Attachment 5

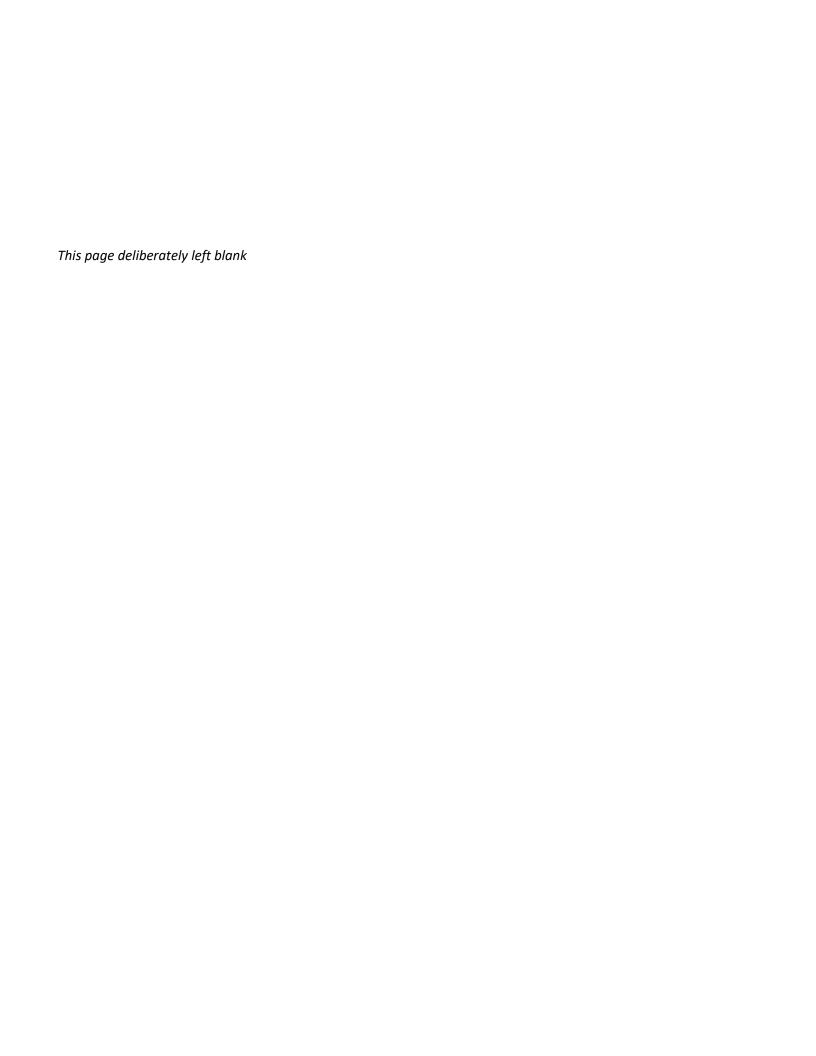
Comments Received

(as of March 31, 2021)

Title 21 Text Amendment to Off-Street Parking and Site Access Regulations

Public Hearing Draft
PZC Case No. 2022-0026

Anchorage 2040 Land Use Plan Implementation Actions 4-3 and 4-6



Municipality of Anchorage Public Transit Advisory Board Resolution #2022-01

A RESOLUTION OF THE ANCHORAGE PUBLIC TRANSIT ADVISORY BOARD SUPPORTING THE MUNICIPALITY OF ANCHORAGE PLANNING DEPARTMENT'S TITLE 21 PARKING AND SITE ACCESS AMENDMENTS

WHEREAS, the Planning Department at the Municipality of Anchorage has presented a Public Hearing Draft of updates to the Planning and Zoning rules for minimum parking and site access requirements, and

WHEREAS, the Anchorage 2040 Land Use Plan (LUP) designates transit-supportive development corridors, and

WHEREAS, the Board is intended to contribute to the long range planning of a balanced public transit system in the municipality, and

WHEREAS, the Board's core values are connection, equity, riders, and safety, and

WHEREAS, these updates include as one of its main proposals improvements to site access for pedestrians, bicyclists, ride-share, and public transit ridership, and

WHEREAS, the updates propose a 5% reduction in parking minimums if the developer or owner includes participation in a rideshare program, a 10% reduction in parking requirements if the developer or owner includes transit benefits, and a 2% reduction in parking requirements if the developer or owner includes a transit stop or shelter in cooperation with the Planning and Public Transportation Departments, and

WHEREAS, the Public Transportation Department offers a rideshare program and programs for organizations to offer transit benefits to their constituents, and

WHEREAS, the updates propose clarifying and consolidating design standards for sidewalks and on-site pedestrian walkways, increasing bicycle parking space requirements and requiring some bicycle parking spaces be located in sheltered and secure facilities, and

NOW THEREFORE BE IT RESOLVED that the <u>Anchorage Public Transit Advisory Board</u> supports Title 21 Parking and Site Amendments Public Hearing Draft as written.

