

Planning and Zoning Commission

May 6, 2024
Work Session

Case #: **2024-0006**

Case Title: **Title 21 Text Amendments: H.O.M.E. Initiative**

Agenda Item #: **-----** Supplementary Packet #: **5**

Comments submitted after the 3/18/24 packet was finalized:

Comments received from 3/18 (2 pm) through 5/2 (3 pm):

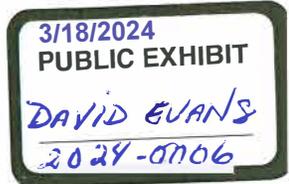
- Rogers Park Community Council Resolution 2023-2 (p. 1)
- Sharon Stockard (p. 3)
- John Riley (p. 4)
- Tom Stephens (p. 4)
- Kathleen Metcalfe (p. 5)
- Cale Green (p. 5)
- Andrew Roos Bell (p. 6)
- Michele Palatas (p. 6)
- Erik Peterson (p. 7)
- Kristine Bunnell (p. 8)
- Graham Downey, Alaska Public Interest Research Group (p. 10)
- Jason Norris (p. 19)
- Debbie Ossiander (p. 22)
- Shaun Debenham (p. 23)

Sent by email: **X** yes no

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Rogers Park Community Council

(Including Anchor Park, College Village, Woodside East and Rogers Park)



Scott McMurren, President
zoom907@gmail.com

Jill Klein, Vice-President
Cassandra Raun, Secretary
Sara Dykstra, Treasurer
Pete Mjos, Past President
Linda Chase, FCC Representative

Date: September 11, 2023

RPCC Resolution 2023-2

To: Anchorage Assembly Members

CC: Dave Bronson, Mayor of Anchorage
Anchorage Municipal Clerk
Federation of Community Councils

Whereas:

1. One of the proposals in the "HOME Initiative" is a zoning change to allow two-family dwellings (duplexes) in R-1 zones throughout the Anchorage bowl.
2. The "HOME Initiative" states that it "directly implements" the 2040 Land Use Plan (LUP), but in fact that is false: the 2040 LUP specifically states that it "does not recommend a Bowl-wide rezoning" (p. 75), and it says that it's "single family and two-family" areas are to have R-1 areas with single-family dwellings, at a density of 3 to 5 housing units per gross acre (p. 37), as well as R-2 areas.
3. Most of Rogers Park Community Council (RPCC) area is zoned R-1. The Rogers Park subdivision has an approximate density of 4 units/gross acre. That number of units per acre would be larger if ADUs are counted, but Title 21 states that ADUs do not contribute to density.
4. Title 21 specifies maximum building heights and lot coverages, and typical homes in RPCC do not reach those maximums. The proposed changes would incentivize construction of new, larger buildings that do reach those maximums. Also, an ADU would be allowed to be constructed on the same lot as a duplex.
5. Due to the cost of construction and other factors, the proposed changes in the RPCC area are unlikely to significantly increase Anchorage's supply of housing, especially not affordable housing.
6. But any such new large structures are likely to significantly adversely affect adjacent neighbor's solar access and privacy, as well as neighborhood character, changing what have been neighborhoods with many long-term residents to more transient rental areas. Without ordinance changes to limit short-term rentals this initiative will likely incentivize construction of buildings that are used as non-owner-occupied short-term rentals.

Rogers Park Community Council

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7. Earlier this year, the regulations for accessory dwelling units (ADUs) were revised to promote their construction with the intent to increase Anchorage's affordable housing supply. It is appropriate for these recent ADU changes to play out before new R-1 zoning changes are considered.

Now, therefore, be it resolved that Rogers Park Community Council opposes the proposed zoning change that would allow duplexes in RPCC R-1 areas.

THIS RESOLUTION WAS **APPROVED** by the Rogers Park Community Council on September 11, 2023, by a vote of: For 18, Against 11, Abstentions 2



Scott McMurren
President
Rogers Park Community Council

1518 Garden Street
Anchorage, AK 99508

I oppose AO 2023-087(S). AO 2023-087(S) reduces Anchorage's 15 residential zones to five, which constitutes a radical change to the city's zoning districts. Assembly sponsors developed AO 2023-087(S) in a rushed process that lacked adequate public notice; adequate public participation; adequate information as to the consequences of the changes; and adequate opportunities for public input.

AO 2023-087(S) is speculative and incomplete, which denies the public the opportunity to understand its effects. It does not provide any data, for instance, that demonstrates that current zoning constrains housing, nor does it provide any data on how it affects property values and land costs, and future infrastructure costs. Assembly sponsors have tried to blame current zoning for the high cost of housing and a housing shortage, but there is no evidence to support those claims. High mortgage rates, steep costs of materials, supply shortages, a declining workforce, and a pandemic-related shortage of construction workers are the big contributors to a tight housing market.

AO 2023-087(S) makes sweeping, undefined changes in terms of height, access to sunlight, and design standards, such as landscaping and entrances, and street-facing windows. AO 2023-087(S) removes limits on commercial uses in apartment districts, in direct contradiction to its stated purpose of building more residential units.

AO 2023-087(S) reduces predictability and the cost-efficiency of infrastructure and services, both in existing and new developments. Infill should be targeted, not scattered throughout the Anchorage Bowl, so that new homes have bus access and safe pathways for walking to work.

Assembly sponsors developed AO 2023-087(S) in a piecemeal fashion – separate from the city's professional planning staff – without providing an analysis of its long-term costs, its effect on housing supply and demand, and without providing a vision and quality-of-life framework generated by public participation.

AO 2023-087(S) is filled with uncertainty, confusion, and a stunning lack of data. It should be suspended, and a new Comprehensive Plan should be funded with full public outreach and data-driven planning staff analysis. At the very least, it should be shelved until all its pieces (design, dimensional, and development standards; allowable uses; etc.) are identified and supported by data; is compliant with the 2020 Comprehensive Plan; and includes broad public participation.

