

April 8, 2024

Anchorage Assembly

Re: AO 2024-24, Title 21 Parking and Site Access Clean-Up Text Amendments

Dear Anchorage Assembly members,

Please accept this letter offering comments on AO 2024-24, Title 21 parking and site access clean-up amendments. Cook Inlet Housing Authority (CIHA) is an Alaska Regional Housing Authority and Tribally Designated Housing Entity in the CIRI region. Our organization owns and operates more than 1,700 housing units in Southcentral Alaska. We intend to build more housing, in 2024 and beyond.

We ask that the Assembly take immediate action to suspend Site Elements A, B, and C of Tables 21.07-2 and Table 21.07-3 in 21.07.060. These new design rules jeopardize multiple housing projects in 2024, including duplexes, single-family homes, and townhouses.

Site Element A of Table 21.07-2 strictly limits front parking on all residential and commercial sites in large swaths of the community without improved alleys. While Anchorage no longer requires minimum parking, some amount of parking is necessary – and desired by renters and homeowners – for residential development throughout even the most "urban" neighborhoods in the city. The other Site Elements impose more restrictions and less flexibility for parking and garages in areas that need new development and lack on-street parking much of the year.

Especially on lots without improved alleys, these rules mean:

- Smaller buildings, and fewer units
- Higher construction costs
- Higher operating costs (snow removal)
- Significantly more impermeable surface on lots, from effectively requiring parking to route behind buildings
- Potentially less market desirability as construction costs reach all-time highs.

CIHA could not have built much of its new multi-family housing from the past 10 years with these rules in effect. This directly contradicts efforts to remove barriers to small multi-family construction and stimulate overall housing development. Today, residential permitting activity is at half its typical volume. Our community permitted or built fewer than 250 total housing units in 2023 – the lowest in at least a decade, despite rising demand and prices.





We also want to observe the broader issue at work here: **People simply cannot understand** what the Parking and Site Access amendments say. Even experts have trouble making sense of the jargon and cross-references. Anchorage residents – English and non-English speakers – cannot meaningfully participate in the planning process if they cannot understand or access the zoning code. (This comment paraphrases a 2023 analysis of the even-more-complex Boston zoning code by Sara Bronin).

This letter contains several urgent requests to move housing projects forward. But we believe the entirety of the Development and Design Standards in Chapter 7, which affects many aspects of housing development, must be reformed. In the meantime: Do not approve new zoning requirements without adequate testing, transparent consultation with building community, and clear standards supported by visuals.

Thank you for the opportunity to comment. This is a significant issue that impacts our stated goals of boosting housing supply and production in our community.

Tyler Robinson

Syla P. Bl

V.P., Community Development and Real Estate

Devin Kelly

Community Development Planner



Parking, Urban Design, and Housing in Anchorage

Memo Response to AO 2023-50 and Clean-Up Ordinances

February 2024

OVERVIEW

Anchorage repealed minimum parking requirements as a "pro-housing" move in fall 2022. Advocates pitched parking reform as a way for builders to right-size parking and cut costs. But that reform has given rise to new zoning barriers. This memo focuses on a new design requirement that largely bans parking in front of new buildings and limits parking options for Anchorage builders, particularly for duplexes, triplexes, and fourplexes on standard Anchorage lots. While appropriate in some limited areas, most of Anchorage's "urban" multi-family residential neighborhoods are characterized by narrow lots, lack of alleys, and limited-to-nonexistent on-street parking. In these circumstances, builders should be able to decide where to place parking if they choose to provide it.

Our community must balance urban design aspirations with the issues of cost, feasibility, market preferences for off-street parking, and the need to produce more housing.

This memo will provide:

- I. Background on the evolution of a new zoning restriction for multi-family development
- II. Case studies on how CIHA's small infill projects handle parking and site access
- III. Summary of issues
- IV. Recommendations for policy and process

CIHA recommends **suspending the new Pedestrian Frontage Standards** adopted in AO 2023-50. We ask to reconvene the Anchorage Assembly's 3/4plex technical advisory group and other stakeholders to analyze these requirements in the context of small infill redevelopment, and community goals to stimulate housing production, density, and attainability.

We welcome questions and engagement on this issue.

