This is inconsistent with 21.03.090(C)(1)(a). Public Facility Site selection is in the same table (2 lines above); it is reviewed and decided differently.	CHANGE "Selection" to "Design" for consistency.
21.02.040 B 2	P & Z powers and duties	The School District has a Capital Request Advisory Committee (CRAC) which recommends capital projects to the School Board, which, in turn, recommends to the Assembly for approval of inclusion on a bond issue ballot proposition. The Planning Department is represented on the CRAC. The Planning & Zoning Commission does not have the background, knowledge, and experience to make recommendations on District projects. B2 appears to create a process with much less broad community involvement and, therefore, less credibility.	Delete "...and school board..." and "...and school district...."
21.02.080 B9	UDC powers and duties	Based on 21.02.040 B 2, is the intent of the Mayor's "list of public facilities" to include school projects?	Clarify that this does not include school projects.
21.03.020	Common Procedures for Applications	The overall schedule, considering all the procedures, seems to be quite lengthy. Anchorage School District projects are frequently under tight schedules. We are seeing 90 days from P&Z application to approval under current procedures. This does not include further time required for Assembly approval. Footnote #2 on page 2 says, "However, staff resources in Anchorage may not be sufficient to fully implement the text as written." The procedures are only as good as the capabilities of the staff to support them. Recognizing that operating budgets are frequent targets of cost-cutting, the process should be streamlined to fit a conservative model of staffing, not <i>vice versa</i> .	Reduce schedule of paperwork process and maximize staff's efficiency by simplifying system while maintaining quality.
21.03.020 E	Time limit on application completeness decision.	Because of Anchorage's short building season, any delay (especially due to understaffing) can negatively impact project delivery. Just as applicant's are given time limit's, so should the reviewers be given similar time limits.	Retain, or shorten, the 15-day limit.
21.03.020 E	Traffic Impact Assessments (sic)	Traffic Impact Analyses for school projects often rely on seasonal conditions for accurate data and may not coincide with the application procedures' schedule..	Reflect timeliness of TIA's for school projects in any process schedule.
21.03.020 5 & 6	Community meetings	The proposed minimums, totaling 35 days, are too restrictive and add to the already lengthy process. Community councils have their own calendaring requirements, which may vary between councils and from any time frame in Title 21.	Delete 5.b's reference to a minimum prior to first public hearing and reflect 6's time limit as a function of community council calendaring requirements.
21.03.020 L	Effect of Inaction on Applications	By defaulting to a denial, if a review or decision-making fails to take action, this provisions places an onerous burden on the applicant under circumstances which could be caused by the review staff or decision-making body. Such delays are commonly caused by lack of staffing and lack of quorums.	Include a provision that excepts denial when delay is caused by circumstances beyond applicant's control..
21.03.090	Public Facility Site Selection.	Question: Does this include schools? The Assembly/ASD has a Joint School Site Selection Committee which is not mentioned here. The bulk of the school site selections work is done by this Committee, not the P&Z Commission. JSSSC consists of 2-3 Assembly members, 2-3 School board members, 2 P&Z members, and some MOA staff and will typically work on a site selection for about a year before bringing it forward to P&Z.	If schools are included in "Public Facility", then the language should be revised to reflect the actual process used. If schools are not included, then that clarification should be included and the JSSSC process be referenced.
21.03.090 C.5 b	Site Plan and Landscaping	School projects have been increasingly held to higher and undefined landscaping standards than other public projects. Standards need to be clearly defined and agreed to. Fiscal responsibility should be a top priority. Both initial and maintenance costs should be considered. Outcome related to aesthetics and functionality. Make consistent with storm water permits.	Standards should not rely on ambiguous performance criteria. Refine the criteria to be quantifiable and qualitative, paying special attention to fiscal responsibility.
21.04.030, p.8, line 20	CBD - Restrictions on first floor educational activity use	Would this include restricting educational programs, such as the National Parks Service in the old Post Office? It's conceivable, though not presently considered, that Anchorage School District could envision a downtown outreach educational center - either to the general public or to homeless students. It appears that the phrase "Education and research center" does not apply to such educational programs.	Please clarify.