PASSED AND APPROVED by the Anchorage Public Transit Advisory Board this 10th day of February 2022.

Sarah Preskitt

Chair



Municipality of Anchorage Project Management and Engineering MEMORANDUM



DATE:

March 21, 2022

To:

Dave Whitfield

FROM:

Kyle Cunningham

SUBJECT:

Cases 2022-0026: Comments from Watershed Management Services.

Watershed Management Services (WMS) has the following comments for the April 11, 2022 Planning and Zoning Commission hearing:

- 2022-0026 Title 21 Text Amendment to Parking and Site Access Regulations: Request for Public Comment for April 11, 2022 PZC Public Hearing;
 - o WMS has no comments on or objections to this request.

MEMORANDUM

DATE: February 22, 2022

TO: Kristine Bunnell, Manager, Long-Range Planning Section, Planning Division

Alex Prosak, P.E., Civil Engineer II, Planning Section, AWW FROM:

RE: **Zoning Case Comments**

Hearing date: April 11, 2022

Agency Comments due: March 21, 2021

AWWU has reviewed the materials and has the following comments.

2022-0026 TITLE 21, Proposed text amendment to the off-street parking and site access regulations in the Anchorage Municipal Code Title 21 Zoning Ordinance (Title 21). This amendment provides for area-specific lower parking requirements and streamlines approvals of reductions in parking for developments. It also reforms site access requirements for driveways and pedestrian facilities, Grid N/A

1. AWWU has no objections to this Title 21 amendment.

If you have any questions pertaining to public water or sewer, please call 786-5694 or send an e-mail to alex.prosak@awwu.biz



MUNICIPALITY OF ANCHORAGE

Traffic Engineering Department



MEMORANDUM

DATE: March 22, 2022

TO: Current Planning Division Supervisor.

Planning Department

THRU: Kristen A. Langley, Traffic Safety Section Supervisor,

Traffic Engineering Department

FROM: Randy Ribble, Assistant Traffic Engineer

SUBJECT: 2022-0026 Title 21 Text Amendment to Parking and Site Access Regulations:

Request for Public Comment for April 11, 2022 PZC Public Hearing.

Traffic Engineering has reviewed the proposed text amendments to AMC Title 21 and is providing the following comments and recommendations:

Administrative Parking Reductions:

Traffic Engineering is supportive of the proposed text amendments that clarify the administrative process, standards to be met, and level of reduction that can be granted without requiring approval by the Planning Director and Municipal Traffic Engineer. Defining which reductions are consider by right and which will require additional staff time to review and approve should improve the process and reduce costs for future developments.

Parking Reduction Strategies:

Traffic Engineering is also supportive of the proposed text amendments that revise the menu of available alternative parking strategies to include the addition of the newer rideshare programs, improved standards for requiring improvements to or adding pedestrian amenities to the site to support the reduction strategies, and consolidation or elimination of existing strategies to also improve the process of administering parking reductions.

Area Specific Parking Requirements:

Traffic Engineering supports the definition of specific neighborhood development context areas that grant additional by-right reductions to off street parking requirements for new developments located in these context areas. Traffic Engineering recommends the geographical areas defined in the new maps and figures be added to layers with both internal and public Geographic Information Systems (GIS) to readily identify if proposed development is within these defined areas.

Traffic Engineering has concerns on the existing District Parking (F7) and the new Open Option Parking District (E7). Both of these options may require modifications to other municipal code sections, such as Title 9, in order to develop a more comprehensive process of establishing and defining a district geographically within the municipality, identifying the responsible agency for managing and enforcing regulations within these specific districts, and determining the cost and

impact to operations and management of street maintenance due to implementing these proposed parking reduction strategies in the Municipality.

