

---

# TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils  
1057 West Fireweed Lane, Suite 100  
Anchorage, Alaska 99503

---

TO: Mr. Tom Davis, Senior Planner, Municipality of Anchorage Planning Department  
FROM: Turnagain Community Council  
DATE: Friday, October 26, 2018  
RE: Comments on Proposed Changes to R-2 Zoning and Related Development Standards

**NOTE: This letter was ratified by Turnagain Community Council on November 1, 2018 with the following vote: 12 Yes, 0 No, 1 Abstain.**

Dear Mr. Davis (Tom),

First of all, thank you for reaching out to Turnagain Community Council (TCC) during the Municipality of Anchorage Planning Department's Community Discussion Draft process, and specifically for meeting with the TCC Land Use Committee earlier this month to provide information on proposed municipal Code changes to R-2 Zoning Districts.

TCC appreciates the opportunity to provide written comments on these proposed Code amendments that would affect height specifications and other regulations for housing in the R-2 Zoning Districts. The Planning Department has stated the purpose of the proposed changes is to address some challenges developers have had with the existing requirements, encourage building to the density / number of units allowed in the Code, and require additional aesthetic features to address visual impacts of infill development in existing neighborhoods.

TCC understands the need for more housing opportunities in Anchorage, and recognizes the Municipality's effort to propose a variety of ways to change local policies to meet those needs. Because the Turnagain neighborhood contains a fair amount of R-2-zoned land, the proposed actions could potentially, over time, have a significant impact to the area. The intent of this letter is to share some of our comments and concerns as well as pose some questions to help us better understand the changes and the impacts they would have in Turnagain neighborhoods. Please note that TCC expressed some of these same concerns when commenting on the Accessory Dwelling Unit Code amendment proposals.

Our comments are generally organized around the three proposals described on page ii of the discussion draft dated September 27, 2018, with some references to the ordinance language and other sections.

## **Overall Comments**

TCC understands this is one of several proposals to implement the Action Plans outlined in the 2040 Land Use Plan to increase housing opportunities and incentivize building more housing throughout the Municipality, particularly in areas that are close to transit, shopping, employment and other services. Turnagain is a candidate for this type of infill development, and has already seen some new redeveloped housing over recent years. TCC supports the overall goal of improving affordability and availability of housing in the city. However, as an established neighborhood, we are also concerned about the potential

negative impacts of increased density and potential unintended consequences of changing Anchorage's zoning regulations without careful consideration of what this means when these new policies are implemented over time. We are expressing general concerns about the cumulative impact of these changes, and would like these concerns factored into each proposal as it is brought forward. For example, our concerns about increased demand for parking should be considered broadly as it relates to increasing the number of people living on a street or in a neighborhood.

Neighborhoods in the Turnagain area tend to be relatively older and built on narrower roads, or with narrow lots with few on-street parking spaces available to those without driveways or alleys. Many of our roads also do not have sidewalks, shoulders or curbs, and several roads have required significant upgrades to the drainage system (such as Turnagain Blvd. and McRae Rd. projects). Many Turnagain streets still need improvements for pedestrian and bike safety as well as drainage and flooding, and very little space in the right of way to do so. We are concerned about the potential increase in traffic and demand for parking in these neighborhoods, with a greater number of units per acre or property than exist now. We understand that changing the height limit and design standards for buildings in R-2 zones does not change parking requirements, but as its intended effect is to allow more units per acre, parking and traffic demand are likely to increase and exacerbate the existing problems outlined above. We will be anticipating and closely reviewing Implementation Project 1 on the list on page iv (Action 4-3) regarding reduced parking requirements, as we see reducing parking requirements contributing to additional issues for some R-2-zoned neighborhoods in Turnagain.

### **Section 1. Height and Scale of Houses**

1. TCC has no objection to the change removing the 2.5 story requirement, provided that the 30-foot height requirement and existing setback requirements remain in place, as stated in this version of the ordinance (also applies to Section 3).
2. TCC has no objection to including floor area ratio (FAR) has one of the dimensional requirements in R-2 districts, in place of the language limiting to 2.5 stories.
3. TCC has concerns about the implications of excluding some living spaces in calculation of FAR. We understand that the intent is to address visible, aboveground square footage of a building as it relates to how large and bulky it looks. We also understand that current Code is written to exclude these spaces. However, as it relates to concerns described above, basements and attics that are considered rental space would still contribute to higher density per lot.

**Question:** If basements and attics were not exempt, what impacts would this have? Is that a feasible alternative?

**Question:** In item "c," the text refers to "allowing extra square footage for detached accessory structures," but in reviewing the Code language provided, we did not understand how this is actually the case. Is it an additional allowance of square footage, or part of the new FAR formula? Please clarify what this sentence is referring to.

### **Section 2. Height of Rooftop Appurtenances on 3-Story Buildings**

1. TCC has no objection to the proposed changes regarding height of smaller building features that exceed the 30-foot height limit. We generally support rules that protect neighborhood character by establishing minimum aesthetic standards or incentivize builders to make choices for attractive, high-quality developments (also applies to Section 3).

### Section 3. Design of 3-story Buildings on Smaller Lots

1. As noted above, TCC has no objection to removing the 2.5 story language provided that other dimensional standards remain in place.
2. TCC has no objection to the proposed limit regarding stair entrances to buildings.
3. As noted above, TCC generally supports rules that encourage attractive, high quality developments, including the proposed requirements that building facades be more interesting than simply blank walls.

**Question:** In reviewing this portion of the draft, we saw on page 16 references to “Section F (2)(c)” in Code, but the information on page 17 is Section B (2)(c). Is this a typo, and the two pages are intended to refer to each other? This seemed like the case, but we wanted to verify.

4. The current language indicates that the design standard applies to external-facing facades, i.e. those facing the street and/or adjacent properties. We are concerned about two aspects of this proposal as written in code:
  - a. The design standards for building exteriors should not be exempt simply because the building is far from the property line, or if it is a building surrounded by other similar buildings in a multi-unit development. For example: this hypothetical development has 7 buildings, with Building 3 surrounded by the others in the development.



The language appears to say that while all the other buildings would be required to have an interesting façade, Building 3 in the middle would not. We believe that the development would be more attractive if all buildings are held to the same standards, regardless of location on the property or placement relative to other buildings, so that — regardless of which unit you live in — your view of the other building exteriors has some architectural features.

- b. Even if the intent of this section remains the same, we are concerned that the actual proposed language in the draft is not sufficiently narrow in describing that situation, and instead only refers to buildings located 50 feet or more from the property line:  
Exemptions from this subsection c.: Single-family detached homes are exempt. Building elevations located 50 feet or more from the property line are also exempt.



This would appear to allow any building, regardless of which direction it faces or whether it is part of a multi-unit development that is far enough away from the property line to be exempt from the requirements. If the intent is to only exempt “interior” buildings in a single development, this should be stated more explicitly. For example: if the setbacks in the illustration are 60 feet and 120 feet, respectively, this property would be exempt although it is still the closest/only building to the street.

**Recommendation:** Apply the façade standards for all buildings, and at least three walls, in a multi-unit development, not just those facing the street or other properties. This would ensure that there is more visual interest and better standards than with many current developments.

Again, thank you for the opportunity to provide input to the Community Discussion Draft for your consideration. Please don’t hesitate to contact me, or Turnagain Community Council Land Use Committee Co-chair Anna Brawley, if you have any questions or would like to discuss our comments.

Sincerely,

Cathy L. Gleason  
Turnagain Community Council President  
TCC Land Use Co-chair