Tyler Robinson V.P., Community Development and Real Estate 907.887.9884 trobinson@cookinlethousing.org Devin Kelly Community Development Planner 907.793-3026 dkelly@cookinlethousing.org



I. BACKGROUND

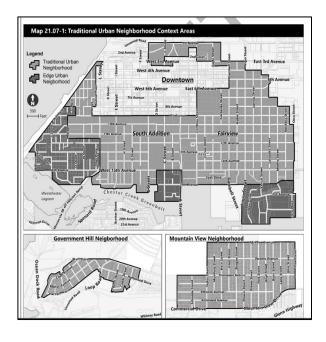
Traditional Urban Neighborhood Context.

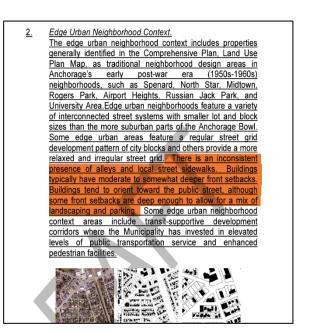
The traditional urban neighborhood context includes Anchorage's original urban neighborhoods, such as Government Hill, South Addition, Fairview, and Mountain These neighborhoods are identified by the Comprehensive Plan, Land Use Plan Map as Traditional Neighborhood Design areas. Properties within the Downtown (DT) zoning districts are not included because they are addressed in chapter 21.11. 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, except in limited parts of southern South Addition and western Government Hill. There is a consistent presence of alleys. Buildings and residences typically have moderate front setbacks and orient to the street, with landscaping or pedestrian access comprising a majority of the frontage. Parking tends to be located to the side or rear of buildings. There is a balance of pedestrian, bicycle, public transit, and automobile reliance.



In early 2021, the MOA Planning Department set out to address the high cost associated with parking regulations in housing developments. A code rewrite effort called Title 21 Parking and Site Access sought to reduce parking requirements and encourage narrower driveways, "in parts of Anchorage that experience a lower parking demand." The code rewrite mostly focused on a section of Title 21 called Development and Design standards (21.07), a complicated 124-page document.

Initial drafts identified these lower-demand areas as "traditional urban neighborhood context" areas with sidewalks and alleys – Government Hill, South Addition, Fairview, and Mountain View. Drafts also identified "edge urban neighborhoods" like Spenard and Airport Heights, parts of town built up in the 1950s and 1960s that feature fewer alleys and less-consistent sidewalk facilities.







As part of the rewrite, staff created a new table of "pedestrian frontage standards" – rules about what a building should look like from the street, and how a person should get to it.

In "Traditional Urban" areas, planners sought smaller setbacks and restrictions on how big a garage can be and how far it can stick out in front of a home. More relaxed requirements would apply to the "Edge Urban" neighborhoods and other areas.

Building and Parking Placement 1	Primary Frontage	Secondary Frontage
A. Maximum front setback (ground-floor only) in the R-4 and non-residential zoning districts ¹	30 feet in Traditional Urban, and 60 feet in other areas	90 feet
B. Minimum percentage of the width of ground-floor street-facing building elevation(s) required to comply with max. setback in A 1	50%	50%
C. Residential garage entrance as a percentage of ground-floor street- facing building elevation width (maximum allowed)	50% in Traditional Urban, and 67% in other areas	67%
D. Maximum distance a garage may project out in front of the rest of the street-facing residential building elevation	Name and Address of the Owner, when the Owner, which the O	dth of the non-garage port acing building elevation

These drafts made no reference, in either the Traditional Urban or Edge Urban contexts, to limiting parking in front of buildings. At this point, this was a choice for builders depending on the site context. The Planning and Zoning Commission approved this version in June 2022 (PZC Case 2022-0026).

In the staff report to PZC, planning staff opposed fully eliminating parking requirements, pointing to limitations in Anchorage's built environment and challenges with winter maintenance. Instead, staff sought to target requirements for the lower-demand areas (Downtown, Traditional Urban, Edge, and Transit-Supportive Corridors) and apply parking reductions to certain situations, such as adaptive reuse of an older building or historic preservation.

