

Planning and Zoning Commission

February 13, 2023

Case #: **2023-0011**

Case Title: **Title 21 Site Access Text Amendments**

Agenda Item #: **G.1.** Supplementary Packet #: **2**

Comments submitted after the packet was finalized

- Mélisa Babb

Additional information:

Other:

Sent by email: **X** yes no

To: The Anchorage Planning and Zoning Commission

Re: PZC Case 2023-0011

I am writing to urge you to ask the Planning Department to revise their approach to the Urban Neighborhood Development Context Area overlay prior to sending these code amendments to the Assembly.

I recommend the following as alternatives:

- **Expand these standards to benefit all areas with high residential density**
- **Apply these “urban” standards to R-2M, R-3, R-4, R-4A and B-1A, B-1B, B-3, RO districts in a uniform way instead of using an overlay to define the applicable area.**

Overall, I strongly support most of the proposed changes to Title 21 included in Case 2023-0011 and feel that the amendments included in this draft would simplify code requirements and further support the development of a safer and more pleasant pedestrian environment in Anchorage. I admire the effort and thought the staff members have put into this, and I appreciate the opportunity to submit my comments as part of the Expert Focus Group. This letter is not intended in any way to derail their efforts or to object to the details of the proposed code changes themselves. However, based on current planning theory and the public’s desire for a more walkable city, as identified in Anchorage 2040, **please ask the Planning Department to reconsider the establishment of an Urban Neighborhood Development Context Area overlay.**

I do not support the establishment of this overlay for two reasons:

- **The overlay concentrates design that supports a more walkable environment in those areas that already have walkable streets and leaves out those neighborhoods most in need of the improvements.**
- **Title 21 already has an instrument in place to provide a framework for deciding the appropriate location for these building frontage and driveway improvements - the zoning districts.**

The overlay is the result of a thorough inventory of existing conditions in all of our Anchorage neighborhoods, combined with an in-depth analysis of street grid patterns, sidewalks, alleys and other infrastructure. While I would argue it doesn’t identify all of the “urban” areas in town, it does indeed identify, very accurately, the areas in town that most people would consider the more walkable neighborhoods because the streets were designed for slow vehicular speeds, are laid out in a permeable grid street pattern with easy connections to surrounding commercial areas, and usually include Type A curbs and have sidewalks.

The corollary is that as a result of identifying the walkable neighborhoods, which the overlay calls the “urban neighborhoods,” it also accurately identifies all of the neighborhoods outside of those “urban neighborhoods” that lack a pleasant and walkable streetscape. This is where I feel the overlay approach fails. It identifies all neighborhoods outside of these “urban neighborhoods” as “suburban neighborhoods.” **I’d argue that there are many other places in town where the commercial development or the dwelling-per-acre density is extremely urban but these areas have been relegated to “suburbia” by this overlay because they lack basic pedestrian infrastructure.**

The overlay completely ignores the Anchorage 2040 Land Use Plan's identification of areas outside the portion of town covered by the overlay that the citizens of Anchorage would like to see developed as Compact Mixed Use Residential, Urban Residential, Neighborhood Centers, and Town Centers. My understanding of Anchorage 2040 is that these areas should be developed in a manner that "reduces dependence on motorized vehicle travel to local services" and should provide "cohesive, pedestrian-friendly urban settings." According to Anchorage 2040, those areas identified above are not intended to be "suburban."

Applying the overlay only to the "urban neighborhoods" will only further exacerbate the disparity between the densely populated "urban neighborhoods" and the densely populated neighborhoods that fall outside of the areas the overlay identifies as "urban." For example, new high-density infill developments in Muldoon and South Anchorage will be held to lower standards than similar developments in areas like South Addition. The new driveway standards are also meant to help increase the amount of on-street parking available, especially now that parking minimums have been eliminated. However, parking minimums have been eliminated throughout Anchorage, not just in the overlay's "urban neighborhoods." While it is a useful tool to identify which areas of the city will need more investment to improve the streetscape to meet the goals of the Anchorage 2040 Land Use Plan, the overlay is not the right instrument for the application of these new frontage standards.

Instead, I'd urge the Planning Department (again) to use the zoning districts as the instrument to define the urban vs. suburban context. The zoning districts were created with the intention of supporting the goals of the land use plan map. The land use plan map is a tool we use to identify which parts of town we would like to see remain low-density suburban development, and which parts of town should be developed in a more urban manner. They are the tools we use to shape future development. **The overlay, if applied in the manner proposed by the planning team, will become a tool used to further cement the shape of past development and will do very little to meet the goals of Anchorage 2040 outside of the overlay "urban neighborhood" areas.**

If we continue forward with a dual system that has one set of standards for urban contexts and another set for locations outside of the urban context **I suggest applying these "urban" standards to R-2M, R-3, R-4, R-4A and B-1A, B-1B, B-3, RO districts instead of using an overlay to define the applicable area. This would eliminate the complexities involved in trying to enforce and educate developers about yet another overlay map, it would meet the goals of the Anchorage 2040 land use plan, and it would be a more equitable application of the new standards.**

Thank you for your time and consideration of this matter.
Please feel free to reach out to me if you have any questions.

Sincere regards,

Mélisa Babb, PLA

Alaska Chapter of the American Society of Landscape Architects (ASLA) Past-President