John Riley johnr.rccc@gmail.com 907-250-4852 3/18/2024 2:35:59 PM

6401 Italy Circle
Anchorage, AK 99516

I am writing in support of increasing the availability of affordable housing in Anchorage.

For success in ensuring an adequate supply of affordable housing we must first agree on a common definition of "affordable". Thankfully the Anchorage Assembly has given us an answer to that question by providing an illustrated example in their slideshow promoting 87(S). The illustration shows a new ASD teacher (Mr. Lewis) and calculates what he can afford for rent at 30% of his after-tax income.

Mr. Lewis's ASD salary is \$55,168. 30% of his after-tax income is \$1076 for monthly rent. The price range for a 2-bedroom apartment shown within 3 miles of Mr. Lewis's school on the Anchorage map as \$1500 - \$1800 monthly. The challenge here for Mr. Lewis is that market rate within his local school district is 28% higher than what is considered affordable rent for his family.

Mr. Lewis's ASD salary is slightly more than the cutoff to qualify for subsidized Section 8 housing. The 2023 median family income in Anchorage is calculated by HUD as \$122,300. To qualify for Section 8 Housing his family income must be 50% or less of the medium family income or \$55,050 for a family of three. Mr. Lewis is caught in the middle between not qualifying for federally subsidized housing and meeting the affordability target of 30% of their after-tax income.

Increasing the supply of affordable housing by redesigning zoning and construction standards is the paramount driver of the "Upzoning" movement sweeping across US cities. Upzoning has stimulated housing construction in some US cities. However, a 2023 literature review published by Yonah Freeman in the Journal of Planning Literature found that Upzoning efforts offer mixed success in terms of housing production, reduced costs, and social integration in impacted neighborhoods.

Is it feasible that passing 87(S) will be sufficient to solve the significant affordability gap experienced by Mr. Smith and allow his family, and the thousands of other households with after-tax incomes under \$60,000 to realize their American Dream of affordable housing? Can market forces drive Anchorage market prices for high quality, energy efficient housing down to an affordable level for families like Mr. Lewis while retaining acceptable returns for developers?

87(S) in its current form does not appear to provide a clear mechanism to achieve our definition of housing affordability.

I suggest that before Anchorage proceeds with major changes to our current zoning and land use plans, we should collect detailed data and analyze our current housing capacity by price, type, location and how it matches to affordability standards for the current and projected population of Anchorage. Once that data is established, we need clear metrics to measure success.

Tom Stephens utpow@hotmail.com 9072301054 3/19/2024 8:27:22 AM

1440 Inlet Place
Anchorage, AK 99501

I object to the rezone proposed by the Anchorage Assembly in case 2024-0006. There has been limited opportunity for public comment in this hasty, rushed process. I live in the South Addition because it is an attractive neighborhood. The rezoning proposed would turn our neighborhood inside out and violate the northern design standards specified in Title 21. The Anchorage Assembly has bypassed the Planning and Zoning Department and no data has been presented to demonstrate that Anchorage's zoning limits housing stocks or result in unaffordability. The proof of that are the 70 some lots in the South Addition that have been vacant for years - in some cases, more than 40 years. Zoning standards are being cited as causing housing unaffordability here and that is ridiculous. Zoning standards make this neighborhood a good place to raise kids, walk to downtown and have a good neighborhood. That's why it is desirable. Please reject the initiative and send it back to the drawing board, have a decent public process and take the time needed. Thank you.

Kathleen Metcalfe
6624 Imlach Dr
Anchorage, ak 99502

teenyray@gmail.com

3/19/2024 10:17:42 AM

I oppose the proposed changes to 87(S). The Rabbit Creek Community Council wrote an in depth analysis of the issue and site many reasons these changes are flawed. Your own planning department opposes the plan - In specific: Staff Recommendation 3, includes these points: focus the scope of the zoning revisions on targeted infill and redevelopment areas with urban infrastructure and public services; maintain low density in hazardous, inaccessible and critical environmental areas; and address impacts of more intensive uses on surrounding properties and infrastructure as required by policies of the 2020 Comp Plan and 2040 Land Use Plan. I ask that you oppose this change. Thank you

Cale Green
151 Mt Hood Drive
Girdwood, AK 99587

cale.green@gmail.com

9073014648

3/21/2024 5:44:01 PM

As a 33-year-old who has lived in Anchorage all my life, I'm Cale Green, and I firmly believe in practical solutions for our city's challenges. The HOME ordinance is a necessary step to address the clear mismatch between our housing supply and the needs of Anchorage's residents. We're dealing with a stark housing shortage that's driving up prices to unsustainable levels, and it's time for pragmatic action, not just conversation.

Current zoning laws are relics of a bygone era, ineffective for today's Anchorage. They're hindering our growth and our economic potential. By streamlining the residential zones and allowing for varied housing types, we're not just modernizing outdated policies; we're responding to the market's demand with common sense. It's about stimulating development, reducing red tape, and providing the opportunity for more homes to be built where they're needed most.

The truth is this ordinance represents a hard-nosed decision to get our city on the right track. It's not about ideals; it's about addressing a bottleneck that has stifled development and affordability for too long. For the sake of Anchorage's future — a future where regular folks can afford to buy a home without a financial stranglehold — it's essential that we move forward with the HOME ordinance. Let's put the power back into the hands of homeowners and builders, not outdated zoning laws.

