Turnagain Community Council Board of Directors Cathy L. Gleason, President

June 21, 2024

RE: PROPOSED AO 2024-44 — ANNOUNCED JUNE 17, 2024

Dear Assembly Chair & Members:

These comments on Assembly Ordinance 2024-44 are being submitted by Cathy Gleason, President of the Turnagain Community Council (TCC) on behalf of the Turnagain Community Council Board of Directors. TCC previously commented and testified on this ordinance when it was brought before the Planning and Zoning Commission (PZC) and acted on during their May 20^{th} meeting. We opposed this ordinance at that time for several reasons, including some of those listed in our comments below. Other community councils also opposed amending the Comprehensive Plan without proper public involvement. The PZC voted to postpone action to a subsequent meeting on the basis that the ordinance had problems that needed to be addressed, and that the proposed draft was not ready to advance to the Assembly for consideration.

TCC recommends that no action be taken on AO 2024-44 until the concerns raised by the PZC, the Planning Staff, the new administration, and TCC and other community councils are addressed and answered.

1. Need for revising the 2020 Comprehensive Plan.

We understand that this ordinance is being considered because the changes proposed in AO 2023-87(S-1) require amending the Comprehensive Plan. Now that changes are limited to the Use Table and allowing detached duplex structures, is a revision to the Comprehensive Plan needed?

The need for revising the Comprehensive Plan should be confirmed with the Municipal Attorney and Planning Staff.

2. Revising the Comprehensive Plan requires meaningful public engagement before deliberation.

While this may appear to be a minor revision, but one with potentially far-reaching consequences, revising the Comprehensive Plan requires meaningful public engagement beyond public comment opportunities before PZC and the Assembly. This is not being provided. At least two PZ Commissioners commented to this effect at their May 20th meeting and were reasons for postponing action by that body.

No action should be taken on AO 2024-44 without meaningful public engagement, involving the Co-Sponsors, Planning staff, the new administration, and the public (including engaging community councils).

3. <u>The Planning Staff Report submitted to the PZC laid out substantive concerns with this ordinance that have not been addressed.</u>

TCC testified before the PZC that we supported Planning Staff findings and

recommendations regarding Comprehensive Plan Revisions, and that action should not be taken until they were resolved. We continue to support the Staff Report and its findings.

No action should be taken to approve AO 2024-44 until concerns and recommendation outlined in the Planning Staff report to the PZC are addressed and resolved.

4. <u>The proposed Comprehensive Plan Revision language is extremely broad and may have unintended consequences.</u>

TCC does not understand the intent of the changes, and the intent is not specifically addressed in the Assembly Co-Sponsor Memorandum. A clear understanding of the intent of the proposed changes need to be provided and explained to the public before taking action.

The intent of the proposed language changes and potential consequences needs to be clarified and discussed with public before taking action.

5. The specific deletions of language requiring new development to consider neighborhood scale and character remove guidance for higher density to be compatible with existing neighborhoods.

This is of great concern to single family homeowners and community councils. A presentation was made at the November 2023 Housing Summit *that higher density housing can be designed to be compatible with existing single-family housing*. In addition, some testimony at the PZC and in *Anchorage Daily News* Letters to the Editor have expressed concern that uncontrolled increased in density could affect property appraisals and led to an increase in short-term rentals and Air B&Bs, which are already negatively affecting housing availability.

The proposed deletions of language requiring new development to consider neighborhood scale and character should not be approved.

6. <u>Difference of opinions regarding compliance with adopted plans.</u>

There is a difference of opinion between the ordinance Co-Sponsors and Planning Staff and Community Councils regarding compliance with existing plans for new, higher density development. The Co-Sponsors have stated that the 2040 Land Use Plan is the most recently-adopted plan and supersedes compliance with other adopted plans, such as the 2020 Comprehensive Plans and Neighborhood and District Plans. A lot of community effort was put into developing the District Plans in particular (including the West Anchorage District Plan), and our conversations with Planning Staff that developed the 2040 Land Use Plan is that this plan defers to District and other adopted plans for guidance.

The difference of opinions regarding compliance with adopted plans needs to be resolved between the Co-Sponsors, Planning Staff, and the public before AO 2024-44 is adopted.

TCC is not opposed to the concept of amending the Comprehensive Plan to intelligently increasing housing density that improves the availability and attainability of housing in

Anchorage. However, amending the Comprehensive Plan is a serious matter requiring meaningful public engagement. <u>This should not be done with limited public involvement and potentially unforeseen consequences.</u>

We reiterate the conclusions of our comments made on AO 2023-87(S-1) that Turnagain Community Council has always been eager to be meaningfully involved of efforts to address Anchorage's housing needs, support constructive change, and believe that with mutual engagement, we can increase density while minimizing adverse effects to homeowners and neighborhoods.

Thank you very much for considering our comments.

Sincerely,

Turnagain Community Council Cathy L. Gleason-President, Karen Pletnikoff-Vice President, Jon Isaacs & Kathleen McCoy, Board Members