



Municipality of Anchorage

Planning Department


Memorandum





E.1.

Date: June 6, 2022

To: Planning and Zoning Commission

Thru:  Craig Lyon, Planning Director

Thru:  Kristine Bunnell, Long-Range Planning Manager

From:  Tom Davis, AICP, Senior Planner

Subject: Case 2022-0026 Title 21 Text Amendment to Parking and Site Access Standards:
Issue-Response Summary

The attached *Issue-Response Summary* provides Planning Department responses to comments and questions raised by the public and Planning and Zoning Commissioners regarding the Public Hearing Draft amendments to the parking and site access regulations in Title 21. The Planning and Zoning Commission closed the public hearing on April 11 and postponed deliberations until the Department could address the comments. These include:

- Comments received by March 31, as provided in *Attachment 5* in the April 11 case packet;
- Comments provided to the Commission in *Supplementary Packet #2* on April 11;
- The April 11 public hearing testimony; and
- Commissioners' questions at the March 14 and April 11 work sessions and April 11 meeting.

The *Issue-Response Summary* table documents each issue and provides the staff response and recommendation for each. The staff recommendations in the *Issue-Response Summary* supplement the Department's recommendation for approval of and recommended edits to the Public Hearing Draft, which are provided in the April 11 staff memorandum (pages 17-18) in the packet for Case 2022-0026. In addition to the April 11 packet attachments, *Background Information Attachment 6.3* is provided to support responses to some of the issue items, as referenced in the issue-responses.

The *Issue-Response* table is designed to support the Planning and Zoning Commission's deliberations. It could be used by the Commission to organize its discussion according to the main topic areas of the Title 21 parking and site access amendment. The table includes a far right-hand column to document the action of the Planning and Zoning Commission on each issue.

Upon completion of deliberations, staff will provide an updated version of the *Issue-Response Summary* reflecting the Commission's deliberations and action to the Assembly as an attachment to the Planning and Zoning Commission resolution.

Attachments: Issue-Response Summary (Attachment 7)
Background Research (Attachment 6.3)

Comment and Issue-Response Summary

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***

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Comment and Issue-Response Summary

Purpose

This *Comment and Issue-Response Summary* provides Planning Department responses to comments and questions raised by the public and Planning and Zoning Commissioners regarding the Public Hearing Draft amendments to the parking and site access regulations in Title 21. These include:

- The comments received by March 31, as provided in *Attachment 5* in the April 11 case packet;
- The comments provided to the Commission in *Supplementary Packet #2* on April 11;
- The April 11 public hearing testimony; and
- Commissioners’ questions at the March 14 and April 11 work sessions and April 11 meeting.

The issue-response table on the following pages summarizes each issue raised, provides the staff response and recommendations for each issue, and documents the action by the Planning and Zoning Commission. For each issue, the table references the source of the comment/issue by the name of the commenter. An index to commenters appears on the next page.

Organization

The issue–response table is organized by topic into the seven main proposals of the public hearing draft amendments outlined on page 2 of the April 11 staff memorandum. These include:

A. Streamlined Approvals for Administrative Parking Reductions	Issues #1-3	pages 1-2
B. More Complete Menu of Parking Reduction Strategies	Issues #4-6	pages 3-4
C. Area-Specific, Lower Minimum Parking Requirements	Issues #7-19	pages 5-19
D. Improved Site Access for Pedestrians, Bicyclists, and Transit	Issues #20-26	pages 19-25
E. Reforms to Driveway Standards	Issue #27	pages 25-27
F. Provisions for Smaller Parking Dimensions	Issues #28-30	pages 28-30
G. Consolidated, Simpler Regulations	Issues #27-33	pages 31-37

A detailed table of contents for the 38 issues begins on page iii.

The issues and responses in the issue-response table reference the Public Hearing Draft code amendment text in *Attachment 3: Annotated Zoning Code Amendment Language*, as provided in the April 11 packet for this Case 2022-0026.

Format of Proposed Code Text Changes

Some issue responses recommend additional changes to the public hearing draft code amendments. These are formatted in “tracked changes” text with a **shaded background**, as follows:

- Code language recommended to be added to the public hearing draft is **underlined**.
- Code language recommended to be deleted from the public hearing draft is in **[ALL-CAPITALIZED TEXT IN BRACKETS]**.
- Code language without tracked-changes/shaded background is public hearing draft code language not being changed by the issue-response.

Comment and Issue-Response Summary

Index of Commenters (by Issue #)

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9.	Can All Areas Currently Eligible for Area-Specific Reductions Still Get Them?	8	Yes
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33.	Clarity of Maps and Graphics for the Neighborhood Development Context Areas	33	Yes
34.	Clarity of the Off-Street Parking Purpose Statement	33	Yes
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36.	Determining which Spaces on a Site Plan are Eligible for Small Dimensions	34	Yes
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Comment and Issue-Response Summary

Issue-Response Table

Item #	Comment/Question	Response and Recommendation	PZC Action
Part A: Streamlined Approvals for Administrative Parking Reductions			
1.	<p>As-of-Right Approval Process for Parking Reductions.</p> <p>If public input is removed from the approval process for reduced parking and driveways and modified site access, it puts the burden on neighbors, community councils, and municipal enforcement to address parking violations. The proposed Title 21 changes to eliminate public notice/input and allow administrative and by-right approvals should be delayed for further public discussion. <i>(Turnagain Community Council)</i></p> <p>If a discretionary, case-by-case review by the municipal Traffic Engineer is no longer required, and the property owner can get a parking reduction by right, what if members of the public later report parking problems after the development has been built? Even if the Municipality has the authority to review the development’s parking after the fact, what good will that do? There will not be enough space on a built-out site to install more off-street parking spaces to resolve a parking problem. <i>(Cathy Gleason for Turnagain Community Council)</i></p> <p>Traffic Engineering supports the amendments that clarify the level of reduction that can be granted without requiring approval by the Planning Director and Traffic Engineer. Defining which reductions are “by-right” and which require additional staff time to review and approve should improve the process and reduce costs. <i>(Traffic Engineering Department)</i></p> <p>UACC supports the new neighborhood context areas and by-right parking reductions. These amendments simplify permitting, maintain green space, and encourage alternative modes of access. <i>(University Area Community Council)</i></p>	<p>Response: Current Title 21 parking and driveway reductions are approved by the Traffic Engineer and Planning Director through an administrative approval process. No public notice or public comment opportunity would be taken away by the proposed amendments that streamline this administrative approval process. Applicants periodically request a parking requirement Variance, which is heard by a municipal board. The Variance process is not proposed to change.</p> <p>The administrative parking reductions currently done by discretionary review by the Traffic Engineer and Planning Director will become nondiscretionary, or “as-of-right,” up to a certain percentage reduction in parking spaces. As-of-right approvals make it easier for developers, property owners, and municipal zoning administrators to understand the parking requirement. This provides certainty and reduces cost in the process, especially for applicants who may be considering whether to ask for parking reductions in return for development characteristics that reduce parking utilization rates.</p> <p>For all administrative parking reductions, Title 21 will continue to require the property owner and Municipality to enter into a recorded Parking Agreement. The proposed amendments to the Parking Agreement in 21.07.090F.2.d. (page 35, lines 38-46, in Attachment 3) will strengthen the ability of the Municipality to go back, reevaluate, and require changes to the Parking Agreement and reduction strategy if a parking problem emerges later. The Municipality could require the applicant to undertake additional parking reduction strategies that do necessarily include adding more parking supply. Reduction strategies such as those listed in proposed Table 21.07-9 (pages 32-34, in Attachment 3) are less costly than parking facilities and take little or no site area.</p> <p>Attachment 6.3: Background Research (Section 2.2) provides more details on this approval process.</p> <p>RECOMMENDATION: No change.</p>	

Comment and Issue-Response Summary

Item #	Comment/Question	Response and Recommendation	PZC Action
2.	<p>Alternative, Case-by-Case Approval Procedure for Large Reductions.</p> <p>There may be a need for an alternative solution to the process for reviewing proposed parking reductions, other than the proposed by-right parking reductions and the administrative parking reductions. Planners should have a procedural tool available to allow more significant reductions or going as far as eliminating the parking requirement, on a case-by-case basis, that allows time to review the properties involved. Such would be preferable to ad hoc reductions or a wholesale change in the code allowing by-right reduced parking. We should give the developers requesting those parking reductions an avenue to be heard if they are being blocked through the administrative process. <i>(Commissioner Strike, April 11 PZC meeting)</i></p>	<p>Response: The proposed amendments clarify and consolidate the existing discretionary review and approval process for large parking reductions, in 21.07.090F.8., <i>Discretionary Parking Reductions</i> (page 48 of Attachment 3). Through this reformatted section, the applicant may still request a bigger percentage reduction than will be allowed through a non-discretionary (as-of-right) approval. Title 21 does not limit to the size of the percentage reduction that may be granted through the discretionary approval process. The applicant may also propose a different kind of parking reduction strategy than those listed in the proposed table of parking reductions (Table 21.07-9 on pages 32-34 in Attachment 3). The applicant will be subject to the same discretionary review and approval involving the Traffic Engineer and Planning Director as under the current Title 21 parking reductions.</p> <p>Title 21 also provides procedures for obtaining relief from parking requirements which involve going to a board or commission and providing for public comment, such as the Variance, the Small Area Implementation Plan (SAIP) master planning process, and the Institutional Master Plan process.</p> <p>RECOMMENDATION: No changes.</p>	
3.	<p>Effectiveness of Parking Reduction Strategies in Reducing Parking Utilization Rates.</p> <p>Several of the proposed mechanisms for reducing parking demand, such as rideshare agreements, parking pricing, unbundled parking from rent, and free public transit passes have not likely been tried in Anchorage. They seem difficult to monitor and enforce, particularly in rental units with higher turnover. Reducing parking requirements to encourage enhanced pedestrian amenities and bicycle parking is admirable but creating more on-street parking problems without a demonstrated decrease in parking demand and adequate enforcement is not an acceptable tradeoff. <i>(Turnagain Community Council)</i></p> <p>The Public Transportation Department offers a rideshare program and programs for organizations to offer transit benefits to their constituents. <i>(Public Transit Advisory Board)</i></p>	<p>Response: Rideshare programs, parking pricing (i.e., unbundled parking), and free public transit pass programs have been used and continue to be in use today in Anchorage (Attachment 6.3, Section 2.1). The Public Transportation Department can track and document continued compliance with any Title 21 Parking Agreement with employers participating in its rideshare program and “U-Pass” free transit pass program.</p> <p>Bicycle parking has been one of the more popular Title 21 parking reductions and is rated highly in the research literature as among the most effective kinds of parking reduction strategies. Some sources indicate a direct correlation between perceived availability of bike parking and the likelihood of bicycling for trips.</p> <p>The <i>Anchorage 2040 Land Use Plan</i> calls for the Municipality to, “Amend Title 21 to allow parking reductions by right for residential uses; offer greater reductions in RFAs and other key development areas.” Developments that employ parking reduction strategies tend to experience lower parking utilization rates. For such developments, the as-of-right percentage reductions yield a more accurate parking requirement.</p> <p>The parking reduction strategies in Table 21.07-9 (pages 32–34 in Attachment 3) refine the existing set of strategies for which applicants receive percentage reductions in required parking under current Title 21. The revised slate of strategies reflects updated research and recent trends and experiences, as documented in Attachment 6.3: Background Research (Section 2.1).</p> <p>RECOMMENDATION: No change.</p>	