<p>Andrew Roos Bell 1006 W 30th Ave, Apt 5 Anchorage, AK 99503</p>	<p>andrewroos.bell@gmail.com</p>	<p>2064275600</p>	<p>3/24/2024 6:08:15 PM</p>
	<p>I support the rezoning measure for a whole host of reasons, and while I acknowledge the concerns of its opponents, I think the issue is ultimately one of simple mathematics. There are more people in the world today than yesterday, and there will be more tomorrow (and when that stops being true, we may have a very serious economic problem without a younger generation to support the elderly). If there are more people, but not more housing, then they will either live in increasingly unsatisfying room-mate situations, or they will simply avoid the area entirely.</p> <p>Many of the concerns stem from a love for the kind of green suburban neighborhoods that contain a lot of single-family homes. I appreciate that environment, as I grew up in it, and I am not opposed to more neighborhoods like that existing - but they will have to go where there is room, in places not yet developed. In the center of a large city, with more jobs than other places, we will have to allow the construction of denser housing at higher volumes. It's simply a matter of space. For those wishing to freeze things the way they are, I sympathize - I have a great deal of nostalgia for the small cities of past history. My great-grandfather lived in the middle of Seattle a century ago, in a small house that he was able to afford as an immigrant house-painter, and it's easy to be wistful about the seemingly simpler world of those days. In some ways, Anchorage is still like that in terms of size and the height of its buildings. But the thing is, someone like my great-grandfather could never afford to live anywhere near his old neighborhood now, because the price has risen too much - and that's even with new housing having been built, but simply not enough.</p> <p>I've lived in other places besides Anchorage. Our housing is not yet that expensive in the grand scheme of things (though it is expensive relative to local incomes, which is what matters). But in the long run, failure to allow the free market to build more housing and keep up with demand may slow the growth of the city, but only at the expense of its economy - you can keep the physical character of the built environment the same, but only by displacing people who can no longer afford the increasing rents. Alternatively, failure to not just build more housing, but to build it at a rate rapid enough to meet or slightly anticipate demand could simply entrench economic stagnation. It's been pointed out that part of Anchorage's housing crisis stems from the state of the overall economy, which I think is true. But without helping decrease the percentage of each paycheck that goes to housing for those here, and without accommodating the possibility of growth, the economy will never improve, and it may in fact deter growth. At several points in the last few years, I spent months searching for a new job. I was open to moving almost anywhere in the country - but I had a rule to not even consider anything in the Bay area, even though there were more jobs there than in most other places, simply because the housing situation was so atrophied. We're a long way from that right now, but we have to take action now to avoid falling into that same mathematical trap.</p>		
<p>Michele Palatas 6911 Sherwood Avenue Anchorage, AK 99504</p>	<p>michelepalatas@hotmail.com</p>	<p>9073512004</p>	<p>3/25/2024 11:29:07 AM</p>
	<p>Short term rentals on VRBO and Airbnb are already in the Room Tax database. These platforms already monitor complaints, activities and conditions of these rentals, and the Host would not be successful if their property were not safe and accommodating. The biggest problem I have experienced with both my long term and short term rentals is the street people.</p> <p>My observation is all the empty boarded up houses in neighborhoods, specifically Fairview, where homes should be fined for not appropriate maintenance and being vacant for years!!! How about these slum landlords and vacant properties being dealt with and not regulating people improving their properties for quality tenants???</p>		

, 99502

Thank you so much for taking on the housing crisis in this city. I wholeheartedly support the passage of this bill, and future actions to lower housing and rental prices across Anchorage.

The youth of this city are leaving in droves, looking not just for higher wages, but also cheaper housing. As a young adult in this city, all of my friends and former roommates have left to purchase homes in other cities, half the price of Anchorage, or are actively planning to move out of here. We can see this in our population trends, more elderly and less younger workers. This has exacerbated worker shortages and made city and state services worse off.

Housing in this city has effectively halted, with nothing being built and very little being sold. The inability of people to change residential status: empty nesters downsizing, young families buying larger homes, or lower wage workers struggling to afford rent, creates a huge amount of social and economic problems. This stagnation can be felt across the city, creating a sense of hopelessness about the future of Anchorage.

This city is not an open-air museum, it must change based on the needs and wants of residents, both present and future. Doing nothing to address the housing crisis is as good as endorsing the decline of this city.

Thank you again for putting this bill forward, I support its passage, and hope to see even more reforms, especially to the Special Limitations system the Anchorage Planning Department seems to use to stop any multi-family residential construction in this city.

RECEIVED

April 10, 2024

TO: Anchorage Planning & Zoning Commission

APR 09 2024

RE: PZC Case No. 2024-0006

Dear Planning and Zoning Commission Members,

I encourage your recommendation of approval of the HOME Title 21 Zoning code update and associated Anchorage 2040 Land Use Plan Map update.

On March 29, 2024, I stood in the sunlit common room of the new Block 96 apartments on 8th Avenue and K Street listening to Shaun and Megan Debenham share an emotional story of collective hard work in building 44 new market-rate housing units. Special thanks went to everyone involved in the project, including Anchorage Community Development Authority (ACDA), Municipality of Anchorage, and a local Anchorage bank, all willing to share in the multi-million-dollar risk of bringing this project to fruition.

After the congratulatory remarks, I visited with Chris Schutte, a former colleague during the Berkowitz administration. Chris and I had giant dreams in 2015 for "Our Downtown," and what I ultimately called the 2007 Downtown Comprehensive plan update, *Our Downtown: Anchorage Downtown District Plan (Our Downtown)*.

To accomplish our dreams for Downtown, we wrote Smart Growth America (SGA), asking for support in creating new economic development tools and redevelopment ideas for Anchorage. SGA arrived in May 2016, to jointly facilitate a community workshop with the Planning Department, which included over 50 invited community partners and developers. Resulting workshop recommendations included "Focus the Effort," and use the Municipal property at 7th Avenue and I Street to catalyze new development.

To this end, "A Few Good Blocks," was mapped as the area bounded by 9th and 5th avenues, and L to I streets. A *focused effort* was envisioned to bring new development within these few city blocks. Mayor Berkowitz approved the concept and as they say, "We were off to the races." Within about a year of the workshop, the Municipality entered into negotiations for the 7th and I Street property. Elizabeth Place was built on 7th Avenue and I Street providing market and lower-income housing. The Duke's remodel to Qanchi Place followed providing more new housing. The Alaska Railroad started the Rail townhouse project.