Improved Site Access for Non-Vehicular Transportation:

Traffic Engineering concurs with the proposed amendments that emphasize the need to provide new or improved pedestrian amenities that support more non-motorized modes of transportation. These amendments will provide greater assurance that new developments have all required amenities to support these alternative strategies.

Traffic Engineering supports the significant modifications to the bicycle parking section (090 K). This section addresses both long and short terms needs for non-motorized users. Traffic Engineering has some concerns on how this will be implemented and managed on some developments that are changing the use but are modifying only the building and not the site. An example of this would be a change of use with strip mall type developments where the new use will trigger improvements, but the site has inadequate space to support the requirement.

Residential Site Access Reform:

Traffic Engineering is supportive of the text amendments that both clarify residential site access of existing codes and provide additional flexibility to the smaller residential infill developments for site access and parking by working with established minimums of the current Municipal Driveway Standards.

Smaller Dimensions for Parking and Circulation:

Traffic Engineering is appreciative of the changes made to Table 21-07-13 for parking angle, stall, and aisle dimensions. Traffic Engineering has no issue with proposed percentages of 50% and 30% of spaces in the Downtown District that may be used for small or compact dimensions.

Traffic Engineering has concerns with exception "ii" that allows for 50% of spaces to be smaller dimensions for employee only, structured parking facilities, and low parking uses. This section may need additional clarification on which spaces on a site plan are designated as either employee only or low turnover for both municipal staff who review plans and design professional that develop the site plan.

Kimmel, Corliss A.

From:

Right of Way Requests

Sent:

Thursday, February 24, 2022 1:20 PM

To:

Blake, Lori A.; Kimmel, Corliss A.

Cc:

Right of Way Requests

Subject:

RE: 2022-0015, 2022-0026, 2022-0031 Request for Reviewing Agency Comments

All:

ROW has the following comments by case number:

2022-0015

ROW has no comment or objections on the proposed action.

2022-0026

ROW has no comment or objections on the proposed action.

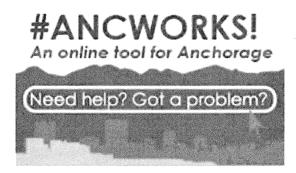
2022-0031

ROW has no comment or objections on the proposed action.

Regards,

Lynn McGee Senior Plan Reviewer Right of Way Section lynn.mcgee@anchorageak.gov

Office: 343-8226 Fax: 249-7340



University Area Community Council's 3/20/22 Comments on the Public Hearing Draft of Planning and Zoning Commission Case No. 2022-0026, a proposed text amendment to off-street parking and site access regulations in the Anchorage Municipal Code Title 21.

The proposed amendments to Title 21 would identify four neighborhood development context areas where urban patterns and vehicle use in these older neighborhoods may provide a basis for tailored parking and driveway standards (21.07.015). These new areas include: 1) Traditional Urban neighborhood context area; 2) Edge Urban neighborhood context area; and 3) Transit Supportive neighborhood context area. While discretionary off-street parking reductions may currently be approved after review by the traffic engineer and Director, the proposed amendments would allow certain reductions without additional review, i.e., "by right" within specified neighborhood context areas. Any reductions to the required off-street parking would be implemented via a parking agreement with the Municipality of Anchorage (MOA).

The proposed amendments include maps of the new neighborhood development context areas; specific parking reductions and alternatives (e.g., carpooling, bicycle parking, transit pass benefits) are identified in tables within 21.07.090F - K. The proposed Title 21 amendments would also remove redundant requirements and re-organize the code to improve efficiency in its application. The University Area Community Council supports these amendments to simplify project permitting, maintain green space (e.g., by reducing unnecessary paving), and encourage non-motorized (i.e., walking/biking) and public transit as alternative modes of access to specific areas in the Municipality.

In addition, UACC has identified one proposed amendment that should be clarified. There is proposed one new district that would eliminate required off-street parking, the Open Option Parking District. Such a district may only be designated for specific area(s) within the already established neighborhood development context areas delineated in section 21.07.015. Section 21.07.090E7 establishes two options for creating an Open Option Parking District. However, the process does not clearly identify the conditions for approval by either the traffic engineer and Director (Option A) or the Assembly (Option B). Section 21.07.090E7e presents approval criteria to be used by the decision-makers. Criteria include: 1) an On-street parking management plan; 2) a Right-of-way (ROW) maintenance plan; and 3) consistency with the Comprehensive plan. It is unclear how on-street parking would be managed and/or enforced in these Open Option Parking Districts, including measures to allow for street maintenance and snow removal. UACC recommends that the amendments to Section 21.07.090E7 include specific criteria that would be used to evaluate the adequacy of the on-street parking management and ROW maintenance plans.

