Correspondence



December 3, 2023

Dear Assembly Members:

Rabbit Creek Community Council (RCCC) Board Members were excited to participate in the recent Housing Action Week. RCCC had previously expressed significant concerns about draft proposals to collapse Anchorage development zones into only a few zones, with little involvement by experts in Municipal departments or the public. Thus, we greatly appreciated the participation of municipal and private sector experts and the public at Housing Action Week. We support an inclusive, public effort to update our zoning, land use plans, and development/construction codes in reasonable and effective ways to address Anchorage's housing crisis.

The pace of change on all fronts in this century requires innovative planning and bold leadership. We are grateful that the Assembly is taking the lead on a Housing Action Strategic Plan (HASP). But housing is only one area that Anchorage needs to re-envision, and housing is integrally related to workforce retention, other economic factors, transportation, land use patterns, open space and energy needs, etc. Previously, we commented on the need for a new Comprehensive Plan to look wholistically at land use, transportation, environmental sustainability, and economic opportunities. We again urge the Assembly to commit to a Comprehensive Plan Update to envision and build a solid physical, social, and economic foundation for Anchorage for the coming decades.

As an initial but overarching step in this process, the Assembly has developed a Draft HASP. At its November 9, 2023, meeting, RCCC voted to provide comments on the Draft HASP, detailed in an attachment to this letter. The vote was 23 yeas, zero nays, and 1 abstention.

During the Housing Action Week Summit, we were inspired by the comments of keynote speaker Charles Marohn and anticipate your working his proven advice into the HASP and its implementation. His recommendations that seemed particularly important for Anchorage included that we find ways to:

- Direct funding and development incentives to neighborhoods and blocks where people are excited about making their areas attractive to growth and development/re-development.
- Emphasize funding projects in more central locations rather than at peripheral locations where they will encourage sprawl and where infrastructure is not fully available.
- Quality matters: create places where people will want to live.

Thank you for the opportunity to comment on the Draft HASP. We look forward to continuing engagement with the Assembly as the plan evolves and is adopted and implemented.

Sincerely,

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Co-Chair

Attachment

cc: Mayor Bronson

John Rilsy

Co-Chair

Attachment: Detailed Comments on Assembly's: Draft Housing Action Strategic Plan

Recommended additional text in *italics*.

VISION:

We agree with the plan's vision.

The list of the types of housing we want includes "urban, walkable living" and "innovative design" – two types we strongly support. These concepts should be better incorporated in the Plan's Guiding Principles, Goals, and Strategies as noted below.

GUIDING PRINCIPLES

We recommend the second bullet be expanded: "Housing choice for all."

We like the guiding principle: "Engage the whole community to find solutions." We suggest the addition of a strategy to implement this principle: <u>Initiate a new Comprehensive Plan to engage the public in a vision for land use and</u> transportation patterns, social and economic goals, and sustainability.

Guiding principles we would like to revise:

"Community where everyone belongs" is too vague. Inclusivity is a great concept, so we'd like to state it specifically, so that it can be measured.

- For the humanitarian intent to house everyone, there should be a principle such as:
 - <u>Safe and sanitary shelter for everyone</u>.
- For the intent of a social goal of community connectedness, include a principle such as:
 Neighborhoods designed with public spaces and safe travel options.

"Economic prosperity" is too vague, and the Draft Plan has no corresponding goals or strategies or measurability. A more specific principle is <u>Raise land values</u>. Another way to promote prosperity is to reduce cost burdens to both households and businesses. See the goals for reduced travel costs and for energy efficiency below.

"Government that works" is too vague. And it seems self-evident. Delete this or determine what measures of success can be monitored to determine whether this principle is being achieved.

Guiding principles we recommend adding: <u>Walkable neighborhoods</u> <u>Attractive, durable housing</u> <u>Energy efficiency</u>

GOALS

Four of these five goals focus entirely on cost and supply. We recommend adding goals for quality, energy efficiency, and reducing family cost burdens (which directly boosts their prosperity) as follows:

- 6. Foster walkable neighborhood centers to reduce transportation cost burdens for residents.
- 7. <u>Raise land values by targeting infill, redevelopment, and improvements in underbuilt and blighted areas</u>.
- 8. <u>Minimize traffic impacts and vehicle miles traveled to reduce burdens of cost, time, and health</u>.
- 9. <u>Maximize energy efficiency at both the housing unit scale and the citywide scale</u>.
- 10. Ensure durable and aesthetic construction.

Under "ACTIONS" for each strategy we have the following comments:

STRATEGIES

We recognize that the strategies are currently identified as summary statements and will be fleshed out as the Plan is developed further. Accordingly, we want to point out some significant caveats that should be included and provide suggestions to ensure the strategies do not compromise our current Comprehensive and Land Use Plans goals or existing neighborhood characteristics.

Strategy 1. Remove barriers to infill and new construction: This is too broad. The barriers to infill and new construction need to be identified first and should be treated separately. Some barriers will be issues that the Assembly/Administration cannot easily address (e.g., labor shortages, supply issues), but they should be identified. Where possible, the Assembly can request supportive actions from public and private partners who can address those issues (e.g., can the Legislature provide financial support for trade schools and apprenticeships?).

