



September 3, 2024

Mr. Craig Lyon  
Planning Director  
Municipality of Anchorage  
4700 Elmore Road  
Anchorage, AK 99507

**Subject: Southcentral Foundation Tudor Elmore Development  
Request for Administrative Relief from AMC 21.07.060.F, Table 21.07-3,  
Subsection A**

Dear Mr. Lyon,

Southcentral Foundation (SCF) is working to redevelop their property located at 4330 Elmore Road (at the northwest intersection of East Tudor Road and Elmore Road). This project is known as the SCF Tudor Elmore Development (TED). In order to complete construction by 2026, a grading permit (C24-1270) was submitted in March 2024, which included the proposed building location. The permit was approved in summer 2024, and earthwork activities have started at the site. On July 18, 2024, SCF received notice that its application for an Administrative Site Plan Review (ASPR) associated with the TED was approved with conditions (Case 2024-0073).

ASPR Case 2024-0073, Condition 2a states: "Provide to the Planning Department for approval, an amended Site Plan, an Alternative Equivalent Compliance, or a Design Variance, to resolve the lack of a minimum of 20% of street facing building elevation width along Tudor Road that is not encumbered by off-street automobile parking or circulation."

This condition is in reference to Anchorage Municipal Code (AMC) Section 21.07.060.F – Pedestrian Frontage Standard. Per AMC 21.07.060.F.3.b, "the director shall approve administrative relief if the applicant demonstrates the adjustment is necessary to compensate for some practical difficulty of the site." Subsection "c" also states: "The director may approve administrative relief for land use permits submitted for review before November 1, 2025, if the applicant demonstrates in writing an undue burden placed upon the affected developments as a result of standards set forth in Table 21.07-3."

The purpose of this letter is to request administrative relief from the requirement discussed in ASPR Condition 2a.

### **Applicable Standard**

Based on AMC 21.07.060.F.2 – Applicability, subsection 5 applies to this development as it is currently prior to November 1, 2025. The standards of Table 21.07-3 apply. Subsection A listed in Table 21.07-3 is as follows:

Site Elements for Pedestrian-Oriented Frontages	Standard
A. Minimum required ground-floor, street-facing building elevation with on-site walkways, pedestrian amenities, or landscaping in front—and no off-street automobile parking or circulation <sup>1</sup>	20% of building elevation width, on one frontage

Footnote 1 indicates an exception: “Non-residential buildings located more than 100 feet from the applicable street rights-of-way are exempt from subsections A., D., E., and F. above.”

The Elmore Road building frontage is exempt from this requirement as it is located over 100 feet from the right-of-way (ROW). However, this requirement is applicable to the Tudor Road frontage.

### **Project Background**

4330 Elmore Road is currently developed as the SCF Detox facility. SCF has seen an increased demand for services related to its medical detox and withdrawal management programs. The expansion of these programs requires more space than exists at the current facility. Additionally, SCF and its healthcare partners in the community have seen an increase in emergency room visits for those in a mental health crisis. To ensure that individuals that require the most acute care at the level of a hospital can be seen, SCF is creating a new program for Adult Crisis Stabilization. As a new program, no space currently exists at the main Alaska Native Health Campus for this service.

The TED will provide space to meet these community Health Service needs in a new three-story, 101,000 square foot building to expand detox and outpatient behavioral health services and provide a location for the new crisis stabilization center. The proposed development also includes a 100,000 square foot integrated parking garage.

### **Practical Difficulties of the Site**

The following outlines considerations for the TED building placement, highlighting practical difficulties related to the site and operations of the proposed development.

#### **Existing Building Must Remain Operational**

As detailed above, SCF is currently providing medical detox and withdrawal management programs at its SCF Detox facility on the site. SCF has observed an urgent need to expand these services to accommodate more patients, as well as adding a new crisis stabilization clinic for adults experiencing mental health crises that would otherwise need to visit the emergency room. The TED will address these community needs.

However, the existing facility needs to remain operational during the construction of the new facility so that the existing medical detox and withdrawal management programs can continue providing these critical services. Therefore, TED site plans were designed to strategically site the new building so that it can be constructed without requiring demolition of the existing facility until the new facility is complete, ensuring no gap in services.

Given the location of the existing building near the southeast corner of the site, the new building was designed in an L-shape in the northern and western portions of the site. The majority of the TED's parking is proposed to be provided in an integrated parking structure situated on the north side of the building to shield it from view from the adjacent ROWs. This design is intended to make the building appear more welcoming and accessible for patients and visitors.