AM supporting adoption of the Parking and Site Access Amendments Ordinance

Page 5

Most cities that remove parking requirements have right-of-way management like on-street parking enforcement, more sidewalks, more public transit, stricter controls on front yard driveway widths, and fewer challenges with winter maintenance. These advantages allow their streets to accommodate more parked cars and pedestrian travel. In Anchorage, strategic management of rights-of-way and on-street parking is an important next step before removing off-street parking requirements completely.

When the Parking and Site Access ordinance was introduced to the Assembly in September 2022, however, an advocacy effort to repeal minimum parking requirements altogether was gaining steam. In November 2022, the Assembly did just that, through AO 2022-80(S). It was a shift celebrated as a simplification of code that could right-size developments and reduce housing cost. "Developers will decide how many parking spaces to include on each site," the sponsors wrote in a memo.



But that policy objective of "right-sizing" was less apparent when staff returned to the Planning and Zoning Commission in February 2023 with a revised version of Parking and Site Access (AO 2023-50). This version included an updated pedestrian frontage standards table that explicitly limited the amount of parking – not just garages – that developers could place in front of buildings.

Final version of Pedestrian Standards table, approved July 2023 and effective Jan. 1, 2024

	Chapter 21.07: Development and Design Standard Sec. 21.07.060 Transportation and Connectivit			
Table 21.07-2: Pedestrian Frontage Standard for Urban Neighborhood Contexts				
Sit	e Elements for Pedestrian-Oriented Frontages	Standard		
Α.	Minimum Required ground-floor, street-facing building elevation with on-site walkways, pedestrian amenities, or landscaping in front – and no off-street automobile parking or circulation	50% of building elevation width ¹ Lots with alley access: no parking allowed in front of building except in driveways for individual dwellings		
B.	Maximum allowed width of residential garage entrance(s) on ground-floor street-facing building elevation	40% of building elevation width ¹		
C.	Maximum allowed distance a garage may project out in front of the rest of the street-facing residential building elevation	No more than 50% of the width of the non-garage portion of the street-facing building, on other lots		
D.	Minimum required visual access windows or primary entrances on non-residential ground-floor street-facing building elevation ²	25% of wall area on primary frontage 15% of wall area on second frontage		
E.	Minimum required windows or primary entrances on residential and upper-floor non-residential street-facing elevations ²	15% of wall area on primary frontage 10% of wall area on second frontage		
F.	Requirement for primary entrance facing the street or visible from the street via an unobstructed line of sight	Residential: Meet 21.07.060G.14., Covered, Visible Residential Entrance Other uses: at least one entrance		
G.	Minimum required number of pedestrian amenities from 21.07.060G. (in addition to G.14) in multifamily, mixed-use, townhouse, group housing, and non-residential developments	2 pedestrian amenities		

¹Exception: On lots without alley access in R-2A, R-2D, and R-2M zoning districts, two-family (duplex) developments may have a minimum of 20% in A. above and a maximum of 67% in B. above.

Staff proposed restricting this change to the new "Traditional Urban" and "Edge Neighborhood" urban context areas.

²Visual access windows shall have a sill height of no more than four feet above finished grade. Rules for measuring window area as a percentage of building wall area are provided in 21.15.020P. Visual access windows ("Window, providing visual access"), primary entrance, and ground-floor wall area are defined in 21.15.040.



But in ultimately approving AO 2023-50, the Assembly went a step further, taking out the urban context areas and applying the new frontage rules to **all multi-family zoning districts**, not just urban districts with a built environment that can support on-street parking.

Proposed Amendment #1 to AO 2023-50

AN ORDINANCE AMENDING ANCHORAGE MUNICIPAL CODE TITLE 21 CHAPTERS 21.03, REVIEW AND APPROVAL PROCEDURES; 21.04, ZONING DISTRICTS; 21.07, DEVELOPMENT AND DESIGN STANDARDS; AND 21.15, RULES OF CONSTRUCTION AND DEFINITIONS, IN ORDER TO AMEND THE SITE ACCESS DEVELOPMENT STANDARDS AND ACHIEVE COMPREHENSIVE PLAN GOALS FOR INFILL AND REDEVELOPMENT, HOUSING, AND ACCESSIBLE LAND USE

Submitted by: Assembly Member Cross

PROPOSED AMENDMENT

Purpose/Summary of Amendment: This amendment applies the concept of the urban neighborhood context area to all zoning districts that allow multifamily housing construction, instead of limiting these areas to only those delineated on Map 21.07-1 on p. 8 of the Ordinance. Limiting the urban neighborhood context area creates an overlay district that concentrates the more walkable environment to only areas that already have walkable streets and leaves out those neighborhoods most in need of these improvements. There are many other places in Anchorage that benefit from a more walkable environment, and this amendment applies the "Urban Neighborhood Development Context Area" standards to all the zoning districts that permit multifamily dwellings and multi use dwellings, which have higher residential density goals and reflect an urban setting.

