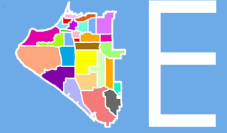


APPENDIX



# *Anchorage 2040 Land Use Plan*

A Supplement to Anchorage 2020 - Anchorage Bowl Comprehensive Plan



## Appendix E: Public Comments Compilation

For Planning and  
Zoning Commission  
Recommended Draft 2040  
LUP, dated June 5, 2017

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**PZC Case No. 2016-0127**  
**Anchorage 2040 Land Use Plan**  
**Public Hearing Draft**

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**Appendix E-1**

(formerly D-1)

**Public Comments**

**(Received through November 1, 2016)**

*Organizations and Agencies,  
Community Councils, and the General Public*

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# Table of Contents

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	<i>page</i>
<b>Comments Received – Agencies and Organizations</b> .....	1
1. Alaska (SOA), Department of Fish and Game, Holly Zafian .....	3
2. Alaska (SOA), Department of Natural Resources, The Trust Land Office, Craig Driver.....	4
3. Alaska (SOA), Department of Transportation and Public Facilities, Division of Program Development, James Starzec.....	5
4. Alaska (SOA), Department of Transportation and Public Facilities, Planning & Administrative Services, Central Region, Aaron Jongenelen.....	13
5. Anchorage Chamber of Commerce, Walter Wilcox.....	17
6. Anchorage Citizens Coalition, Cheryl Richardson .....	18
7. Anchorage (MOA), Watershed & Natural Resources Advisory Commission .....	24
8. Cook Inlet Housing Association, Jeff Judd.....	26
9. Debenham Properties, Greenland LLC, Shaun Debenham .....	29
10. DOWL, Tim Potter .....	33
11. Habitat for Humanity, Elaine Phillipps .....	37
12. University of Alaska, Facilities & Campus Services, Chris Turletes .....	38
<b>Comments or Resolutions Received – Community Councils</b> .....	41
13. Fairview Community Council, Allen Kemplen.....	43
14. Rabbit Creek Community Council, Adam Lees .....	55
15. South Addition Community Council, Jeffrey Manfull.....	58
16. Turnagain Community Council, Anna Brawley and Cathy Gleason .....	64
17. University Area Community Council, Paul Stang.....	95

# Table of Contents (continued)

---

	<i>page</i>
<b>Comments Received – General Public</b> .....	97
18. Andersen, Seth .....	99
19. Arnold, Teresa .....	102
20. Carnahan, Mara .....	103
21. Danner, Jackie .....	104
22. Devenport, Dael.....	105
23. Dusel, Janie.....	106
24. Forest Park Drive Property Owners .....	109
25. Goforth, J. Penelope.....	117
26. Havelock, John .....	118
27. Holmes, Dianne .....	119
28. Holubik, Genevieve .....	121
29. Isaacs, Marnie and Jon.....	122
30. Korpi, Jacquelyn .....	125
31. Langdon, Mary G.....	126
32. Marshall, Jordan and Susan .....	127
33. Morgenthaler, Boyd.....	128
34. Pease, Nancy .....	129
35. Ramsey, Sandra .....	132
36. Schoellhorn, Janine .....	134
37. Thurber, John.....	135
38. Traber, Fred .....	136
39. Veltre, Kathryn.....	139

# Table of Contents (continued)

---

	<i>page</i>
40. Walkinshaw, Patrick Solana .....	140
41. Wilber, Michelle .....	142
<b>February 29, 2016 Community Discussion Draft Comments</b> (Unintentionally left out of previous compilation of Community Discussion Draft) .....	143
41. Alaska Railroad, Brian Lindamood .....	145
42. South Addition Community Council, April 21, 2016 .....	146

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# Agencies and Organizations

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## Land Use Plan Map

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**From:** Zafian, Holly K (DFG) <holly.zafian@alaska.gov>  
**Sent:** Monday, October 17, 2016 4:51 PM  
**To:** Land Use Plan Map  
**Cc:** Seitz, Jody L; Meehan, Joe (DFG); Massie, Tammy M (DFG); Carter, Marla M (DFG); Marie, Megan E (DFG); Battle, David; Baumer, Jay A (DFG)  
**Subject:** FW: news from Long Range Planning

Good afternoon,

The Alaska Department of Fish and Game (ADF&G) has reviewed the Anchorage 2040 Land Use Plan Public Hearing draft. ADF&G manages the Anchorage Coastal Wildlife Refuge (ACWR). While much of the ACWR is located outside of the Anchorage Bowl Land Use Plan Boundary, development and activities along its border can affect the fish, wildlife, habitat, and user experiences within the refuge. ADF&G supports the plan's designation of Open Spaces along the ACWR boundary. ADF&G continues to oppose Airport Expansion areas that would cross into the ACWR.

Thank you for the opportunity to review and comment on this draft of the Anchorage 2040 Land Use Plan. ADF&G would like to continue to be involved with the municipality's land planning process. Please feel free to contact me if you have any questions or if you'd like to discuss our comments.

Holly Zafian  
Habitat Biologist  
Access Defense Program  
Alaska Department of Fish and Game  
333 Raspberry Road  
Anchorage, Alaska 99518  
Phone 907-267-2292  
Fax 907-267-2859  
Email [holly.zafian@alaska.gov](mailto:holly.zafian@alaska.gov)

## Land Use Plan Map

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**From:** Driver, Craig A (DNR) <craig.driver@alaska.gov>  
**Sent:** Monday, October 17, 2016 4:56 PM  
**To:** Land Use Plan Map  
**Subject:** Alaska Mental Health Parcels - Northwest Corner of Northern Lights/Bragaw

The purpose of this email is to express concerns over the latest iteration of the 2040 LUP Map and the proposed designation of the lands referenced above which are owned by the Alaska Mental Health Trust Authority ("AMHTA"). The lands surround the Whaley School and provide a significant footprint for future development adjacent and to the north of the UMed District. The lands in this area are predominantly zoned PLI currently and have been used for programmatic or charitable purposes for decades.

The exception to this general categorization of uses would be approximately 12 acres directly adjacent to the intersection with frontage on both Northern Lights and Bragaw. This area is undeveloped and designated as Urban Residential-High in the proposed 2040 LUP Map. While we are interested in exploring the proposed use, it is likely that the market will dictate a wider mix of uses which may include the Urban Residential-High proposed use, but could very likely require additional commercial uses to make development economically feasible.

The area currently has physical constraints which include existing buildings, access challenges, overhead power lines traversing across critical areas of the site, several segments of the Chester Creek pathway system that may require relocation to allow for development of this type, and the as-of-yet unknown resolution to the potential construction of the Northern Extension roadway to the south of the intersection. These issues combined with the overall size of the property lend it to a more horizontal, mixed-use approach that could allow for compatible uses including the Urban Residential-High use proposed in the 2040 LUP Map, but which could also include separate footprints of strictly commercial buildings.

Certain adjacent AMHTA lands in this area also are shown as University or Medical Center in the proposed 2040 LUP Map. The outcomes resolving some of the above mentioned development challenges could very well change the overall feasibility of a specific proposed use such as Urban Residential-High or University or Medical Center, and the existing PLI zoning and existing buildings/leases require thoughtfulness to flexibility in how these lands are used and developed in the future. We respectfully request the following:

1. Flexibility in how the proposed zones are applied to existing structures and future uses of those structures given the current PLI zoning;
2. Flexibility in how the proposed boundaries of these zones are applied to the AMHTA parcels; and
3. The option to develop compatible uses from any of these zones (Urban Residential-High, University or Medical Center, and PLI) within the footprint of the AMHTA owned parcels.

We are available to discuss more specific resolutions with respect to this submittal and thank you for your consideration.

Best regards,

**Craig Driver**

Asset Manager  
The Trust Land Office  
2600 Cordova Street, Suite 100  
Anchorage, AK 99503  
Direct: 907-269-8735  
Main: 907-269-8658  
craig.driver@alaska.gov



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Transportation and  
Public Facilities

DIVISION of PROGRAM DEVELOPMENT  
Anchorage Field Office

4111 Aviation Avenue  
P.O. Box 196900  
Anchorage, Alaska 99519-6900  
Main Phone: (907)269-0520  
Fax: (907)269-0521  
Web site: dot.state.ak.us

October 7, 2016

Terry Schoenthal, Current Planning Section Manager  
MOA, Community Development Department, Planning Division  
P.O. Box 196650  
Anchorage, Alaska 99519-6650

RE: MOA Zoning Review, Case 2016-0127

Dear Mr. Schoenthal:

The Alaska Department of Transportation and Public Facilities (DOT&PF), Division of Program Development, Anchorage Field Office recommends that the Municipality of Anchorage's Planning and Zoning Commission should not support the adoption of the Anchorage 2040 Land Use Plan and Map (LUP) by the Assembly until the document is amended to include a commitment to addressing transportation issues before zoning and redevelopment plans are implemented.