21.05.010 TABLE p.5	Classification of alternative schools	Some alternative schools are K-12 or K-8. Where do they fall in the Table?	Clarify that the highest grade level determines the classification.

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21.05.030(A)(5)(b)(ii)	Building code details in Land Use Planning document	Why do we need this level of detail here? Isn't this a building code issue? If this level of detail is retained, it should be consistent for all use categories.	Delete any provisions that duplicate, conflict with, revise, delete from, or add to accepted building codes.
Table 21.05-1, p.5	Equitable treatment of public & private schools	Educational Facilities require Major Site Plan Review ("M"), while Religious Assemblies (churches) require only an Administrative Site Plan Review ("S"). Some schools run out of church facilities are at least as large as some public schools. Have schools within Religious Assemblies/churches been addressed?	Require schools on church properties with student populations over 100 to be subject to same provisions as "Educational Facilities" schools.
21.05.040, p.37, line 28	Accessory uses definition	Accessory uses at schools also include "meeting areas, parking, maintenance facilities" and libraries.	Add these to schools' accessory areas.
21.05.040, p.38, line 10, and p.39, line 18	School type definitions	Clarification of technicality: Middle schools may also have 6th graders.	Clarify applicability of each provision without restricting grade levels to K-6 and 7-12.
21.05.040(E)(b)(ii) p.38, lines 19-24	Reference to Anchorage School District Design Criteria	ASD currently has three design/planning-related documents: 1) Educational Specifications, which define program and areas; 2) Design Guidelines and Standards, which define construction materials and systems; and 3) Instructional Technology Plan, which defines integration of computer technologies into the curriculum.	Change the "Anchorage School District school facility design and construction manual" title to be less specific, for example, "the facility standards of the Anchorage School District".
21.05.040(E)(4)(b)(iii)(A) p.38, lines 27-29	Site coverage and setbacks	Neither the minimum lot size nor the setbacks work for urban schools like Denali Elementary at 9th and Cordova. It exceeds both the maximum 35% coverage and 50 foot side and back setbacks. A full elementary school educational program requires 15 acres, giving us about 10 usable acres. Denali's multi-story urban elementary school sits on reduced acreage and does not provide full site-related educational program activities for a standard 550-pupil school. If this provision were in effect when Denali School's replacement was submitted, it would be disallowed.	Allow exception to the site coverage for urban schools. Refer to the building codes for setbacks.
21.05.040(E)(4)(b)(iii)(B) p.38, lines 30-36	Minimum lot sizes	The State of Alaska DEED references the Council of Educational Facility Planners International site planning site standards as: (1) Elementary: 10 acres plus 1 acre per 100 pupils (ASD elementary schools have 550 pupils; 10 + 5 = 15 acres); (2) Middle: 20 acres plus 1 acre per 100 pupils (ASD middle schools have 1,058 pupils; 20 + 10 = 30 acres); (3) High: 30 acres plus 1 acre per 100 pupils (ASD's new high schools have 1,600 pupils; 30 + 16 = 46 acres; however, the 1600 may be expandable to 2,000 pupils, so 50 acres). One of our concerns with the proposed Title 21 provisions on site size is that, even though the "minimum" is stated, recent discussions with the Municipality have questioned ASD's and DEED's standards as being too large for an Anchorage bowl that is running out of available school site properties. The Joint School Site Selection Committee includes 2-3 Assembly members, 2-3 School Board members, 2 Planning and Zoning members, and MOA staff. There is a real possibility that the minimum will become the site selection norm rather than an exception. Urban sites, such as Denali School, are not able to provide sites for a full outdoor program in our educational specifications.	Include a strong statement that the sizes are exceptions to the norm specified by the Anchorage School District educational specifications in compliance with State of Alaska DEED standards.