While perhaps well-intentioned, this marked a significant change, and imposed a specific restraint on housing development, particularly in areas that lack pedestrian infrastructure. During the public process, staff did not produce drawings or designs that demonstrated, for example, routing parking behind buildings. This impact and intent was not clear until after the start of 2024, when the new rules took effect.

In fact, it does not appear the new requirements were tested or modeled in any way prior to approval to assess the cost and feasibility impact for Anchorage housing developments.



II. CASE STUDIES

For small multi-family buildings on lots without alley access, Standard A of the Table 21.07-2 **effectively forces parking to be located behind a building**. This may be a practical policy choice for cities like Portland, with built urban infrastructure and little if any snow, and Minneapolis, with extensive alleys; and even Anchorage neighborhoods such as South Addition, where alley access and sidewalks are more common. But for many neighborhood contexts here, it is not practical, and creates feasibility challenges.

In this section we cite examples of CIHA developments that would not meet the new code standard today, yet have been used as examples of desirable infill development that positively respond to the neighborhood in which they are located.



MCCAIN LOOP



McCain Loop triplex with front parking and landscaping



Street conditions on McCain Loop, January 2024

CIHA recently built a triplex on a narrow lot with no alley access and no ability to accommodate onstreet parking. CIHA built 4 parking spaces in front of the McCain Loop triplex. While parking is placed in front of the building, the site plan allows for a walkway connecting to the individual units, and the parking area is separated from the street with a reduced driveway entrance and landscaping. Every other building on McCain Loop handles parking the same way.

Reducing the amount of parking in front of a residential building remains an optional menu requirement for multi-family developers in Ch. 7 of Title 21 (see 21.07.060.X.6.e, "Street frontage – parking beside or behind the building.") That is, the developer can choose to limit parking and garages in front of the building, or provide no parking at all, if the context allows for it. As the case of McCain Loop, many multi-family neighborhoods outside of the downtown core lack alleys, sidewalks, and on-street parking, and limited right-of-way serves as snow storage for most of the year. CIHA recently visited McCain Loop and found that snow storage had reduced the street to one-way driving access in both directions with no ability to accommodate on-street parking.

Neighbors supported the redevelopment once they understood that CIHA was providing adequate parking that would not spill out into the street.

While it's one thing to limit parking in centralized commercial areas to force people into alternative transportation modes, it's another to say this approach is acceptable for the Anchorage residential market.



HARRISON STREET: FRONT AND BACK

In 2018, CIHA built a duplex on Harrison Street, a short distance south of McCain Loop in the Spenard "superblock" between W. 36th Ave. and Tudor. Harrison Street offers two side-by-side parking spaces from the alley for tenants of Unit B, and two side-by-side spaces in front for tenants of Unit A.





Front driveway and street views of CIHA duplex at 4104 Harrison Street.

Even though Harrison Street has alley access, providing parking on the front as well as the alley makes the duplex look more like a single-family home, allowing it to blend in with the rest of the neighborhood while taking up fewer front spaces. Restricting all parking to the alley would create snow storage issues for street maintenance.

Taking access from both the alley and the front of the lot is a legitimate design option to support "gentle density" and incremental redevelopment in Anchorage neighborhoods with alleys.

In Central Spenard, this design fits the surrounding context.



OTHER EXAMPLES

These CIHA developments would not meet the new front parking standard today, but account for snow removal challenges, harsh or nonexistent pedestrian facilities, and limited onstreet parking.

435 E. 12TH AVENUE





Snow storage winnows down parking for this Fairview duplex on a street without pedestrian facilities. A steep hill immediately behind the duplex renders the back of the lot undevelopable.