The DOT&PF, along with a number of other organizations and individuals, made comment during the public review period that the LUP would have significant impacts to the transportation network. Alaska Statutes 35.30.010 and 19.20.080 require the municipality and state to work together to preserve the function of the National Highway System (NHS) and Interstate roads as a network to facilitate regional mobility. Many of the goals and strategies outlined in the LUP may have the unintended consequence of deteriorating the effectiveness of the NHS, to the detriment of the transportation network and land use plan as a whole. Having a coordinated transportation strategy in place to deal with these systemic conflicts is necessary before carrying out the actions of the LUP.

To help further articulate our concerns, please find enclosed a selection of comments highlighting some of the issues. The DOT&PF has committed to supporting the municipality in the development of the LUP and looks forward to continuing to provide assistance. By delaying adoption, the municipality will be afforded the time to fully align the LUP with transportation development strategies that support its goals while maintaining the effectiveness of the system.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Starzec".

James Starzec  
Anchorage Area Planner

Enclosure: LUP Review Comments

Cc: Tucker Hurn, Right of Way Agent, Right of Way, DOT&PF  
Scott Thomas, P.E., Regional Traffic Engineer, Traffic Safety and Utilities, DOT&PF  
Jim Amundsen, P.E., Highway Design Group Chief, DOT&PF

# LUP PROJECT NAME: Anchorage 2040 Land Use Plan

## Review PROJECT NUMBER:

	Confirmation of action taken on comment by:
DATE: 10/7/16 REVIEWER: SET SECTION: TS PHONE: 269-0639	

<p>In Sheet No. column, use a 1 for General comments, X for estimate comments, Y - pg # for Specifications, and Z - pg # for DSR, and the alpha numeric pg # of Plan sheets (use an A if no Alpha is used on the plan sheets)</p> <p>In the Section column below please use your assigned Functional group identifier: Right-of-Way = RW; Traffic/Safety = TS; Highway Design = HD; Materials = M; Bridge Design = B; Survey = SC; Internal Review = QC; Construction = C; Utilities = U; Specifications = S; Review Engineer = RE; Maintenance = M&amp;O.</p>					
Item No.	Sheet No. / Page No.	By	Comment	Recommendation/Response?	Meeting Note

1)	2	TS	<p>Mobility and Access. Missing from statement – “and with a priority on maintaining the principal function of each roadway according to its classification.” Accessibility as defined cannot be at the same level or quality for all roads. For the NHS Interstate and Intermodal routes – these roads have a mobility priority and purpose with reduced accessibility. Accessibility and crossings on these highest principal routes need to be maximized via alternative routes. This needs to be stated as it is part of DOT and FHWA’s mission.</p>		
2)	11	TS	<p>LUP 1.5 does not seem to be fully accounted for in this LUP Draft. We had to go to the MTP to verify coordination by looking for the same areas of increased density, infill were planned, and that the MTP supports this by “getting the red out” through a slate of intended and fiscally constrained projects.</p> <p>The MTP logic supports the LUP, but this is not demonstrated in the LUP:</p> <p>Fig 5-4 MTP has growth on Tudor-Muldoon          Fig 5-19 has No Build failures in growth areas Tudor Muldoon, Midtown          Fig 5-26 has LOS resolved - with capital projects in 5-22 and 5-24 -- these are not lane reduction projects and are not identified as lower mobility corridors through lower speeds and more signals. These are typically managed access corridors in their MTP scope.</p> <p>These applicable MTP figures are not mentioned in this report – so is there really an “accounting” documented in the LUP – the LUP depends upon the 2035 MTP for success in supporting transportation.</p>		

**LUP PROJECT NAME: Anchorage 2040 Land Use Plan**

**Review PROJECT NUMBER:**

	<p><b>DATE:</b> 10/7/16  <b>REVIEWER:</b> SET  <b>SECTION:</b> TS  <b>PHONE:</b> 269-0639</p>	<p>Confirmation of action taken on comment by:</p>

3)	14	TS	<p>Goal 6 leaves no flexibility relative to road function required by Statute as written. DOT/PF requests this section be expanded to recognize accessibility and mobility changes with roadway function.</p> <p>Disagree accessibility can be raised as the broader goal in all cases. This is inconsistent with the MTP on principal corridors calling for Access management and control – such as the Tudor Road corridor, and the Seward to Glenn Highway connection in midtown and east of downtown.</p> <p>Mobility as defined here is the broader goal for the State and FHWA on the NHS Interstate and Intermodal corridors – connecting other cities and ports/airports. Alaska Statute requires the City and State preserve the Statewide function on these classes of principal arterial roads in local planning. The MTP currently recognizes this and accomplishes this overall through its slate of 2035 road projects and capacity targets.</p> <p>Both the MTP and LUP are not keeping up with the Muldoon Corridor performance which requires access management and collector road support due to congestion and safety – and as a natural extension of freight routing coming from the west Tudor Road.</p>		
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**LUP PROJECT NAME: Anchorage 2040 Land Use Plan**

**Review PROJECT NUMBER:**

	DATE: 10/7/16 REVIEWER: SET SECTION: TS PHONE: 269-0639	Confirmation of action taken on comment by:

4)	15	TS	<p>DOT could require MOA assistance in providing higher levels of M&amp;O for local access - not something we are funded and equipped to do at a desirable level for maximum local use. The State has a primary responsibility to prioritize plowing, patching, traffic control, etc. for statewide mobility and intermodal connectivity, with local accessibility as a second goal.</p> <p>How does the LUP and MTP balance needed M&amp;O with growth when M&amp;O budgets are decreasing rapidly at all levels of government?</p> <p>Absent other funding sources, by Code, 17 AAC 10.020, DOT/PF will have to consider which costs are the responsibility of MOA for local accessibility impacts to infrastructure that reduces statewide mobility, such as increased signal density and other infrastructure enhancements such as added multimodal space and lanes beyond a minimum usable space.</p>		
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**LUP PROJECT NAME: Anchorage 2040 Land Use Plan**

**Review PROJECT NUMBER:**

	Confirmation of action taken on comment by:
DATE: 10/7/16 REVIEWER: SET SECTION: TS PHONE: 269-0639	

5)	19	TS	<p>Areas of Growth – The MTP is not just illustrative as if it can be deferred while moving ahead with the LUP – it should be clearly state the MTP plan is critical to Tudor, Seward/Ingra/Gambell, Minnesota and C Street and that those related projects remain a goal from the MTP 2035.</p> <p>Without improvements to these corridors and connecting collectors – the MTP will not be able to address land use trip generation by all modes, and the MTP will then fail its performance measures. This concerns the State on NHS Interstate and intermodal facilities.</p> <p>The Muldoon Corridor lacks MTP projects at the Collector level to address intended growth. As stated later in the LUP, Collectors should be a prerequisite to added Muldoon infill and redevelopment. (Oklahoma, Duben, Patterson, Peck/Boundary connectivity, etc.)</p> <p>C Street and Dimond areas also have adequate arterials in place, however, Collectors should be prerequisite to added infill and development (92<sup>nd</sup> Ave; Arctic Blvd, 100<sup>th</sup> Ave etc. as determined in the MTP).</p> <p>The Boundary area at Boniface to Muldoon sorely needs Collector planning to get to these arterials</p>	
6)	32	TS	<p>Regional Commercial Center. Disagree with language recommending complete disconnect from neighborhoods. Instead, access can be managed to prevent cut-thru, but access can also be beneficial to neighborhoods and arterials. Other modes and local trips can be more safely served without going on and off the arterial to conflict with other cross-city traffic. Internal connections prevent on and off trips into degrading arterials, including walking and biking should not be forced onto arterial access. Transit and local trips could also be served internally.</p>	