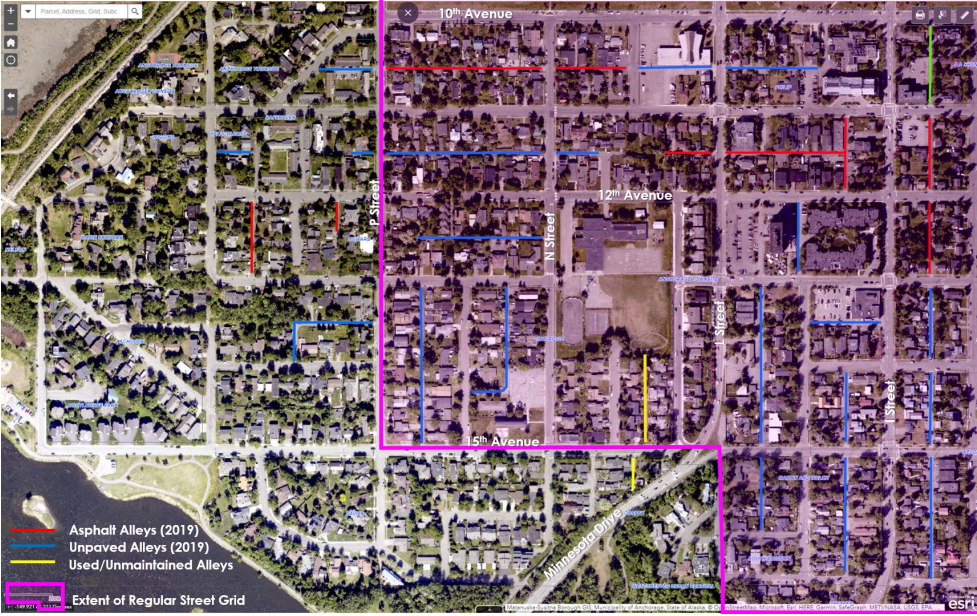
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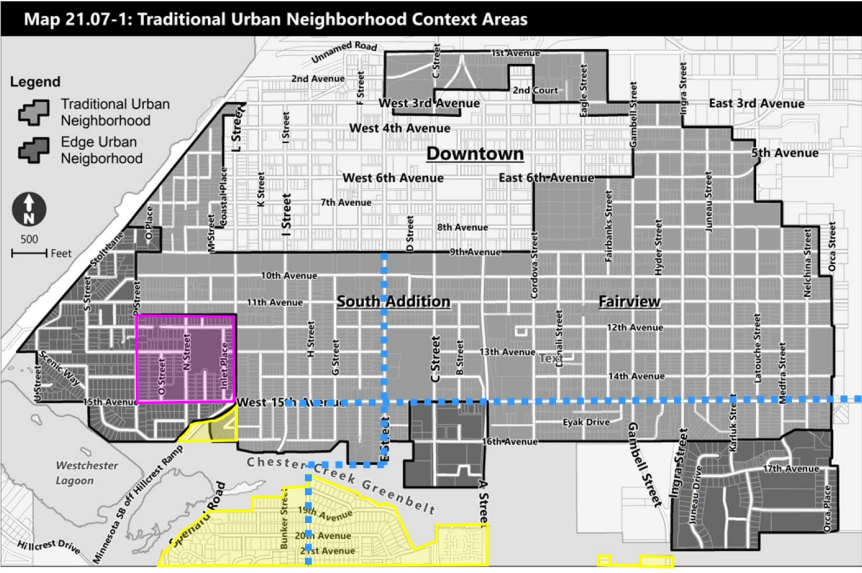
Item #	Comment/Question	Response and Recommendation	PZC Action																
Part B: More Complete Menu of Parking Reduction Strategies																			
4.	<p>Parking Reductions for Shared Vehicle Programs.</p> <p>Traffic Engineering is supportive of the revised menu of available parking alternative strategies to include the addition of newer rideshare programs. <i>(MOA Traffic Engineering Department)</i></p> <p>Whereas the amendments propose a 5% reduction in parking minimums if the property owner participates in a rideshare program, a 10% reduction if the owner includes free transit passes, and a 2% reduction if the owner provides a public transit stop or shelter, and whereas the Public Transportation Department offers rideshare and free transit pass programs for organizations to offer to their constituents, the Anchorage Public Transit Advisory Board supports the amendments as written. <i>(Anchorage Public Transit Advisory Board)</i></p>	<p>Response: The project team appreciates these comments, resolution of support, and multiple consultations with Traffic Engineering and Public Transportation Departments that informed the updated menu of parking reductions in Table 21.07-9 for shared vehicle and high-occupancy vehicle (HOV) programs.</p> <p>Public Transportation staff has requested that the Title 21 parking reduction for rideshare programs be offered to property owners and employers who participate in the program but may only partially subsidize the cost. Of the approximately 18 employers that participate in the municipal rideshare (vanpool) program, only one fully covers the cost for its employees to participate. Other employers partially subsidize, and the remainder is grant funded by the rideshare program.</p> <p>RECOMMENDATION: Amend Table 21.07-9, Rideshare Program, (page 32 in Attachment 3) as follows:</p> <table border="1" data-bbox="997 748 2287 1180"> <thead> <tr> <th colspan="4" data-bbox="997 748 2287 797">Table 21.07-9: Parking Reductions and Alternatives</th> </tr> <tr> <th data-bbox="997 797 1163 907">Type of Reduction</th> <th data-bbox="1163 797 1370 907">Applicability</th> <th data-bbox="1370 797 1948 907">Additional Requirements</th> <th data-bbox="1948 797 2287 907">Reduction Amount</th> </tr> </thead> <tbody> <tr> <td colspan="4" data-bbox="997 907 2287 956">*** *** ***</td> </tr> <tr> <td data-bbox="997 956 1163 1180">Rideshare Program</td> <td data-bbox="1163 956 1370 1180">Non-residential uses</td> <td data-bbox="1370 956 1948 1180">The employer or property owner <u>participates in</u> <u>[SPONSORS]</u> a rideshare program that is available to all employees <u>at no cost</u> and provides designated rideshare parking spaces that meet the passenger loading space dimensional standards of 21.07.090I.2. and are signed for exclusive use by the rideshare program.</td> <td data-bbox="1948 956 2287 1180">Each rideshare space may count as six spaces toward meeting the minimum number of required parking spaces, up to a 5% reduction in the number of required parking spaces.</td> </tr> </tbody> </table>	Table 21.07-9: Parking Reductions and Alternatives				Type of Reduction	Applicability	Additional Requirements	Reduction Amount	*** *** ***				Rideshare Program	Non-residential uses	The employer or property owner <u>participates in</u> <u>[SPONSORS]</u> a rideshare program that is available to all employees <u>at no cost</u> and provides designated rideshare parking spaces that meet the passenger loading space dimensional standards of 21.07.090I.2. and are signed for exclusive use by the rideshare program.	Each rideshare space may count as six spaces toward meeting the minimum number of required parking spaces, up to a 5% reduction in the number of required parking spaces.	
Table 21.07-9: Parking Reductions and Alternatives																			
Type of Reduction	Applicability	Additional Requirements	Reduction Amount																
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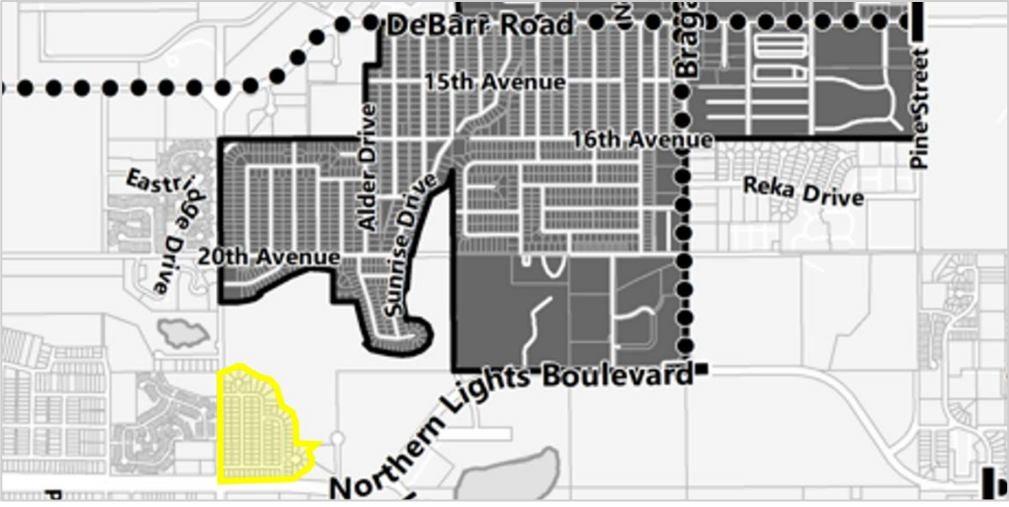
Item #	Comment/Question	Response and Recommendation	PZC Action
5.	<p>Elimination of Parking Reduction for On-Street Parking.</p> <p>The proposed parking reduction code changes in 21.07.090F. do not pose a significant concern for the SACC neighborhood. One comment is the proposed elimination of the existing Title 21 parking reduction for on-street parking. Currently, on-street parking may be counted toward the parking requirement. SACC committee wants to encourage Parking Reductions while also ensuring that the by-right reduction of off-street parking can be absorbed on surrounding streets. Additional reduction considered on a case-by-case basis to use on-street parking should still be available. New developments should not rely on the on-street spaces granted to another parcel. <i>(South Addition Community Council Planning Subcommittee)</i></p>	<p>Response: The deletion of the current Title 21 parking reduction for on-street parking appears on page 49, lines 5-21, in Attachment 3. The annotation for page 49 in Attachment 3 provides the reasons for the recommended deletion of the parking reduction.</p> <p>In addition, there have been only two parking reductions approved for on-street parking since this option became available in 2014. Under the proposed amendments, if a future applicant wishes to propose counting nearby on-street parking (or any other strategy not listed in the proposed table of parking reductions) toward getting a reduction in the off-street parking requirement, the discretionary administrative approval process will remain available for the applicant to propose such under 21.07.090F.8.</p> <p>RECOMMENDATION: No change.</p>	
6.	<p>Applicability of Parking Reduction for Transit Pass Benefits in Girdwood.</p> <p>Free transit passes are currently a parking reduction option enjoyed by Girdwood. Girdwood Valley Transit is a free shuttle bus providing public transportation throughout the Girdwood Valley. Limiting the Transit Pass Benefits parking reduction to only the Neighborhood Development Context Areas in the Bowl would take this away, which would be unfortunate. There are at least three properties that have used this parking reduction in Title 21. Suggest changing the applicability to "Any use located in the Neighborhood Development Contexts or Girdwood." <i>(Connor Scher)</i></p>	<p>Response: Staff finds no evidence of any recorded parking agreement for the Title 21 Transit Pass Benefits parking reduction (21.07.090F.10.) in Girdwood. There have been parking reductions for using the public parking in the Girdwood Town Center (GC-7 district). There are several pending parking agreements for off-site parking, reduced parking space dimensions, and other reduction strategies as conditions of approval for two development master plans and an amendment to a conditional use (See Attachment 6.3).</p> <p>Limiting the non-discretionary Parking Reduction for Transit Pass Benefits to the Urban Neighborhood Development Context Areas in Anchorage will not impact any current zoning entitlements, programs, or public transit shuttles in Girdwood. A property owner could propose a parking reduction to reflect fare-less public transit in Girdwood through the same process of discretionary approval under the current Title 21 parking reduction. It could be helpful to clarify that administrative parking reductions will be available through the discretionary approval process for parking reduction strategies not listed in Table 21.07-9.</p> <p>RECOMMENDATION: Clarify section 21.07.090F.1.e. (page 32, line 18, in Attachment 3) as follows:</p> <ul style="list-style-type: none"> e. Proposals for larger percentage reductions than shown, that modify any of the provisions for the reductions shown, or that propose other types of parking reductions from those in table 21.07-9 <u>may be approved</u>[ARE] subject to a discretionary review and approval by the traffic engineer and director as provided in subsection 21.07.090F.8., <i>Discretionary Parking Reductions</i>. 	

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Item #	Comment/Question	Response and Recommendation	PZC Action
Part C: Area-Specific, Lower Minimum Parking Requirements			
7.	<p>Map 21.07-1 of Traditional Urban Neighborhood Areas.</p> <p>SACC Planning Committee appreciates the amendments that establish the Traditional Urban Neighborhood Context Area to address the characteristics and context of older neighborhoods like South Addition, and the proposed boundaries generally define the subject area properly for South Addition, a few adjustments are necessary. The map should be revised to include all blocks north of Westchester Lagoon or at least the gridded blocks with alleys in the Traditional Urban Context Area. These are established, fully developed neighborhoods with characteristics more akin to that Context Area. <i>(South Addition Community Council Planning Subcommittee)</i></p> <p>The Neighborhood Context Area maps are great; however, a specific comment that everything south of 15th Avenue should be "Edge Urban." Breaking out only the Eastchester Flats neighborhood (east of the Seward Highway) as "Edge Urban" recalls the tragic history of Urban Renewal in that area. Graphically it may improve the perception of these Edge Urban areas if there was a continuous "Edge Urban" area instead. <i>(Connor Scher)</i></p> <p>Shouldn't the parts of the Edge Urban Neighborhoods from Map 21.07-2 that extend northward show as Edge Urban in Map 21.07-1 too? Also, where does the E St./Arctic Transit-Supportive Development Corridor (dotted line) from Map 21.07-2 begin in Map 21.07-1? In Downtown? <i>(Connor Scher)</i></p>	<p>Response: No objection to extending the boundaries of South Addition’s Traditional Urban Neighborhood Context Area westward to include the regular gridded blocks with alleys west of L Street.</p> <p>Staff surveyed potential revised boundaries. The traditional urban neighborhood pattern with regular gridded blocks and maintained alleys, shaded purple in the map below, extends as far west as P Street. The grid/alley system breaks up west of P Street into irregular street patterns and individual subdivisions, with more changes in topography. This matches in the “Edge Urban” definition. Areas south of 15th Avenue west of L Street, including the Coffey Subdivision, also match the “Edge Urban” character. See map below.</p>  <p>In Fairview, the public hearing draft boundaries on Map 21.07-1 reflect the development pattern of Eastchester (east of Seward Highway, south of 15th Avenue), both historically and currently. Even prior to the 1960s Urban Renewal, Eastchester had a much more informal grid layout than Fairview’s strict grid block pattern with alleys on the plateau north of 16th Avenue.</p>	

Item #	Comment/Question	Response and Recommendation	PZC Action
		<p>No objection to depicting the Transit-Supportive Development Corridor (TSDC) from Map 21.07-2 on E Street/Arctic Boulevard in Map 21.07-1. Per the <i>Anchorage 2040 Land Use Plan</i>, the TSDC begins at E Street’s intersection with 10th Avenue. The <i>Anchorage 2040</i> TSDC on DeBarr Road/15th Avenue could also be extended into Map 21.07-1, to its western termination at 15th Avenue’s intersection with I Street.</p> <p>RECOMMENDATION: Amend Map 21.07-1 (Section 21.07.015D., page 7 of Attachment 3) as follows:</p> <ol style="list-style-type: none"> Transfer the area between 11th and 15th Avenues and L and P Streets, shown in purple in the map below, from the Edge Urban to the Traditional Urban Neighborhood. South of 15th Avenue, designate Coffey Subdivision east of Minnesota Drive and west of L Street, shown in the small yellow polygon below, as Edge Urban Neighborhood. Clarify that parts of South Addition and Fairview may be in the Edge Urban Neighborhood Context Area recommendation, as proposed in issue #32 recommendation b. Clarify that the portion of North Star Community Council south of Chester Creek Greenbelt is designated as Edge Urban Neighborhood, as shown in yellow below. Depict the Transit-Supportive Development Corridor on Arctic Boulevard/16th Avenue/E Street north to 10th Avenue, and on 15th Avenue east of I Street, as shown in the dotted lines in the map below. 	

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Item #	Comment/Question	Response and Recommendation	PZC Action
8.	<p>Map 21.07-3 of Edge Urban Neighborhood Areas.</p> <p>On Map 21.07-3 (Section 21.07.015D.2., on page 9 of Attachment 3, include the southern portion of the Anchor Park subdivision (on the northeast corner of Northern Lights Blvd. and Lake Otis Parkway) in the "Edge Urban Neighborhood" area. This area has the same development pattern as the northern portion of the same subdivision that is now part of Airport Heights north of the Chester Creek Greenbelt. Relatedly, the Transit-Supportive Development Corridor on Lake Otis Parkway should extend north from 36th up to the intersection with 15th/DeBarr Road. (Connor Scher)</p>	<p>Response: No objection to including the southern portion of the Anchor Park Subdivision (on northeast corner of Northern Lights Boulevard and Lake Otis Parkway) in the Edge Urban Neighborhood Context Area. It has the same Edge Urban development pattern as Airport Heights neighborhood north of Chester Creek Greenbelt: a grid pattern of streets, sidewalks, small driveways, and postwar era homes.</p> <p>The <i>Anchorage 2040 Land Use Plan</i> provides the basis for the Transit-supportive Development Corridors (TSDCs) in the proposed Title 21 amendments. TSDCs are <i>land use</i> corridors with compact development and redevelopment potential. <i>Anchorage 2040</i> does not extend the Lake Otis TSDC north of the 36th Avenue intersection; the uses along Lake Otis north of 36th Avenue are either schools or have low transit ridership and redevelopment potential. There is no transit service on Lake Otis north of Northern Lights Boulevard. However, recommendation c. in issue #9 below adds a parking reduction for properties within a half-mile of high-frequency bus routes that serve Transit-Supportive Development Corridors to address the comment.</p> <p>RECOMMENDATION: Amend Map 21.07-2 (in Section 21.07.015D.2., page 9 of Attachment 3) to include the Anchor Park Subdivision on the northeast corner of Northern Lights and Lake Otis, highlighted in yellow in the map at right, in the Edge Urban Neighborhood.</p>  <p>See also the recommendations in issue #9.</p>	

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Item #	Comment/Question	Response and Recommendation	PZC Action
9.	<p>Can All Areas Currently Eligible for Area-Specific Reductions Still Get Them?</p> <p>The maps on page 8 of Attachment 1 indicate that some parts of town currently eligible for area-specific administrative parking reduction (upper left map) will not be included in the area-specific, by-right lower parking requirements (lower right map). Has there been feedback from any developers or property owners that currently would qualify for area-specific administrative parking reductions but under the proposed amendments would not? Or is it the Planning Department's belief that this is not likely to be an issue because there have been so few area-specific parking reductions? (<i>Commissioner Krishna, March 14 work session</i>)</p>	<p>Response: Staff has not heard concerns from developers or property owners. All properties in the Bowl will still have access to the same administrative parking reduction approval process as they do today. The current administrative parking reduction, including the area-specific reductions shown on the upper left map, is a discretionary approval process. Because of the uncertainty involved and other factors, few property owners have used the existing area-specific administrative parking reductions.</p> <p>The proposed amendment replaces area-specific parking reductions with by-right lower parking requirements for the areas shown in the lower right map (page 8 of Attachment 1). The rest of the properties will continue to be eligible to ask for discretionary approval of administrative parking reductions using locational rationale.</p> <p>The proposed slate of as-of-right parking reductions will also be available. In review of the comments in this issue and issue #8, staff finds that making more of the reductions available along <i>entire</i> transit routes with higher-frequency service (30-min. or better service) beyond the Transit-Supportive Development Corridors (TSDCs) that they serve would be more equitable, recognize lots near high levels of transit service, and respond to the concerns.</p> <p>In addition, developments located just outside a ¼-mile-wide TSDC but still within 10-minutes (1/2-mile) walking distance of the transit route line should be entitled to at least some parking reduction. This would be more consistent with the treatment of properties located just inside the ¼-mile TSDCs entitled to a 10% lower parking requirement. (See recommendation c. below.)</p> <p>RECOMMENDATION: Move forward with the clarification recommended in issue #6. Amend the maps in section 21.07.015D., and the Table 21.07-9 menu of parking reductions in 21.07.090F.1., as follows:</p> <ol style="list-style-type: none"> a. Amend Maps 21.07-1 through 21.07-4 (pages 7-10 of Attachment 3), by adding a linear feature “<i>Public transit routes with frequent service,</i>” to include the portions of People Mover Routes 10, 20, 30, 40, and 25 that extend beyond the Transit-Supportive Development Corridors that they serve. b. Amend section 21.07.090F.1., Table 21.07-9., (pages 32-33 of Attachment 3), by amending the “Applicability” column for the <i>Car-Share Program, Transit Pass Benefits, Enhanced On-Site Walkway, Enhanced Street Sidewalk,</i> and <i>Other Pedestrian Amenities</i> parking reductions as follows: <ul style="list-style-type: none"> Any <u>development site[USE]</u> in the Neighborhood Development Contexts¹ or within ¼-mile of the centerline of a right-of-way of a public transit route with frequent service mapped in <u>21.07.015D.</u> 	