Thank-you for the opportunity to comment on proposed amendments to Title 21 affecting offstreet parking and site access.

Mark Fink
UACC Executive Board member



March 21st, 2022

To the Planning and Zoning Commission,

We are writing to comment on PZC Case No. 2022-0026, Title 21 Text Amendment to Parking and Site Access Regulations. Bike Anchorage advocates for a vibrant, livable, and healthy Anchorage where it is safe and practical to go by bike. As such, we support the proposed changes to Title 21 that will increase availability of bicycle parking, including secure long-term storage.

Bike Anchorage members often cite the need for better availability and security of bicycle parking as a reason they do not bike as much as they would like to. Bicycle infrastructure supports the local economy by increasing property values, encouraging more frequent visits to businesses, and attracting a workforce¹. A more bikeable city also has a higher quality of life by increasing health and reducing noise and pollution. Improving bikeability would support the vision for Anchorage's future as outlined in Goals 2, 3, 4, and 5 of the 2040 MTP² and Guiding Principles 2 and 3 of the 2040 Land Use Plan³ by improving safety, traffic conditions, economic viability, environmental sustainability, compact development, and mobility and access. As such, Bike Anchorage strongly supports the proposed changes to Title 21 that outline baseline requirements for bike parking at all new development, require secure parking for long-term storage, ensure usability for all bicycle types by specifying that a minimum of 30% of bike parking should be horizontal, and providing the option to replace car-parking requirements with bicycle parking.

While we strongly support the proposed increases in bike-parking requirements, we also encourage the PZC to consider removing car-parking minimums entirely. By continuing to set minimum car-parking requirements for new development, the revised Title 21 Parking and Site Access Regulations still prioritize car parking over housing, businesses, or community services. This prioritization increases costs for developers and residents and reduces the supply of housing. Instead of the proposed, incremental revisions, eliminating car-parking requirements would be a simpler and more effective approach and has been supported throughout the comment process by a broad range of Anchorage residents, from housing advocates to developers.

A major argument that has been presented for maintaining car-parking minimums is that on-street parking can interfere with snow clearing. However, effective management of on-street parking (e.g., alternate-side parking, as implemented by many other winter cities) would be a more effective solution than to continue requiring off-street parking, as street management



would improve the current effectiveness of snow clearing as well as preventing additional problems in the future. Eliminating car-parking minimums would make snow removal more affordable by increasing tax revenue per foot of road. In addition, while entirely removing parking requirements may seem dramatic, the revision would apply only to new development, so changes in car-parking patterns would occur gradually over time.

If car-parking minimums are carried forward in the Title 21 revision, we support the proposed reductions in the minimum requirements for car parking. We also strongly support the increased requirements for bicycle parking. However, because the revised requirements would apply only to new development, the availability of bike parking will increase slowly and may not be balanced across the city. Directly funding bicycle parking would be more effective than making bike parking a part of the complex car-parking regulations. Funding would encourage developers to add bike parking to current development, not only to new development.

In addition to the above comments, we suggest the following minor changes to the proposed specifications for bike parking in the Public Hearing Draft:

- Add a minimum requirement for outdoor (non-secure) bike parking. For development where most parking is required to be secure (e.g., multifamily housing), it may become more cost-effective to implement the full bike-parking requirement as secure parking. However, limited-access parking would not be available to guests or customers, and residents making a quick stop at home would also appreciate an option to temporarily lock their bike in an easily accessible location. Requiring a minimum of 2 bike parking spaces outdoors (unsecured) per developed property would provide the best flexibility for all those traveling by bike.
- Do not allow in-dwelling parking to count toward the parking minimum. Residents
 will likely prefer to use space inside a dwelling unit as living space or to store
 other belongings, and may not want to deal with the mess or hassle of moving a
 bike indoors after every use. Instead, requiring bike parking to be provided in a
 dedicated communal space will make it most usable and accessible for most
 residents. In-dwelling bike storage could be provided, but should not count
 toward the bike parking minimum requirement.