**LUP PROJECT NAME: Anchorage 2040 Land Use Plan**

**Review PROJECT NUMBER:**

	Confirmation of action taken on comment by:
DATE: 10/7/16	
REVIEWER: SET	
SECTION: TS	
PHONE: 269-0639	

7)	38, 40	TS	Anchor facilities. Request these additionally be noted as "intermodal" facilities to represent how they are key to the Statewide economy and not just local or regional.		
8)	49	TS	DOT/PF concurs the 2040 LUP should be updated and amended to reflect any major changes in transportation plans and projects.  Most notably – any changes to the Seward and Glenn Highway, Tudor Road, Minnesota Drive or other corridor projects that are critical to the 2035 MTP level of service. Deletion or alteration of these MTP projects means the adjacent land use affecting the need for those projects should be reevaluated.		
9)	49	TS	Calling these projects potential or illustrative does not convey their importance to the LUP.  Projects for the Seward and Glenn Highway, Tudor Road, Minnesota Drive should be listed as critical – key components to enabling the LUP. Without Seward to Glenn or UMed – this alters the capacity of roadway to absorb more employment trips by any modes. DOT does not see any modeling that reduces trips below existing with this land use, thus capacity will suffer.		
10)	51	TS	3.1.B Capital Improvements. DOT does has its own STIP process. But don't all projects go through AMATS and the TIP – so owe are unified and there is really ONE process? This sounds as if we don't coordinate.		



# LUP PROJECT NAME: Anchorage 2040 Land Use Plan

## Review PROJECT NUMBER:

	Confirmation of action taken on comment by:
DATE: 10/7/16	
REVIEWER: SET	
SECTION: TS	
PHONE: 269-0639	

11)	56, 62, 63	TS	<p>Muldoon, Gambell/Ingra, Tudor – Special Study Areas. Even Spenard. These are the areas where DOT believes transportation plans are a prerequisite to land use changes. The transportation function and plans in these areas are larger than the area themselves – and are so critical to the MTP performance that any land use changes have to demonstrate compatibility with those corridors and planned projects before they occur.</p> <p>The key is not to wait for the primary corridor project alone. These Special Area Studies need to connect to the Collector strategies listed later under Goal 6-1. Identifying, preserving, upgrading and sometimes adding Collectors are the key to these areas.</p>	
12)	64	TS	<p>Concur with identifying street typologies and goals. However, recognize right of way and utilities are a premium on most arterials, and adjacent Collectors are intermittent if at all. Functional class of NHS Interstate and Intermodal routes will need to prioritize mobility and may result in a different typology than other arterials. M&amp;O costs and abilities may also limit the typology acceptable on state roads, or at least the enhancements and added traffic control for that typology.</p> <p>Consider allowing shared landscape and "complete" credits in partnership with private owners – as all parties are short on space for landscaping and walkways in some cases – and could pool efforts towards one combined facility to make a street and adjacent land use complete. Was called "superblocks" in the past midtown efforts.</p>	

**LUP PROJECT NAME: Anchorage 2040 Land Use Plan**

**Review PROJECT NUMBER:**

	DATE: 10/7/16 REVIEWER: SET SECTION: TS PHONE: 269-0639	Confirmation of action taken on comment by:

13)	67	TS	Actions Map. Muldoon, Tudor, Midtown, South C Street and Old Seward target areas need a prerequisite to identify collectors and plan for them before targeting redevelopment. This is necessary to maintain the mobility functions of the main roads (other than Old Seward Hwy).		
-----	----	----	---	--	--

## Land Use Plan Map

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**From:** Jongenelen, Aaron M (DOT) <aaron.jongenelen@alaska.gov>  
**Sent:** Monday, October 17, 2016 4:45 PM  
**To:** Davis, Tom G.; Land Use Plan Map  
**Cc:** Thomas, Scott; Amundsen, James (DOT); Starzec, James A (DOT); Post, David E (DOT)  
**Subject:** Municipality of Anchorage 2040 Land Use Plan Supplemental Comments from DOT&PF  
**Attachments:** 2016-0124 October - Supplemental Comments.pdf

Tom,

These comments are in addition to the ones already submitted by James Starzec. Please let me know if you have any questions.

Thank you.

Aaron Jongenelen  
AMATS Transportation Planner  
Alaska DOT&PF: Program Development, Anchorage Field Office  
(907) 269-0515



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Transportation and  
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October 17, 2016

Tom Davis, Senior Planner  
MOA, Community Development Department  
Planning Division  
P.O. Box 196650  
Anchorage, Alaska 99519-6650

RE: 2040 Land Use Plan Supplemental Comments

Dear Mr. Davis:

Attached you will find technical comments/edits that are being provided in addition to the comments submitted on October 7<sup>th</sup>, 2016 for MOA Zoning Case 2016-0127. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aaron Jongenelen".

Aaron Jongenelen  
AMATS Transportation Planner

Attachment: 2040 Land Use Plan Supplemental Comments

Cc: Scott Thomas, P.E., Regional Traffic Engineer, Traffic Safety and Utilities, DOT&PF  
Jim Amundsen, P.E., Highway Design Group Chief, DOT&PF  
James Starzec, Anchorage Area Planner, DOT&PF  
David Post, Surface Transportation Manager, DOT&PF  
Craig Lyon, AMATS Coordinator

*"Keep Alaska Moving through service and infrastructure."*

## 2040 Land Use Plan Supplemental Comments

Page 3 – First bullet: Add “AMATS” (spell out as needed) before “Metropolitan Transportation Plan”.

Page 3 – Second bullet: Recommend adding the Areawide Trails Plan.

Page 3 – Graphic; This graphic is a little misleading as it shows the TIP directed by the Comp Plan and Land Use Plan when it is not. AMATS directs the TIP through its own process. Also there is no mention of the STIP which plays an integral part in capital investments within the Municipality of Anchorage. While the Comp Plan and Land Use Plan do not direct the TIP and STIP, they do provide input and it should be recognized as such. Recommend the following be added:

- Add AMATS to the TIP box and add an \* saying “Adopted by AMATS.”
- Add a STIP box and add an \* saying “Adopted by the State of Alaska.”
- Move both under the Capital Improvements box in their own box

Page 12 – LUP 3.2 Does not talk about coordination with partner agencies. Recommend adding in a statement about coordinating with partner agencies on transportation related changes. Has there been discussion that coordination could be a goal of its own?

Page 49 – First sentence; Instead of “Anchorage’s” it should state “AMATS” (spell out as needed), because the MTP is an MPO document which is separate from the Municipality of Anchorage.

Page 49 – The word “illustrative” is used twice in the Major Streets section and it is recommended this word be changed to either, “shown” or outlined”. ‘Illustrative’ is too close to the word ‘illustrative’ (a funding term) used in the MTP and TIP for projects that are outside the timeframe of the program. The projects listed in this section (KAC, U-Med, and Seward Highway to Glenn Highway) are within the timeframe of the currently adopted AMATS Interim 2035 MTP.

Page 51 – Capital Improvements; The first sentence should have AMATS before the TIP.

Page 51 – Capital Improvements; The first sentence talks about the TIP being a primary planning and budgeting process for the Municipality. This is incorrect. Remove the AMATS TIP from this sentence and start a new one. The TIP is a 4-year program outlining funding for transportation projects within the MPO boundary. The TIP is not a budgeting tool and is not what determines the costs of projects. Recommend working with AMATS/DOT&PF to determine the best way to talk about the TIP in this section.

Page 51 – Capital Improvements; Sentence two needs to be changed as the TIP does not span a 6 year period. It is a 4 year funding program.

Page 51 – Capital Improvements; Sentence 3 should also include the fact that the Airport has its own capital improvement process as well.

Page 51 Capital Improvements; The STIP should be called out directly in this section as it is another funding program that provides significant capital investments within the Municipality of Anchorage. Recommend working with DOT&PF Planning staff to outline a quick sentence or two.

Page 53 – Strategy 2; This strategy should include a statement about coordinating with partner agencies, especially DOT&PF. A number of the reinvestment areas directly impact facilities managed and owned by partnering agencies.

Page 53 – Strategy 8; Any changes within the area can have a direct impact on systems managed by partner agencies. This strategy should include a statement about coordination with partner agencies.

Page 58 – Table 3 has some confusing acronyms. Recommend the following changes:

- Planning-AMATS = AMATS.
- ADOT = ADOT&PF or DOT&PF.
- Remove TSAIA and JBER from Airports definition. TSAIS already has its own acronym.
- Railroad change to ARRC.
- Add JBER acronym.