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		<p>c. Amend section 21.07.090F.1., Table 21.07-9., in part B of the table (page 33 of Attachment 3), as follows:</p> <table border="1" data-bbox="1032 407 2292 1070"> <thead> <tr> <th colspan="4" data-bbox="1032 407 2292 456">Table 21.07-9: Parking Reductions and Alternatives</th> </tr> <tr> <th data-bbox="1032 456 1212 516">Type of Reduction</th> <th data-bbox="1212 456 1575 516">Applicability</th> <th data-bbox="1575 456 1921 516">Additional Requirements</th> <th data-bbox="1921 456 2292 516">Reduction Amount</th> </tr> </thead> <tbody> <tr> <td colspan="4" data-bbox="1032 516 2292 578">B. Pedestrian and Transit Amenities: Developments that provide improved conditions for walking and bicycling are eligible for reductions in the minimum number of required parking spaces, as provided below.</td> </tr> <tr> <td colspan="4" data-bbox="1032 578 2292 613">*** *** ***</td> </tr> <tr> <td data-bbox="1032 613 1212 776">Transit Stop or Shelter</td> <td data-bbox="1212 613 1575 776">Any use in the Neighborhood Development Contexts¹ or on a public transit route with frequent service mapped in 21.07.015D.</td> <td data-bbox="1575 613 1921 776">Based on a determination of need by the public transportation department, the development provides a public use easement or transit stop improvements per 21.07.060G.7.</td> <td data-bbox="1921 613 2292 776">2% reduction in the number of required parking spaces</td> </tr> <tr> <td data-bbox="1032 776 1212 1027">Nearby Public Transit Route with Frequent Service to a Transit-Supportive Development Corridor</td> <td data-bbox="1212 776 1575 1027">Development sites located within one-half mile from the centerline a right-of-way of a transit-supportive development corridor or a public transit route with frequent service shown on maps 21.07-1 to 21.07-4 in section 21.07.015D. This distance shall be measured on publicly accessible streets or trails.</td> <td data-bbox="1575 776 1921 1027">The development site is located outside of the ¼-mile radius of the Transit-Supportive Development Corridor and is not within any other Neighborhood Development Context¹. The development meets the area-specific bicycle parking requirements in subsection 21.07.090K., Table 21.07-14.</td> <td data-bbox="1921 776 2292 1027">10% reduction in the number of required parking spaces for sites located within 1,320 feet (1/4 mile) of the right-of-way centerline. 8% reduction for sites within 1,650 feet. 6% reduction for sites within 1,980 feet. 4% reduction for sites within 2,310 feet. 2% reduction for sites within 2,640 feet (half-mile).</td> </tr> <tr> <td colspan="4" data-bbox="1032 1027 2292 1070">*** *** *** (no further changes)</td> </tr> </tbody> </table>	Table 21.07-9: Parking Reductions and Alternatives				Type of Reduction	Applicability	Additional Requirements	Reduction Amount	B. Pedestrian and Transit Amenities: Developments that provide improved conditions for walking and bicycling are eligible for reductions in the minimum number of required parking spaces, as provided below.				*** *** ***				Transit Stop or Shelter	Any use in the Neighborhood Development Contexts ¹ or on a public transit route with frequent service mapped in 21.07.015D.	Based on a determination of need by the public transportation department, the development provides a public use easement or transit stop improvements per 21.07.060G.7.	2% reduction in the number of required parking spaces	Nearby Public Transit Route with Frequent Service to a Transit-Supportive Development Corridor	Development sites located within one-half mile from the centerline a right-of-way of a transit-supportive development corridor or a public transit route with frequent service shown on maps 21.07-1 to 21.07-4 in section 21.07.015D. This distance shall be measured on publicly accessible streets or trails.	The development site is located outside of the ¼-mile radius of the Transit-Supportive Development Corridor and is not within any other Neighborhood Development Context ¹ . The development meets the area-specific bicycle parking requirements in subsection 21.07.090K., Table 21.07-14.	10% reduction in the number of required parking spaces for sites located within 1,320 feet (1/4 mile) of the right-of-way centerline. 8% reduction for sites within 1,650 feet. 6% reduction for sites within 1,980 feet. 4% reduction for sites within 2,310 feet. 2% reduction for sites within 2,640 feet (half-mile).	*** *** *** (no further changes)				
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10.	<p>Ensuring that the Lower, Area-Specific Parking Requirements Will Reflect Parking Utilization Rates.</p> <p>SACC's committee concurs that proposed Table 21.07-7 may offer a simpler solution to off-street parking minimums in Traditional Urban Neighborhoods due to better developed street infrastructure and transportation choices in these areas. SACC is not equipped to verify the if the lower, area-specific parking requirement is best at 20% lower or at a different number for South Addition but want to ensure that the by-right lower minimum parking requirements reflect vehicle and</p>	<p>Response: This Title 21 amendment is intended to reduce the costs of construction, support housing and economic development, improve opportunities for good site design and pedestrian access, and reflect the character and aspirations of urban neighborhoods like South Addition, Fairview, and Spenard per adopted neighborhood and district plans. It is not set to increase spillover parking or require new investments in street maintenance. It does not change minimum parking requirements in suburban Anchorage.</p> <p>The scope of changes in this amendment respects the commenters' concerns, and the intent of the current off-street parking regulations, to minimize spillover parking onto public streets and ensure the movement of traffic and service vehicles. It does so using the Current Title 21 method of requiring a supply of parking on</p>																													

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	<p>parking utilization. (<i>South Addition Community Council Planning Subcommittee</i>)</p> <p>Turnagain Community Council is concerned that some of the proposed changes could create additional on-street parking. Anchorage should delay the adoption of the proposed amendments to assess the potential to apply these code changes on a case-by-case basis; some situations, such as commercial parking, may have a clear excess of parking, whereas some residential situations may create safety issues without site-specific consideration. Or it should pick some target areas for initial implementation of these changes, where existing on-street parking problems are minimal, and the effects of implementation can be monitored. The consequences of the proposed code amendment to allow for increased housing density include that it creates additional on-street parking problems without regard to safety and snow removal. In many of our older residential neighborhoods, narrow streets are not built to accommodate on-street parking and do not have pedestrian amenities. There are already safety and snow removal issues where inadequate on-site parking has led to unsafe on-street parking, with ramifications for vehicle safety, emergency vehicle access, pedestrian and bicycle safety, and snow removal. This past winter has exemplified challenges with snow removal and on-street parking. In some of the older, narrower streets in Turnagain there were snow piles this past winter that reduced the travel way down to one lane. There would be no space for on-street parking if there are fewer off-street parking spaces required and more housing units developed. There is no way to get around Anchorage's winter snow conditions in relation to these changes increasing the demand for on-street parking. We have yet to find a solution to keeping sidewalks clear during the winter for safe pedestrian</p>	<p>each development site to meet anticipated parking utilization. This reasoning assumes that some developers would supply insufficient parking if not regulated.</p> <p>The proposed parking requirements are set to match forecast parking utilization in the Urban Neighborhood Contexts. If we reduce the parking requirement for urban neighborhoods where the parking utilization rate is lower, then the lower parking requirement should be able to accommodate the lower peak period parking demand in those neighborhoods. There will be less parking utilization on fewer parking spaces.</p> <p>These urban neighborhoods have lower automobile ownership rates, lower parking utilization rates, and a more compact and pedestrian-friendly urban development pattern that predates the imposition of suburban zoning requirements for off-street parking. Suburban parking requirements hamper investment in infill development and adaptive reuse of older buildings on the small sites and awkward lots that characterize the urban neighborhood contexts. These reforms move Title 21 toward once again allowing construction that retains and restores this desirable traditional urban development pattern.</p> <p>The vehicle ownership and parking utilization research that provided the technical basis for the recommended Title 21 area-specific urban parking ratios is provided in Attachment 6.3: Background Research (Section 1). The local parking utilization studies used followed the parking field survey methodology of the Institute of Transportation Engineers (ITE). The ITE method factors in the occupancy/vacancy rate of the survey sites. The area-specific parking requirements is based on this empirical data, a forward-looking orientation to forecast parking utilization during the life span of development projects, and linkages to the community goals in the <i>Comprehensive Plan</i> and neighborhood and district plans for the Urban Neighborhood Contexts.</p> <p>This information indicates that parking requirements should be responsive to the physical characteristics, transportation conditions, and preferences that vary across different neighborhoods. Title 21 should not apply suburban parking standards that induce higher parking utilization by overparking urban neighborhoods. Overparked site development induces more driving and depresses alternative transportation modes like walking, bicycling, and public transit. It spreads places further apart to increase vehicle miles travelled (VMT). Suburban zoning standards for parking increase housing costs and housing unit size. Wide front driveways take curb space away from on-street parking, pedestrian walkways, and street snow storage. In short, high parking requirements contribute to the problems that the commenters at left are concerned about.</p> <p>High off-street parking requirements that overpark most developments do not address the root cause of on-street parking behavior problems or street maintenance problems, nor are they the most effective treatment of the symptoms. On-street automobile parking (and storage) is going to occur even if there is enough off-street</p>	

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	<p>access. <i>(Turnagain Community Council; Cathy Gleason in public testimony representing Turnagain Community Council)</i></p> <p>I am concerned that area-specific lower parking requirements will create hardship on persons with disabilities and households with large families that rely on multiple cars because the primary caregivers work jobs that do not allow them to transport other household members. <i>(Connor Scher)</i></p> <p>Concerned that if a development's parking requirement is reduced to below how much parking is needed by a development--i.e., to below current parking utilization levels, there are fewer off-street parking spaces than cars, and where do those cars go? They will go to park on-street or in some other location. Has the department has done a sensitivity analysis to ensure that, within the areas to receive lower, area-specific parking requirements, there is enough parking on-street or elsewhere to accommodate the flow of that parking from one area to another? <i>(Commissioner Raun, April 11 Work session)</i></p> <p>If the proposed amendments push parking utilization onto the street, it will create on-street parking problems. <i>(Commissioner Strike, March 14 work session)</i></p> <p>In the parking survey measurement of actual parking utilization rates for developments, which was used to gauge the average parking utilization rate in urban neighborhoods, were those average utilization rates that we observed in the field predicated on an assumption that every dwelling unit or tenant space in the developments was fully occupied? If the local parking utilization survey assumed that every site tested was fully occupied, then it would not have considered vacancy rates and essentially undercounted potential parking utilization rate for a development. Apartment vacancy rates have been increasing, and occupancy rates falling, in the past two years, due to the economy. <i>(Commissioner Strike, March 14 worksession)</i></p>	<p>parking. Some people prefer to park, store, or abandon vehicles in the street. Local field studies and observations indicate they do so even where off-street parking facilities have many empty parking spaces.</p> <p>RECOMMENDATION: No change.</p>	

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11.	<p>Parking Impacts of Increasing the Number of Dwellings.</p> <p>If we reduce the parking requirement, there will be more buildable area on the lot to increase the number of dwelling units. Won't increasing the number of dwelling units also increase parking demand and where will that go? <i>(Commissioner Strike, March 14 work session)</i></p> <p>More people tend to live in rental housing units than originally intended when the units were built, which generates more parked cars than one might think, even if the residents of the rental unit own fewer cars per person or household, with associated larger numbers of vehicles being parked along streets. <i>(Turnagain Community Council)</i></p>	<p>Response: The parking requirement accommodates the parking utilization regardless the size (or density) of a development. If the number of dwellings increases, the number of required parking spaces increases too.</p> <p>If we reduce the parking requirement for urban neighborhoods where the parking utilization rate is lower, the lower parking requirement should be able to accommodate the lower parking demand in those neighborhoods. There will be less parking utilization for fewer parking spaces.</p> <p>If high housing costs push more people to live in the same unit, the <i>Anchorage 2040 Land Use Plan</i> recommends strategies to reduce housing costs, rather than double-down on high parking requirements that contribute to the high housing costs.</p> <p>Anchorage parking studies indicate that some parkers prefer to park on the street, even when off-street parking is available. There may be a moderate increase in on-street parkers if there is a substantial increase in the number of housing units, but not because of a lack of off-street parking due to these amendments.</p> <p>RECOMMENDATION: No change.</p>	
12.	<p>Parking Impacts of Accessory Uses.</p> <p>Changes to increase housing density through Accessory Dwelling Units further restrict the ability to provide adequate residential on-site parking. <i>(Turnagain Community Council)</i></p> <p>Also concerned about the on-street parking impacts of specific uses like short-term rentals (e.g., VRBOs, AirBnBs), such as in the Bootleggers Cove next to Downtown, especially during the snowy season. <i>(Commissioner Strike; April 11 Work session)</i></p>	<p>Response: This ordinance does not amend the parking requirements for specific use types or accessory use types. If the parking requirement for a specific use is found to be either excessive or inadequate, other ordinances can be brought forward to address use-specific problems.</p> <p>The on-street parking problem is not use-specific to VRBOs or other particular use or accessory use type. A single-family household with more household members of driving age might park more vehicles than a smaller household with an ADU. On-street parking behavior problems or a lack of on-street parking can be addressed through on-street parking management and enforcement, as recommended in issues 18 and 19.</p> <p>RECOMMENDATION: No change.</p>	
13.	<p>Estimated Development Cost of Parking Spaces.</p> <p>Regarding the Planning Department's estimate of the cost of a parking space (e.g., \$10,000 per surface space) in Attachment 6.1, page 9, bullet item #2 on slide 9), does that represent just the direct development construction costs or does that include other costs on the site including stormwater management for the impervious pavement and other externalities mitigating the parking space? <i>(Commissioner Raun, March 14 work session)</i></p>	<p>Response: This is a general rule of thumb for the hard cost of developing a parking space. It does not include the peripheral environmental costs not directly a part of the parking facility, such as stormwater management, landscaping, snow storage areas. It does not include soft costs, such as design or permitting. It also does not include land costs or the broader impacts of parking on a city's transportation system.</p> <p>RECOMMENDATION: No changes.</p>	