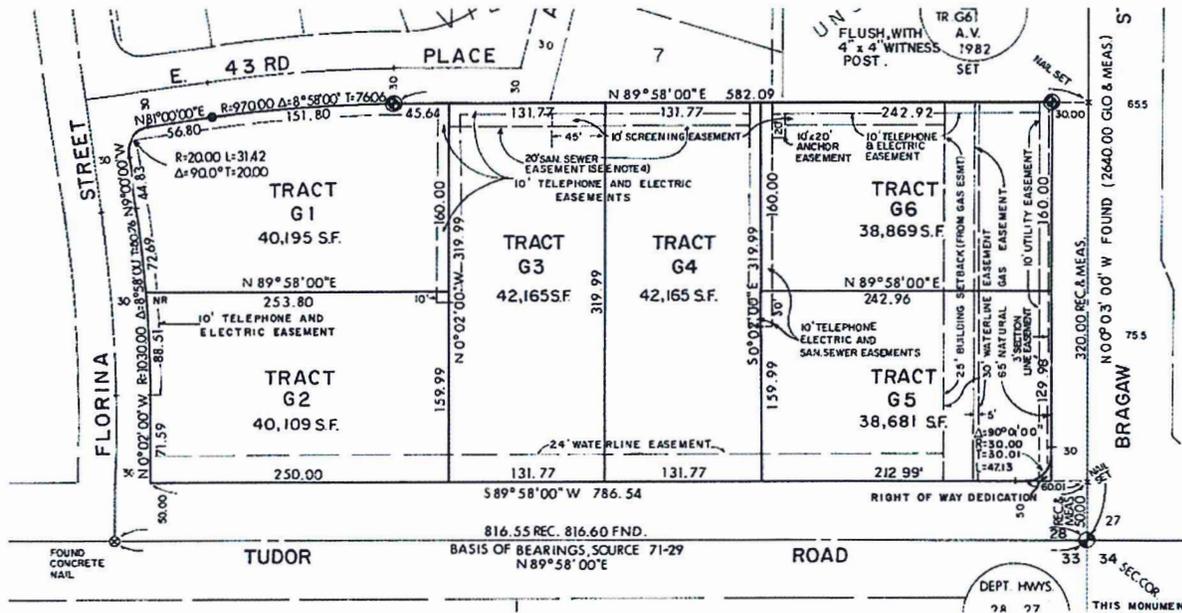
A smaller parking area for visitors and patients is planned along the south side of the building. The parking area also includes a pedestrian connection between the Tudor Road bus stop and the front entrance of the building. Once the new building is complete and ready for patients, the existing building will be demolished, allowing the existing building site to be redeveloped with the patient and visitor access elements including drive aisles and a smaller parking area.

Easements

As shown on the site plans and plat submitted with the ASPR, this site is a corner lot with frontages on East Tudor Road and Elmore Road. All property frontages are encumbered by easements, most of which have existed since Plat 1983-62 which created Tracts G1 through G6, Athenian Village Subdivision. The existing SCF Detox building was constructed on Tract G5, and since then SCF has acquired and combined Tracts G3 through G6 as Tract G5-1 (Plat 2023-43).

**Subject property according to Plat 1983-62.**

The existing SCF Detox facility was developed in the northwest corner of Tract G5 in 1996.