In summary, we strongly support the proposed changes to increase bike-parking requirements, and encourage the PZC to consider the two minor changes we suggest above as well as potentially removing car-parking minimums entirely. Increasing the requirements for bicycle parking, including secure long-term storage, will boost Anchorage's economy by supporting local businesses and making the city a more attractive place to live, work, and visit.

(510) 478-4279



Sincerely,

Devora Barrera Gonzalez Director, Bike Anchorage

Emily Weiser

President, Bike Anchorage

Guily Wusn

with support from

Bike Anchorage Board of Directors and Advocacy Committee

References:

- Schiller, B. 21 Jan 2014. Bike lanes aren't just safer for cyclists. They're good for business, too. Fast Company. Available at: https://www.fastcompany.com/3024974/bikes-lanes-arent-just-safer-for-cyclists-theyre-good-for-business-too.
- ² 2040 Metropolitan Transportation Plan, Anchorage Bowl and Chugiak-Eagle River. Prepared for Anchorage Metropolitan Area Transportation Solutions by HDR. Anchorage, AK. https://www.muni.org/Departments/OCPD/Planning/AMATS/MTP/2040/Final_FHWA_FT_A_Approved/2040_MTP_Final_Approved.pdf.
- ³ Anchorage 2040 Land Use Plan. 2017. Municipality of Anchorage Planning Department, Long-Range Planning Division. Anchorage, AK.
 https://www.muni.org/Departments/OCPD/Planning/Publications/Documents/Anchorage%202040%20Land%20Use%20Plan/Anchorage 2040 LUP Adopted 9-26-17.pdf.

Davis, Tom G.

From:

Marc-gmail

Sent:

Wednesday, March 23, 2022 2:44 PM

To:

Davis, Tom G.

Subject:

PZC consideration of Title 21 changes

[EXTERNAL EMAIL]

Hi,

I appreciate the concern shown for bikers and pedestrians, but does staff really believe that U racks and easing parking are going to do anything for bikers or pedestrians?

No one locks bikes on bike racks because no locks are secure.

The best thing we can do about cars is prohibit them from any on street parking while promoting effective public transit (for example a system that ran weekend evenings and all days when people work!)

We need to reduce the imprint of automobiles on Anchorage, and that involves making it more expensive and less convenient to own a car.

Meanwhile as affordable housing gets scarcer we see more cars per housing unit as the number of adults sharing units rises.

Focus on a walkable city

Make it easy to offer surveilled bike parking Put more offices on foot or bike being proactive instead of being reactive

Off Pembroke there is a PUD where residents virtually shutdown Pembroke because residents parking their cars on the road instead of parking in garages and driveways. Enough!

It is a bit unclear from e-mail shared by FCC how PZC comments on the cases should be made aside from using the horrid web interface.

Marc Grober

Davis, Tom G.

From:

Connor Scher

Sent: To: Sunday, March 27, 2022 5:01 PM Davis, Tom G.; Appleby, Elizabeth I.

Subject:

Case 2022-0026 Title 21 Parking and Site Access Amendments - Comments

Attachments:

Comments on Parking Amendments.docx

[EXTERNAL EMAIL]

Tom and Elizabeth,

Thank you for your work on this project. I am attaching some comments I wanted to make as an individual on the amendments. Let me know if you have any questions!

Kind Regards,
-Connor

Comments on Parking Amendments:

This proposed amendment creates a great deal of change in Title 21 and it is very exciting to see it and contemplate its legacy. Overall I am supportive of this specific amendment and the direction and strategy it adopts. Creating these designations of neighborhood typologies is very interesting and I hope it finds a future. At the same time though, I worry that it recalls some of the unfortunate planning strategies of Urban Renewal and wonder about how it may contribute to gentrification of neighborhoods, especially Fairview, Mountain View, and Northeast Anchorage that have strong minority populations. I wonder that some of the provisions specifically regarding housing developments cater too greatly to the developer at the expense of the residents. Although it is nice to think that everyone can ride a bike or bus, without safe bike routes and frequent and prolific bus service, I worry that this will create hardship on some residents, especially persons with disabilities and minority families. Many families rely on multiple cars because the primary caregivers work jobs that do not allow them to transport other household members. In neighborhoods throughout Anchorage, but significantly in those areas identified as eligible for the greatest parking reductions, many people live with roommates or extended families in order to afford rent. I know it was one example, but it did cause my brow to furrow a bit. Still, the bicycle parking changes are really exciting and I look forward to implementing them in design projects. I am in full support of revising the off-street parking requirements, and am well aware of the delicate work the Planning team have done so far. Most of my comments are criticisms or suggested changes, but I must applaud the efforts of the planning team and other stakeholders in this effort.