GRASS CREEK NORTH DUPLEXES





Design and landscaping break up garage frontages in Muldoon. Betnu Circle is a private street; it's unclear how the pedestrian frontage standards would impact developments on a private street.



4302 MOUNTAIN VIEW DRIVE





These units are located on a busy commercial section of Mountain View Drive and are intentionally buffered by parking and (required) arterial landscaping.

RICHMOND AVENUE DUPLEXES (MOUNTAIN VIEW)





These duplex units line Richmond Avenue in Mountain View. CIHA intentionally set the second unit behind the first unit to mitigate the garage near the primary entrance.



III. SUMMARY

Far from a singular code issue, the issue of regulating design and limiting off-street parking in multi-family residential districts across the Municipality exemplifies:

- 1. How **design standards** and **complicated codes** disguise challenges, raise cost, and hamper multi-family and compact housing development.
- 2. **Contradictory** initiatives that send mixed messages. The Anchorage Assembly convened a technical advisory group in the first half of 2023 to identify barriers to 3- and 4-unit construction, culminating this winter in a series of code changes. The 3/4plex working group never reviewed AO 2023-50, nor did staff discuss it during workgroup meetings, despite provisions that could impact small multi-family development.
- 3. **Solutions misalignment** among policymakers, builders, and community planners. We share goals of a "better Anchorage," but disagree about how to get there.

We debate these issues as a critical housing crisis confronts our community. Hundreds of people are experiencing homelessness this winter. Home prices and rents, after an explosion of new households during the pandemic, have escalated by double-digit percentage points. City permitting data indicates that just seven new construction multi-family housing projects applied for permits in 2023 (fewer than 80 units). Past housing studies have indicated demand for hundreds of new multi-family units annually.



IV. RECOMMENDATIONS

As a first step, we ask the Assembly to re-convene the 2023 **tri/fourplex working group and/or other developers** to discuss solutions to small infill and the implications of AO 2023-50, particularly the street-facing garages and driveways in the context of three- and four-unit development. Even in neighborhoods with alleys, many existing developments take access from the street. The Fairview Design Competition produced two examples of viable triplexes where one unit had a single car drive/garage on the street and the others from the alley.

On policy:

- 1. Option 1: Immediately suspend the new frontage requirements of 21.07.060.F, including Tables 21-07-2 and 21-07-3, as it relates to residential.
 - a. Adopt a policy of not adding new zoning requirements as we evaluate our construction progress.
 - b. The Assembly can consider separate standards for parking in front of commercial buildings and should communicate with the commercial development community.
 - c. If focusing on **street frontage**, **limit this focus to garages**. CIHA does not necessarily object to limits on the extent a garage can project in front of a building, for example.
 - d. Provide adequate staffing and testing/modeling rooted in an actual Anchorage development context, that accounts for snow storage needs, larger vehicles, etc.
- 2. Option 2: Keep the frontage standards exclusively for "traditional urban" areas South Addition, Government Hill, Fairview and Mountain View while adding flexibility. If policymakers and the community decide to keep the frontage requirements, the context and surrounding area matters. Exempt all other areas.
 - a. Re-evaluate the "Traditional Urban Neighborhood" to delineate different access standards for Anchorage's older neighborhoods with consistent sidewalks and alleys. These should be **existing functioning alleys only** requiring access from unimproved, non-functioning alleys likely results in less density.
 - b. Even on lots with functioning alley access, create flexibility for providing a driveway for a front unit, if appropriate in that neighborhood context.
 - c. Exempt areas previously identified as "Edge Urban."

[EXTERNAL EMAIL]

Hello Assembly Members –

I'm writing to you because you are the assembly representative for my area and/or you are working towards bettering the housing environment and conditions in Anchorage. Tonight's agenda includes "clean up" amendments to Title 21's site access and parking standards.

Ask:

At tonight's meeting I think AO 2024-24 needs to have significant changes to be worthwhile, or the Site Access Standards/Urban Neighborhood Context from AO 2023-50 should be suspended until they can be appropriately vetted and scaled.