More progress. Fire Island Bakery moved from South Addition to Downtown in 2021, into the *Few Good Blocks* area. Eleven other new businesses will soon move Downtown. Mark Begich and partners are renovating the Blue Building and Aviator Hotel. Peach Investments' projects on 4th and 5th avenues are another success story. The 6th Avenue Garage may be renovated soon by ACDA. Mayor Bronson and the Assembly, especially Chris Constant and Dr. Volland, keep progress moving meeting the *Our Downtown* vision.

The projects and progress noted above can be found by a quick search on ADN.com.

The Municipality has contributed by adopting the *Our Downtown* plan with action items and tools for progress. Additionally, the rewrite and adoption of Title 21, Chapter 11: Downtown (A.O. 2023-44) in 2023, soon followed removing unnecessary code requirements.

It's now easier and more cost-effective to build in Downtown. The plan and code projects were my responsibility to complete with a team of experts selected by the Planning Department. We chose a team of professionals who we knew used the code on a daily basis and intrinsically understood its issues and strengths.

Our community is in the process of amending sections of Title 21. This project called HOME is a great start at simplifying Title 21 to make it more straightforward and predictable.

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Is HOME perfect? Nothing is perfect, but it is a great first step. HOME is patterned in part after Chapter 11: Downtown. Downtown Anchorage has three primary zoning districts and easy to understand and implement design standards. There are no set backs in Downtown and no private open space is required. Housing is allowed in all zoning districts. Again, Title 21, Chapter 11: Downtown has made it more cost-effective to build Downtown.

It is my understanding from listening to the Assembly presentations, HOME is intended to make it easier and more cost-effective to build. There may be some fixes after HOME is adopted. We had to make fixes on the Downtown code after it was adopted. Why is this important? We need HOME to support new investment in Anchorage, just like the updated code for Downtown has helped with extensive new development in Downtown.

Back to the Block 96 Flats, no project is possible without those willing to take on "Risk." Investing your family's savings coupled with large bank loans is a monumental personal risk. Public/private partnerships with ACDA, the Municipality, and a willing bank lender helped alleviate some of the personal risk the Debenham's were willing to take. We need to support those who take on risk. They are incrementally fulfilling the desperate need we have for housing. One of the ways to do that is to simplify the Title 21 code.

HOME is a great start, but there needs to be more done after this win. Let's not rest till we have a code that brings developers from all over the Alaska and the Lower 48 to Anchorage knowing we are open for business and encourage all new housing opportunities.

I believe Smart Growth America would be proud of the decisions our community has made to make development easier in *Our Downtown*.

It's time to get the rest of the code fixed so we can make progress through new development as we help support residents and new comers with all the housing types that are so desperately needed.

Thank you,
Kristine Bunnell,
Former Planning Manager, Municipality of Anchorage

CC by email: Assembly members Zaletel, Volland, and Brawley



Review of the Planning Department's Staff Report on HOME

RECEIVED

Graham Downey
Economic Justice Lead, AKPIRG
2024-04-11

APR 11 2024

On March 8, 2024, the Planning Department issued a [Staff Report](#) analyzing the HOME Initiative (AO-2023-87).

The Staff Report has four key elements:

1. It makes a broad statement of *support* for HOME. It acknowledges that zoning simplification is needed to address the high cost of housing.
2. It describes how HOME will change the zoning code.
3. It speculates about how HOME will change Anchorage's built environment. It worries about the impact of new housing, especially on the Hillside. And it predicts that HOME may need to be more ambitious in order to increase housing supply.
4. It raises procedural concerns about HOME, including questioning whether specific aspects of HOME align with the Comprehensive Plan.

The Staff Report is a valuable resource for anyone who wants to understand how HOME would change the zoning code.

Of course, what we really want to know isn't how the zoning code will change, but rather how Anchorage will change. Will HOME actually lead to more housing? Will new development burden our sewer and road infrastructure? What will our neighborhoods look like after HOME?

Unfortunately, the Staff Report fails to provide evidence to support its speculations about the real-world impact of HOME. And the Staff Report's procedural concerns were not fully vetted by lawyers before they were published.

Additionally, the Staff Report inappropriately shifts the burden of proof when it suggests that the Assembly has failed to justify HOME. This "burden pushing" is both an underhanded debate tactic and factually incorrect. There is [substantial empirical evidence](#) (not to mention economic sense) that [zoning restrictions limit the supply of housing](#) which, in turn, [increases the cost of housing](#). Locally, there have been [several significant studies](#) that indicate the need for more housing and identify zoning as a problem. Rather than pushing the burden of proof, the Planning Department should have made a good faith effort to review the available evidence, both for and against zoning reform.



To distinguish fact from opinion, the following memo surfaces and assesses six claims made in the Staff Report. In some cases, we find that the Planning Department’s opinions are justified by available evidence. In most cases, however, we find a lack of support.

Summary Table

Claim	Assessment
HOME should go further to have a greater impact on housing.	Supported. The experience of other US cities shows that significant zoning simplifications are required to allow incremental real world changes.
“Unlimited” commercial entitlement will replace housing in the Compact Mixed Residential Medium and Urban Residential High zones.	Not supported. This claim is contradicted by available evidence. The phrasing “unlimited” is likely to confuse readers.
Changes to Hillside-area zoning may damage the environment and burden infrastructure.	Somewhat supported. This claim has some merit, but it should be narrowed and clarified. HOME adds new rules to mitigate environmental risks on sloped lots. The Planning Department should offer constructive solutions to address specific issues on the Hillside.
“Some” neighborhoods should remain single-family only.	Not supported. This claim is inconsistent with other aspects of the Staff Report and ambiguous about which neighborhoods should be “preserved.” This advice risks reinforcing economic and racial segregation.
HOME does not align with the Comprehensive Plan.	Incomplete and misleading. HOME may require supplemental amendments to the Comprehensive Plan, but it is consistent with the Comprehensive Plan’s broader principles and has several elements drawn directly from the plan.
The Assembly must go through an elaborate, multi-year public process to pass HOME.	Not supported. As our elected, legislative body, the Assembly has the authority to change the zoning code (and Comprehensive Plan) with normal legislation.



Should HOME go further to have a greater impact on housing?

