

Cheryl Richardson Anchorage Citizens Coalition (ACC) wrote:

Title 21 public hearings start Monday, March 12 and continue Monday, March 19 at 6:30pm, Loussac Library.

This email contains technical reasons why sunlight is important. Your testimony from personal experience is more important.

Residential sunlight is in trouble under the Mayor's amendments to the Provisionally Adopted Title 21. How can Anchorage succeed as a winter city without winter sunlight?

Here is Anchorage Citizens Coalition's position that we submitted to the Planning and Zoning Commission:

"In order to protect sunlight penetration in neighborhoods, proposed commercial buildings that might shadow a home in a residential zone shall met the following standard:

New commercial construction and commercial redevelopment shall not shadow residentially zoned lots between *March 21 and October 21*, for the six hours between 9am and 3pm solar time."

The Mayor's Title 21 amendments remove sunlight protections for North Star, Spenard and Rogers Park neighborhoods. See ACC's comments on the Mayor's proposed amendments to the Provisionally Adopted Title 21 below.

ACC worked to develop the best language to protect midtown residential sunlight until the municipality decides it is a priority. Note that even this standard allows considerable fall and winter shadowing.

ACC'S COMMENTS ON THE MAYOR'S AMENDMENTS TO THE PROVISIONALLY ADOPTED TITLE 21

Mayor's Title 21 amendment 18 (and implementing amendments:)

ELIMINATION OF MIDTOWN ZONING DISTRICTS (MT)

21.04.010A.2 Delete the Mt-1 and Mt-2 districts from the table....

Eliminating midtown zoning districts, alongside restoring unrestricted heights in Midtown's B-3 zones wipes out height restrictions for Midtown and allows the construction of tall towers that could easily shade yards and homes in midtown's established residential zones and the North Star neighborhood north of Fireweed.

In addition this action removes incentives, *and actually creates disincentives* for midtown property owners to rezone into the Regional Mixed Use district. Buildings zoned mixed use would have a lower height limit and more restrictive setbacks. The mixed use standards are needed to begin redeveloping Midtown into a walkable employment center from its current status as a place where high speed traffic overwhelms walking and biking, and landscaping and public open spaces are hard to find.

ACC's position is supported by:

Comprehensive Plan Policy 10: Mixed-use development is encouraged within Major Employment Centers....

MAYOR'S AMENDMENT #54

HEIGHT TRANSITIONS FOR NEIGHBORHOOD COMPATIBILITY

21.06.030D.8.4.

Height transition requirements provide some protection to adjacent lower density neighborhoods. They move toward protecting property values and encourage thoughtful placement of tall buildings when they are next to residential neighborhoods. Denali Tower North is one example of a high rise blocking the sun onto a significant number of homes even 3 blocks away. But the Denali Tower would not be subjected to the proposed height transition standard. *More protection is needed.*

Large cities such as Denver, Tacoma, and even Manhattan have successfully implemented zoning height transitions. Their experience shows that infill and redevelopment is more likely to succeed if neighborhoods are confident they will be protected through better building and site design. If Anchorage is to grow taller and more dense, it will need standards that ensure higher densities can be compatible in closer urban environments.

To maintain Anchorage's quality of life, our homes and sunlight must be preserved. But proposed height transition standards will not protect homes if midtown's B-3 height limitations are eliminated.

The municipality should adopt changes that protect neighborhoods from new commercial development that would darken their yards and homes. Midtown's established residential zones and the North Star neighborhood north of Fireweed particularly need sunlight protection. Add the following language to the height transition section:

"In order to protect sunlight penetration in neighborhoods, proposed commercial buildings that might shadow a home in a residential zone shall meet the following standard:

New commercial construction and commercial redevelopment shall not shadow residentially zoned lots between *March 21 and October 21*, for the six hours between 9am and 3pm solar time."

(Note that this standard allows significant commercial shadowing between October 21 and March 21.)

If a proposed commercial project can show less overall residential shadowing using a different standard, the Planning and Zoning Commission may use the alternative equivalent compliance or the conditional use process to adjust building placement and/or massing to mitigate and minimize the loss of sunlight to the affected residential properties.

Anchorage 2020 provides ample support for height transitions to protect neighboring uses from new development.

This position is supported by:

Comprehensive Plan Policy 7 Avoid incompatible uses adjoining one another.

Comprehensive Plan Policy 41 Land Use regulations shall include new design requirements that are responsive to Anchorage's climate and natural setting.

Comprehensive Plan Implementation Strategies – Design Standards - This strategy responds to the need to be more efficient with land use, the importance of design in the economic success of urban areas, as well as the community's desire to be more attractive, comfortable year-round, and reflective of our natural setting. It seeks to improve the appearance and function of developments, including their ability to respond to the specific northern city conditions of Anchorage such as **sun angles**, length of days, ... consider such things as **building scale and massing**, roof lines, ... building placement and orientation, natural light, ... (See the picture on page 96 of *Anchorage 2020*.)