Reasoning:

While planning and designing new projects for this year I was directed to new building design standards hidden within the section of Chapter 7 covering Transportation and Connectivity. This section was added in 2023, I admit I didn't have time to review the standards at the time and honestly thought they were pedestrian and transportation amendments, not building design standards, so didn't thoroughly review them. Within this new section there are minor changes to design standards previously in 21.07.110 Residential Design Standards and new standards that are problematic. The new section also applies these design standards to single and two-family residential, which were previously exempted from many of the design standards.

AO 2024-24 is a clean up amendment but does not really clean up problematic portions, specifically to the new Pedestrian Frontage Standards in 21.07.060 Transportation and Connectivity.

- Site elements A, B and C in tables 21.07-2 and 21.07-2: For one these standards are not clear to understand and included terms that are not defined in Title 21. They do not appear to be tested to actual sites since the outcome will be limiting site utilization, increasing cost, and decreasing the number of units dimensionally and financially possible.
- Application to all development prior design standards were for multi family residential, now they apply to
 all development, single family, duplex, and non-residential. The assembly and planning department have
 made positive changes in the last 2-years to reduce the design and cost burden on small residential
 developments. Applying new standards (maybe?) appropriate for large commercial and residential
 developments to small residential developments is out of scale and not in alignment with recent changes
 to support more housing.
- Application of the new standards to recently designed projects would make those recent projects nonconforming.

- Applying the new standards to this years design projects are resulting in sites with lower utilization and fewer units which means they wont work financially.
- Urban Neighborhood Context I understand the intent/desire here but in reality there are very few places in Anchorage where this should/could apply. Most of the neighborhoods included in this context area aren't actually urban and don't have public streets, sidewalks, facilities, or existing private development that resemble the desired urban context. I think we're asking for something that doesn't exist in most places.
- Reading through 21.07.060 I've picked up several areas where the text conflicts with tables as well as
 design standards hidden in text that shouldn't apply to small residential (i.e. an onsite curb or bollards
 between driveways and walkways/landscaping, even in single family and small multifamily)

I am an advocate for attainable housing and more housing in Anchorage. Id also like to see more attractive buildings in Anchorage. At this time, if we really want more housing, new/confusing/burdensome design standards aren't going to help. We could work on design standards forever and there will still be unattractive buildings and likely unintended consequences (like less construction). A lot of effort is being put into zoning and design standards but at this point the biggest burden to more housing is financing, the cost of amenities, and off-site improvements that a builder/developer must carry.

Regards, Seth

[EXTERNAL EMAIL]

Good afternoon,

I would appreciate the opportunity to provide comments on the above item that is scheduled for tonight's Assembly meeting. Triad Engineering has been involved with countless residential developments within this community since the early 1980's. We are heavily involved in assisting home builders and developers with their residential subdivisions and multi-family projects. We have also been involved with in-depth code studies involving the above site access ordinance. The site analysis studies that we have been involved with generally indicated the following results;

- Smaller residential units,
- Less parking,
- Limited or no garages,
- Higher development costs,
- Higher permitting costs,
- And generally speaking, site plans that aren't historically being built. (ie. the market does not appear to have a need for this type of development configuration)

I understand the intent of code is to direct the development community towards a desired site plan style or configuration. However, this ordinance drastically pushes these standards in a direction that will be cost prohibitive and detrimental to the housing crisis that Anchorage is currently facing. I learned recently that this ordinance also applies to single and two-family home construction. I'm aware of at least 10 residential single-family permits that are held up in plan review due to issues with the code interpretation of this ordinance. This is completely unacceptable.

Triad Engineering respectfully requests that the Anchorage Assembly take action to suspend site elements A, B and C of Tables 21.07-2 and Table 21.07-3 within 21.07.060. These new standards are overly restrictive and open to misinterpretation by both staff and developer alike. An immediate suspension will allow spring permitting and summer construction to not get bogged down beyond what it already is. T21 needs to be stripped of overly burdensome design standards if we ever want to see a rebound in housing permits.

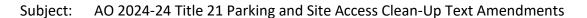
Thank you for the opportunity to provide comment.

Please note, our new office location is 615 E. 82nd Ave. Suite 101, Anchorage, AK 99518.