Claim

To encourage housing construction, HOME should allow four-plexes (or more) in the STFR zone while minimizing restrictions like minimum lot sizes, set-backs, height-limits, and lot-coverage rules.

“A careful assessment may also find that the public hearing draft proposal to limit all former single-family-only and two-family zoned areas to no more than two principal residences per lot, and name the merged zone as a “Single and Two Family” district, may not yield adequate housing to meet Anchorage residents’ needs.” (p15)

Assessment

This claim is well supported by available evidence. Bold change to the zoning code is needed to enable incremental change to the built environment.

Comparative evidence from [St. Paul](#) and Minneapolis, MN shows that duplexes alone aren’t enough to encourage housing construction. Most new development in the [Twin Cities](#) has happened in zones that both (a) allowed four-plexes and (b) made it [physically possible](#) to build four-plexes on available lots. Still, [Minneapolis shows](#) that even imperfect [zoning reforms can help stabilize rents without specifically mandating affordability](#).

Further evidence from [Spokane, WA](#) suggests that allowing up to 6-plexes, plus lot splits has allowed incremental growth. And (in contrast to dramatic rises elsewhere in Montana) [Helena, MT stabilized housing costs](#) by eliminating minimum lot sizes.

Will “Unlimited” commercial entitlement replace housing in the Compact Mixed Residential Medium and Urban Residential High zones?

Claim

In the Staff Report (p16, 25, 34) and at the 2024-03-18 PZC hearing, the Planning Department has claimed that “Unlimited” commercial entitlement will be allowed in the Compact Mixed Residential Medium and Urban Residential High zones.

The Planning Department worries that this commercial development will replace low-income housing.

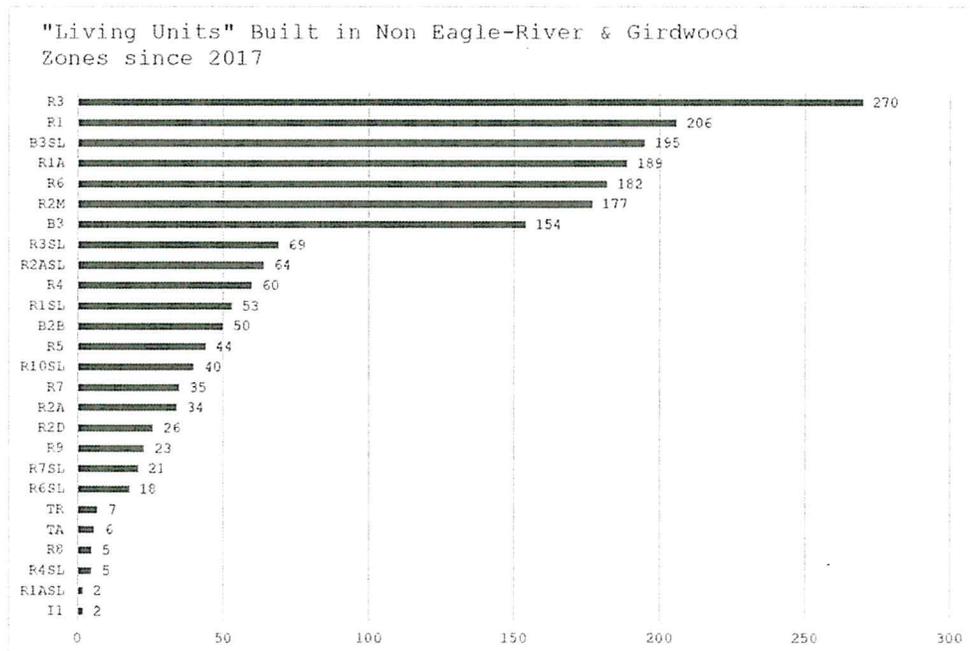


Assessment

The language “unlimited” is extreme and likely to confuse the average reader. It is true that the use could be exclusively commercial. But it is not true that all types of commercial uses will be allowed. For example, a doctor’s office or grocery store might be possible, but it will not be possible to build a gravel pit.

The most generous interpretation of “unlimited” is that the Planning Department didn’t mean unlimited types of commercial uses, but rather an unlimited percentage of the lot may be commercial. That is, developers will not be required to include any residential units, so they can make the entire property commercial.

The claim that commercial development will replace or displace housing is contradicted by current data. Evidence (see chart below) from zones that allow both commercial and residential uses today, like the B-3 and B-2 zones, shows that commercial uses are not likely to replace housing. Currently, these permissive zones are where we build the majority of our affordable housing.



When we look at [Muni GIS data](#), we see that 154 new units of housing have been built since 2017 (the year the 2040 plan was adopted) in the B3 zone alone. In general, B zones are some of the most popular zones to build housing in. Since 2017, Cook Inlet Housing Authority – the primary builder of multi-unit housing in Anchorage – has built most of its housing (176 units, or 67%) in a B-3 or B-3SL zone.



A note on low-income housing:

Anchorage's 2020 Comprehensive Plan called on the Planning Department to amend the zoning code to support manufactured housing, since manufactured homes are lower-cost. Those changes have not yet been implemented by the Planning Department.

Currently, manufactured housing is only allowed by-right in a single zone (R-5), and with a conditional use permit in a few other zones (R-2M, R-3, R-4, and R-4A). Permit data indicates that no new manufactured home parks have been created in Anchorage in the last 20 years.

HOME would legalize manufactured housing in the Large Lot Residential, Compact Mixed Residential Medium and Urban Residential High zones. This change suggests that, contrary to the insinuations of the Planning Department, HOME would directly promote low-income housing.

Will changes to Hillside-area zoning damage the environment and burden infrastructure?

Claim:

The Staff Report warns that HOME should “avoid increases in allowed residential density in critical environmental areas, areas with natural or technological hazards, and areas with inadequate levels of access, public infrastructure, and urban services.” (p34)

The Staff Report points out that the new “Large Lot Residential” zone will (as compared to the other 4 zones) combine a greater number of existing zones with more diverse requirements.