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14.	<p>Development Size Threshold for Applying the Lower, Area-Specific Parking Requirements.</p> <p>Is there a minimum size of building or number of dwelling units that the area-specific lower parking requirements would apply to in the urban neighborhoods? (<i>Chair Gardner, March 14 work session</i>)</p>	<p>Response: There is no minimum or maximum development size, or limitation on use type. The area-specific lower parking requirements would apply to all development regardless of building size, use, or number of dwellings. The proposed applicability of the area-specific parking requirements is set forth in section 21.07.090E.2., Table 21.07-1, second column, as shown on page 27 of Attachment 3.</p> <p>It is important for small infill development projects to be eligible for the lower area-specific parking requirements in urban areas because so much of it occurs on small lots or in small existing buildings in which the development project involves renovations and additions with relatively little floor area.</p> <p>RECOMMENDATION: No change.</p>	
15.	<p>Providing Excess Off-Street Parking Spaces as Snow Storage Areas.</p> <p>What impacts will the lower parking requirement have on on-site snow storage? On many properties the excess parking spaces required by Title 21 today tend to be used for snow storage in the wintertime. That is evident around town where some of the parking spaces are being used to store plowed snow from the rest of the parking lot. Would each proposed development need to demonstrate where the snow will go? (<i>Commissioner Strike, March 14 work session</i>)</p>	<p>Response: The snow storage area required by current Title 21 Section 21.07.040F., <i>Snow Storage and Disposal</i>, will still be required. The size of the required snow storage area is proportionate to the size of the parking lot surface area to be plowed. Applicants may provide extra parking spaces beyond the minimum number of required parking spaces and designate those extra spaces to be used as snow storage. Or the applicant may instead designate landscaped areas for snow storage.</p> <p>Developments with lower minimum parking requirements will continue to be required to identify on-site snow storage. Developments with fewer parking spaces and narrower driveways will have less paved area that needs to be plowed, and therefore need less snow storage area.</p> <p>RECOMMENDATION: No change.</p>	
16.	<p>Removing Minimum Off-Street Parking Requirements</p> <p>Consider removing Title 21 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 housing and development costs, reduces the supply of housing, limiting small businesses, and leads to a car-centric way of life in our city. Eliminating car-parking requirements would be a simpler and more effective approach than just decreasing the parking requirements. Eliminating the requirements and has been supported throughout the comment process by a broad</p>	<p>Response: The project team appreciates these comments and has heard similar from several developers and others. A growing number of North American cities are removing or severely reducing parking requirements.</p> <p>A combination of feedback from many participants during the public process, the analysis of local parking utilization trends and Anchorage’s urban context, and the assessment of current limitations in Anchorage’s right-of-way management capabilities have directed this amendment project toward <i>a strategic, stepped approach</i>: to tailor lower, area-specific parking requirements for urban neighborhoods, allow by-right site-specific parking reductions area-wide, and a establish regulatory foundations for future reforms.</p> <p>This project carries out specific action items adopted in the <i>Comprehensive Plan</i>. The scope of its public process focuses on relatively easy code changes which yield significant gains for developments and the public, at low cost. The proposed code changes do not necessitate additional investments in public</p>	

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	<p>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 or redevelopment, not for most existing development. So changes in car-parking patterns would occur gradually, piecemeal, and in sparse locations over time. Anchorage will have time to figure out how to best manage on-street parking and snow removal. The gradual, piecemeal rate of the effects is a reason to make sure these amendments are forward-looking to reflect what our city will need decades from now in the future when the effects of these changes will finally be realized. If car-parking minimums are carried forward in the Title 21 revision, we support the proposed reductions in the minimum requirements for car parking. <i>(Bike Anchorage; Donovan Camp; Emily Weiser for Bike Anchorage)</i></p> <p>Lift Anchorage's minimum parking requirements as these rules cause harm to our community's financial strength and resilience. These minimums have filled our city with empty and unproductive parking spaces that push homes and businesses farther apart, impede the walkability of our neighborhoods, and raise the cost of housing. In the absence of minimums, we could build more housing or businesses. In my</p>	<p>infrastructure or changes to municipal street management or on-street parking enforcement operations. These amendments create a regulatory framework to enable further efficiencies in parking utilization.</p> <p>These amendments do eliminate minimum parking requirements wherever the Municipality manages and prices on-street parking in <i>parking benefit districts</i> (see issues #18 and #19 below). Even outside of parking benefit districts, the proposed amendments will have significant, immediate, positive impacts. They yield a <i>by-right</i> parking ratio low enough to enable infill development, adaptive reuse, and redevelopment that elements of the <i>Comprehensive Plan</i> call for (See site examples in Attachment 6.2, slides 19-25).</p> <p>Most public feedback from public meetings and consultations, as documented in Attachment 6.3, supported <i>reducing</i> urban neighborhood parking requirements to either (a) match average peak-hour parking usage rates or (b) somewhat lower than average peak-hour parking utilization levels to allow a shift in new development toward community goals (Attachment 1, page 14 of 360 in April 11 case packet). Some participants called for eliminating parking requirements. Others did not support reducing or allowing by-right reductions. Even participants in urban neighborhoods like South Addition and Fairview expressed concerns about reducing parking requirements in context of unmanaged on-street parking, poor sidewalk facilities, wide driveways, snow storage, and worries that some developers would take advantage of public street space. Consultations with municipal Street Maintenance and other ROW agencies document (in Attachment 6.3) problems with unmanaged on-street parking, limited operational resources, zoning entitlements that allow wide driveways, balkanized ROW agency management responsibilities, and street facilities configured without space for winter snow storage or separated sidewalks.</p> <p>Most cities that remove parking requirements have more sidewalks, public transit, neighborhoods that predate automobiles, on-street parking enforcement, stricter controls on front yard driveways, and fewer challenges with seasonal street maintenance. Few cities have the length and severity Anchorage's winter with snow accumulating or glaciating in freeze-thaw cycles for the duration the season. These challenges are visualized on slides 31 through 34 in Attachment 6.1. These challenges constrain how low this amendment project could propose to reduce urban neighborhood parking requirements while still having a response with operational solutions to concerns such as those raised in issue #10 above. Strategic management of public ROWs and on-street parking appears to be essential before removing off-street parking requirements.</p> <p>In response to the commenters at left, staff has re-examined the draft amendments for further opportunities to reduce, simplify, and support forward-looking parking regulations. Staff finds there is empirical and forecast data in Attachment 6.3 (Section 1), adopted policies, and documented public feedback to support adjusting the area-specific parking requirements. First, parking utilization data and forecasts indicate that the proposed area-specific residential parking requirements could be decreased 5%-10%. This would reflect public support</p>	

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	<p>recent personal experience moving to Anchorage and finding housing, I looked for a year before finding an affordable place by chance. My experience is not unique, as an article published in tonight's Alaska Public Media about the housing market documents. Had there never been parking minimums there might be more housing available and my long search would not have occurred. If we remove minimum parking requirements, we will still have parking--but that which is determined by the real estate professionals and businesses that are building on our finite land. <i>(Steven Bridwell)</i></p> <p>I support the public hearing draft recommendations to reduce and, in some cases, eliminate the parking requirements, and the idea of going further by eliminating parking requirements. I support the overall goals of the amendments as stated in the materials. Within my neighborhood of Spenard and in other neighborhoods, citizens have been working hard to create neighborhoods that are easier to navigate on foot, with transit, or by bicycle. In Spenard we are working to promote reinvestment and redevelopment. I want to see people-focused instead of car-focused developments in my neighborhood. Much of Spenard is along a Transit-Supportive Development Corridor, where we seek less single-occupancy vehicle use by promoting alternatives. Reducing parking requirements encourages people to use other forms of transportation and reduces the footprint of parking lots. As a result parking will not go away, but it will better needs of the property and the community. These changes support a more resilient community in the face of climate change, and since they will take effect over a long period of time it is important to start making them now. <i>(Lindsey Hajduk)</i></p> <p>To acknowledge all the testimony the Commission has heard asking to do away with off-street parking minimums, I would like to enable the Planning Department to continue moving in</p>	<p>for forward-looking requirements that reflect forecast parking utilization. South Addition's residential parking requirement could also be decreased to match the rest of the Traditional Urban Neighborhood. Secondly, non-residential parking requirements could be decreased in the Traditional Urban and Edge Urban Neighborhoods. The <i>Fairview Neighborhood Plan</i> and <i>Spenard Corridor Plan</i> envision reducing and eliminating parking requirements in their mixed-use corridors. Attachment 6.3: Background Research (Section 1) provides the analysis and references public feedback. These changes could simplify the parking requirements for all development in the urban neighborhood contexts in Table 21.07-7 to the following:</p> <ul style="list-style-type: none"> • Traditional Urban Neighborhoods: 65% of the area-wide parking requirement • Edge Urban Neighborhoods: 75% of the area-wide parking requirement • Transit-Supportive Corridors: 90% of the area-wide parking requirement <p>RECOMMENDATION: Amend proposed subsection 21.07.090E.2., Table 21.07-7 (Page 27, lines 10-14 in Attachment 3) as follows:</p> <table border="1" data-bbox="1045 771 2268 1396"> <thead> <tr> <th colspan="3" data-bbox="1045 771 2268 841">TABLE 21.07-7: AREA-SPECIFIC PARKING REQUIREMENTS</th> </tr> <tr> <th data-bbox="1045 841 1583 911"><u>Areas</u></th> <th data-bbox="1583 841 1860 911"><u>Applicability</u></th> <th data-bbox="1860 841 2268 911"><u>Minimum Spaces Required</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1045 911 1583 976">Downtown (DT) zoning districts</td> <td data-bbox="1583 911 1860 976">All Developments</td> <td data-bbox="1860 911 2268 976">No off-street parking is required, as provided in 21.11.070F.</td> </tr> <tr> <td data-bbox="1045 976 1583 1149" rowspan="2">Traditional Urban Neighborhood Context (Section 21.07.015D., Map 21.07-1.)</td> <td data-bbox="1583 976 1860 1068">All Developments [RESIDENTIAL USES EAST OF C STREET]</td> <td data-bbox="1860 976 2268 1068">65[70]% of the minimum spaces required in table 21.07-8.</td> </tr> <tr> <td data-bbox="1583 1068 1860 1149">[ALL OTHER DEVELOPMENTS]</td> <td data-bbox="1860 1068 2268 1149">[80% OF THE MINIMUM SPACES REQUIRED IN TABLE 21.07-8.]</td> </tr> <tr> <td data-bbox="1045 1149 1583 1276" rowspan="2">Edge Urban Neighborhood Context (Section 21.07.015D., Maps 21.07-1 thru -3.)</td> <td data-bbox="1583 1149 1860 1214">All Developments [RESIDENTIAL USES]</td> <td data-bbox="1860 1149 2268 1214">75[80]% of the minimum spaces required in table 21.07-8.</td> </tr> <tr> <td data-bbox="1583 1214 1860 1276">[ALL OTHER DEVELOPMENTS]</td> <td data-bbox="1860 1214 2268 1276">[90% OF THE MINIMUM SPACES REQUIRED IN TABLE 21.07-8.]</td> </tr> <tr> <td data-bbox="1045 1276 1583 1396">Transit-Supportive Development Corridors outside of Traditional Urban and Edge Urban Neighborhood Context areas (Section 21.07.015D., Maps 21.07-1[2] thru -4.)</td> <td data-bbox="1583 1276 1860 1396">All Developments</td> <td data-bbox="1860 1276 2268 1396">90% of the minimum spaces required in table 21.07-8.</td> </tr> </tbody> </table> <p>*** ** (No further changes)</p>	TABLE 21.07-7: AREA-SPECIFIC PARKING REQUIREMENTS			<u>Areas</u>	<u>Applicability</u>	<u>Minimum Spaces Required</u>	Downtown (DT) zoning districts	All Developments	No off-street parking is required, as provided in 21.11.070F.	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	<p>that direction if the Commission approves the public hearing draft amendments. What may be good here in the draft amendments should not get in the way of, or pause, movement in that greater direction. Therefore, I recommend adding a sentence to Recommendation #2 on page 11 of the April 11 staff memorandum, to read, "The Planning Department should work with other municipal agencies in evaluating the elimination of on-site parking minimums per Code." <i>(Commissioner Raun)</i></p>		
17.	<p>Additional Information Resources Regarding Reforming Minimum Off-street Parking Requirements.</p> <p>Footnote 7 on page 15 of the April 11 staff report memorandum for this case references some articles on www.planning.org, the website of the American Planning Association. The reference is made from a statement in the staff memorandum indicating there is a growing number of reports, articles, and other information from the American Planning Association and other organizations regarding the problems with off-street minimum parking requirements. However, it looks like an account is required to retrieve the articles. Does the public and Planning and Zoning Commission have access to an account or, alternatively, can the Planning Department make available particularly relevant articles contemplated by the footnote? <i>(Commissioner Gardner)</i></p>	<p>Response: The referenced web page highlights four resources:</p> <ul style="list-style-type: none"> • Two are PDF articles that are provided in Attachment 6.3: Research (Appendices). • The third resource is a web article that should be accessible at https://www.planning.org/planning/2021/winter/3-zoning-changes-that-make-residential-neighborhoods-more-affordable/. • The fourth resource is a webinar called "From the Trenches: Abolishing Parking Minimums" that costs \$15 or \$30 depending on APA membership status. A free (no cost) alternative/equivalent webinar is "Parking Reform Made Easy," which may be accessible at either https://smartgrowth.org/parking-reform-made-easy/ or https://www.youtube.com/watch?v=tRXk9JEJwH8. <p>RECOMMENDATION: No change.</p>	
18.	<p>Clarification of the Creation of On-Street Parking Management Districts.</p> <p>The proposed Open Option Parking District (21.07.090E.7.) may need modifications to other municipal code sections, such as Title 9, to develop a more comprehensive process of establishing and defining a district within the Municipality, identifying the responsible agency for managing and enforcing</p>	<p>Response: As discussed on pages 15 and 16 of the April 11 staff report memorandum, staff reevaluated the public hearing draft Open Option Parking District in 21.07.090E.7. and determined that changes should be made to clarify the code amendments. The public hearing draft provisions in 21.07.090E.7. for establishing new parking districts should be moved to AMC Title 9, <i>Traffic</i>. Instead of creating new regulations in Title 21 to manage street rights-of-way, it is better to revise and improve the street management regulations that already exist in Title 9. For more information, see pages 15 and 16 of the April 11 staff report memorandum.</p>	

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	<p>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. <i>(MOA Traffic Engineering)</i></p> <p>Clarify the proposed one new district that would eliminate required off-street parking, the Open Option Parking District. Its proposed Section 21.07.090E.7 establishes two options for creating an Open Option Parking District. However, the process does not clearly identify the conditions for approval. It is unclear how on-street parking would be managed and/or enforced in these Open Option Parking Districts, including measures for street maintenance and snow removal. The amendments to Section 21.07.090E7 should include specific criteria that would be used to evaluate the adequacy of the on-street parking management and ROW maintenance plans. <i>(University Area Community Council)</i></p> <p>The most effective strategy is to make it more expensive and less convenient to own or drive a car, prohibit on-street parking, and provide higher levels of public transit service. For example, off Pembroke Street(?) there is a PUD where residents shut down Pembroke because residents parking their cars on the road instead of parking in garages and driveways. <i>(Marc Grober)</i></p>	<p>RECOMMENDATION: Move forward with the recommended additional amendments #1 and #2 on pages 17 and 18 of the April 11 staff report memorandum.</p>	
19.	<p>Timing of Amending Title 9 On-Street Parking Management Regulations.</p> <p>The April 11 staff memorandum recommended edit #2 (page 18) regarding amending Title 9 to create on-street parking management districts, does not seem to have enough teeth. The second sentence, which states that, "The Planning Department should work with other municipal departments to prepare the Title 9 amendment text for Assembly review and action..."</p>	<p>Response: Title 21 off-street parking amendments and Title 9 parking district amendments are independent of each other. There is no harm in moving forward with adopting the draft Title 21 amendments, before a Title 9 amendment is completed. The Title 21 amendments provide significant public benefit on their own.</p> <p>Parking management districts can help build the institutional capacity to manage and enforce parking in more public ROWs. If the community aspires to eliminate off-street parking requirements, it should first figure out appropriate street design, on-street parking management, and ROW maintenance/management. Agencies like EasyPark (ACDA) would be candidate institutions for running manage on-street parking districts.</p>	

