



RABBIT CREEK COMMUNITY COUNCIL (RCCC)
A Forum for Respectful Communication & Community Relations



1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503

April 16, 2021

TO: Planning and Zoning Commission
Theede Tobish, Senior Planner

RE: PZC Case No. 2021-0039, Small Area Implementation Plan Ordinance

The Rabbit Creek Community Council (RCCC) submits this letter regarding PZC Case No. 2021-0039, regarding proposed changes to Anchorage Municipal Code Title 21 to create a Small Area Implementation Plan (SAIP) process.

The RCCC discussed Planning and Zoning Commission (PZC) Case No. 2021-0039 at its publicly-noticed April 8, 2021 meeting. The new planning process appears to be a useful tool for the facilitating infill and compact redevelopment in the Anchorage Bowl, particularly when multiple lots or multiple zoning districts are involved. However, the RCCC has several concerns regarding use of the SAIP process in the outlying areas of the Anchorage Bowl, such as our Council area. Following a discussion on the record and input from the community, the RCCC voted to request the following revisions to the proposed ordinance, by a vote of 20 yeas, 0 nays, 3 abstentions.

A. Add language to the appropriate sections of the ordinance to limit the SAIP to areas served by transit, water, and sewer or to the Class A improvement area. The SAIP is intended to achieve compact urban land use through infill and redevelopment, achieving relatively high density. This is appropriate in parts of the city where urban services are in place. The RCCC does not feel that high-density development should be expedited in Class B improvement areas, where residents and institutional uses may depend on onsite wells and septic, and where roads and intersections are often built to rural standards.

B. Add a requirement that at least 2/3 of the area proposed within a Small Area Implementation Plan must have been previously developed (graded, filled, paved or had structures built on it). The SAIP process is intended for redevelopment and infill, yet there is nothing in the ordinance to preclude an SAIP on virgin land, especially if the virgin land has environmental constraints or lacks infrastructure. The SAIP process could also be mis-applied to sparsely developed land, such as a 5-acre Hillside homesite with one house on it. Virgin tracts and sparsely developed tracts should follow traditional planning, which includes choices such as planned unit development and conservation subdivision development.

C. Add a requirement that the Small Areas and the types of development under an SAIP should not increase Vehicle Miles Traveled compared to the standard type of development allowed under zoning. The SAIP, section 21.03.240.E.3.c, allows B1A commercial use at twice the acreage of normal B1A districts and this could create far-flung business hubs on the periphery of the Anchorage

Bowl, and generate long commutes to jobs and services. We should avoid SAIP projects that induce more commuter travel.

D. Provide a longer-than-usual public comment: a 60- or 90-day public comment period after presentation to Community Councils, prior to the public hearing by the Urban Design Commission. At least half of the comment period should be non-summer months (June, July, August). This is a complex and compressed planning process compared to the normal sequence of rezoning, platting, and site plan approvals. Residents should be afforded time to learn the complex details, especially given the infill nature and increased density intended under the SAIP.

E. Finally, RCCC suggests consideration of a maximum size to the SAIP. Given the intent for the SAIP to transform the local land use pattern and increase the intensity of use, there should possibly be a maximum acreage limit so that the Comprehensive Plan and District Plans are not, in effect, overridden. This would be in keeping with “Small Area” in the title of the ordinance.

If you have any questions, please feel free to contact us.

Sincerely,



Ann Rappoport, Co-chair
Rabbit Creek Community Council



Carl Johnson, Co-chair
Rabbit Creek Community Council