
TURNAGAIN COMMUNITY COUNCIL

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

TO: Municipality of Anchorage Planning Department and the
Planning and Zoning Commission
FROM: Turnagain Community Council
DATE: Monday, February 11, 2019
RE: **PZC Case # 2019-0009** — Public Hearing Draft Proposed Municipal Code Changes to
R-2 Zones and Related Development Standards

Please note: TCC approved the following comment, Yes-13, No-0, at our February 7, 2019, meeting.

Planning Department Staff & Members of the Planning and Zoning Commission,

Thank you for the opportunity to provide written comments on the proposed ordinance with some changes to height specifications and other regulations in R-2 zoning districts, which would address some challenges developers have had with the existing requirements, encourage building to the allowed density / number of units allowed in Code, and require additional aesthetic features to address visual impacts of infill development in existing neighborhoods.

Some of our concerns expressed to the Planning Department have already been addressed in the new review draft, and we appreciate staff's responsiveness to our concerns as well as availability to attend meetings. Following are comments on the new Public Hearing Draft, as well as reiterated concerns about how the 2040 Land Use Plan implementation projects, as a whole, will impact our neighborhood.

Overall Comments

TCC understands that this is one of several proposals to implement the policies outlined in the 2040 Land Use Plan, and 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 in 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 regulations for Anchorage's zoning districts (including R-2) without careful consideration of what this means when these new policies are implemented over time. We express 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, although this particular proposal does not change parking requirements.

On-Street Neighborhood Parking & Street Traffic Increases

Neighborhoods in the Turnagain area tend to be relatively older and built on narrower roads, and with narrow lots that create few on-street parking spaces for 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 improve drainage (i.e., Turnagain Blvd. and 35th Ave. & 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 on existing properties. 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.

Process Recommendation: Include Public Review of Proposed Developments

TCC recommends that an additional step of public review be implemented for infill developments that may significantly impact neighboring properties, to ensure that there is adequate consideration of the context of the lot and how the new building or addition would impact neighbors. This could be limited to developments that approach the upper limit of the FAR and/or that are on a lot smaller than a certain size, or with setbacks below a certain threshold, as it would be most relevant for smaller lots or properties that are built to or closely approach the setbacks. We understand that this review would not include any decision-making authority, but like many other processes outlined in Title 21, having the opportunity to provide input on a proposed development is valuable and ideally results in a better outcome for all.

Comments on 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). However, a more judicious approach may be to allow the 3-story limit only on lots of 20,000 sf or greater. This is a recommendation proposed by the South Addition Community Council as well.
2. TCC has no objection to using floor area ratio (FAR) as 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, above-ground 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 increased density and the general concerns described above, basements and attics that are considered living space or are a separate unit rented out would still contribute to density.
4. We are also concerned about the exemption of additions to houses from calculation of FAR. Many of our older homes, like other Anchorage neighborhoods, are very small and additions are built to significantly increase the size of the home. We do not object to people increasing the size of their homes, but exempting additions from the FAR calculation may potentially exclude a significant

portion of the house. We understand the proposed exemption is limited to 400 square feet for adding a one-time addition—this is preferable to having no limits, but may still have a significant impact on the lot.

Comments on Height of Rooftop Appurtenances on 3-Story Buildings

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).

Comments on Design of 3-story Buildings on Smaller Lots

1. TCC would like to thank Planning staff for clarifying that there are several existing development standards in Code related to building façades in a multi-unit development. The previous draft was written in a way to imply that only some building sides would be subject to the requirements to improve the façade for greater aesthetic appeal. We support requiring building façades on all sides — regardless of the building’s location on the lot of a multi-unit housing development.
2. We support the general concept of encouraging screening of buildings through natural vegetation, as trees and other landscaping have a variety of ecological, aesthetic and health benefits. However, we have two concerns regarding the use of trees and landscaping as a strategy to screen blank building façades:
 - a. If a development uses existing vegetation as its screening strategy, such as a stand of mature trees or thick underbrush, either on its own property or a neighboring property, how could future removal of this vegetation be prevented? What requirements, if any, would be on the developer to retain this screening in the future, or replace the screening vegetation if the original trees are removed? We understand it is not feasible to hold a property owner responsible for screening his or her neighbor’s buildings—but if vegetation that is not located on the property is intended as screening, there is significant risk of this strategy failing if that vegetation is removed.
 - b. If a development is built, including installation of new vegetation with the goal of providing screening to meet the code requirements, what standard or threshold of vegetation will be required upfront, to ensure the screening is sufficient in the first few years of the development’s life? It is often not feasible to plant mature trees due to their cost, so small, immature trees that are intended to grow over a long period of time are used instead. If these small trees or other small foliage are used to screen buildings, they will not be effective until they reach maturity years later. Will the Municipality require a minimum age, size, species (TCC recommends evergreens for year-round screening) or other threshold of vegetation—to effectively screen the new development when it is built, not just at a future date?
3. TCC has no objection to the proposed limit regarding stair entrances to buildings.
4. As noted above, TCC has no objection to removing the 2.5 story language provided that other existing dimensional standards remain in place; but please see our above comments on the idea of perhaps limiting this to 20,000 sf or larger lots.

5. As noted above, TCC generally supports regulations that require attractive, high quality developments, including the proposed requirements that building facades be more dimensional and aesthetically pleasing than simply blank walls.

Comments on Proposed Rules Protecting Solar Access

1. TCC supports the concept of protecting solar access in Anchorage neighborhoods, and appreciates this concept being included in these changes. This is beneficial to maximize neighbors' enjoyment of their property in a place that gets little sunlight in the winter and where many people garden in the summer. It is also beneficial for energy and economic reasons: in 2019, Turnagain will be a neighborhood participant in the Solarize Anchorage project. As residential rooftop solar is more common, solar access impacts residents' ability to generate their own electricity and offset their use of power on the grid. Residents will be making a significant investment upfront, with the idea it will pay off over time, so they will be relying on the assumption that the degree of solar access they have now will be reliably available into the future.
2. That said, we have concerns about whether this concept, as drafted in the ordinance, will be sufficient protection or achieve the stated goal. Planning staff stated in a recent presentation that the policy was an initial attempt using a narrow standard based on compass orientation. The sun's position changes considerably throughout the year, particularly at Anchorage's latitude, so this may only address solar access during one small portion of the year. While we do not have a specific recommendation to improve this portion of the draft, we encourage additional research and consideration of options to develop a reasonable policy that protects neighbors from significant loss of solar access to do an adjacent development.

Again, thank you for the opportunity to provide input on the Public Hearing Draft of Compatible-Scale Infill Housing in R-2 Zoning Districts — and thank you for your consideration of our comments.

Sincerely,



Cathy L. Gleason
Turnagain Community Council President