Page 60 – Table 4:

- Add AMATS to 2-2
- Add AMATS to 2-3
- Add AMATS to 5-1
- Add AMATS to 5-2 or removed the TIP from the description. AMATS makes the decision for the criteria regarding the TIP, not the MOA.
- Add Highway to 5-3 description.
- Recommend adding a 5-3b that states – “Direct land development and reinvestment towards areas that can accommodate growth with minimal impacts to the efficiency and safety of the transportation system and other public infrastructure.”
- Add Planning to 6-1. Planning plays a critical role in coordinate with agency partners.
- Add Utilities to 6-1. Utilities has a very important role in transportation development.
- Add Planning and ADOT&PF to 6-5.
- Add ADOT&PF and AMATS to 8-6.
- Add ADOT&PF, AMATS, PM&E, and Traffic to 8-8. Park designations have significant impacts to transportation development. This needs to be coordinated with the transportation partners.
- Add ADOT&PF and AMATS to 9-1.
- Add ADOT&PF, AMATS, and Traffic to 9-2.
- Add Traffic to 9-3.
- Add AMATS, ADOT&PF, and Traffic to 9-6.

## Land Use Plan Map

---

**From:** Walter Wilcox <jr.wilcox@pbchemical.com>  
**Sent:** Thursday, October 6, 2016 4:46 PM  
**To:** Seitz, Jody L; Land Use Plan Map  
**Cc:** Bruce Bustamante  
**Subject:** Anchorage Chamber LUPM Comments

The Anchorage Chamber of Commerce would like to reiterate the concern we expressed in our last set of comments that the shortage of housing stock suitable for a professional/technical workforce is prohibiting our member businesses from growing. Bold action is needed to facilitate more housing at reasonable pricing in the Anchorage Bowl.

We applaud your efforts to finalize the long overdue adoption of this map in an expeditious manner. However, we believe this map will do little by itself to alter land use patterns in Anchorage if is not translated into actual zoning. The small targeted rezonings contemplated in the report are not going to be enough by themselves. We would urge you to reconsider the decision to not to do a much broader municipal-led rezone.

For instance, the municipality might send a mailer to all property owners whose property would be eligible to change to a new zoning type in conformance with the new map. The mailer would explain the new zoning on offer, and if the landowner agreed, the property would be automatically rezoned in conformance with the new map. Perhaps the property owner would need to send a payment to cover the transaction fees so that the effort was not a net cost to the municipality. The public notice for such a bulk rezone should be handled as a single process, instead of separately for each parcel.

Also, we wanted to reiterate our view that it is important to preserve an industrial land base in Anchorage to provide for future development. Several sections of the proposed plan make mention of allowing for rezones of industrial land for commercial purposes. This is not bad thing in and of itself, but should be coupled with a 'no-net-loss' policy for industrial land. Under a 'no-net-loss' policy, other lands should be moved to industrial zoning to offset the loss. Industrial lands should be consolidated in developable areas near other industrial lands, preferably in the areas near the port, railroad, and airport. PLI and T-zoned lands should be re-zoned as industrial lands where possible.

Actions should include acquisition of additional land where possible, consolidation of small lots, and partnering with utilities to find ways to lower the up-front cost of development.

Especially, the action list needs to include a review of the DCM to ensure it is not effectively used as a separate body of law. Internal policies and procedures determined to effectively be regulations should be consolidated into a public document that would reviewed and formally adopted by the Assembly. Any future policies with the force of regulation should go through a similar public process before they could be enforced.

Thank you,

JR Wilcox  
Chairman



## **Anchorage 2040 Land Use Plan Public Hearing Draft Comments November 1, 2016**

We regret to say that these comments were rushed, without a complete and thoughtful review of the entire document and without adequate discussion as to how the plan will affect our community over the long term. The few days allotted to review this latest draft, and the few public meetings that were offered were plainly inadequate given this plan's importance to our city's future.

**Citizens have had to comment on this second draft without having received feedback on our first round of comments.** We are left to second guess staff's reasoning why some previous recommendations were accepted and some were not.

While this truncated review meets the letter of Anchorage's public process standards, it does not meet its intent for meaningful public involvement. Following last year's rushed approval of AO 2015-100, **it begins to appear that development interests are being given more value than the comments and concerns of citizens and homeowners.**

Informed and involved citizens understand that the city will change as it grows. Neighborhoods are willing to accept changes. For example, **Anchorage 2020 polling 17 years ago demonstrated a clear preference for urbanizing the city's core and improving neighborhoods throughout the community over continuing past growth patterns and sprawled growth into Mat Su.** Now this plan is providing definition. Staff has clearly invested much forethought to protecting Anchorage's quality of life while it grows more dense. We agree that infill should be done well, and especially appreciate provisions that support Phasing of Growth and Investment, Reinvestment Focus Areas, Traditional Neighborhood Design and future decisions based on meaningful public process.

At the same time, there are two areas that still need significant refinement:

- **transportation investments need to serve a broader array of community goals** and shift a significant portion of investments from wide, fast roads to building transit and safe walking.
- secondly, summarily **changing existing zoning districts to add height and density,** especially in the urban core, must not be allowed until there has been a **meaningful public process that establishes reasonable infill standards.**

### **Transportation Investments**



While the Land Use Plan's single transportation goal speaks to safe, efficient, affordable transportation choices:

*"Anchorage coordinates transportation and land use to provide safe, efficient and affordable transportation choices,"*

the plan's language tends to assume that **Anchorage will build additional roadway capacity to support infill and redevelopment, rather than shifting investments to significantly grow transit and walking, even in the urban core.**

For example: the first transportation action 6-1 states:

*"Coordinate with agency partners to develop a working list of additional local and collector street connections, intersection and access improvements, and pedestrian connections that are needed to support infill and redevelopment neighborhoods, centers and corridors targetted (sic) to experience growth and change, such as along Lake Otis and Tudor near the UMED District."*

Instead, the plan should include strategies that redirect auto travel into becoming one of several transportation choices as we travel among home, work, school and other daily activities.

**If new jobs and homes locate in the City and Town Centers without new transportation policies and programs in place, the result will be increased traffic congestion and growing parking demand.** Existing and new jobs may locate elsewhere if such problems are not anticipated and addressed. Existing neighborhoods need active transportation choices in order to welcome infill and redevelopment.

**It is very costly to both families and government to depend so heavily on auto travel for our mobility.** Auto ownership and maintenance cost suburban households 25 percent of their budgets according to the FHWA. Urban households located closer to jobs and shopping can reduce their costs to 10 percent or less.

One way to begin balancing transportation investments and build a multi-modal system will be to **screen all transportation projects - including transit, bike and walk - using rudimentary benefit-cost analyses that consider accessibility, mobility, economic vitality, environmental effects, social equity, funding, finance, the transportation system, land use, growth management and livability.**

Revised Action 6-1:

Anchorage's Metropolitan Transportation Plan will institute benefit-cost analyses to screen all proposed transportation investments considering accessibility, mobility, economic vitality, environmental effects, social equity, funding, finance, the transportation system, land use and growth management, livability.

Concentrating growth in and near City and Town Centers by attracting a greater percentage of new businesses and residents than has occurred historically will reduce vehicles miles

traveled per capita in the urban core, improve air quality and enhance the quality of life for residents. Transit investments will assume an increased role in providing connectivity and access. **People living near their work places are more likely to walk, ride bicycles, or use public transit to get to work.**

Revised Action 6-2:

Create a priority list of high volume streets currently cutting through residential neighborhoods to consider for redesign with the goals of making the streets more compatible with adjacent land uses and also safe and comfortable for transit use and walking. Criteria for selecting these streets will include proximity to City and Town Centers, current and planned employment and residential densities, proximity to schools and park space, posted speeds compared with 85th percentile speeds.

### **Adding height and density to existing zoning districts**

Two provisions in this draft increase height and density within existing zoning districts and are likely to take property owners unpleasantly by surprise:

*“Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story .” page 29*

and

*“To provide greater housing opportunities, areas up to a half mile from designated City Centers may allow increased density. This is subject to compatibility standards for scale, design, lot coverage, setbacks, and alley driveway access.” page 28*

While citizens may agree to infill and redevelopment, it needs to be done well, and improve Anchorage's neighborhoods, not overwhelm their character or add unnecessary traffic and parking burdens as previously discussed.