- Is this amendment removing all mixed use design standards, or just replacing and combining those related to pedestrian amenities into a new section?
- Section 21.07.015: Generally supportive of this section
- Section 21.07.015C.1.: This paragraph seems unnecessarily wordy. I'm not really sure of its purpose or necessity to be in code. There are several repeated phrases. The sentence on sidewalks is a little odd as it starts with a general statement (present on most streets) and then qualifies it with another general statement (limited parts). You could probably end the sentence after "most streets". Suggested edit for paragraph: "Traditional urban neighborhood contexts feature development features including a regular street grid, sidewalks, buildings with moderate front setbacks oriented toward the street, and parking located to the side or rear of principal buildings. There is a balance of pedestrian, bicycle, public transit, and automobile reliance."
- Section 21.07.015C.1.: Add call-out graphic to middle image to indicate the right-most image is a blown-up version.
- Section 21.07.015C.3.: I'm not sure I would refer to the 1960s as "early post-war". Either say "post-war" or "Urban Renewal" or just 1950s–1960s. Again, the second paragraph is really commentary and doesn't seem to belong in code. The last sentence smacks a little of pride. Suggested paragraph edit: "Edge urban neighborhoods feature smaller lot and block sizes than later subdivisions with a mix of street grids and development patterns. Some areas have alleys and sidewalks. Generally, the edge urban areas support transit and enhanced pedestrian facilities." In contrast to the areas in Government Hill and South Addition which were subdivided based on strict grids either from the original survey (360' grid) or Jeffersonian (330' grid), these

areas were originally homestead plats of 5 to 160 acres. As a result, they were subdivided and sold at various times with various development patterns that remained consistent within original parcels (frequently). Applying these general statements to these areas is not an effective means of describing them. However, these areas share a period of development, and perhaps defining them by the time period or plat number versus the improved infrastructure is more effective. Alternatively, describing the infrastructure allows a more comprehensive and fluid understanding of subject area. This is the conclusion I believe you reached, but I would put much less commentary in the description.

- Section 21.07.015C.4.: This paragraph is also slightly wordy, and I would suggest moving the last sentence to the second sentence, and leaving only those first three sentences.
- Map 21.07-1: These maps are great, but I would think everything south of 15th would be "Edge Urban". I really don't believe a change is necessary, but I recall the tragic history of Urban Renewal in the Eastchester Flats neighborhood. Graphically it may improve the perception of these Edge Urban areas if there was a single continuous zone instead. Breaking it apart like this recalls this misstep in our history.
- Map 21.07-2: I know this is a way to highlight Midtown, but shouldn't these areas show up in Map 21.07-1? Where does the E St/Arctic TSD corridor begin (in Downtown)?
- Map 21.07-3: I would include the southern portion of the Anchor Park subdivision (northeast of Northern Lights and Lake Otis) in an Edge Urban Neighborhood. This small area has the same development pattern as the northern portion that is now part of Airport Heights, and was part of the same subdivision. Relatedly, I would like to see the TSD corridor extend to Debarr along Lake Otis, instead of ending at 36th Avenue.
- Section 21.07.060G.15.: Will this porch count towards meeting max front setback requirements?
 Will the porch be allowed to project into a minimum front setback as is currently allowed elsewhere in code?
- Section 21.07.090A.4.: Rephrase to eliminate "walkable" as an ableist term.
- Section 21.07.090B.4.: This is a good sentence added. My only comment comes from a court case I was involved in where the building owner was charging a commercial client for use of some parking spaces. Would it be helpful to add a provision that maintains a certain minimum number of parking spaces for a single use in a mixed-use development? If you have a restaurant and apartments in the same building, the restaurant is going to have higher turn-over, but will need fewer spots. If there is a parking reduction applied to the property, whose parking gets reduced?
- Section 21.07.090D.2.b.xii.: What does a "bicycle parking access route" look like? Does it need to be separated from a vehicle lane? Can it be on a sidewalk? (I hope the answer to both these questions is no).
- Section 21.07.090E.[2].: Great edit.
- Table 21.07-8: Although I understand you did not want to touch this sleeping dragon, I want to suggest as I have previously that restaurant parking be based on occupants of the dining room and kitchen instead of area.
- Section 21.07.090E.7.c.: "Surrounded by public streets or public lands". I would clarify if these are constructed or platted streets, and if a PUE or ROW constitutes a "public land".
- Table 21.07-9: Transit Pass Benefits is currently a parking reduction option enjoyed by much of Girdwood. The Girdwood Valley Transit is a free public shuttle providing public transportation