April 9, 2024

Anchorage Assembly 632 W. 6th Avenue Suite 250 Anchorage, Alaska 99501



Hello Anchorage Assembly Member's,

I would like to encourage you to become comfortable with the idea of deleting all design standards and specifically tables 21.07-2 and 21.07-3 in tonight's ordinance. Title 21's design standards only make housing more expensive and as you can see below in this case, uglier. The wording of Table 21.07-3 C. is so vague that I still think my proposed building, a single-family house in Eagle River meets the code but the MOA Planning Department said it did not, so I changed my building and obtained a permit.



As you can see in the photo this home features a front porch with a post and roof above that are in line with the front of the garage. This home was held up during a recent zoning plan review because it did not meet the MOA planning staff's interpretation of Table 21.07-3 C. In any other section of Title 21 a covered deck is treated as part of the building but for some reason Planning staff chose to ignore the front porch or even the second floor above and measured the standard below in relation to the wall with the front door.

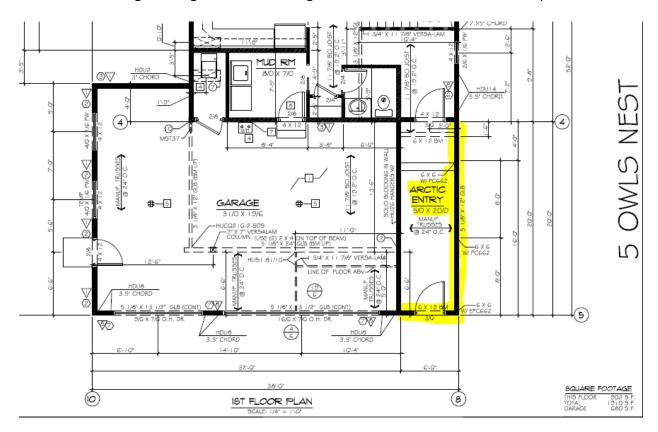
Excerpt from Table 21.07-3

- 1		9 99	
	C.	Maximum allowed distance a garage may project out in front of the rest of the street-facing residential building elevation	
- 1	_		4=04

My first response to this initial plan review comment was to argue that the building did meet the code. Then the MOA held an internal meeting with Senior Staff from Long Range Planning to establish the interpretation of the department. I was told the garage would be measured from the wall containing the front door, which still confuses me but also wreaks the most havoc on the community.



Get ready, this is where things get weird. I then added walls to my front porch to create a long dark tunnel where the friendly front porch used to be and my permit was approved. The result is a less interesting building with less building articulation that costs more money. WINNING!!!



The residential design standards don't work, are having the opposite effect of what was intended and are making our house more expensive. Given that construction costs have increased over 40% in 3 years and mortgage interest rates have more than doubled, Anchorage housing cannot afford such a ridiculously failed set of codes. I suggest getting rid of them.

Sincerely,

Spinell Homes, Inc.

Andre Spinelli

[EXTERNAL EMAIL]

See attached and below.

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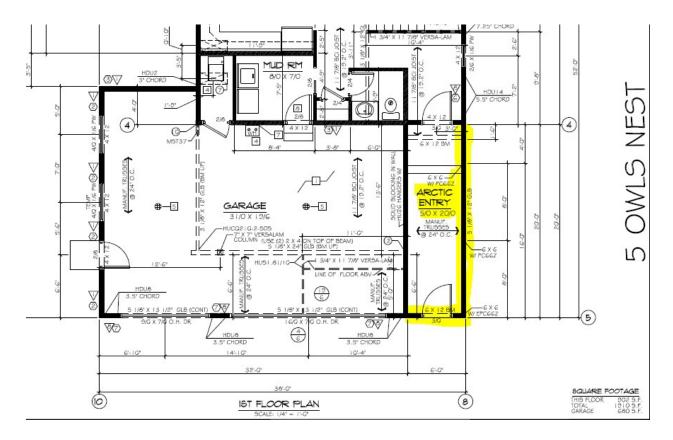
As you can see in the photo this home features a front porch with a post and roof above that are in line with the front of the garage. This home was held up during a recent zoning plan review because it did not meet the MOA planning staff's interpretation of Table 21.07-3 C. In any other section of Title 21 a covered deck is treated as part of the building but for some reason Planning staff chose to ignore the front porch or even the second floor above and measured the standard below in relation to the wall with the front door.

Excerpt from Table 21.07-3

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	front of the rest of the street-facing residential building	0 0 ,
	elevation	building elevation

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