Recent up-zonings in South Addition were approved supposedly because the city urgently needs additional housing, but the projects lacked basic neighborhood protections.

The plan provides a number of safeguards for established neighborhoods, including: Action 4-4 provides for neighborhood compatibility standards: *"Amend Title 21 to allow compact housing on R-2M or R-3 zoned lots near designated Centers. May include increased height or allowed units per lot, subject to additional urban design and neighborhood compatibility standards. Determine appropriate measures through a public process."*

Action 7-3 secures compatibility standards: *"Incorporate neighborhood compatibility standards in compact housing amendments in Actions 3-4, 4-3, 4-4, 4-6, 4-7, and 4-8."*

Action 7-4 offers an overlay district: *"Adopt a Traditional Neighborhood Design zoning district or overlay zone for urban neighborhoods, which reflects adopted plans. Incorporate 'form based' regulations and structure the code to accommodate neighborhood differences and characteristics."*

These are reasonable protections. At the same time, **it is critically important that these provisions not be weakened or even eliminated by special interests with more political power than neighborhoods.**

Action 4-4 can be strengthened by adding: "Amend Title 21 to allow compact housing.... **Determine appropriate measures through a public process that includes meaningful collaboration with neighborhoods and formal public hearings.**"

The remaining comments generally recommend specific edits to strengthen goals and actions for transportation, infill and redevelopment and future public processes.

page 1 column 1

"Anchorage 2020 envisioned a more compact and efficient land use pattern served by active transportation connections and transit in and around mixed use centers, while preserving lower intensity...."

page 1 column 3

Its emphasis on place making strengthens this plan, while it also highlights the challenge of focusing municipal investments in order to produce even a few truly "great places" over the next several years.

page 1 column 3

"The core purpose of the 2040 LUP is to manage land uses and shape transportation investments to improve the quality of life for all residents during times of change."

page 2 column 2

"Compact Development. Use infill and redevelopment with a more compact land use pattern, which supports efficient use of land, lowers the cost of public services, improves performance of transportation systems ~~networks~~ and preserves open space."

page 2 column 3

"Mobility and Access. Develop a transportation system that supports desired ~~aligns with~~ land use and moves people and goods safely with positive impacts ~~low impact~~ on surrounding land uses and the environment, and that makes it easy to choose active transportation ~~maximizes choices and alternative travel modes~~ like walking, bicycling and ~~or~~ public transit."

page 10 column 2

"Mixed-use, walkable centers served by transit will absorb much future growth while infill development is encouraged along multi-modal corridors."

page 11 column 2

Excellent: "It seeks a compatible mix of uses on the same site or between properties that can use the same parking facilities at different times of day."

page 12 column 2

Excellent: "Centers vary in size, location, mix of uses, scale, urban form, and intensity."

Also: "...this strategy will encourage the evolution [of corridors] into mixed use, pedestrian-oriented and transit friendly environments. "

page 12, column 3

Excellent: "Target and coordinate investment in the built environment and green infrastructure, in and around centers and corridors that are most able to absorb housing and employment growth."

page 13 column 3

Excellent: "Coordinated and targeted infrastructure investments catalyze new growth, provide an acceptable return on investment, and equitably improve safety and quality of life. "

page 13 column 3

Excellent: "Availability of infrastructure such as water and sewer, sidewalks, schools and parks, roads, public transit and other services influences whether growth occurs."

page 14, column 1

Excellent: "Phasing allows for flexibility in where and when public service upgrades will occur."

Also: "Coordination of infrastructure projects allows the Municipality to set in motion 'place making' as an economic strategy."

page 14 column 3

"~~Coordinating~~ Phasing land use and transportation actions is especially important in places where a majority of new housing and employment will go."

To repeat: **Anchorage 2020 goals and outcomes should drive transportation priorities, not simple vehicle mobility or level of service. To be successful, this plan must address how fundamental transportation investments are in implementing both Anchorage 2020 and the Land Use Plan itself.**

Emphasis on "accessibility" rather than mobility is helpful. Connectivity is another standard that should be used here.

page 15 column 1

Excellent: Transit and trails are critical to growth, while improving quality of life, and managing road congestion and parking demand.

page 15 column 1

...safely support mixed-use densities. **At the same time, a number of roadways serve as major barriers dividing downtown neighborhoods and midtown shopping areas. They need to be redesigned to reduce vehicle speeds and allow safe pedestrian crossings for people who live there now, and those to come as homes and jobs are added along the corridor.**

page 15 column 3

Correct: "There are concerns about neighborhood character being harmed through the construction of different or larger-scale projects."

page 15 column 3

Correct: "The form and scale that new developments take - more than its density - is increasingly a primary concern."

page 15 column 3

Excellent: "The scale or physical appearance of buildings, noise, glare, shadowing effects of taller buildings, parking and other characteristics can impact neighboring properties."

page 16 column 1

Excellent: "Tools like neighborhood plans and improved development codes will need to can guide new development in ways that help it keep in character and scale with existing homes. **Improving tools that allow neighborhoods to accept new types of housing opportunities without losing their essential character can reduce conflicts between neighbors and developers.**"

**This whole section, of course discusses essential infill standards that need to be protected from weakening or deletion.**

page 25

Excellent: Shared Design Principles.

"'Complete Streets' that accommodate transit, bicycles and pedestrians."

Thank you for the dedication that has gone into preparing this draft. The Anchorage Citizens Coalition looks forward to working with the Municipality and its neighborhoods to refine this plan as it moves towards adoption.

Sincerely,

Cheryl Richardson

**MUNICIPALITY OF ANCHORAGE  
WATERSHED & NATURAL RESOURCES ADVISORY COMMISSION  
RESOLUTION NO. 2016-02**

**A RESOLUTION TO THE PLANNING AND ZONING COMMISSION  
RECOMMENDING APPROVAL OF THE PUBLIC HEARING DRAFT 2040 LAND USE  
PLAN.**

(WNRC Case No. 2016-03)

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WHEREAS, a typical Comprehensive Plan incorporates a Land Use Plan Map; and

WHEREAS, *Anchorage 2020* called on Neighborhood and District Plans to address and implement the land use elements for the Anchorage Bowl collectively; and

WHEREAS, over the ensuing years it became necessary for the Municipality to produce a comprehensive Land Use Plan Map that integrates neighborhood and district plans on a Bowl-wide basis that also incorporates and reflects current development trends, updated demographics and projections, and results of focused planning efforts related to, for instance, housing and industrial land needs; and

WHEREAS, the Municipal Planning Department produced a Community Hearing Draft *Anchorage Bowl Land Use Map* for public comment in February 2016, which included several elements of interest to and relevant for the Watershed and Natural Resources Commission, including recommendations for Natural Open Spaces, Parks, and a new concept labeled Greenway Supported Development, which ties creek and drainage area restoration with linear redevelopment projects and trail systems; and

WHEREAS, it is the responsibility of the Watershed and Natural Resources Commission to advise the Municipal Assembly, Planning and Zoning Commission and other Municipal entities; and

WHEREAS, the natural open spaces and watershed features in the areas designated on the *2040 Land Use Plan* with the “Greenway-Supported Development” overlay feature are extremely important to the health and welfare of the community; and

WHEREAS, the Watershed and Natural Resources Commission provided some preliminary, informal comments to staff at one of its spring 2016 regular meetings, which were considered by staff in the *2040 Land Use Plan* Public Hearing Draft, which has been reviewed by the Commission; and

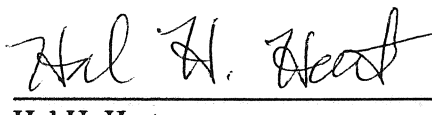
WHEREAS, the Land Use Plan Map, the new designations, and the associated Action Items collectively fairly represent the unique and important natural features and functions in the Anchorage Bowl that will be protected or enhanced by actions in this Plan.