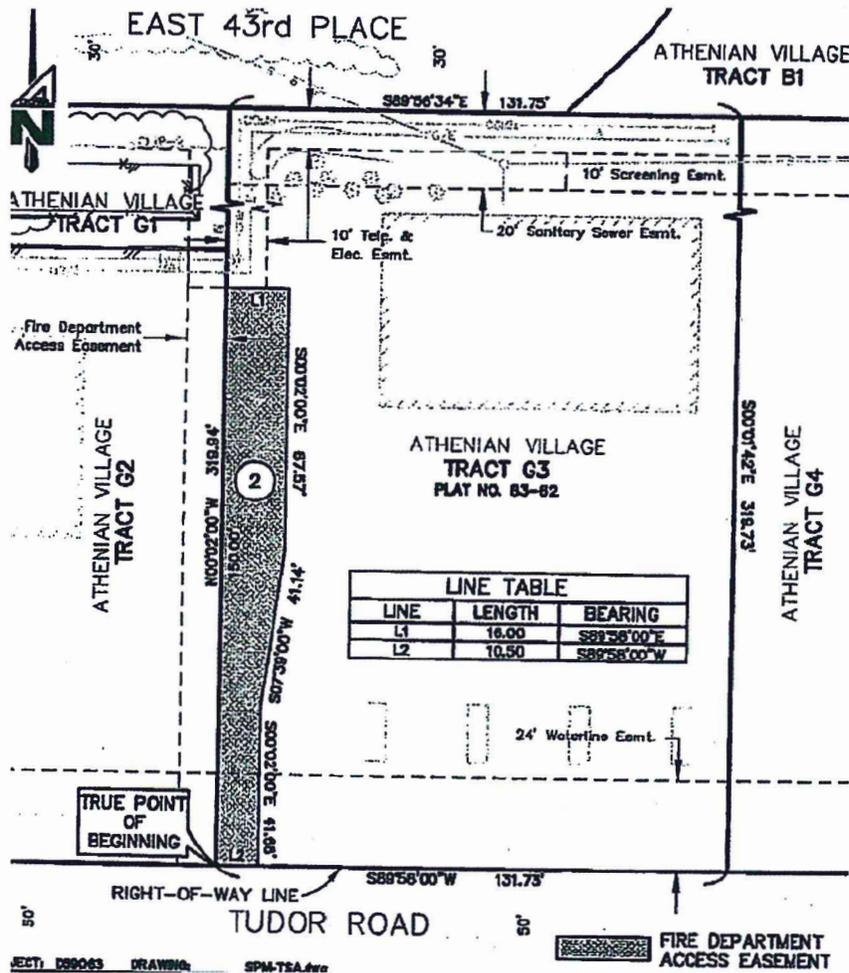
As indicated in Plat Note 3 of underlying Plat 1983-62, "Direct vehicular access on Tudor Road shall be via one common driveway each for Tracts G2 & G3 and G4 & G5." Existing developments have been served by a driveway located between Tracts G2 and G3 and between G4 and G5 as originally specified in Plat 1983. To serve future development of the TED on Tract G5-1 (former Tracts G3 through G6), only the existing shared driveway between Tracts G2 and former Tract G3 (along the western edge of current Tract G5-1) will be maintained for Tudor Road access.

***View of existing shared driveway on Tudor Road that will be maintained (outlined in red).***



The western portion of the site is also encumbered by a 10-foot to 16-foot-wide Fire Department Access Easement (document 2006-053801-0). The easement extends northward from Tudor Road and terminates near the northern boundary of Tract G2. The easement serves both the project site and the adjacent parcel to the west.

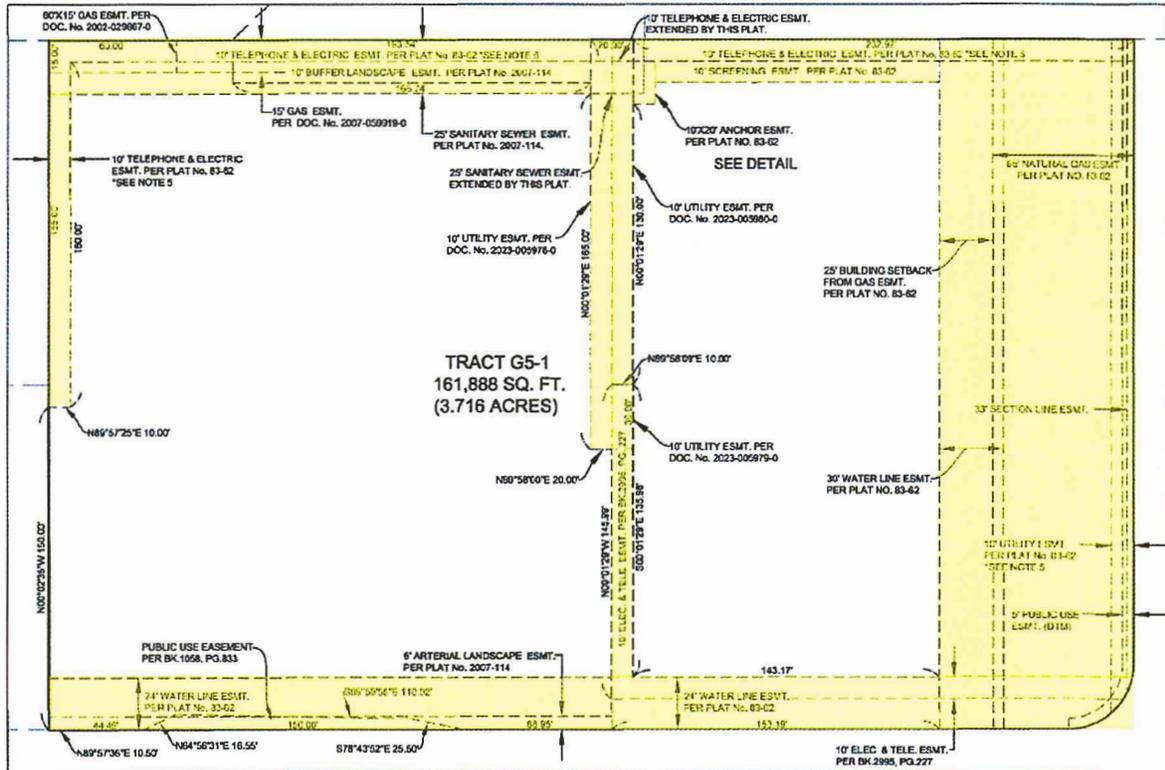
Figure from Fire Department Access Easement 2006-053801-0.