21.05.040(E)(4)(b)(v)(A) p.39, lines 11-12.	Temporary Structures for School Expansion Space	Frequently the School District has no other option than to position relocatable classrooms between principal buildings and any abutting right-of-way due to construction sequencing of multi-phased projects and site constraints. To force the District to make multiple moves for aesthetic reasons is irresponsible use of public money. See also comments on Section 21.05.080	Delete.
21.05.070 TABLE 21.05-3: TABLE OF ACCESSORY USES	Child Care	Sometimes secondary education's Family & Consumer Science classes have provide child care for more than 6 children as part of the curriculum. Would this be permitted as an accessory use?	Clarify.
21.05.080(10) p.113, lines 15-19	Location of relocatables	Relocatables sometimes must be located in parking lots. They may also alter or impede on-site pedestrian traffic.	Provide exception for schools.
21.06.010, p.10 TABLE 21.06-4: TABLE OF DIMENSIONAL STANDARDS (PLI)	Lot coverage and setbacks	The PLI lot coverage and setbacks conflict with Section 21.05.040(E)(4)(b)(iii)(A). As noted in review comments to that Section, neither the minimum lot size nor the setbacks work for urban schools such as Denali Elementary School.	Refer to the building codes for setbacks.

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21.06.020(B)(2)(b)(v)(D) p.16, lines 11-13	Handicap ramp	This is in direct violation of the International Building Code requiring 42" handrail heights at landings greater than 30" above adjacent grade. This is only one example of numerous other detailed provisions that ignore building codes' requirements.	Again, delete any provisions that duplicate, conflict with, revise, delete from, or add to accepted building codes. To avoid conflict with them, either leave the detailed building construction and dimensional issues to the building codes, or hire a building code expert to scrub your "land use planning" document of conflicts with the building codes.
21.06.020©(1)(a) p.23, lines17-27	Height Measurement and Exceptions	These may conflict with building code definitions.	Coordinate definitions with building codes for consistency.
21.06.020 Graphics appendix of Setbacks	Snow Storage	Setbacks do not address need for either snow storage or Municipal street and side walk clearing after a snow storm.	Coordinate with municipal snow removal and clearance needs.
21.07.020(E)(3)(b)(iii) p.15, lines 9-10	Wildlife movement inhibited by fences	Many of our schools are separated from adjacent neighbors by fences. Before a forested school site is developed, wildlife habituate the site. Sometimes, as in the case of Service, Bartlett, and Chugiak high schools, we are able to avoid fencing the perimeter and allow wildlife movement. However, more commonly, the neighborhood requests fenced separation. Initially, the new South Anchorage High School was designed with the intent of allowing free large wildlife movement through the site. Fearing students would trespass on their properties, the neighborhood demanded a fence on three sides through a Special Limitation attached to rezoning, even on the Leyden Road (north) side.	Retain fence-free wildlife movement provision as a goal, but do not make mandatory. Recognize mitigating solution to extenuating circumstances may over-rule implementation of this goal.
21.07.020(G)(2)(a&b) p.17, lines 9-27	Tree Retention Applicability	The general tenure of this provision appears to be directed to residential and commercial uses. Anchorage School District sites, because they are funded by taxpayer-approved funds, do not have the luxury of purchasing excess tree retention areas. The site sizes are chosen to meet the Educational Specifications for elementary, middle, and high schools. These address educational program requirements. Private educational facilities are less governed by such comprehensive educational specifications. (See comments regarding Section 4. "Minimum Retention Areas" below.)	Include public education sites in the list of exceptions.
21.07.020(G)(3) p.18, lines 8-9	Relationship to Landscaping & Screening	This clause says the tree retention "shall generally be in addition to the requirements in Section 21.07.080." Section 2.a. "General Requirement", p.17, lines 15-16 implies the landscaping shown on the plan can be combined with, or be in lieu of, tree retention.	Clarify.