We recommend rewording this strategy as: "Identify and remove preventable barriers to infill and new construction."

As this Strategy is fleshed out, we recommend that carrying capacity studies be implemented as follows:

Lot size, lot coverage, and dwelling units per acre have practical limits in the areas reliant on private wells and on-site septic systems. An areawide hydrological and drainage study should precede any revisions to density, lot size, and lot coverage in areas of onsite services, and include coordination and consultation with Anchorage's Watershed and Natural Resources Advisory Commission. Anchorage has no comprehensive, current quantitative mapping of water recharge and groundwater carrying capacity. Lot coverage has a direct impact on run-off versus groundwater recharge. Local availability of groundwater is already constrained in some parts of the Anchorage Hillside. Some areas of wetlands or shallow bedrock have severe limits on septic systems that will require low density/large lots.

<u>Third bullet: Dimensional standards should be concurrent with re-zoning decisions.</u> The intent to encourage more housing units per acre "by revising dimensional standards, minimum lot size and coverage, height limits and other components (AO 2023-87(S)" <u>should be</u> <u>done as a major amendment to Title 21, and it should be done concurrent with any rezoning</u>, so that the full impacts of re-zoning at both the site level and the neighborhood level can be analyzed by staff and presented to the public for discussion.

Seventh bullet: The concept of "trading" should be part of this strategy of making suitable municipal lands available and it should be further explained: Sell or trade surplus municipal lands (Heritage Land Bank, Municipality of Anchorage, Anchorage School District) to obtain beneficial locations for residential housing.

- A. Identify <u>uncommitted</u> <u>surplus</u> HLB, MOA and ASD lands. Do not propose converting Municipal land that is committed to parks or other public uses.
- B. <u>Use surplus public lands in innovative and efficient ways, including sales, trades, and acquisitions to prioritize housing in neighborhood centers and blighted areas</u>. HLB and MOA should focus on developing in areas appropriate for walkable, fairly dense housing, in compliance with our Comprehensive Plan; and not in areas that would need expensive extensions of public services.

Last bullet: Suggest adding to end of this, "... that meet safety and construction codes."

Strategy 2. Encourage reuse and redevelopment. RCCC endorses this strategy with a caution and a revision to the second bullet which promotes subdividing properties to add multiple units. This could create a hodge podge of very small lots in the midst of areas zoned for specific size lots. Subdividing existing buildings or homes into multiple units would be a more reasonable approach.

Last bullet: Excellent. Could be expanded by partnering with the Anchorage School District: "... Encourage workforce development in skilled trades, *including by partnering with the Anchorage School District, King Career Center, and local trade unions,* with a focus"

Strategy 3. Develop Funding Streams for Infrastructure and Public Utilities:

We particularly endorse the first bullet which may provide innovative opportunities to ensure that new infrastructure is fully integrated with existing systems. On the Hillside secondary egress for disasters such as wildfires is needed in many areas. Unfortunately, developers typically put in long cul-de-sacs which are cheaper than extending roads to connect with existing roads that could provide secondary egress; nor do they routinely include pedestrian easements to connect new neighborhoods and people with adjacent ones. Public-private partnerships present a more affordable option for providing both motorized and non-motorized connectivity to make our neighborhoods safer and friendlier.

Targeted locations for infrastructure

Add a clarification about WHERE infrastructure should be subsidized. Given the limits to public funding, <u>tax-payer subsidized infrastructure for new development should apply to neighborhood</u> <u>centers and re-development areas</u>. Taxpayers should not subsidize new development in peripheral areas (creating urban sprawl and induced traffic), nor should public infrastructure increase the density on sensitive natural areas such as alpine slopes and wetlands.

Strategy 5. Maintain Housing Affordability and Stability

Expand second bullet: "*Identify and* remove barriers for people . . . " Add a bullet: "Work with the state Legislature, lending authorities (e.g., Alaska Housing and Finance Corporation), non-profits, and Native Corporations to provide subsidies to lower interest rates and mortgage payments for lower income households and first-time home buyers."

Add a strategy and actions to ensure quality, livability, and energy efficiency. At the Housing Action Week, Keynote Speaker Charles Marohn confirmed that re-development and infill should be directed to neighborhoods and sites that are eager for it, and that the new development should create a place where people want to live. Quality AND quantity of housing are essential for an inclusive, prosperous and healthy future for Anchorage. Inclusivity should start now, through the process of inclusive public planning.

New Strategy 7. Ensure that revisions to standards for zoning and design contribute to long-term value, energy efficiency, and the policies of neighborhood and district plans.

- Maintain access to sunlight and views when considering height limits and setbacks.
- Maintain or create requirements for durable and energy efficient housing materials and construction techniques, such as adequate windows for natural daylight and ventilation.
- Maintain or create standards for resiliency in the face of climate change, e.g., trees and greenspace for summer temperature moderation, and swales for extreme run-off events.
- Follow neighborhood and district plans regarding connectivity to open spaces and preservation of prominent neighborhood features.