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	<p>could be strengthened by changing the word "should" to "shall." <i>(Commissioner Raun, April 11 PZC meeting)</i></p> <p>Since Title 9 is not under the purview of PZC, is PZC just recommending that the Title 9 amendment process be put into place so that those change in Title 9 can be made? My concern is that in the meantime until Title 9 is amended to provide on street parking management that there will be on-street parking problems. What is going on with management of the public street ROW? Some areas that either TCC or the public hearing draft urban neighborhoods are already under-parked, the street infrastructure is not up to current code, and there is no on-street parking enforcement. Curb spaces are being rented by property owners for vans and motor homes, and other cars are abandoned in street. Is Planning Department discussing the on-street parking management problem with the municipal ROW agencies? What organization would be responsible for operating a parking management district, would it be like a LRSA Board or a Community Council? <i>(Commissioner Spinelli; April 11 Work session)</i></p> <p>If the parking management district is an important part of the equation for reducing or eliminating parking requirements, then why is the parking management district part of all this not as evolved as the rest of the draft Title 21 amendments? Do we need to act on Title 21 amendments before the Title 9 parking management districts are realized, or should one wait for the other? <i>(Commissioner Raun, April 11 Work session)</i></p> <p>The adoption of the proposed code changes to Title 21 should be delayed to assess the needed companion Title 9 changes to on-street parking management and enforcement regulations, among other reasons. Or the companion amendments to Title 9 should get underway now to reduce the duration of unresolved on-street parking problems. The concern is about when, and if,</p>	<p>RECOMMENDATION: Move forward with the recommended additional amendments #1 and #2 on pages 17 and 18 of the April 11 staff report memorandum, per the Planning and Zoning Commission (PZC) deliberations at the April 11 PZC meeting.</p>	

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	<p>these companion changes to the code will occur, and what sort of parking problems will be created by the proposed Title 21 text amendments to parking and site access standards in the meantime. <i>(Turnagain Community Council)</i></p> <p>TCC is concerned that the proposed amendments to Title 9 to improve Anchorage's on-street parking management are not being prepared concurrently with the Title 21 parking amendments and encourages the Title 9 amendments to be done concurrently. <i>(Cathy Gleason for Turnagain Community Council)</i></p>		
Part D: Improved Site Access for Pedestrians and Bicyclists			
20.	<p>General Support for Pedestrian Provisions.</p> <p>Traffic Engineering concurs with the proposed amendments that support non-motorized modes of transportation. These amendments will provide greater assurance that developments have all required amenities to support these alternative transportation strategies. <i>(Traffic Engineering Department)</i></p> <p>Bike Anchorage strongly supports the proposed code changes to increase the baseline requirements for bike parking in new development, require secure parking for long-term bike storage, and ensure usability of bike parking facilities, as well as the option to replace required car-parking with additional bike parking. <i>(Bike Anchorage)</i></p> <p>Support for the proposed updates that clarify and consolidate design standards for sidewalks and on-site pedestrian walkways, increasing bicycle parking space requirements. <i>(Anchorage Public Transit Advisory Board)</i></p> <p>The bicycle parking requirement changes are exciting, and I look forward to implementing them. <i>(Connor Scher)</i></p>	<p>Response: Staff appreciates the comments of support. These comments are consistent with feedback in staff heard at public meetings and consultations support of improving pedestrian facilities.</p> <p>RECOMMENDATIONS: No changes.</p>	

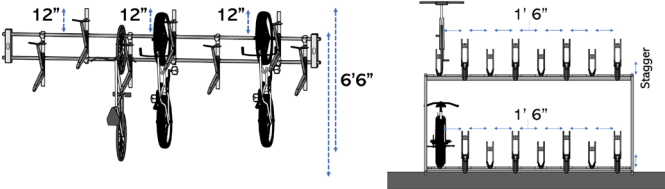
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21.	<p>Maximum Front Setbacks.</p> <p>Table 21.07-2 sets the proposed Pedestrian Frontage Standards for Traditional Urban Neighborhood Contexts including South Addition. The maximum setback in the table is a tenuous concept for South Addition, for several reasons. It does not provide specific exemptions for properties. It does not address existing, older residential buildings that may be remodeled. It does not address lots that are located along the Chester Creek bluff in South Addition and Fairview, especially lots without alley access. Similar bluff conditions exist in Mountain View and Government Hill as well. The lots in Traditional Urban Neighborhoods are smaller and need to allow the designers to use their best judgement to locate buildings on the lot. For example, a west or south facing frontage may want to pull the building back all the way towards the back where garage access exists from the alley. Such building can still have "eyes on the street" (i.e., street-facing windows, entries, and living spaces) even if it is set back farther. The most important feature to avoid on the street is large garage frontages. (<i>South Addition Community Council Planning Subcommittee</i>)</p> <p>Will a porch, stoop, or landing sheltered by a roof count towards meeting the maximum front setback requirements? Will the porch be allowed to project into the minimum front setback? (<i>Connor Scher</i>)</p>	<p>Response: No objection to removing the maximum setback from the low- to medium-density residential zoning districts. The maximum setback is more important in the urban commercial districts, mixed-use corridors, and high-density R-4 residential district. (Maximum setbacks in the R-4A district are addressed in the R-4A district-specific standards.) The proposed maximum setbacks are carried over from current code for mixed-use development in the commercial districts, as well as from the current Title 21 approval criteria for area-specific parking reductions. Fairview Community Council in consultations emphasized that buildings should be required to be set close to the street, as called for in the <i>Fairview Neighborhood Plan</i>. The <i>Spenard Corridor Plan</i> also calls for pedestrian-oriented building placement.</p> <p>Maximum setback regulations in Title 21 address existing buildings. The general provisions for maximum setbacks in Section 21.06.030C.5. recognize that existing buildings may remain legally out of compliance.</p> <p>The maximum front setback applies to the building elevation wall. Covered entry porches but not stoops or landings may also count toward meeting a maximum front setback. Because the maximum front setback is 10 to 20 feet larger than the minimum front setback and applies to no more than 50% of the building façade width, there is plenty of space between the max. and min. to avoid a “catch-22” situation for front stoops.</p> <p>RECOMMENDATION: Amend Section 21.07.060F.3, Table 21.07-2 (page 14 of Attachment 3), in row “A,” and delete footnote 4, as shown below. (Also delete the references to footnote 4 from rows B and G.)</p> <table border="1" data-bbox="999 930 2279 1185"> <thead> <tr> <th colspan="3" data-bbox="999 930 2279 979">Table 21.07-2: Pedestrian Frontage Standard for Urban Neighborhood Contexts and Parking Reductions</th> </tr> <tr> <th data-bbox="999 979 1709 1019">Building and Parking Placement ¹</th> <th data-bbox="1709 979 2024 1019">Primary Frontage</th> <th data-bbox="2024 979 2279 1019">Secondary Frontage</th> </tr> </thead> <tbody> <tr> <td data-bbox="999 1019 1709 1084">A. Maximum front setback (ground-floor only) <u>in the R-4 and non-residential zoning districts</u> ^{1[.4]}</td> <td data-bbox="1709 1019 2024 1084">30 feet in Traditional Urban, and 60 feet in other areas</td> <td data-bbox="2024 1019 2279 1084">90 feet</td> </tr> <tr> <td colspan="3" data-bbox="999 1084 2279 1125">*** **</td> </tr> <tr> <td colspan="3" data-bbox="999 1125 2279 1185">[⁴ DEVELOPMENT IN THE R-4A ZONING DISTRICT IS EXEMPT FROM THE MAXIMUM SETBACK RELATED STANDARDS A, B, AND G.]</td> </tr> </tbody> </table>	Table 21.07-2: Pedestrian Frontage Standard for Urban Neighborhood Contexts and Parking Reductions			Building and Parking Placement ¹	Primary Frontage	Secondary Frontage	A. Maximum front setback (ground-floor only) <u>in the R-4 and non-residential zoning districts</u> ^{1[.4]}	30 feet in Traditional Urban, and 60 feet in other areas	90 feet	*** **			[⁴ DEVELOPMENT IN THE R-4A ZONING DISTRICT IS EXEMPT FROM THE MAXIMUM SETBACK RELATED STANDARDS A, B, AND G.]			
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22.	<p>Bike Parking Requirements for Existing Developments and Changes of Use.</p> <p>Bike Anchorage supports the proposed changes to Title 21 that will increase availability of bicycle parking, including secure long-term storage. 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</p>	<p>Response: A requirement for bike parking in Title 21 ensures that future developments will consistently add bike parking. Not all property owners would take advantage of grant funding or tax exemptions for bike parking facilities to build the bike parking if there was no Title 21 requirement.</p> <p>Bicycle parking requirements for changes of use or building expansions on existing sites will apply the same way that automobile parking requirements apply to such developments. Per Title 21 section 21.13.060B., <i>Parking Out of Compliance</i>, if a change of use or a building expansion does not result in an increase in the bike parking requirement, then no new bike spaces will be required, provided the lot has legal nonconforming</p>																

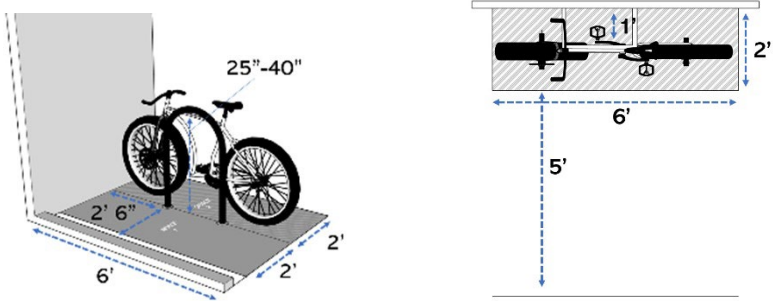
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	<p>the city. Directly funding bicycle parking would be more effective than making bike parking a part of the complex car-parking regulations. Funding would encourage developers to add bike parking to current development. <i>(Bike Anchorage)</i></p> <p>Traffic Engineering supports the changes to the bicycle parking requirements which address 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. <i>(MOA Traffic Engineering)</i></p>	<p>rights for its lack of bike spaces. If a change of use or building expansion results in an increase in the minimum number of required bicycle spaces, then the number of bike spaces related to the increase must be provided. A tech edit to the parking <i>Applicability</i> section could help clarify (See recommendation a. below).</p> <p>A bike space is easier to add to an existing site than a car parking space. Proposed section 21.07.090K.3., <i>Administrative Adjustments</i> (page 63, line 15 in Attachment 3) provides relief if adding a bike space is a practical difficulty on an existing site. This administrative relief provision could be clarified (see below).</p> <p>RECOMMENDATION:</p> <p>a. Amend the first sentence in Section 21.07.090B.2. (page 24, lines 12-13, in Attachment 3) as follows:</p> <p style="padding-left: 40px;">2. Expansions, Relocations, and Enlargements A site to which a building is relocated shall provide required parking and loading spaces per tables 21.07-7, 21.07-8, [and]21.07-11, and 21.07-14.</p> <p>b. Amend Section 21.07.090K.3. (page 63, line 15, in Attachment 3) as follows:</p> <p style="padding-left: 40px;">3. Administrative Adjustments The director may approve administrative relief or adjustments to the bicycle parking requirement for changes of use or modifications to existing developments, provided the applicant demonstrates the adjustment is necessary to compensate for a practical difficulty of the site. <u>The department shall keep record of the approved adjustment with written findings supporting the adjustment on file and available for public inspection.</u></p>	
23.	<p>Requiring at least Two Short-Term Bike Parking Spaces.</p> <p>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, or residents making a quick stop at home. Requiring a minimum of 2 bike parking spaces outdoors (unsecured) per developed property would provide the best flexibility for all those traveling by bike. <i>(Bike Anchorage)</i></p>	<p>Response: No objection to the commenter’s suggestion or rationale. The AMATS Nonmotorized Transportation Plan supports ensuring that developments include accessible short-term bike parking (e.g., a U-rack outside a main building entrance) for building and site visitors, customers, and others who intend only a brief stay.</p> <p>Some cities specify a portion of required bike parking be short-term spaces (Attachment 6.3, Section 3). Short-term spaces are generally not required for industrial uses or for residential 3- or 4-plexes.</p> <p>RECOMMENDATION: Amend section 21.07.090K.1.a. (page 62, line 13, Attachment 3) as follows:</p> <p style="padding-left: 40px;">a. <u>A minimum of two bicycle parking spaces shall be provided for each use in Table 21.07-14. For commercial and community uses, group living uses with 10 or more beds, and household living uses with 10 or more dwellings, the two spaces shall be located outdoors and publicly accessible for customers and short-term visitors.</u></p>	

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24.	<p>Effectiveness of Required Bike Parking Facilities for Increasing Bicycling.</p> <p>Bike Anchorage supports the proposed changes to the bicycle parking requirements. These do a good job of providing usable, convenient, safe, and secure bicycle parking. Bike Anchorage hears from bicyclists about the importance of such facilities at destinations, especially workplaces and at home, where the bicycle will be parked for a longer period. If there is not a safe place to store the bicycle, it is a real hurdle for bicycling more, and is in some cases a factor in deciding whether to eliminate a car from the household in favor of replacing the car with a bicycle. <i>(Emily Weiser for Bike Anchorage)</i></p> <p>It is questionable that bicycle U-racks and easing minimum parking requirements are going to do anything for bicyclists or pedestrians. Bicyclists do not use bike U-racks because no locks are secure. Make it easy to offer surveilled bike parking and put more police officers [sic.] on foot or bike. <i>(Marc Grober)</i></p> <p>Secure, common-use bike parking rooms, as pictured in the lower right corner on page 5 of Attachment 1 and as proposed in the draft standards, will not work because of bike theft. Bike theft is a big problem even in secure, common-use bicycle parking rooms with key card access limited to the residents or employees. In two large apartment complexes in Downtown Anchorage vicinity bikes were stolen and vandalized in common bicycle parking rooms such that residents would not use the parking. A more secure set up would be needed for it to be used. For example, there are examples in the Lower 48 of secure rooms providing compartmentalized, individually secure cubicles for individual bicycles, stacked two high. <i>(Commissioner Strike, March 14 work session)</i></p>	<p>Response: The Title 21 amendments seek to provide reasonable bicycle parking accommodation without excessive cost, and U-racks meet this objective. The priority is to ensure access to a variety of modes of transportation. Beyond that it is impossible to eliminate all risk of loss of personal property. Although secure compartments within a secure bike storage room and/or video surveillance monitoring could be encouraged, it would be difficult to enforce continued maintenance and operation of security cameras or personnel.</p> <p>Staff reexamined the draft bicycle parking design standards for security, accessibility, and usability, using information from field visits, and other experts, relative to bikes commonly used for commuting in Anchorage and the practicality of getting a bicycle into and out of a space, or fitting the bike in the space. The staff found that several of the draft design standards should be adjusted. A field visit to a local bicycle store provided information on real-world conditions; The store hangs bikes vertically with wall hooks spaced about 19 inches apart with a 12-inch vertical stagger, placed at 6'5" or 7'5" height on the wall.</p> <p>RECOMMENDATION: Amend proposed subsection 21.07.090K.4.c., as follows:</p> <ul style="list-style-type: none"> c. A required bicycle parking space shall be a minimum of six feet long and two feet wide, with the following exceptions: <ul style="list-style-type: none"> i. Vertical bicycle parking spaces (securing the bicycle perpendicular to the ground) shall be a minimum of three feet six inches deep measured from the wall and six feet six inches tall. <u>Vertical parking spaces placed side-by-side shall be a minimum of one foot six inches wide, with a vertical stagger of one foot[EIGHT INCHES] between side-by-side spaces, as shown in the first set of figures below.</u> <p>*** *** ***</p> <p>Dimensions for Horizontal/Side-by-Side and Vertical/Wall-Mounted Bicycle Spaces: <i>(Note to PZC: The two figures below include changes to the dimensional standards from the public hearing draft figures. No other figures from the public hearing draft are changed.)</i></p> 	