21.07.020(G)(4) p.18, lines 17-19, TABLE 21.07-1 "MINIMUM REQUIRED TREE RETENTION"	Minimum Retention Areas	In general, as noted above, the educational specifications dictate the program activities that will occur on a school site. Most of these are universal requirements and dictate maximum use of the site to fit the minimum acreage. For "traditional suburban schools", the Council of Educational Facilities Planners International (CEFPI) recommends the following minimums plus one additional acre for every 100 pupils: <u>Elementary</u> - minimum 10 acres (ASD 550 pupils = 15+ acres); <u>Middle</u> - minimum 20 acres (ASD 1,058 pupils = 30+ acres); <u>High</u> - minimum 30 acres (ASD for low 1,600 pupils = 46 acres; for high 2,000 pupils = 50 acres). Other factors to be considered for tree retention on educational PLI sites are: 1) existing tree canopies may offer less than full coverage of undisturbed natural vegetation due to a number of factors, including species (scrawny black, or swamp, spruce), wind blow-downs, and disease (spruce bark beetle); 2) site grading required to locate large flat play fields and building facilities on sloped or variable topography may require disturbing much of the <i>in situ</i> vegetation (new South Anchorage	Include Anchorage School District sites in exceptions as noted above.
21.07.020(G)(6)(b) p.20, lines 8-12.	Early Tree Removal Prohibited	What happens if the Municipality/School District wish to purchase and develop for educational facility usage a site that is restricted by this three year restriction? It could delay construction on a new school based on this technicality.	Consider exempting public entities.
21.07.020(G)(6)(c)(ii) p.20, line 37	Fence Required	It is unclear if "staff" means the Planning Department, and if the applicant and staff <u>jointly</u> consider existing conditions.	Clarify.
21.07.060(C)(3) p.36, line 11	Traffic Mitigation Measures	Snow removal and on-site storage has a big impact on the ability of School District buses to navigate through subdivisions. This paragraph does not address the snow storage issue.	Add requirement for a snow storage and removal plan.

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21.07.080(A) p.41, lines 9-32	Purpose of landscaping, screening and fences	There is no reference to security issues. Crime Prevention through Environmental Design is a principal Anchorage School District seeks to include in its design standards. As an example, there is the 3' maximum, 8' minimum guideline which means no shrub between public street view and a school should exceed 3' high, with 18" clear from foliage to ground, and no tree foliage in the same circumstance should be less than 8' above ground level. For more information, see the website: http://www.safetyzone.org/pdfs/ta_guides/packet_4.pdf	Add security and crime prevention as a purpose.
21.07.080(A)(8) p.41, lines 29-30	Types of landscaping	This would imply only evergreen landscaping materials since they maintain the same "desired effects" throughout the year, even in "harsh urban and winter conditions".	Clarify intent more precisely.
21.07.080(D)(3) p.43, line 4 and following	Purpose of perimeter buffer landscaping	See comments about CPTED above.	Address security and crime prevention.
21.07.080(D)(3)(d) Table 21.07-3, p.45	Applicability of perimeter landscape buffering	The category 2 buffer appears to work against CPTED for both R-5 to R-10, TA, W and Collector, Arterial, Expressway	Compare with CPTED principles and adjust to category 1 perimeter buffer.
21.07.080(E)(2) p.47, lines 20-24	Applicability of screening	Again, "block the views" runs against CPTED principles.	Delete reference to "public/institutional" from line 20.
21.07.080(E)(3)(b) p.48, lines 18-24	Refuse collection - screening enclosure	The inclusion of a roof with a minimum 4:12 slope is very impractical and adds unnecessary expense. Trash refuse trucks lift the dumpster vertically before tipping. In addition, requiring closure on all four sides, especially when there is a large snowfall blocking a gate, is impractical. Especially in new designs, the School District seeks to locate dumpsters in the service areas, away from public view.	Delete roof requirement.
21.07.080(E)(3)(b) p.48, lines 25-30	Amortization of non-conforming Refuse Collection Receptacles	Any amortization term will be difficult for the School District. We have over 90 facilities, the majority of which do not comply with the proposed screening requirements. The District would have to present a bond issue to the voters. It is highly unlikely voters would approve dumpster screening when it is often difficult to have them approve schools for unhoused students.	Exempt the School District.