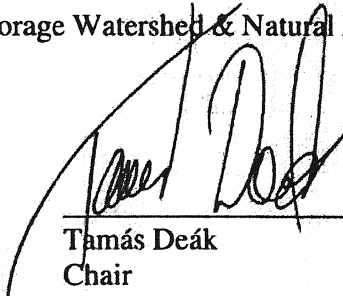
NOW, THEREFORE, BE IT RESOLVED that the Watershed & Natural Resources Advisory Commission recommends that:

- A. The Planning and Zoning Commission approve the *2040 Land Use Plan Public Hearing Draft*, dated September 2016, including its depiction of Greenway-Supported Development areas and corridors, with the following consideration for text additions in the Section 3-Actions Table:

The Section 3 – Actions Table needs implementation language under the *Centers and Corridors* Action Item that directs the Municipality to undertake background research, pursue fund sources, and initiate projects for the priority Greenway-Supported Development designations. This should be initiated with an Action Item directive to undertake historical identification of the channel function and locations and a feasibility evaluation to see whether and how a restoration action could happen here and what fund sources might cover it.

PASSED AND APPROVED by the Anchorage Watershed & Natural Resources Advisory Commission on this 12th day of October, 2016.

 10/13/16  
\_\_\_\_\_  
Hal H. Hart  
Secretary

 10/12/16  
\_\_\_\_\_  
Tamás Deák  
Chair

WNRC Case No. 2016-03



October 17, 2016

Tom Davis  
Municipality of Anchorage  
Planning Department  
4700 Elmore Road  
Anchorage, AK 99507

Re: Land Use Plan Map

Dear Mr. Davis:

On behalf of Cook Inlet Housing Authority (CIHA), we appreciate the Municipality of Anchorage's work updating the Land Use Plan Map.

As both the Regional Housing Authority and the Tribally Designated Housing Entity for Cook Inlet Region, Inc. we have a 40 year record of infill and redevelopment projects in Anchorage's older neighborhoods such as Mountain View, Muldoon and most recently in Spenard. Our projects include both residential and mixed-use developments that we develop, own and operate long term through a variety of partnerships. CIHA's housing and commercial investments in these re-emerging neighborhoods are intended to catalyze additional investment and help the Municipality implement the Comprehensive Plan. They also serve as examples of medium and high density designs.

CIHA's owns 19 parcels at the intersection of Spenard Road and 36<sup>th</sup> Avenue which are zoned both B3 and R2M. We have spent years acquiring and assembling parcels with a history of undesirable uses, crime, contamination, and blight. This year we broke ground on 3600 Spenard, a 3-storey mixed-use building with 33 units of housing and retail on the site of the former PJ's strip club. On the southeast corner of the intersection, we are in the process of remediating a contaminated gas station, and have assembled a variety of parcels with substandard housing; many of these lots lack public water, and roads are strip paved within 30 feet of right away. Simply put, these lots are representative of the significant challenges when it comes to redeveloping our older neighborhoods.

The purpose of this letter is to ask that you re-examine the land use designations in the area of 36<sup>th</sup> and Spenard. We respectfully ask that you strongly consider the following designations:



1. Change the Compact Mixed Residential Low along 36<sup>th</sup> and Wilshire between Spenard and Arctic to Compact Residential Medium. CIHA has acquired 10 lots between Dorbrandt and the commercial properties to the west. Much of this area, due to poor soils and lack of water infrastructure (lots south of Wilshire are on wells), is infeasible at duplex or even townhouse style development. Furthermore, given the large redevelopment focus areas at both Spenard and Arctic and the presence of many older single family homes in need of significant improvements, it is both appropriate and needed to consider R-3 style development. This would also be consistent with the land use designation immediately to the south, accessed from Chugach Way.
2. Change the Compact Mixed Residential Low along the south side of the Chugach Way corridor between Spenard and Arctic to Compact Residential Medium. Chugach Way is designated as some form of greenbelt; much of this stretch should be redeveloped at higher intensities, preserving the lower intensity neighborhoods character once you move into the neighborhood to the south. In particular, a large lot along Fish Creek south of Chugach Way lacks water infrastructure. It will never be developed as an R-2M lot. The most appropriate use of this lot is a higher intensity residential or mixed use building towards Chugach Way, with the “back” portion of the lot reserved for stormwater purposes and or private or public green space, or even a restored Fish Creek.
3. Allow the Urban Residential High between Spenard and Minnesota (currently zoned B-3) to continue to develop as a mix of housing and commercial. Much of this area, due to zoning, is already commercial. Furthermore, streets are strip paved and lack pedestrian amenities; it seems rather than hoping for a larger scale residential use, embracing its mix of uses and scale (mostly medium), and even considering light manufacturing such as the Maker Space and other warehouses in the area, is appropriate for this part of Spenard. Appropriate scale food and beverage manufacturing should also be considered. We do suggest that the land in this area be able to minimally go to 4 stories; current B-3 zoning height is too restrictive, and the LUPM designation for higher intensity supports this premise.

We recommend changes in #1, #2, and #3 be contemplated via area-wide rezonings. Given the number of different land owners, coordination is essential if the city would like to see this area change. Rezoning in #3 should expand the height and uses allowed.

The above recommendations represent CIHA’s extensive experience in redevelopment in Anchorage, years of planning in this particular areas of Spenard, and are reflective of numerous conversations with MOA staff at the permit center. It is clear that MOA requirements for roads and streets, circulation, design requirements, and infrastructure means that low scale development is simply not feasible.

October 17, 2016  
MOA / Tom Davis  
Page 3

In an effort to implement the goals of the Comprehensive Plan for needed infill housing and redevelopment in Spenard and Midtown, we strongly urge you to make the above three changes to the Land Use Plan Map.

Regards,



Jeff Dudd  
Executive Vice President Real Estate

October 31, 2016

Tyler Robinson, Chair  
Planning and Zoning Commission

RE: Change of South Park Mobil Home Park Designation

Mr. Robinson:

This letter is in response to the most recent Public Hearing Draft (September 2016) of the Anchorage 2040 Land Use Plan and Land Use Plan Map (LUPM).

My company, Greenland LLC, owns South Park Mobil Home Park located near the corner of Benson Blvd. and Arctic Blvd. The current LUPM has proposed a “residential” land designation with a “Residential Mixed-use Development” overlay district for our land that is directly on Arctic Blvd. and Benson Blvd. **We request that the land designation be changed to a “commercial” designation that is either “City Center” or “Commercial Corridor”.**

A commercial designation is more **consistent** with the surrounding land and the LUPM commercial criteria narrative that is found in the LUMPM booklet released with the map.

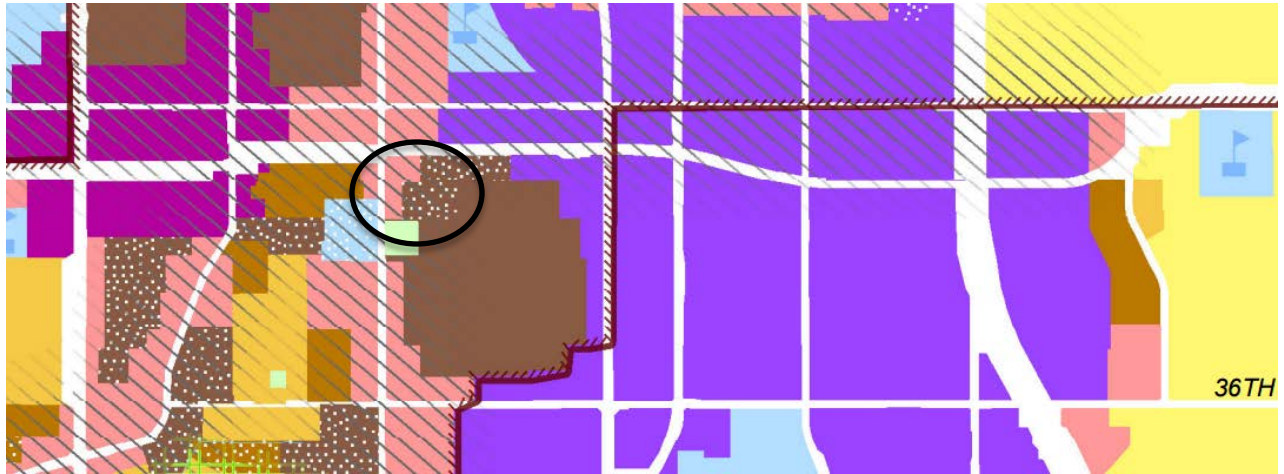
Following is a more in-depth explanation of our request.



South Park Mobil Home Park

## Explanation of Request

Below is a section of the LUPM that shows the land owned by Greenland LLC. The LUPM proposes that the Greenland land located on Arctic Blvd. and Benson Blvd. be a “residential” use (see map below).