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		<p>d. Bicycle parking spaces shall be designed so that the bicycle may be added or removed without having to move another bicycle.</p> <p>i. There shall be a minimum of five feet of clear space inclusive of a walkway, behind the [TWO-BY-SIX-FOOT (OR ALTERNATIVE DIMENSIONED)] parking space to allow room for bicycle maneuvering.</p> <p>ii. There shall be a minimum of two-foot six-inch clearance from all sides of the bicycle rack to walls, fences, curbs, and vehicle parking and circulation areas, or other obstructions, except [THAT] for racks provided in iii.</p> <p>iii. Horizontal bike parking spaces (securing the bicycle horizontal to the ground) with racks attached to walls shall have a minimum one-foot clearance from the rack to the wall, as shown in the second figure below. Vertical and stacked spaces have no required wall clearance.</p> <p><i>(Note to PZC: The right-hand figure below is proposed to be added. It was not in the public hearing draft. The left-hand figure is in the public hearing draft and is not changed.)</i></p> 	
25.	<p>Long-Term Bike Spaces Located inside Dwelling Units.</p> <p>Do not allow in-dwelling parking to count toward the parking minimum in 21.07.090K4.g.ii. (page 65, lines 27-32, in Attachment 3). 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</p>	<p>Response: In reexamining this issue, staff mostly agrees. Requirements for long-term bike parking should:</p> <ul style="list-style-type: none"> • Ensure that residents in all dwelling units will have access to the bike parking in a secure, accessible room or enclosure. • Accommodate bicyclists who prefer to park their bikes in a secure common bike parking room outside the dwelling unit, understanding that the most bicyclists who prefer to store their bikes in their dwelling will do so anyway, with or without a designated alcove space. 	

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	<p>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. <i>(Bike Anchorage)</i></p>	<ul style="list-style-type: none"> • Ensure that all long-term bike parking is in an accessible location without need to navigate stairs. <p>In-dwelling bicycle parking is a challenging issue. It is often awkwardly located and easily removed by building managers. Many people end up storing other belongings in the in-dwelling designated bike space. Many people prefer to park their bikes in a secure bicycle parking room when they have a choice. Common, dedicated, secure bike rooms or enclosures are more likely to remain utilized for bike parking. Common use parking areas allow more efficient use of the pool of bike parking spaces, because when a space is not being used by one resident, it is available for use by another. As a result, most cities do not allow required bicycle parking spaces to be located within an apartment unit or on a unit’s balcony.</p> <p>The public hearing draft provision to allow required bike spaces within the dwelling unit living space was intended to provide flexibility, accommodate different user preferences, and reduce development costs. However, because the public hearing draft requires only one bike space per two dwelling units at best, there will not be enough bike spaces for in-dwelling bike spaces to be distributed fairly. The residents of the units without bike spaces will not have access to bike parking at all.</p> <p>Developments up to a four-plex in size can probably get by with in-dwelling bike parking and no common bike room, without taking away from what bike parking other residents will have available—but only if each unit has at least one in-dwelling bike space, and there are standards that ensure the designated bike space is functional, including a bike rack for holding the bicycle.</p> <p>RECOMMENDATION: Amend Section 21.07.090K.4.g.ii. (page 65, lines 27-32, in Attachment 3) as follows:</p> <ul style="list-style-type: none"> ii. <u>Long-term bicycle parking spaces shall be located where bicyclists are not required to carry bicycles on stairs to access the parking.</u> iii. Long-term bicycle parking spaces for residential uses <u>with fewer than five dwellings</u> may be located within dwelling units, <u>provided each dwelling unit has at least one bike parking space</u>[FOR FIRST-FLOOR DWELLING UNITS ONLY UNLESS THE UNIT IS ON A FLOOR WITH AN ACCESSIBLE ELEVATOR]. Bicycle parking <u>in the dwelling</u> shall be located within 15 feet of the <u>dwelling’s primary entrance</u> and in a closet or three-sided alcove which <u>includes a rack and meets the development standards of this subsection 21.07.090K.4.</u>[ALLOWS A SPACE 2 FEET WIDE AND 6 FEET LONG]. Long-term spaces shall not be located on a balcony, deck, or patio area accessory to an <u>individual dwelling unit.</u> 	

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26.	<p>Bicycle Parking Access Route.</p> <p>What does a "bicycle parking access route" look like on the parking facility layout and design plan, in section 21.07.090D.2.b.xii. (Page 26, lines 27-28, in Attachment 3)? What are its development standards? The section makes it seem like these need to be painted or separated, which should not be necessary. Is the intent in Title 21 is to have the bicyclist remain in the vehicle circulation lane as they enter the property and find the bicycle parking, or is it to have the bicyclist move onto the site's pedestrian circulation system? (Connor Scher)</p> <p>Is the intent of section 21.07.0909K.4.a. to have the bicycle parking on an accessible pedestrian route? Bike parking should not need to be on an accessible (ADA) pedestrian route to the building entry. This has a specific definition in the Building Code and may become a hindrance to some development. Most people who bicycle do not have accessibility issues and could navigate stairs. (Connor Scher)</p>	<p>Response: The intent of “bicycle parking access routes” mentioned in 21.07.090D.2.b.xii. would be that a bicycle parking access route is the same as any accessible walkway, and that cyclists and pedestrians may mix around destinations. There shouldn’t be any need for additional striping or delineation. Therefore, the public hearing draft addition of “bicycle parking access route” in the submittal requirements in 21.07.090D.2.b.xii. is probably unnecessary and confusing and could be deleted.</p> <p>Staff recommends retaining the standard for an accessible pedestrian route from the bike parking to the primary entrance in section 21.07.0909K.4.a. (page 63, lines 24-27, in Attachment 3), to reduce barriers for all bicycle users including both those able to walk or carry belongings up flights of stairs and those who cannot. Accessibility standards should serve both those with mobility needs who are able to drive and those with mobility needs who are not able to drive.</p> <p>RECOMMENDATION: Amend proposed subsection 21.07.90.D.2.b.xii. (page 26, lines 27-28, in Attachment 3), as follows:</p> <p style="padding-left: 40px;">xii. Number, location and dimensions of bicycle parking spaces if required per 21.07.090K. [INCLUDING BICYCLE PARKING ACCESS ROUTES].</p> <p>No other changes.</p>	
Part E: Reforms to Driveway Standards			
27.	<p>Driveway Width and Alley Access in Traditional Urban Neighborhoods.</p> <p>SACC has expressed its concerns regarding how its neighborhood character relates to the regulation of driveways. There have been problems with developments that have been granted wide front driveways that access double-wide garages that take up the frontage of the redeveloped lots, instead of providing driveway access from the alley. Such developments have completely changed the streetscape and character of their area. The proposed amendments make improvements to existing code under 21.07.090H.9.b.ii. especially by setting a</p>	<p>Response: Staff acknowledges the importance of requiring site access to be from the rear alley in the Traditional Urban Neighborhoods. Fairview Community Council has also emphasized the need for alley access and to prohibit driveways from breaking up block frontages. Driveways take away from on-street parking, street snow storage, separated sidewalks, and the ability to reduce off-street parking requirements.</p> <p>No objection to tightening up the entitlement for a second driveway on the secondary street frontage of corner lots (Subsections 21.07.090H.9.b.i. and ii., page 52, lines 15-19, in Attachment 3). The provisions could clarify that the second driveway be no wider than 12 feet, and that the entitlement is for multi-unit development (i.e., more than just a homeowner who wants two driveways to their house).</p> <p>The administrative relief provision in 21.07.090H.9.b.iii. (page 52, lines 20-26, in Attachment 3) revises the current Title 21 alley access exception (in 21.07.110F.4., being deleted on page 78 of Attachment 3). Title 21</p>	

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	<p>maximum 12-foot width for front driveways in Traditional Urban Neighborhoods. However, it does not make sense to allow wider than 12-foot driveways on both frontages on a corner lot. Both frontages area on a street and have the same neighborhood character issue.</p> <p>In addition, the proposed inclusion of the exception to the alley access requirement in traditional urban neighborhoods (in 21.07.090H.9.b.iii.) ignores the issue that SACC has been raising for years. This exception relies on the discretion of the municipal Traffic Engineer to allow projects to deviate from the proposed rules for properties that have alley access but choose to pursue an alternative driveway configuration from the street for any reason. SACC committee recommends there be a higher bar by requiring a public process, like a Variance. There should be no circumstance where a multi-family or townhouse development in South Addition is exempted from alley access or driveway width requirements, except that perhaps in the R-3 or R-4 districts such exemption could be more easily warranted.</p> <p><i>(South Addition Community Council Planning Subcommittee)</i></p>	<p>gives the Traffic Engineer administrative authority to grant exceptions where the alley is unimproved, unmaintained, or physically inaccessible, or if use of the alley would create a traffic hazard on the streets. (For reference, the Title 21 definition for “alley” is provided on page 82, line 4, in Attachment 3. A 20-foot-wide right-of-way meeting this definition is generally considered to be an alley instead of a street.)</p> <p>The public hearing draft amendment tightens up the administrative relief provision. It restricts availability to multifamily and townhouse developments because homes and duplexes can more easily use a single 12-foot-wide front driveway. It clarifies that the alley must be unmaintained or impassable AND the Traffic Engineer determines that improvement and vehicle access is not feasible. This change prioritizes alley access in urban neighborhoods. The draft provision could be made clearer by adding wording to explain that “unimproved” means unbuilt (e.g., still vegetated) and does not refer to the unpaved gravel alleys that are in use.</p> <p>The commenter advocates for using Variance process instead to provide transparency, public input, and stronger approval criteria. The commenter opposes the neighborhood impacts of allowing a low bar for relief just for an occasional exception in the Traditional Urban Context Area. However, the proposed amendments tighten up the exception limiting it to multifamily projects on impassable alleys. Requiring a Variance just to recognize that an alley is impassable and unbuildable seems like an unnecessary level of process and a barrier for infill projects.</p> <p>However, a requirement for documentation of the administrative approval would improve transparency. Staff has also found another administrative approval from pedestrian-oriented frontage standards, in public hearing draft section 21.07.060F., Pedestrian Frontage Standard, that would similarly benefit from documentation, per recommendation a. below.</p> <p>RECOMMENDATION: Amend the public hearing draft as follows:</p> <p>a. Amend 21.07.060F.2.f. (page 13, lines 35-36, in Attachment 3) as follows:</p> <p style="padding-left: 40px;">f. The director shall approve administrative relief provided the applicant demonstrates it is necessary to compensate for some practical difficulty of the site. <u>The department shall keep record of the approved exception with written findings supporting the approval on file.</u></p> <p>b. Amend 21.07.090H.9.b. (page 52, lines 11-26, in Attachment 3) as follows:</p>	

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		<p>b. <i>Alley Access Requirement (in Urban Neighborhood Context Areas)</i> Where a residential use is served by an alley in a Traditional Urban or Edge Urban Neighborhood Context (21.07.015), direct vehicle access to the street shall be limited to the following:</p> <ul style="list-style-type: none"> <li data-bbox="1139 467 2239 558">i. <u>[DRIVEWAY ACCESS TO THE SECONDARY STREET FRONTAGE ON CORNER LOTS, PROVIDED THE DRIVEWAY IS NOT LOCATED WITHIN THE PRIMARY FRONT SETBACK;]</u> <li data-bbox="1139 591 2239 711">[II.] Residential driveway access <u>[TO THE PRIMARY STREET FRONTAGE]</u> not exceeding one driveway no wider <u>than 12 feet</u> at any point <u>[THAT 12 FEET]</u>, except that lot frontages 100 feet or wider <u>on a primary street frontage</u> may have one driveway per 50 feet of lot frontage <u>on that street</u>. <li data-bbox="1139 743 2239 802">ii. <u>One additional driveway no wider than 12 feet providing access to the secondary street frontage on corner lots for multifamily, townhouse, or two-family developments.</u> <li data-bbox="1139 834 2239 1107">iii. Additional driveway access to the primary street frontage for multifamily or townhouse developments may be allowed if the alley is unimproved <u>(i.e., vegetated, no built accessway)</u>, unmaintained, or <u>[PHYSICALLY]</u> inaccessible, and the traffic engineer determines that improvement and vehicle access is not feasible, or that use of the alley for access would create a substantial traffic impact or safety hazard. The additional driveway access shall be the minimum the traffic engineer determines is necessary to provide access for the development. <u>The Planning Department shall keep record of the approved additional driveway access with written findings supporting the approval on file and available for public inspection.</u> 	

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Part F: Provisions for Smaller Parking Dimensions			
28.	<p>Allowing Compact-Car-Only Parking Spaces in Traditional Urban Neighborhoods.</p> <p>Consider including Traditional Neighborhood Context Areas in the entitlement for up to 30% of parking spaces to be "Compact" size parking spaces. <i>(Connor Scher)</i></p>	<p>Response: The draft Title 21 amendments reformat and carry forward the current Title 21 provision for compact-car-only spaces in Downtown Anchorage. The compact space entitlement is limited to Downtown and dates from the 1970s. The amendments avoid expanding the entitlement for compact spaces because of problems with modern-size vehicles and enforcement of the compact-only rules, as reported by ACDA.</p> <p><u>The Dimensions of Parking</u> (5th Ed., 2010) by the Urban Land Institute (ULI) establishes recommendations for parking geometrics, including for smaller-than-standard parking spaces. The ULI publication is an industry standard for development of parking facilities. ULI recommends against installing compact-car-only spaces. When the small-vehicle-only parking space was introduced in the 1970s, the car fleet consisted of very large and very small cars, and the “compact only” rule was self-enforcing. Since then, however, the size of smaller vehicles has increased, and some of the medium-size vehicles has decreased. The boundary between small and large cars has blurred and more large cars can be shoe-horned into compact spaces. Larger vehicles parked in compact spaces sometimes encroach into the adjacent spaces, which negates the improved efficiency offered by compact-car-only spaces.</p> <p>RECOMMENDATION: No change.</p>	
29.	<p>Allow Historic Landmarks to Have Small Parking Spaces.</p> <p>Consider allowing a historic Landmark property to use the "Small" parking space dimensions, like in the Downtown zoning districts and Traditional Neighborhood areas. The intent of the Anchorage Local Landmarks Register is to protect and encourage use of historic properties. Even historic properties located outside Downtown and the traditional urban neighborhoods have small parking lots that do not easily accommodate the "Standard" parking space size. Many of these older properties have had their parking areas reduced over time with the widening of road rights-of-way. The smaller parking space dimensions would allow their parking areas to function safely. Requiring such spaces to be Landmarks would highlight the Local Landmarks Register. <i>(Connor Scher)</i></p>	<p>Response: No objection to allowing historic properties on the Municipality’s Local Landmarks Register to use the “Small” parking space and aisle dimensions. Before the current Title 21 standard parking space dimensions were established in the late 1970s, most developments used a smaller parking space dimension. As a result, properties eligible for listing on local, state, or national historic registers tend to have grandfathered, legally nonconforming parking space sizes.</p> <p>RECOMMENDATION: Amend proposed subsection 21.07.090H.12.a., (page 58, after line 31, in Attachment 3), by adding a subsection iii. just above Table 21.07-13, to read as follows:</p> <p>iii. <u>Any use that involves the preservation of a landmark listed in the Anchorage local landmarks register may also meet the SMALL parking space and aisle dimensions in table 21.07-13.</u></p>	