On the entire eastern frontage along Elmore Road, there is a 65-foot natural gas easement plus a 25-foot building setback from the gas easement to protect the high-pressure gas main running from north to south along the eastern portion of the site. This is essentially a 90-foot building setback along the entire eastern frontage that has existed since Plat 1983-62.

When the existing SCF Detox facility was constructed in 1996 on what was Tract G5, this 90-foot building setback as well as the 24-foot water line easement along Tudor Road required locating the SCF Detox facility at the northwest corner of Tract G5. Images of the subject parcels with easements as platted in 2023 are shown below. It is important to note that permanent structures are not typically allowed in easements given that they can encumber access to the utility infrastructure within the easement. This was one of many considerations when siting the new building.

**Subject property according to Plat 2023-43.**  
Easements are highlighted in yellow.



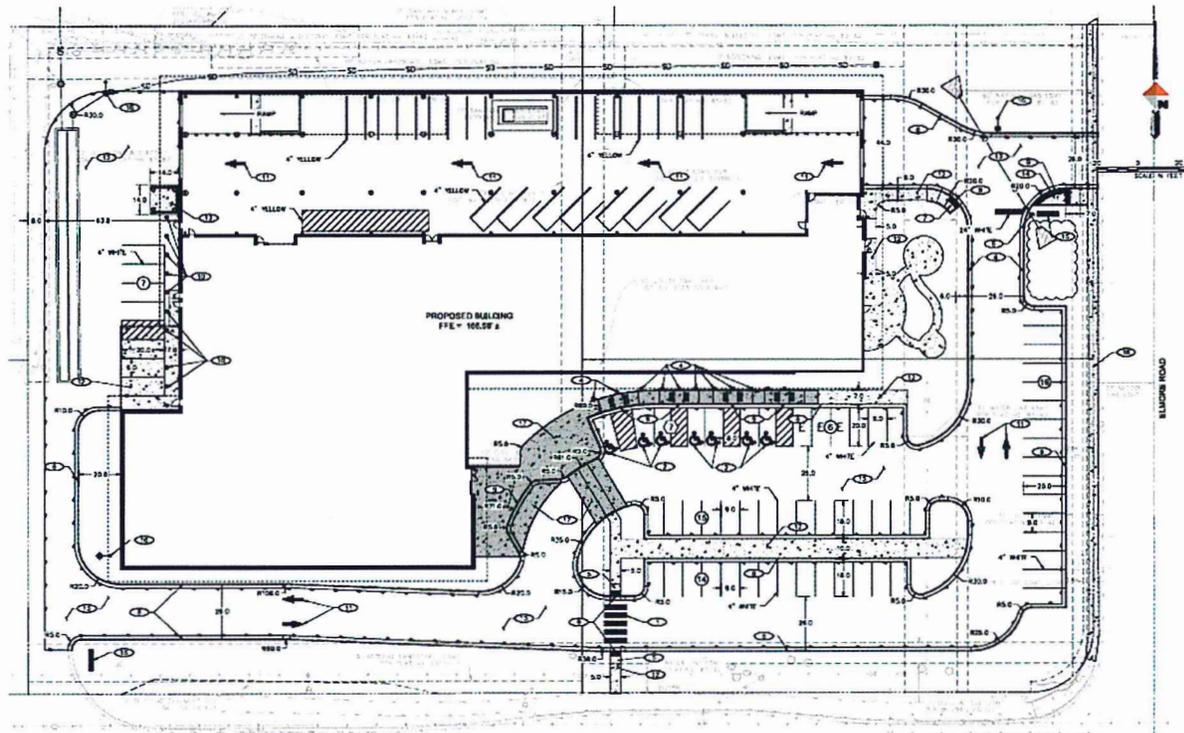
**Shared Access and Parking Layout**

As shown on the site plan that was provided for the ASPR, the development is proposed to have access from the existing shared driveway off of East Tudor Road near the southwest corner of the site and a driveway off of Elmore Road near the northeast corner of the site. The Elmore Road driveway is shifting north on the site to be further from the intersection. One driveway curb cut on Tudor Road is being removed to minimize curb cuts and improve pedestrian and transit experience adjacent to the site.

