

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

FROM: Turnagain Community Council President Anna Brawley

DATE: April 8, 2022

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

Sent via email

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendations

Turnagain Community Council recommends that:

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

Thank you,

Anna Brawley

President, Turnagain Community Council