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30.	<p>Reducing the Minimum Standard Parking Space Length.</p> <p>In Table 21.07-13, reduce the Standard 90-degree parking space depth to 19'0" and track that change down through the other angles (75, 60, and 45 degrees) for the Standard parking space size. For example, the City of Homer requires a 9-foot by 19-foot parking space size (essentially), and this is adequate for most cars. Further down in the table, parallel parking spaces are 9-feet by 23 feet, which accommodates 19 feet plus 4 feet for maneuvering, so it seems logical to change the Standard 90-degree parking space depth to 19 feet. Later in the section, the proposed tandem parking space depth is 38 feet, which is twice 19 feet. <i>(Connor Scher)</i></p>	<p>Response: No objection to reducing the minimum length to 19 feet—at least in the urban contexts, where space is at a premium and the <i>Comprehensive Plan</i> calls for compact, pedestrian-oriented redevelopment.</p> <p>Engineering publications and zoning codes historically recommended an 18-foot parking stall length. The 18-foot standard was based on the dimensions of design vehicles, such as the Ford Expedition, a large SUV which was 17 feet, 3 inches long in the 2010 model year. Research of three dozen zoning ordinances finds that most cities (including Fairbanks, AK) have a minimum standard parking stall length of 18 feet or less. Only two of the cities require a 20-foot stall, and two others (including Homer, AK) require a 19-foot stall.</p> <p>Vehicle sizes have grown since most of these standards were written. According to a J.D. Power website, the average new large pickup is 18 feet 4 inches long. The 2022 Ford Expedition SUV is 18 feet 6 inches long. Even a 19-foot minimum stall length would leave less-than-optimal extra space for large vehicles. It would result in more vehicles overhanging into the drive aisle, particularly in the wintertime.</p> <p>On the other hand, a 19-foot minimum length would provide ample space for most of the automobile fleet. Medium-size SUVs and small-to-medium-size pickups range from 15 to 17 feet in length. The extra foot for 20-foot spaces comes at a cost, as the Urban Land Institute states:</p> <p style="padding-left: 40px;">Parking ordinances that require excessively generous parking geometrics waste land and other resources, and stymie development. Such ordinances are also often in conflict with other community goals, such as green space and reducing stormwater runoff. <i>(The Dimensions of Parking, ULI, 5th Ed., page 64)</i></p> <p>Choosing a 19-foot or 20-foot minimum parking stall length seems to come down to policy priorities. This Title 21 amendment project creates the Urban Neighborhood Development Contexts to allow tailoring zoning regulations to reflect differing priorities across neighborhoods. Prioritizing compact, pedestrian-friendly development with less impervious paved area seems appropriate in the urban neighborhoods seeking to redevelop in a way that is consistent with their historical development pattern.</p> <p>For the Traditional and Edge Urban Neighborhood Contexts, staff has recalculated the geometric formulae for all angles of Standard parking space based on a 19-foot vehicle projection length for the 90-degree angle.</p> <p>RECOMMENDATION: Amend Section 21.07.090H.12.a., Table 21.07-13 space depths (pages 58-59 of Attachment 3) as follows:</p>	

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		<p style="text-align: center;">TABLE 21.07-13: PARKING ANGLE, STALL, AND AISLE DIMENSIONS</p> <table border="1"> <thead> <tr> <th>Parking Angle (Degrees)</th> <th>Parking Space Size</th> <th>Space Width</th> <th>Curb Length (Width Projection)</th> <th>Space Depth (Vehicle Projection)</th> <th>Aisle Width 1-way</th> <th>Aisle Width 2-way</th> <th>Typical Parking Bay Width (Module)</th> <th>Interlock Reduction</th> <th>Overhang Allowance</th> </tr> </thead> <tbody> <tr> <td rowspan="3">90</td> <td>STANDARD</td> <td>9' 0"</td> <td>9' 0"</td> <td>20' 0"¹</td> <td>23' 0"</td> <td>24'</td> <td>64' 0"</td> <td>0' 0"</td> <td rowspan="3">2' 0"</td> </tr> <tr> <td>SMALL</td> <td>8' 6"</td> <td>8' 6"</td> <td>18' 0"</td> <td>23' 6"</td> <td>24'</td> <td>60' 0"</td> <td>0' 0"</td> </tr> <tr> <td>COMPACT</td> <td>8' 0"</td> <td>8' 0"</td> <td>16' 0"</td> <td>23' 6"</td> <td>24'</td> <td>56' 0"</td> <td>0' 0"</td> </tr> <tr> <td rowspan="3">75</td> <td>STANDARD</td> <td>9' 0"</td> <td>9' 4"</td> <td>21' 8"¹</td> <td>19' 0"</td> <td>24'</td> <td>67' 4"</td> <td>1' 2"</td> <td rowspan="3">1' 11"</td> </tr> <tr> <td>SMALL</td> <td>8' 6"</td> <td>8' 10"</td> <td>19' 7"</td> <td>19' 6"</td> <td>24'</td> <td>63' 2"</td> <td>1' 11"</td> </tr> <tr> <td>COMPACT</td> <td>8' 0"</td> <td>8' 3"</td> <td>19' 5"</td> <td>19' 6"</td> <td>24'</td> <td>62' 11"</td> <td>0' 6"</td> </tr> <tr> <td rowspan="3">60</td> <td>STANDARD</td> <td>9' 0"</td> <td>10' 5"</td> <td>21' 10"¹</td> <td>18' 0"</td> <td>24'</td> <td>67' 8"</td> <td>2' 3"</td> <td rowspan="3">1' 8"</td> </tr> <tr> <td>SMALL</td> <td>8' 6"</td> <td>9' 10"</td> <td>19' 10"</td> <td>18' 6"</td> <td>24'</td> <td>63' 8"</td> <td>2' 2"</td> </tr> <tr> <td>COMPACT</td> <td>8' 0"</td> <td>9' 3"</td> <td>17' 10"</td> <td>18' 6"</td> <td>24'</td> <td>59' 9"</td> <td>1' 0"</td> </tr> <tr> <td rowspan="3">45</td> <td>STANDARD</td> <td>9' 0"</td> <td>12' 9"</td> <td>20' 6"¹</td> <td>12' 0"</td> <td>24'</td> <td>65' 0"</td> <td>3' 2"</td> <td rowspan="3">1' 5"</td> </tr> <tr> <td>SMALL</td> <td>8' 6"</td> <td>12' 0"</td> <td>18' 9"</td> <td>12' 6"</td> <td>24'</td> <td>61' 6"</td> <td>3' 0"</td> </tr> <tr> <td>COMPACT</td> <td>8' 0"</td> <td>11' 4"</td> <td>16' 12"</td> <td>12' 6"</td> <td>24'</td> <td>57' 11"</td> <td>1' 5"</td> </tr> <tr> <td rowspan="3">0 (parallel)</td> <td>STANDARD</td> <td>9' 0"</td> <td>23' 0"</td> <td>9' 0"</td> <td>12' 0"</td> <td>24'</td> <td>42' 0"</td> <td>0' 0"</td> <td rowspan="3">0' 0"</td> </tr> <tr> <td>SMALL</td> <td>8' 6"</td> <td>23' 0"</td> <td>8' 6"</td> <td>12' 6"</td> <td>24'</td> <td>41' 0"</td> <td>0' 0"</td> </tr> <tr> <td>COMPACT</td> <td>8' 0"</td> <td>23' 0"</td> <td>8' 0"</td> <td>12' 6"</td> <td>24'</td> <td>40' 0"</td> <td>0' 0"</td> </tr> </tbody> </table> <p>¹ Developments in the Traditional Urban and Edge Urban Neighborhood Development Context Areas may use the following alternative STANDARD parking space depth (Vehicle Projection): 19' 0" for 90-degree parking angle; 20' 8" for 75-degree parking angle; 20' 11" for 60-degree parking angle, and 19' 6" for 45-degree parking angle. Parking bay width may decrease as a result.</p>	Parking Angle (Degrees)	Parking Space Size	Space Width	Curb Length (Width Projection)	Space Depth (Vehicle Projection)	Aisle Width 1-way	Aisle Width 2-way	Typical Parking Bay Width (Module)	Interlock Reduction	Overhang Allowance	90	STANDARD	9' 0"	9' 0"	20' 0" ¹	23' 0"	24'	64' 0"	0' 0"	2' 0"	SMALL	8' 6"	8' 6"	18' 0"	23' 6"	24'	60' 0"	0' 0"	COMPACT	8' 0"	8' 0"	16' 0"	23' 6"	24'	56' 0"	0' 0"	75	STANDARD	9' 0"	9' 4"	21' 8" ¹	19' 0"	24'	67' 4"	1' 2"	1' 11"	SMALL	8' 6"	8' 10"	19' 7"	19' 6"	24'	63' 2"	1' 11"	COMPACT	8' 0"	8' 3"	19' 5"	19' 6"	24'	62' 11"	0' 6"	60	STANDARD	9' 0"	10' 5"	21' 10" ¹	18' 0"	24'	67' 8"	2' 3"	1' 8"	SMALL	8' 6"	9' 10"	19' 10"	18' 6"	24'	63' 8"	2' 2"	COMPACT	8' 0"	9' 3"	17' 10"	18' 6"	24'	59' 9"	1' 0"	45	STANDARD	9' 0"	12' 9"	20' 6" ¹	12' 0"	24'	65' 0"	3' 2"	1' 5"	SMALL	8' 6"	12' 0"	18' 9"	12' 6"	24'	61' 6"	3' 0"	COMPACT	8' 0"	11' 4"	16' 12"	12' 6"	24'	57' 11"	1' 5"	0 (parallel)	STANDARD	9' 0"	23' 0"	9' 0"	12' 0"	24'	42' 0"	0' 0"	0' 0"	SMALL	8' 6"	23' 0"	8' 6"	12' 6"	24'	41' 0"	0' 0"	COMPACT	8' 0"	23' 0"	8' 0"	12' 6"	24'	40' 0"	0' 0"	
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45	STANDARD	9' 0"	12' 9"	20' 6" ¹	12' 0"	24'	65' 0"	3' 2"	1' 5"																																																																																																																																						
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	COMPACT	8' 0"	11' 4"	16' 12"	12' 6"	24'	57' 11"	1' 5"																																																																																																																																							
0 (parallel)	STANDARD	9' 0"	23' 0"	9' 0"	12' 0"	24'	42' 0"	0' 0"	0' 0"																																																																																																																																						
	SMALL	8' 6"	23' 0"	8' 6"	12' 6"	24'	41' 0"	0' 0"																																																																																																																																							
	COMPACT	8' 0"	23' 0"	8' 0"	12' 6"	24'	40' 0"	0' 0"																																																																																																																																							

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Part G: Consolidated, Simpler Regulations			
31.	<p>Clarification of Mixed-use Design Standards Amendments.</p> <p>Is this amendment removing all mixed-use design standards from Chapter 21.04, or just replacing and combining those related to pedestrian amenities into a new section? (<i>Connor Scher</i>)</p>	<p>Response: It is primarily doing the latter: replacing, simplifying, and consolidating the district-specific standards for mixed-use developments (being deleted on pages 1-3 of Attachment 3). The references to reduced parking ratios on pages 1 and 3 are being deleted because these parking reductions are being replaced by lower, area-specific parking requirements in 21.07.090E.2. (page 27 of Attachment 3). The mixed-use development standards on pages 2 and 3 are replaced by proposed Section 21.07.060F., <i>Pedestrian Frontage Standards</i> (pages 13-15). See the annotation for pages 1-3, 13-15, and 27 in Attachment 3 for more details.</p> <p>RECOMMENDATION: No change.</p>	
32.	<p>Descriptions of the Neighborhood Development Contexts.</p> <p>Generally supportive of the proposed section establishing Neighborhood Development Context areas, however the paragraphs describing each of the three proposed neighborhood development contexts areas seem wordy and include repeated phrases and commentary. The function of these paragraphs in the code is unclear. Specific comments follow:</p> <ul style="list-style-type: none"> • <u>Traditional Urban Neighborhood Context:</u> Suggested edit to reword the 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.” • <u>Edge Urban Neighborhood Context:</u> Rephrase "early post-war" to "post-war". The second paragraph is unnecessary commentary. These areas were originally homestead plats of 5 to 160 acres instead of being based on strict street grids. As a result, they were subdivided and sold at various times with various development patterns that remained consistent within original parcels (frequently). Applying 	<p>Response: The draft provision in 21.07.015C.1. (page 5, line 9, in Attachment 3) explains that the Neighborhood Context descriptions are intent statements providing a basis for area-specific development standards elsewhere in this chapter 21.07. This should resolve most of the commenter’s concerns.</p> <p>Statements of purpose or intent in Title 21 are provided to guide interpretation and understanding of the legislative intent behind the substantive regulations of the code. Intent statements are not substantive, regulatory requirements for developments. They instead provide a context whereby the regulations are understood. Intent statements may have additional wording not included in the regulations (21.15.020B.).</p> <p>In addition, some of the content in these draft descriptions is informed by public comments from the public process (e.g., Government Hill residents emphasized that western Government Hill neither has nor should have sidewalks). However, staff reexamination of the Neighborhood Context descriptions wording does find opportunities for simplification and clarification, including some edits suggested by the commenter.</p> <p>RECOMMENDATION: Clarify the last sentence of 21.07.015C. (page 5, line 9, in Attachment 3) to read, “<u>The descriptions below</u> are intent statements...” Then edit the individual descriptions as follows:</p> <ol style="list-style-type: none"> Edit the fourth, fifth and sixth sentences of proposed subsection 21.07.015C.2. (page 5, lines 17-21, in Attachment 3) as follows: <p>Traditional urban neighborhood contexts feature a regular street grid [DEVELOPMENT PATTERN] of city blocks [SURROUNDED BY STREETS], which provide pedestrian and vehicular connections at frequent, regular intervals. Block and lot sizes are small and block shapes are consistent and often the same size. Sidewalks are present on most streets, <u>with few exceptions such as</u>[EXCEPT IN LIMITED PARTS OF SOUTHERN SOUTH ADDITION AND] in western Government Hill.</p> 	