As you can see from the map, this makes little sense. All of the land in the general vicinity of our land has a proposed land designation that is “commercial”. There is no land on Arctic Blvd. or Northern Lights Blvd. or Benson Blvd. that is a “residential” designation except for our land.

Furthermore, if you look at the narrative for City Center (pg. 33) and Commercial Corridor (pg. 34), you will see that the location criteria for these two commercial designations match our properties.

Below is an explanation of the two designations:

### City Center Location Criteria:

- Must be in midtown;
- Areas optimal for concentrations of regional commercial;
- Areas within unobstructed walking distance of high density residential;
- Contiguous core areas of commercial Midtown

Our site meets all of the above criteria for City Center. You can see on the map that City Center designations are all around our site.

### Commercial Corridor Location Criteria:

- Commercial corridors with stand-alone stores or multi-tenant strip malls;
- Intersections of arterials or collectors, convenient for customers, employees;



Our site meets all of the above criteria for Commercial Corridor. You can clearly see on the map that we are located on two very busy auto corridors.

Due to the fact that our property is located on two very busy auto corridors, there is a tattoo parlor next door, and a recent electric substation was constructed next to our property, our land that is located right on Benson and Arctic Boulevards is not conducive to a “residential” land designation. It will never be economically feasible to construct residential right on Benson and Arctic Boulevards.

Below is an example of what we envision for the site. You can see that we have proposed office buildings on Benson and Arctic Boulevards, and then the interior two acres has residential dwellings.



## **Conclusion**

We sincerely appreciate your time and efforts. We are confident as you investigate this matter more that you will see the a "commercial" land use designation is the most appropriate land use designation on the Land Use Plan Map for our properties.

Just to be clear, we are only asking that our one block that is directly on Arctic Boulevard (which is currently already one half commercial) and our one block that is directly on Benson Boulevard be changed to a "commercial" designation. We are fine with our interior block remaining a "residential" designation.

I you have any questions, please let me know.

Sincerely,



---

Shaun Debenham  
Owner  
Greenland LLC (Owner)  
South Park Mobil Home Park

## Land Use Plan Map

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**From:** Wong, Carol C.  
**Sent:** Wednesday, November 2, 2016 8:09 AM  
**To:** Land Use Plan Map; Davis, Tom G.  
**Subject:** FW: Anchorage 2040 Land Use Plan Comments  
**Attachments:** 20161101175147595.pdf

Forwarding comments on the 2040 LUP.

Carol

---

**From:** Ritter, Michelle [mailto:MRitter@dowl.com]  
**Sent:** Tuesday, November 1, 2016 6:09 PM  
**To:** Tyler Robinson <TRobinson@cookinlethousing.org>  
**Cc:** Hart, Hal H <HartHH@ci.anchorage.ak.us>; Wong, Carol C. <WongCC@ci.anchorage.ak.us>; Potter, Timothy <tpotter@dowl.com>  
**Subject:** Anchorage 2040 Land Use Plan Comments

Hi All,

Please find attached written comments on the Draft Anchorage 2040 Land Use Plan Map. This letter represents a comprehensive list of comments that have been provided previously at various public meetings and provides specific commentary as requested by the Planning and Zoning Commission. We greatly appreciate your consideration and are happy to discuss in more detail or answer questions you might have.

Best,  
Michelle

**Michelle J. Ritter, AICP**  
Land Use Planning Manager



(907) 562-2000 ■ (800) 865-9847 (fax)  
4041 B Street  
Anchorage, Alaska 99503

Consider the [environment](#) before printing.



November 1, 2016  
W.O. 1132.62126.02

Mr. Tyler Robinson, Chairperson  
Planning and Zoning Commission  
Municipality of Anchorage  
632 West 6<sup>th</sup> Avenue  
Anchorage, Alaska 99501

Subject: Comments on “Anchorage 2040 Land Use Plan”

Dear Commissioners:

As requested, the following are my written comments on the proposed “Anchorage 2040 Land Use Plan” (2040 Plan).

Specific Parcel Land Use Designations

1. The 100<sup>th</sup> Avenue/C Street corridor redesignation to “Commercial” is appropriate. The Target/Cabela’s area, including the outlots, were all included in a “Commercial Tract Fragment Lot Subdivision”, and have been developed as a retail/commercial center. King Street is the clear boundary line between commercial and industrial use in this area. The northeast quadrant of this intersection has also been designated commercial, except for a small parcel at the corner of 100<sup>th</sup> Avenue and King Street. It is my recommendation that this corner also be identified as commercial. This would be more in keeping with the action the Assembly took to modify the exempted boundary and sunset date of the “Interim Existing Allowed Use Area” (21.04.050, C., 2.a. and b.). The construction of the 100<sup>th</sup> Avenue section, which will create a direct connection of all residential areas west of Minnesota Drive to the Old Seward Highway also supports the creation of a commercial/employment district in this key crossroads location.

I would strongly recommend an areawide rezone approach to implement this change.

2. The undeveloped land north of Dowling Road and between Petersburg Street and Lake Otis Parkway is split zoned Light Industrial (I-1) District on the west, adjacent to Petersburg Street, and General Business (B-3) District for the eastern 2/3 to 3/4 of the parcel. Petersburg Street is a primary access to a residential development just north of the undeveloped area. It seems more compatible to the neighborhood to designate the entirety of the undeveloped parcel from Petersburg Street to Lake Otis Parkway as “Commercial”. This action should accommodate a more cohesive development on this property.
3. The northwest corner of Tudor Road and Piper Street was redesignated office – low intensity in the recently adopted University Medical (UMED) District Plan. This designation allows either office, medical office, or high density residential.

We are concerned, after reading the 2040 Plan and looking at the white stippling in the legend, that the Municipal Planning Staff is pressing a designation for this parcel that, in their statements, at the Planning and Zoning Commission public hearing, would require a development to include some amount of residential. The Assembly, in their recent approval of the UMED District Plan, saw the need to ensure that the “medical” part of the UMED District needed a reasonable ability to grow to meet the health related needs of this community and the



State of Alaska.

We recommend that the designation within the adopted UMED District Plan be retained and that a residential component not be required on this critical parcel. The current 30% - 40% financial gap, associated with new multifamily residential development could kill a needed medical related office/service development.

4. The Northway Mall area and the portion of Northway Business Park located south of Penland Parkway to Debarr Road and west of Northway Business Park Boulevard should be designated Town Center and be rezoned as an areawide rezone to the B-3 zoning district. This will make this area more competitive, given the more restrictive nature of the new codes Industrial districts.
5. South side of 3<sup>rd</sup> Avenue, between Gambell Street and Ingra Street, abutting 3<sup>rd</sup> Avenue, is a one lot deep area that is currently zoned Residential-Office (R-O) District. Most of the old single-family homes in this location have fallen into disrepair, as it is no longer a single-family home neighborhood. This narrow stretch of lots, backing up to an alley, also used by the abutting B-3 zoned development, has been in transition for quite awhile. The depth and size of lots in this R-O zoned area limit, almost any practical use. Additionally, given the continued lack of a definitive road/highway route and no idea what will happen on the old Native Hospital site, it seems prudent to accommodate a land use designation that would allow rezoning these lots to the B-3 zoning District.

Implementation should be by an areawide rezone performed by the Municipality with agreement from the property owners.

#### Additional Comments

- A. The Plan identifies Reinvestment Focus Areas (RFA's). This is a positive approach to a more proactive implementation program. The RFA's, should however, be vetted through some kind of development feasibility screening process to confirm, that in fact, the basic infrastructure to support this focused development exists. The RFA's should be an identifier for now, with a defined vetting and implementation program to be funded and completed within a specific timeframe, such as one or two years.
- B. Strong consideration should be given to moving forward to initiate a Municipal Storm Drain Utility. The Utility could play a major role in shaping our future community and fulfilling many of the Plan's Goals.
- C. One of my most significant concerns and formal comments has to do with actually implementing the Land Use Plan. If we proceed with a status-quo process of letting each property process a rezone application and go through the process, as we now know it, we as a community will not have really, "moved the ball", towards implementation. The process is expensive in dollars, expensive in time, and expensive in brain damage. To meet many of the stated goals of the Plan, more density and development will be necessary, however, to piecemeal this process, individual lot, by individual lot, most owners will be frustrated by the system and either fail or not even try. Implementation will be very slow.