Two-way drive aisles travel along the south and east edges of the property, connecting the two driveways to the surface parking lot near the southeast corner of the lot. The parking garage can also be accessed from both the Elmore Road and East Tudor Road driveways. The driveway connections from Elmore Road and the shared access driveway on Tudor Road also serve as the fire access lane for the new building.

Some driveway access changes were possible to improve surrounding traffic conflicts, especially for pedestrians, but the shared access driveway on Tudor Road is also used by adjacent developments to the west and could not be removed as part of this project. The site plan that was submitted with the ASPR is included below for reference.

**Civil site plan submitted with ASPR.**



The new building is located as close to the Tudor Road ROW as possible, given all of the various site constraints that have been outlined above. The parking area that is visible from the ROW was designed with pedestrians in mind; views of the small parking lot are shielded by attractive landscaping along Tudor Road, and a pedestrian connection is provided from the bus stop on Tudor Road to the main entrance of the building (see site plan above and rendering submitted with the ASPR below). However, with the shared driveway, fire access, and the need to site the building in the northwest corner, it was not possible to avoid a drive aisle for patient and visitor parking in front of the Tudor Road building frontage.

***Rendering of the proposed building frontage on Tudor Road.***



**Appropriate Buffer for Healthcare Uses**

As discussed above, there are many practical constraints that make it difficult to organize the site plan without drive aisles or parking in front of the Tudor Road building frontage. It is also important to note that there are other reasons to support a site layout with parking and drive aisles in front of the building in this case.

SCF's proposed facility will consist of a mix of Health Services and Hospital/Health Care Facility uses. This includes treating detox and behavioral health crisis patients, as well as supporting spaces including waiting rooms, intake and check-in areas, exam rooms, outpatient behavioral health offices, patient gathering spaces, and more.

Given that this is a place for healing, the design team worked to locate patient rooms within the building to be farther from adjacent ROWs for privacy and to decrease potential road noise impacts for patients, as Tudor Road and Elmore Road are both high-traffic arterials. The goal was to create a peaceful and restorative setting for these patients who are undergoing healing for addiction and behavioral health crises. This supported a site layout that places entrance and gathering spaces in the front of the building near pedestrian access and patient and visitor parking, while prioritizing a greater building setback from high-traffic arterials with patient experience in mind.

In this case, the patient and visitor parking and drive aisles located between the building and the Tudor Road and Elmore Road ROWs (with adjacent landscaping and pedestrian walkways) act as a buffer for the healthcare uses.

## **Conclusion**

In conclusion, the SCF TED site (ASPR Case 2024-0073) is subject to practical difficulties that impact the site plan and require drive aisles and parking to be located in front of the Tudor Road building frontage. These difficulties include significant easement encumbrances, the need to keep the existing detox facility operational during construction of the new detox and behavioral health crisis stabilization facility, and the need to maintain the existing shared access driveway at the southwest corner of the site. Providing a quiet and healing space for patients and visitors was also an important consideration. This included siting the building further away from the adjacent ROWs to minimize traffic noise.

Despite practical difficulties of the site, the building design and associated landscaping and pedestrian access provisions between the building and Tudor Road still heavily considered pedestrian and transit access experience, providing an attractive and welcoming entrance oriented towards the Tudor and Elmore intersection. One existing driveway along Tudor Road is being removed with the redevelopment, and a convenient pedestrian pathway connects the building entrance to the existing bus stop on Tudor Road. The larger parking structure is integrated on the north side of the building so that it is shielded from view from the adjacent ROWs. The building design features many windows along the Tudor Road frontage, but also considers patient privacy and a peaceful healing experience with the building and site plan design. The drive aisles and modestly sized patient and visitor parking lot in front of the building provide a buffer between the busy Tudor Road arterial and the healthcare uses.

Based on these factors, we are requesting Planning Director approval of administrative relief from AMC 21.07.060.F, Table 21.07-3, Required Element A. Please provide signature below to indicate approval of this request for administrative relief.

Sincerely,  
DOWL

LaQuita  
Chmielowski

Digitally signed by: LaQuita  
Chmielowski  
DN: CN = LaQuita Chmielowski OU  
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LaQuita Chmielowski, PE, LEED AP  
Land Use Planning Manager

I have reviewed the above letter and approve administrative relief from AMC 21.07.060.F, Table 21.07-3, Required Element A. Condition 2a of Administrative Site Plan Review Case 2024-0073 is met.

  
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Craig Lyon  
Municipality of Anchorage Planning Director