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	<p>these general statements to these areas is not an effective means of describing them. These areas share a period of development, and perhaps defining them by the 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. Suggested edit to reword the description: “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.”</p> <ul style="list-style-type: none"> • <u>Transit-Supportive Development Corridors</u>: This paragraph is also slightly wordy. Suggest moving the last sentence to the second sentence and leaving only those first three sentences. <p>(Connor Scher)</p>	<p>b. Edit proposed subsection 21.07.015C.3. (page 6, lines 8 – 18, in Attachment 3), as follows:</p> <p>The edge urban neighborhood context includes properties generally identified in the Comprehensive Plan, Land Use Plan Map, as traditional neighborhood design areas in Anchorage’s [EARLY]post-war era (1950s-1960s) neighborhoods, such as Spenard, North Star, Midtown, Rogers Park, Airport Heights, Russian Jack Park, and University Area. <u>Parts of South Addition, Fairview, and other neighborhoods also match this context.</u></p> <p>Edge urban neighborhoods feature a variety of interconnected street systems with smaller lot and block sizes than <u>later subdivisions in [THE]</u>more suburban parts of the Anchorage Bowl. Some edge urban areas feature a regular street grid [DEVELOPMENT PATTERN]of city blocks and others <u>have[PROVIDE]</u> a more relaxed and irregular street grid. <u>Some neighborhoods have[THERE IS AN INCONSISTENT PRESENCE OF]</u> alleys and [LOCAL STREET] sidewalks. Buildings typically have moderate to somewhat deeper front setbacks. Buildings tend to orient toward the public street, although some front setbacks are deep enough to allow for a mix of landscaping and parking. Some edge urban neighborhood context areas include transit-supportive development corridors with[WHERE THE MUNICIPALITY HAS INVESTED IN] elevated levels of public transportation service and enhanced pedestrian facilities.</p> <p>c. Edit proposed subsection 21.07.015C.4. (page 6, lines 22-30, in Attachment 3), as follows:</p> <p>Transit-supportive development corridors designated by the <i>Comprehensive Plan</i> extend through and outward from the edge urban neighborhood contexts. <u>Transit-supportive development corridors are a half-mile wide, extending ¼-mile (approximately 5 to 10 minutes walking distance) on each side the public transit route. These corridors feature[ARE WHERE PEDESTRIAN FACILITIES AND FREQUENT PUBLIC TRANSPORTATION SERVICE INTERACT WITH] a compact, pedestrian-friendly pattern of land use[COMMERCIAL, RESIDENTIAL, AND MIXED-USE] development[WITHIN WALKING DISTANCE OF THE PUBLIC TRANSIT ROUTE].</u> These corridors have elevated levels of municipal public transportation service with frequent headways between buses and higher ridership demand. These transit routes connect local and regional town centers, city centers, and other service/employment centers, such as the UMED District. <u>[TRANSIT-SUPPORTIVE DEVELOPMENT CORRIDORS ARE A HALF-MILE WIDE, EXTENDING ¼-MILE (APPROXIMATELY 5 TO 10 MINUTES WALKING DISTANCE) ON EACH SIDE THE PUBLIC TRANSIT ROUTE.]</u></p>	

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33.	<p>Clarity of Maps and Graphics for the Neighborhood Development Context Areas.</p> <p>Traffic Engineering recommends the geographical areas defined in the new maps (in Section 21.07.015) be added to the online, user-interactive map layers on the municipal Geographic Information Systems (GIS) so that code users can readily identify if a proposed development site is within these defined areas. <i>(Traffic Engineering Department)</i></p> <p>In the graphics comprising a set of 3 images below the descriptions of each of the Neighborhood Development Context Areas, add a call-out to the middle image to clarify that the right-most image is a blown-up (larger scale) version of the other two images. <i>(Connor Scher)</i></p>	<p>Response: No objection to the suggested clarifications. The project objectives include to provide the online, user-interactive map layers for the public as part of implementing the amendments. Arrangements have been made with municipal GIS staff to create, post, and maintain these upon adoption of the Title 21 amendments.</p> <p>RECOMMENDATION: Amend proposed subsection 21.07.015, as follows:</p> <ol style="list-style-type: none"> a. Subsections 21.07.015C.1. and C.2. (pages 5 and 6 of Attachment 3), in the graphics comprising a set of 3 images below the descriptions of each of the Traditional and Edge Urban Neighborhood Development Context Areas, add a call-out to the middle image to clarify that the right-most image is a blown-up (larger scale) version of the other two images. b. Subsection 21.07.015D.2., Neighborhood Context Area Boundaries, in each of the Maps 21.07-1 through 21.07-4 (pages 7-10 of Attachment 3), include a disclaimer that online interactive maps are available. 	
34.	<p>Clarity of Off-Street Parking Section’s Purpose Statement.</p> <p>In subsection 21.07.090A.4. of the purpose statement for the Title 21 parking requirements, rephrase to eliminate "walkable" as an ableist term. <i>(Connor Scher)</i></p>	<p>Response: No objection to replacing “walkable” with a more generic term. In reexamining the purpose language, staff has identified additional clarifications to suggest regarding the following:</p> <ul style="list-style-type: none"> • Minimum parking requirements are intended only for areas that do not have adequate on-street parking supply in parking management districts (e.g, Downtown) with on-street parking enforcement. • The primary impacts to nearby streets that are of concern include the flow of vehicle traffic, pedestrians, and service vehicles such as street maintenance, public transit, and emergency services. <p>RECOMMENDATION: Amend proposed subsection 21.07.090A., <i>Off-Street Parking and Loading—Purpose</i>, (page 23 in Attachment 3) as follows:</p> <p>A. Purpose This section establishes off-street parking and loading requirements to accommodate anticipated parking utilization <u>in areas without public on-street parking management</u>, and to ensure that parking facilities are designed to perform in a safe, efficient manner. It is also the intent of this section to attenuate the adverse visual, environmental, and economic impacts of parking lots, and to balance the provision of adequate off-street parking with other modes of site access <u>that promote</u>[IN ORDER TO ACHIEVE AREA-WIDE OBJECTIVES FOR] a compact and efficient land use pattern, affordable housing, pedestrian-friendly environments, and <u>other area-wide objectives</u>[USE OF MULTIPLE MODES OF TRANSPORTATION]. Specific objectives of this section include:</p>	

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		<p>1. Ensure that off-street parking, loading, and access demands will be met without impacting adjoining and nearby [STREETS,] properties, land uses, and neighborhoods;</p> <p>2. Ensure the safe and adequate flow of traffic, pedestrians, and service vehicles in adjoining streets;</p> <p>*** *** ***</p> <p>5[4]. Recognize, through parking reductions and lower parking requirements, the parking efficiencies of mixed-use development, mixed-income housing, pedestrian-friendly[WALKABLE] development patterns, proximity to public transportation, and other area-specific neighborhood characteristics;</p> <p>*** *** ***</p>	
35.	<p>Clarity of Regulation of Parking Space Usage.</p> <p>Support the amendment to 21.07.090B.4. (page 24, lines 29-34 in Attachment 3) to allow for private sector decisions to charge for 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? For example, if a restaurant and apartments are in the same building, the restaurant will have higher parking turnover, but will need fewer parking spaces. If there is a parking reduction applied to the property, whose parking gets reduced? <i>(Connor Scher)</i></p>	<p>Response: Title 21 requires only that the total number of parking spaces on a mixed-use development site be equal to the sum of the number of parking spaces required for each use. The Municipality avoids regulating how property owners assign individual parking spaces on the site to the individual uses. Doing so would be unnecessary to carry out the objectives of the zoning regulations. It would complicate matters for applicants and property managers, and involve Municipal staff in private matters involving internal parking agreements, etc. It would also complicate changes of use and the expansion or contraction of business tenants.</p> <p>Parking reductions for a mixed-use development are applied to each use individually, and then aggregated into a total combined parking reduction. In doing so the parking reduction operates the same way as the basic minimum parking requirement: the parking requirement for each individual use is aggregated to yield the total parking requirement for the site.</p> <p>RECOMMENDATION: No change.</p>	
36.	<p>Determining which Parking Spaces on a Site Plan are Eligible for Small Dimensions.</p> <p>Traffic Engineering is appreciative of the changes made to the parking angle, stall, and aisle dimensions, however has concerns with proposed exception 21.07.090H12.a.ii. (Page 58 in Attachment 3) that allows for 50% of spaces to be smaller dimensions for employee only, structured parking facilities, and low parking uses. This provision may need additional</p>	<p>Response: The comment comprises three main questions:</p> <ol style="list-style-type: none"> 1. What defines low turnover uses; 2. How are the spaces for low turnover uses to be identified; and 3. Can the Municipality require them to be called out in a parking study on the plan? <p>The second and third questions are addressed during the permitting approval process for the site plan. The proposed parking layout site plan should identify which spaces serve low-turnover uses and have smaller dimensions. If the low-turnover parking spaces are not shown on the site plan, and the parking study (if there</p>	

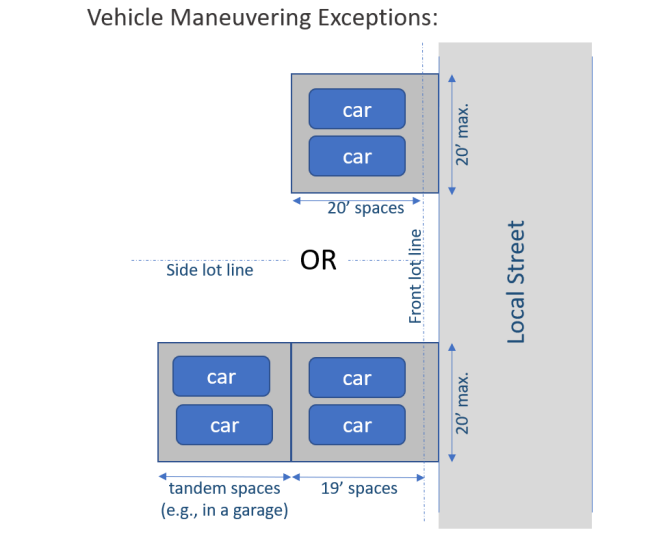
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	<p>clarification regarding which spaces on a site plan are designated as either employee only or low turnover for both municipal staff who review plans and design professional that develop the site plan. <i>(MOA Traffic Engineering Department)</i></p>	<p>is one) does not address the number of spaces, then that should be a permit reviewer comment. Asking for clarification on a parking layout plan or site plan is common practice by zoning plan reviewers.</p> <p>The answer to question 1 above seems apparent in the second sentence in 21.07.090H12.a.ii. (Attachment 3, page 58, lines 27-30). However, perhaps a simple word change, as provided below, could make it clearer.</p> <p>RECOMMENDATION: Clarify proposed subsection 21.07.090H12.a.ii. (Page 58, lines 27-30, in Attachment 3) as follows:</p> <p style="padding-left: 40px;">Uses with a low parking turnover rate are[COMPRISE] multifamily and mixed-use household living uses, office uses, and educational facility uses other than instructional services.</p>	
<p>37.</p>	<p>Clarity of Exempted Use Types.</p> <p>Subsection 21.07.090K.2.g. (page 63, line 14 in Attachment 3) which exempts "Any other non-residential use which has no regular employees or people on premises," seems vague and hard to define or enforce. <i>(Connor Scher)</i></p>	<p>Response: This exemption is for a variety of uses, such as unstaffed utility substations that will have no on-site employees, users, or visitors. Title 21 Land Use Review staff with experience in zoning plan review and land use enforcement find that this language does not seem vague or hard to define for Title 21. During plan review the zoning plan reviewer would ask for a statement from the applicant about the employees or people on the premises. That statement would be used if needed for enforcement.</p> <p>RECOMMENDATION: No change.</p>	
<p>38.</p>	<p>Ordinance Length, Complexity, and Transparency Regarding its Effects on Development Projects.</p> <p>The draft ordinance is long and complicated, and it is probably confusing for most people to understand what is being proposed. Entire sections were deleted out and moved to new sections. It is difficult to determine what the final impact would be on a building permit for a single family, duplex, triplex, or multiple townhome unit project, because the format only shows the sections that were deleted or added without having the context of the surrounding code. Has anything changed that would make things more restrictive, difficult to permit, or other negative impact? <i>(Commissioner Spinelli, March 14 worksession, April 11 PZC meeting, and follow-up email correspondence)</i></p>	<p>Response: In response to this comment, staff reviewed the entire amendment and a checklist of the proposed changes to development standards for residential projects. This review re-confirmed that the nearly all the public hearing draft changes will relax, simplify, or clarify development standards and approval processes for development projects. A few changes increased a pedestrian-oriented standard in the urban neighborhood contexts however these were paired with reductions in required car parking or driveway width to ultimately reduce development costs and land needs by supporting more efficient transportation alternatives.</p> <p>Staff did find several of the draft amendments that did not reduce or simplify an entitlement enough to meet the project objectives. These could be simplified or made more flexible, as follows:</p> <ul style="list-style-type: none"> • The <i>Pedestrian Frontage Standard for Urban Neighborhood Contexts</i> in 21.07.060F.3. should not be a pre-requisite for receiving an administrative parking reduction. This standard goes beyond the basic pedestrian access facilities needed to justify a parking reduction and could deter applicants from seeking reductions. (See recommendations a, b, and c. below.) 	

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		<ul style="list-style-type: none"> • The minimum walkway clear width of an <i>Enhanced On-Site Walkway</i> (a menu choice in section 21.07.060G., <i>Pedestrian Amenities</i>) should be reduced from 8 to 6 feet for 3- and 4-plex developments, to be more in scale with these developments. (See recommendation d. below) • In subsection 21.07.090H.10.d.ii., <i>Vehicle Maneuvering</i>, the exception allowing one or two parking spaces to back out into the street should allow for additional tandem spaces and Traffic Engineer discretionary approval of further exceptions for 3- and 4-plexes. (See recommendation e. below.) • In subsection 21.07.090H.11.d.ii., the Minimum driveway width for small multifamily projects should be 10 feet not 12 feet on straight driveway segments. (See recommendation f. below.) <p>RECOMMENDATION: Amend the public hearing draft as follows:</p> <ol style="list-style-type: none"> a. Amend subsection 21.07.060F.2. (page 13, lines 23-24, in Attachment 3) as follows: <ol style="list-style-type: none"> 2. Applicability Subsection 3. applies to development in the traditional urban and edge urban neighborhood context areas established in 21.07.015[, AND TO DEVELOPMENTS THAT RECEIVE REDUCTIONS TO REQUIRED PARKING IN 21.07.090F]. Subsection 4. applies to development in the other areas of the municipality. Exceptions and exemptions from this section 21.07.060F. include: <div style="text-align: center;">*** *** ***</div> b. Amend subsection 21.07.060F.3. (page 14, line 6, in Attachment 3) by deleting the words “[AND PARKING REDUCTIONS]” from the header of subsection 21.07.060F.3. and title of Table 21.07-2. c. Delete subsection 21.07.090F.4.b., <i>Pedestrian Frontage Standard</i>, (page 37, lines 23-25, in Attachment 3), and re-number subsequent subsections. d. Amend the first sentence of 21.07.060G.3.a. (page 17, lines 23-25, in Attachment 3) as follows: An enhanced on-site walkway shall have a pedestrian movement zone with a continuous, unobstructed walkway clear width of at least eight feet, <u>or six feet where providing access only to four or fewer residential dwelling units.</u> 	

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		<p>e. Amend and illustrate subsection 21.07.090H.9.d.ii. (page 54, line 13, in Attachment 3), as follows:</p> <p>ii. For other developments, parking areas comprising only one or two parking spaces whose only access is to a local street, provided that the paved vehicle area(s) occupy no more than 20 feet of the width of the lot frontage in the front setback. <u>The number of spaces may be increased to four spaces if arranged in tandem for residential dwellings as provided in 21.07.090K.12.k. Additional spaces for multifamily developments with up to four dwelling units may be approved by the Traffic Engineer in appropriate circumstances such as lots on dead-end streets, cul-de-sacs, or other local streets with low traffic volumes.</u></p> <p style="text-align: center;">Vehicle Maneuvering Exceptions:</p>  <p>f. Amend subsection 21.07.090H.11.d.ii. (page 56, line 14, in Attachment 3) as follows:</p> <p>ii. The minimum width of a driveway providing access for up to 10 parking spaces serving a townhouse or multifamily residential use from a local street or alley is 12 feet (e.g., one lane for two-way traffic), <u>except that straight (non-curving) driveway segments on the development property (i.e., not in the driveway approach) may be 10 feet.</u></p>	



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