

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC)

A Forum for Respectful Communication & Community Relations



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

January 3, 2025

TO: Anchorage Assembly

RE: Draft Anchorage Ordinance 2024-104(S), Amending Title 21 by Suspending the Residential Design Standards of 21.07.110

Rabbit Creek Community Council (RCCC) reviewed draft Anchorage Ordinance 2024-104, Suspending Residential Design Standards. RCCC discussed the ramifications at our December 12 meeting. Members of the RCCC Board subsequently reviewed the Substitute Draft, 2024-104(S). RCCC members voted to submit the following comments to the Assembly by a vote of 11 yeas to 1 nay.

RCCC requests the Assembly not to gamble with a three-year abandonment of residential design standards. Three years with no building standards poses long-lasting risks to public safety, health, and property values. Anchorage is already blighted with ill-functioning and indisputably ugly buildings constructed before adoption of design standards (see photo). Furthermore, there is no assurance that AO 104(S) will produce affordable housing that benefits future tenants and the neighborhoods.



RCCC opposes offers an alternative to 104(S) .Rather than abandon residential design standards, do a limited, competitive test case by waiving the standards for a set number of applications on the condition of actual construction by a date certain.

This approach is likely to accelerate housing construction and also enable faster evaluation of affordability and quality. Staff will have a valid comparison of concurrent housing projects that go through the usual

design approval. . RCCC suggests revising AO 2024-104 to create a limited waiver that will catalyze actual construction of multi-family housing in locations supported by transit, per the 2040 Land Use Plan:

Waive the Residential Design Standards of 21.-7.110.C through .F for the first four applications for multi-family housing that meet the following criteria:

Multi-family housing of five or more units, located within a transit corridor identified in the 2040 Land Use Plan, with a construction completion date of October 1, 2027.

Specify the expectation for staff analysis of the resulting housing developments with regard to speed of permitting, affordability, liveability, and integration into the neighborhood. Solicit input from the public, Planning and Zoning Commission, and Urban Design Commission as part of that analysis.

RCCC supports broad retention of the 21.07.110 Residential Design Standards for the following reasons. Detailed explanation of each reason is provided in the attachment.

1. The purpose for current Residential Design Standards is well-defined and sensible.
2. AO 2024-104 (S) conflicts with basic tenets of the 2040 Land Use Plan and 2020 Comp Plan
3. Explore how to simplify and expedite approval of current Title 21 Residential Design Standards
4. Building standards should be evidence-based, and so should the abandonment of building standards.

Thank you for your consideration.

Sincerely,



Tim Alderson, Chair
Rabbit Creek Community Council

ATTACHMENT – REASONS FOR SUPPORTING CURRENT RESIDENTIAL DESIGN STANDARDS

1. The purpose for current Residential Design Standards is well-defined and sensible.

Title 21.07.110.A sets forth strong reasons for residential design standards. We suggest that a large majority of Anchorage residents agree with the purpose of design standards, which include providing for safety and health and connectivity with to the neighborhood, providing variety and visual interest, and protecting the property values of the subject property and surrounding properties. As example, consider the health and safety benefits of northern climate weather protection such as a sheltered entry. Consider the health and visual benefits of five feet of landscaping between the building façade and driveways or parking so that cars can't drive or idle right next to a tenants' windows, impacting their privacy, safety and air quality.

2. AO 2024-104 (S) conflicts with basic tenets of the 2040 Land Use Plan and 2020 Comp Plan

The wholesale abandonment of design standards conflicts with Anchorage's Comprehensive Plan. The Comprehensive Plan repeatedly states the importance of design standards to successfully accommodate higher density and infill, especially in already-built neighborhoods. Here are a few excerpts reiterating the importance of design standards when promoting infill:

2040 Land Use Plan, page 29: Good urban design is central to successful accommodation of additional housing and businesses in already-built neighborhoods...

2040 Land Use Plan pages 34-35: As Anchorage evolves, thoughtful urban design can help both protect and enhance the characteristics of its neighborhoods and districts that make it appealing to residents, workers, and visitors. In a flourishing city, design can seamlessly integrate the new with the old.

The LUP design principles ...guide targeted amendments to development regulations [and] incentive programs.

Page 23 This Plan recognizes that compatible design is a key part off growing successfully thorough infill and redevelopment. The scale or physical appearance of buildings, noise, glare, shadowing effects, parking and other characteristics, can impact neighboring properties.

Anchorage Planning Principles from the 2020 Comprehensive Plan Page 64: Throughout the public participation process, widespread community support was expressed for improving Anchorage's quality of life. Quality-of-life issues and a strong sense of identity are repeatedly reflected in the Design and Environment goals (page 65)..

3. Expedite approval of current Title 21 Residential Design Standards

The AO Preamble suggests that approval of Residential design Standards is time-consuming, because "developers often say [that]". AO 2024-104(S) gives no evidence that design standards are a significant deterrent cost to construction. The fault may lie not in the design standards, but in the approval process and staffing levels.

RCCC notes that

- Title 21.07 currently offers a high degree of flexibility in residential design standards.
- There are menus of standards. The developer can pick a couple of standards that make physical and fiscal sense to his project.
- Any developer can bypass the standards by presenting his project design to the Urban Design Commission.

4. Building standards should be evidence-based, and so should the abandonment of building standards. The standards of 21.07.110 were developed with thorough analysis and review by staff, developers, and the public. For example, requiring main entryways to be visible from the

street has demonstrable safety benefits. Likewise, weather-protected entrances are a safety and quality-of-life feature: a tenant with a baby stroller and grocery bags shouldn't have to deal with an unroofed entry that has drifted snow and ice.

5.

Insufficient causal evidence.

AO 2024-104(S) gives no evidence that design standards are a significant deterrent cost. The Assembly's preamble mentions hearsay. The Planning Staff have not produced data-based analysis. Residential design standards should not be broadly suspended for several years without solid evidence that those design standards have negative impacts on the construction of new housing.

Insufficient catalyst for affordable housing.

It is unclear how abandoning design standards will accelerate multi-family housing construction, let alone produce affordable housing. AO104(S) allows an unlimited number of approvals but requires no actual construction.