Additionally, the Staff Report notes that many specific zoning issues on the Hillside are addressed through one-off “Special Limitations” rather than normal zoning. Since HOME would remove Special Limitations, issues on these specific lots may need to be addressed.

Assessment:

This claim is defensible, but it should be narrowed and clarified.

There are reasonable environmental and fiscal arguments for prohibiting development in Anchorage's exurban areas.

Hillside does have steeper slopes and more reliance on septic systems, which means that new development can pose greater environmental risks. However, septic and well systems are already regulated outside of the zoning code, and would not be changed by HOME. And HOME addresses the risk of steep slopes by proposing a more stringent application of slope



measurements when determining lot size at the time of subdivision, which could reduce the risk of slope-based hazards.

Road, water, and sewer infrastructure at the edge of town is more expensive to build, costlier to maintain, and supported by a smaller tax-base, which creates long-term financial risks for Anchorage taxpayers.

Technical tweaks to the proposed Large-Lot Residential zone could mitigate the risks that HOME would lead to destructive development. But the zoning code may not be the most effective tool to address the risks identified by the Planning Department. Rather than zone-specific fixes, these risks may be better mitigated by (a) broadly applicable rules, such as the slope-based lot size rules that HOME recommends, or (b) scientifically-targeted tools, like our current seismic-map-based building code.

And these concerns do not apply to changes made to the STFR zone (see below).

Should “some” neighborhoods remain single-family only?

Claim

“In some areas currently zoned R-1 and R-2, it may be in the public interest to retain existing allowed densities, to avoid increasing life-safety and economic risks, traffic impacts, or environmental impacts.” (p15)

Some critics of HOME have described these concerns as a call for a “targeted” approach that would exempt their personal neighborhoods from change.

Assessment

This suggestion is ambiguous, not supported by data, and inconsistent with other aspects of the Staff Report. And, if followed, it would risk reinforcing racial and economic segregation.

The claim that we should maintain single-family zoning is inconsistent with other parts of the Staff Report, which suggest that HOME should allow a greater diversity of development in all zones, particularly low-density zones.

The claim is ambiguous because it does not specify which areas should be insulated from change. We worry that more active community councils, which tend to represent wealthier/higher income neighborhoods, will be able to insulate themselves from change, while concentrating change in less resourced neighborhoods.



The claim is also misguided. The evidence from Anchorage's last decade shows that the "targeted" approach of "corridors" and "centers" hasn't led to new housing.

1. R-3A, R-4A, Reinvestment Focus Areas, and Small Area Implementation Plans, were all major innovations of the 2040 plan, yet according to permit data and public record data no new development has since occurred in R-3A or R-4A. No Small Area Implementation Plans or Reinvestment Focus Areas have been used as a tool by any development projects.
2. Urban Centers and Transit Corridors were another major focus of the 2040 plan, but mapping permit data shows that most new development since 2017 has been built outside of these specially designated areas.

Furthermore, evidence from other cities suggests that even when the limits of this "targeted" approach can be overcome with significant private wealth or government subsidy, it tends to lead to racial [segregation](#) and [displacement](#).

Notes on terminology:

Anchorage has had no "single-family" neighborhoods since 2017 when we legalized Accessory Dwelling Units city-wide (including in R-1 and R-2).

We are concerned that the language used throughout the Staff Report reflects an undercurrent of bias in favor of this (illusory) single-family ideal. The Staff Report consistently calls single-family buildings "homes", while multi-family buildings are called "apartments" or "uses."

Does HOME align with the Comprehensive Plan?

Claim:

The 2020 Comprehensive Plan (2020 plan) and 2040 Land Use Plan (2040 plan), together, make up Anchorage's Comprehensive Plan. By law, zoning changes must be consistent with this Comprehensive Plan. The Staff Report lists a number of aspects of the Comprehensive Plan that HOME may be inconsistent with.

Assessment

As a general rule of law, it is true that zoning changes must be consistent with the comprehensive plan, which in Anchorage's case means the combined 2040 and 2020 plans.



This consistency requirement does not prohibit change or mandate a specific process. The 2040 plan, for example, was itself an update to the 2020 plan. And the zoning code itself recommends regular updates. AMC 21.03.070(B) states: “The comprehensive plan should be reviewed and reassessed regularly in order to evaluate its effectiveness and adequacy...”

Anchorage has changed considerably since the 2020 plan was adopted in 2001, and the 2040 plan was adopted in 2017. In just a few years, the economic and demographic predictions of the 2040 plan have been proven incorrect. For example, the 2040 plan predicted an annual growth rate of 0.8%. In fact, Anchorage has been consistently [shrinking](#). Arguably because that projected growth has been [absorbed by the Mat-Su Valley](#), which has been building far more housing thanks in part to less restrictive zoning. Furthermore, as the Staff Report acknowledges, the 2040 plan was always internally inconsistent. For example, the 2040 land use plan map failed to achieve the 2040 plan’s density goals.

Anchorage’s 2040 plan begins with 10 broad goals and more specific policies. It then suggests a number of strategies and actions meant to achieve those goals. Since the 2040 plan is a hierarchical document, the goals supercede the policies, which in turn determines the strategies and actions. Unfortunately, the Staff Report focuses primarily at the bottom level, on actions. Moreover, it wrongly treats those actions as negative prohibitions, rather than positive recommendations. Since the actions are unweighted and often at odds with each other, it is to be expected that any change will necessarily cause some conflicts. The Planning Department’s inappropriately narrow level of analysis would defeat any change. No single policy could possibly achieve every action.

When we look instead at the primary values of the 2040 plan, we find that HOME’s simplifications to the zoning code align closely with several key goals (such as “Goal 1. Plan for Growth and Liveability” and Goal 4. “...meet the housing needs of residents of all income levels, household sizes...”).

Amendments to the 2040 plan could help align HOME with specific objectives, like allowing the STFR zone to include fourplexes. And such changes are warranted. In fact, the Assembly asked the Planning Department to propose any needed amendments in January 2024. Rather than saying that amendments are needed, the Staff Report should have drafted those amendments.