21.07.080(E)(6) p.49, lines 30-40	Screening of wall-mounted mechanical equipment and motors	The School District has many wall-mounted exhaust vents on its schools projecting more than 6" from the wall. Wall locations are better than roof, where possible because snow piles do not obstruct their function. Most of the vents are treated in an aesthetic manner and are usually limited to schools' service areas. Consider a kitchen exhaust 16' up high on a wall screening this would be very difficult and make it more prominent than if it were incorporated into the elevation in a logical aesthetic manner. For a good example of this latter treatment, see the Technology education and art room vents at the northeast end of the new South Anchorage High School.	Delete or add options to treat exhausts in manners compatible with building's materials and design.
21.07.080(G)(1)(e) Table 21.07-7 p.52	Minimum Species Diversity	This diversity constraint, when compared to the tree retention provisions, runs counter to natural reforestation trends where initial species predominate and are followed by other more mature species, each according to the soils and micro-climate. The purpose is laudable, but is the solution scientifically valid?	Validate with Alaskan horticulturalists.
21.07.090(G)(3)(d) p.79, line 9	6" curb height at pedestrian walkways	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?	Re-evaluate 6" curbs.
21.07.090(G)(4) p.79, lines 26-27	Review and approval by Traffic Engineer	In addition to the Municipal Traffic Engineer, ASD is having site plans reviewed by the Police Department.	No action.
21.07.120(D)(1)(a) p.101, lines 29-30	Building orientation	This does not work for all schools. For example, the neighbors requested the new South Anchorage High School have minimum visual impact from the road. Moreover, the School District need maximum view of the building from the primary street side for visual security, and the solar orientation necessitated the building's orientation to be perpendicular to the primary street.	Exempt schools.

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21.07.120(D)(2) p.102, line 14	solar orientation of public spaces	On a large building, such as a school, there are multiple entries and the massing is not usually a simple form. This presents a challenge during the months of use (fall through spring) to prioritize which spaces should receive the best solar orientation. It is probably more useful for the classrooms to receive the greater priority than the entries, in cases where there is a conflict. There is also minimum use of exterior entry plazas in the winter when the sun angle and temperatures are low.	Test validity of this on a number of ASD schools before requiring schools to comply.
21.07.120(D)(7) p.103, lines 31-32	Roof cornice requirement	What is the purpose of this? Consider the new Service High School fascia with no cornice. It very much improves the appearance of the building's elevation. Cornices also invite icicles except for the most careful detail design, including heat trace.	Delete requirement.
21.07.140(E)Table 21.07.14 p.120	Lighting zones	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.
21.07.140(G)Table 21.07-17 p.123	Maximum pole height	Again, 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.
21.07.160(A) p.127	Mixed-Use Districts	Where are charter schools appropriately located? At present, we have them in shopping malls and, temporarily, in an existing school to be demolished.	Address charter schools relative to mixed-use districts.
21.07.160(B)(2) p.128, line 19	Community Commercial Mixed-Use District	Shouldn't schools be included in this category as a community focus. Consider the proposed Muldoon Middle School combined with a Library and Community Center.	Consider including schools.
21.07.160(B)(3) p.128, line 34	Regional Commercial Mixed-Use District	Generally, pupils and teachers remain at high schools for most of the day. The only exception is the open-campus lunch break where many students drive to nearby fast food establishments. Also, a majority of teachers often commute to the high school from outside of the immediate region. The question is, how much of an economic generator is a "large high school"?	Verify that "large high schools" are, in fact, economic generators as they relate to the immediate regional center.
21.08.040(G)(3) p.8, lines 32-34	Utility easements	The provision that "utility easements shall not be placed in...public or private open space areas..., except where necessary to cross such areas" appears to be contradictory where underground service delivers power, gas, etc. to a school. This requires more than an easement through an open area, such as parking.	Clarify intent more precisely.