throughout the Girdwood Valley. Limiting its benefit to only Neighborhood Development Contexts would take this away. I can think of at least three properties that have used this parking reduction, and eliminating it would be significantly unfortunate. I would suggest changing the applicability to "Any use located in the Neighborhood Development Contexts or Girdwood". I do see that someone in Girdwood would be able to use Section 21.07.090F.8., but that seems more tedious. I do appreciate the Adaptive Reuse and Historic Preservation provisions.

- Section 21.07.090F.3: That's shocking. I like it but let's see how that works out.
- Section 21.07.090F.5.d.: Good change.
- Section 21.07.090H.9.d.: Good change.
- Section 21.07.090H.12.a.: Consider adding a provision allowing a Landmark property to use small parking space and aisle dimensions like the Downtown zoning districts. With the intent of the Landmark Register to identify, protect, and encourage use of historic properties, it would seem an easy thing to allow them to use smaller parking dimensions. Even if they are outside of the Downtown and Traditional Urban Neighborhoods, they have small parking lots that are difficult to accommodate the standard sizes. Similarly, many have had their parking lot areas reduced over time with the widening of roads and rights-of-way. I think of the Woronzof Condominiums for example, whose front parking area was reduced with a widening of Fireweed. Original plans show standard spaces with a standard aisle width completely separated from the roadway. However, the parking area is now out of compliance with the wider road and sidewalk improvements made in the decades since. It seems to me that an easy solution to this example, and likely several others, would be to allow properties to have smaller space dimensions so that the parking areas function safely. Requiring them to be Landmarks would increase the prominence of the Register, and provide a tool for the Municipality to control the proliferation of smaller parking areas.
- Section 21.07.090H.12.9.a.i.: Consider including Traditional Urban Neighborhoods in the ability to have up to 30% compact spaces.
- Table 21.07-13: Change standard 90 degree space depth to 19'-0" and track that down through the other angles. Homer requires a 9x19 parking space (essentially), and this is perfectly adequate for most cars. Further in the table, parallel parking spaces have are 9x23 feet which accommodates 19' plus 4' for maneuvering, so it seems like a logical change to me. Later, the tandem spaces can have a combined depth of 38 feet, which is twice 19.
- Section 21.07.090K.2.g.: This seems vague and hard to define or enforce.
- Section 21.07.090K.4.a.: Is the intent here to have the bicycle parking on an accessible route, or
 just a pedestrian route? It seems to me that bike parking does not need to be on an accessible
 route. This has a very specific definition in building codes, and may become a hindrance to some
 development. I would hazard a guess that most persons who can bike would not have
 accessibility challenges, and could navigate stairs.
- Section 21.07.090K.: I'm not seeing any reference to a "bicycle parking access route" as mentioned earlier in the chapter. I would recommend clarifying this term somewhere in code, and specifying whether or not it can be coincident with the vehicle circulation or pedestrian circulation systems, or both. Pathways and sidewalks are safer for bikes than in the parking areas, but less safe for pedestrians in those areas. Also, the aforementioned section makes it seem like these need to be painted or separated somehow, which I'm not sure is necessary.

Other titles of Municipal Code specify in what parts of town a biker can ride on a sidewalk. In Downtown, for example, the bike must ride in the road. If the intent is to have the biker remain in the vehicle circulation as they enter the property and find the bike parking, or is it to have them move onto the pedestrian circulation system? How do you communicate this to the biker, or to pedestrians who must suddenly become aware of bikes entering their space?

• 21.15.040. Pedestrian Feature: Ski racks are an awesome thing. Lahti have installed them throughout the city with free skis and poles for people to use to get around in the winter. I would love to seem them at more places in Anchorage, and maybe a future amendment can look at ways of crediting parking to ski racks as well as bikes.

Kind Regards and Cheers,

-Connor Scher cscher5115@gmail.com +1.907.952.6105