In sum, HOME aligns with the Comprehensive Plan’s broad principles. Local conditions have changed considerably. And, most importantly, the status quo has failed to produce adequate housing. Our plans can and should change.



What public process is required for HOME?

Claim

The Staff Report claims that HOME is an “area-wide rezone.”

Further, it claims that “Changes in zoning district boundaries or other matters portrayed on the Zoning Map can be made only through the rezoning procedure of AMC 21.03.160, Rezoning (Zoning Map Amendments).” (p11)

The Planning Department anticipates that this process will take several years of staff effort and tens of thousands of dollars.

Assessment

The Assembly Council has persuasively argued that the Staff Report is mistaken about the law and incorrect in characterizing HOME as a “rezone.” Rather, HOME is more properly treated as a “text amendment to Title 21” (aka the zoning code). Amending the code, including changing both the zoning code and the comprehensive plan, falls squarely within the Assembly’s legislative authority.

For a fuller discussion of this issue, see the Assembly Sponsor’s [response](#) to the Staff Report.

Jason Norris
2731 Greenscreek Circle
Anchorage, AK 99516

RECEIVED

APR 22 2024

All,

I believe we have an opportunity to do something bold to reverse our city's population decline as well as meet the needs of a generation that is rapidly approaching their prime earning years and has shown a clear preference for more walkable neighborhoods, less reliance on automobiles, and greater access to public spaces. Anchorage has a clear opportunity to give these residents and future leaders what they crave. Alternately, Anchorage has an opportunity to ignore these very clear and overwhelming preferences, favoring the status quo, and accepting our recent moniker as a "city in decline". I urge you to take action on two points to ensure that this opportunity does not go unrealized. To that end, I urge action on two items.

1) Support an enhanced, even more people-centered (instead of car-centered) 2050 MTP Alternative for the Seward-Glenn Connection Study, including all measures including in Section 4.2.1, to include enhanced non-motorized vehicle facilities (discussed below). This is clearly the best option for Anchorage.

2) In implementing AO 2023-87(S) aka the "HOME Initiative", we should embrace the opportunity to use market forces in our city's favor to encourage smarter long-term development.

My focus in this writing centers on Fairview. This community has born the brunt of Anchorage's car-centric development patterns since the 1960's. In righting this historic wrong, Anchorage has the first opportunity to encourage development of a people-centered neighborhood instead of a car-centered neighborhood. That is not to say that cars should not be allowed in the neighborhood, but they should not be the primary design consideration as they have been throughout Anchorage's history. Community interactions, pedestrians, and bicycles should have priority in this redeveloped area.

It is important to note that the concerns raised in Section 4.2.2. of the Seward-Glenn study regarding congestion are fairly specious given the excess capacity of the roadway that exists today and the typical manner in which roadway designs are justified (level of service). Roads that receive a level of service grade of F are typically those which we would most like to live on, work on, walk on, and bike on. Furthermore, there is a mounting evidence that reducing the number of lanes of travel does not actually increase congestion, particularly when people-centered street design is incorporated. These streets

become platforms for building equitable wealth, and by designing around the person rather than the car, we can bring greater prosperity and social cohesion to a community where disinvestment has been consistent due to the presence of the dual four-lane roadways. Alarmist predictions such as the ones in Section 4.2.2. are not only unhelpful, they are quite often inaccurate, leading to ill-advised investments.

One note on the 2050 MTP alternative that I should note: while I am ecstatic that Anchorage has adopted the Complete Streets paradigm for road improvements, more should be done to ensure non-motorized facilities are used. For instance, including a bike lane on O'Malley was a great idea. However, its unprotected nature, tendency to go unplowed all winter (and unswept in the summer), as well as the 50-60mph traffic zooming past makes it an unattractive alternative. To that end, I humbly suggest we form a more robust design for non-motorized traffic in these cases using low cost measures such as Zebra dividers. The 2050 MTP Alternative should also include connections for non-motorized traffic to the Chester Creek trail system to facilitate greater usage of the broader non-motorized network.

Moving on to the HOME Initiative, I believe that we do need to accept more density throughout Anchorage to one extent or another. There are certainly some cases such as the Upper Hillside where due to a lack of infrastructure, more density would be difficult to realize, and given the wildland fire risk, perhaps quite ill-advised. That being said, we are all residents of this wonderful city and need to do our part in a reasonable manner. However, I believe there is one area where the HOME Initiative is falling short. The area from roughly East 16th Avenue on the south, Merrill Field on the east, Ingra on the west, and East 8th Avenue on the north is due to be zoned "Mixed Residential - Low". Per the 2040 LUP, this type of zoning targets 5-15 residential units per gross acre. If we are truly serious about meeting the WHEREAS clauses of the Home Initiative including providing more access to starter homes, reducing urban sprawl, addressing growth in housing demand, and promoting efficient land use, I feel this zoning type is a huge missed opportunity. This area is in close proximity to the downtown core and the best candidate area for smart growth into a more urban center that compliments the existing downtown area. When mixed with the 2050 MTP Alternative, this area has the potential to be a vibrant, people-centered neighborhood. The area is specifically called out as one that has seen development disinvestment because of the current configurations of Gambell and Ingra. With this situation set to change, I humbly, but stridently suggest reconsidering the zoning of this area to something that encourages greater density in the urban core, while encouraging further measures in any redevelopment to avoid displacing current residents by offering them affordable spaces in any new structures to ensure the people disproportionately impacted by poor choices in the past are not the victims of better choices in the present and future.

While I defer to you to make any final choices on this matter, an example of a bold alternative that could produce a vibrant area that is people-focused would be to designate this entire area as "Town Center". Such a bold step would incentivize reinvestment in the area by offering developers the opportunity to include both housing and smaller retail/commercial uses, including a very important increase to up to 40 residential units per gross acre. One of the consistent refrains from developers regarding a lack of investment in residential units in Anchorage is their unaffordability. In this situation developers are more

likely to achieve economies of scale on residential units while also having the added benefit of small retail and commercial development.

I am always reticent to cite examples from other places of how successful this kind of development can be. Such examples are usually met with the refrain that "This is Alaska, not X". This is a statement that is factually true, but the intent is bad. There is no reason our city cannot do better and we should use lessons learned to do so. I have recently found myself in Vancouver, Washington, particularly the Esther Short neighborhood where this kind of low-rise mixed-use combined with enhanced Complete Streets makes for a very inviting space where vehicles move efficiently, but pedestrians feel safe, bicycles move along, and there is a strong feeling of place. There is no reason we cannot have a uniquely Alaskan version of this in an area that has been historically underinvested in. It is an issue that we can now address, and do so in a way that makes the city better for the long term by providing much needed additional housing units, retail and commercial opportunity in the urban core, and a people-centered street network that fosters a sense of place and community.

In summary, I suggest:

- 1) Endorse an enhanced version of the 2050 MTP Alternative for the Seward-Glenn project ensuring non-motorized transit is given adequate, not just minimal, consideration.
- 2) Re-zone the area described above to "Town Center" from "Compact Mixed Residential - Low".

Thank you and I stand ready to answer any questions you may have. As you can tell, I have put a lot of thought into this and am happy to discuss further.

-Jason Norris

Public Comments: 2024-0006

Commenter	Email	Phone Number	Submitted
Debbie Ossiander PO Box 670772 Chugiak, AK 99567	ossiander@hotmail.com	9076882308	4/29/2024 9:55:01 AM
<p>I am concerned with what appears here to be an overly simplistic response to a housing crunch. Our comprehensive plans have in the past targeted density to specific areas with infrastructure to support it. I see next to no discussion about who will bear the cost of the upgraded roads and utility expansions necessary, particularly within the Municipality's service areas.</p> <p>Targeted planned density increases are by far the better way to go</p>			

May 1, 2024

Tom Davis
Senior Planner
Pkanning Department
Municipality of Anchorage

RE: Comments on Proposed Revised HOME Initiative (Sponsors' Draft), dated 1-12-2024

Tom,

Below are my comments on the proposed Revised H.O.M.E. Initiative (Sponsors' Draft), dated 1-12-2024. If you have questions about the comments, please let me know and I would be happy to meet to discuss. Please note that my comments come from the perspective of a residential multifamily housing developer. So, my comments are specific to how to incentivize the construction of more desperately needed multifamily housing in the Anchorage Bowl.

SPECIFIC COMMENTS

1. **Zoning District Abbreviations (Pg 7 - 21.04.010.A.2):** I suggest that you consider changing the abbreviations for the five new residential districts (STFR, CMRL, CMRM, URH, and LLR) to the following:

Single Family and Two Family Residential: **R-1**

Compact Mixed Residential Low: **R-2**

Compact Mixed Residential Medium: **R-3**

Urban Residential High: **R-4**

Large Lot Residential: **R-5**

The abbreviations for the five new residential districts (STFR, CMRL, CMRM, URH, and LLR) are a little confusing and not intuitive.

2. **District-Specific Standards (Pgs. 8-30):** I really appreciate that the District-Specific Standards that pertain to residential have been deleted. These standards are not needed, add cost and complexity to residential projects, and ultimately lead to less housing. In particular, the Mixed-Use Development Standards actually incentivize non mixed-use developments because the mixed-use development standards are so onerous that no one will choose that path. The deletion of District-Specific Standards is a good thing.
3. **Density Question (Pg. 20 – 21.04.010.E):** It is unclear to me if the density of 49+ dwelling units per acre was a requirement. For example, can a development with a density of 25 dwelling units per acre develop in the URH zoning district? If the answer is no, then I would suggest that this be changed so that there is no minimum.
4. **Height Limits (Pg. 45 – Table 21.06-1):** I highly recommend that for CMRM, the allowable height for this district be increased to 55 feet. Modern construction has greater floor to floor heights and the current code does not allow for this. An increase to 55ft will allow for four stories of housing. The current height of 40ft in some cases doesn't allow for three stories of housing. Updating height

limitations to match current construction standards is important. The current goal for the CMRM zoning district is 50 dwelling units per acre. The density goal of 50dua is not achievable with the current height restrictions.

5. **Height Limits (Pg. 46 – Table 21.06-1):** Similar to above, I highly recommend that for URH, the allowable height be 65ft, instead of 60ft, to accommodate for modern construction standards.
6. **FAR Maximum (Pg. 53 – 21.06.030.E):** I recommend that maximum FAR's be deleted. Anchorage doesn't have a problem with too high of FAR's. We have the opposite problem of projects not having a high enough FAR. A FAR maximum requirement is not needed.
7. **Private Open Space (Pg. 55 – 21.-7.030):** I'm sure this is already known, but this section needs to be updated to match the recently updated and passed ordinance pertaining to private open space (2024-16). The reduction in private open space is needed to make projects more efficient.
8. **Bonus Provisions (Pg.56 – 21.07.070.E):** I recommend deleting this section. As mentioned above, Anchorage needs to become denser. Many projects that are being constructed are low density. Bonus provisions that make density harder to achieve defeat the intended desire.
9. **Landscaping (Pg.61 – Table 21.07-2):** I recommend substantively reducing the landscaping setbacks found in L1, L2 and L3. I additionally recommend providing greater exemptions from the setback.
10. **Residential Design Standards (Pg. 63 – 21.07.110):** I recommend deleting this section in its entirety. Housing is the only part of Title 21 that has design standards, commercial uses don't have design standards. The current design standards are costly, not needed and lead to less housing development.
11. **Table of Allowable Uses (Pg. 72 – 21.05-1):** I recommend making "Dwelling, Townhomes" a "P" in the CMRL and CMRM zoning districts. They are currently showing as "S".

Sincerely,



Shaun Debenham
Debenham LLC
President
P: (907) 562-9330
E: shaun@debenham.com