A more straight forward approach, with the Municipality carrying a larger portion of the responsibility to promulgate implementation of the "publicly" reviewed and adopted plan.

Mr. Tyler Robinson, Chairperson  
Planning and Zoning Commission  
Municipality of Anchorage  
November 1, 2016  
Page 3

In closing, we appreciate the significant role the Planning and Zoning Commission plays and would offer our assistance by participating as members of any working "action" committee that the Commission feels we could add to in a positive way.

We appreciate the opportunity to comment, and look forward to continue planning for the future of Anchorage.

Sincerely,  
DOWL

A handwritten signature in blue ink that reads "Timothy C. Potter for". The signature is written in a cursive, flowing style.

Timothy C. Potter  
Planning Director

20161101.D62126.Robinson.TCP.mkr

## Land Use Plan Map

---

**From:** Elaine Phillipps <ephillipps@hfhanchorage.org>  
**Sent:** Tuesday, November 1, 2016 4:14 PM  
**To:** Land Use Plan Map  
**Subject:** Anchorage 2040 Land Use Plan Comment

Habitat for Humanity is eager to work in partnership with the Municipality of Anchorage in its efforts to develop and maintain structures that not only reduce the number of homeless individuals in our community, but also strategically develop new residential units to meet the anticipated population growth through 2040. Habitat directly impacts both populations by building new units and selling those units directly to low-income families, freeing up valuable rental space; thereby, relieving pressure on our current housing gridlock situation.

Habitat for Humanity beneficiaries are Anchorage residents who earn between 30% and 60% of local median income. Anchorage's most economically-vulnerable families earn equity and achieve financial independence through homeownership. Habitat reinvests any proceeds acquired from a subsequent sale of its homes, should a homeowner resell, into future affordable housing. Habitat also retains the right of first refusal to purchase back the property, provides low interest first mortgage as well as a final forgivable mortgage that dissolves the longer the family stays in and maintains the home.

Habitat has multiple strategic housing initiatives planned for the future and requests the continued partnership of the municipality to further our collective goal in providing affordable housing and addressing the homeless situation. Habitat is able to build 4-8 new units per year; however, the lack of affordable land and high cost of infrastructure in Anchorage is a significant hindrance. Please consider Habitat for Humanity in all future discussions during your 2040 Land Use planning.

Warm Regards,  
*Elaine Phillipps*  
Executive Director



1057 W. Fireweed Lane, Ste 103  
Anchorage, AK 99503-1760  
907.272.0800 General  
907.868.3672 Direct  
907.272.1508 Fax



October 21, 2016

Subject: Anchorage 2040 Land Use Master Plan and Map continuing concerns

Municipality of Anchorage Planning Department  
Attn: Mr. Hal Hart  
P.O. Box 196650  
Anchorage, AK 99519-6650

Mr. Hal Hart,

This letter is in reference to our meetings, comments and discussions regarding the Anchorage 2040 Land Use Plan and Map. The update is a significant and necessary effort, and I applaud the Planning Department for getting this started. The University of Alaska Anchorage expressed its concerns with the "Greenway- Supported Development" Overlay as it applies to certain university lands. I expected from these conversations that the overlay would be removed from university lands; however, the most recent draft of the Anchorage 2040 Land Use Plan Map continues to include the overlay on portions of university land. The application of this overlay to University of Alaska land is rushed, fails to consider the comments and concerns expressed by the University through the process, conflicts with the UMed District Plan, is an arbitrary and capricious exercise of zoning powers, and amounts to a taking of University property. The application of this overlay to the university land depicted in the map substantially deprives the university of its ability to develop its land in the best interest of the university.

As we previously discussed, the UAA Facilities Department is stymied. The Anchorage 2040 Land Use Plan and Map puts undefined restrictions on undeveloped university land by designating them as "Greenway-Supported Development." This overlay is not consistent with the recently approved UMed District Plan; the overlay is not consistently applied to other Public Land Institutional (PLI) owners in the UMed district or the Municipality as a whole; and, the overlay is not consistent with Goal 10 of supporting the anchor institutions and facilities development. UAA has hosted and participated in meetings and workshops, and submitted comments throughout the process. UAA has not received an explanation for the deliberate proposed zoning action that effectively "takes" university land. Nor have we received any acknowledgement of the university's concerns. For the foregoing reasons, this proposed zoning action is arbitrary and capricious.

By designating the University's undeveloped acreage as "Greenway-Supported Development," the Municipality is at the least restricting the University's flexibility to meet its mission in the future and provides leverage for the community to contest any future development on university lands. The university already has to develop its land in accordance with wetlands regulations, Title 21 of the Municipal Code, the UMed District Plan guidelines, our own Master Plan and now potentially with additional restrictive language included in the Anchorage 2040 Land Use Plan under "Greenway - Supported Development. "

The overlay designation may be premised in part on a false assumption by the Municipality that the university land affected by the overlay is park land. However, under AS 14.40.291, university land is not public domain land. Rather, it is land meant to achieve the university's fiduciary and trust purposes of higher education. The proposed "Greenway-Supported Development" designation directly interferes with the University's ability to continue to meet its fiduciary and trust responsibilities.

The university respectfully requests that the Planning Department remove the "Greenway Supported Development" overlay from University undeveloped property in the UMed district.

I look forward to our upcoming meeting on Wed Oct 26, 2016 from 11 to 12 at UAA's University Lake Building Room 110A with the Planning Department to discuss this matter further.

I can be reached 907-786-1110 or [cmturletes@alaska.edu](mailto:cmturletes@alaska.edu).

Respectfully,

A handwritten signature in black ink, appearing to read "Chris Turletes", with a stylized flourish at the end.

Chris Turletes  
Associate Vice Chancellor for Facilities  
[cmturletes@alaska.edu](mailto:cmturletes@alaska.edu)  
office: (907) 786-1110; cell: (907) 244-8063

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# Community Councils

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## Land Use Plan Map

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**From:** Allen Kemplen <nordicity@gmail.com>  
**Sent:** Saturday, October 15, 2016 10:20 AM  
**To:** Land Use Plan Map; Hart, Hal H  
**Cc:** Fairview's Finest; SJ Klein; Bunnell Kristine; Davis, Tom G.; Mayor Berkowitz; Flynn, Patrick P.; !MAS Assembly Members; info@communitycouncils.org; Coffman, Amy J.; saselkegg@alaska.edu  
**Subject:** Fairview Community Council LUPM Comments  
**Attachments:** FairviewCouncil\_LUPM\_Comments\_10-14-16.pdf; Final Council Comments LUPM ver2.1.pdf

Hello,

Attached are the official comments from the Fairview Community Council on the latest public draft (September 2015) of the Anchorage Land Use Plan and Map.

Please insure these are presented to the Planning and Zoning Commission as they consider public comments.

Thank you.

Allen Kemplen



Fairview Community Council  
"Where People Make the Difference!"

Fairview Community Council

Harry W. Need  
President

Allen Kemplen  
Vice President

Dr. Sharon Chamard  
Treasurer

Daniel Duque  
Secretary

S J. Klein

Heidi Heinrich

Hugh Brown, III

Hal Hart, Director  
Planning Division  
Department of Economic and Community Development  
4700 Elmore Road  
Anchorage, AK 99507

Re: Anchorage 2040 Land Use Plan

October 13, 2016

Dear Mr. Hart;

The Fairview Community Council is submitting official comments on the revised September Land Use Plan and Map (LUPM) presented to public September 26<sup>th</sup>, 2016. The Council wishes to express its appreciation for past Planning Division efforts to incorporate our concerns.

However, we note there are still some significant oversights, omissions, and inconsistencies relative to the Fairview Neighborhood Plan and our common vision for a prosperous community and a vibrant urban core. It is our hope that the Municipality will seriously consider the points, concerns and requests outlined in the attached comments.

Thank you for the opportunity to comment on this important policy document.

Sincerely,

Allen Kemplen, Vice President  
Fairview Community Council

C.c. Mayor Berkowitz; Assemblyman Patrick Flynn; Amy Coffman, Special Assistant to Community Councils; Tom Davis, Senior Planner; Kristine Bunnell, Senior Planner; Sheila Selkregg, South Addition Community Council; Mark Butler, Federation of Community Councils

**Anchorage 2040 Land Use Plan  
September 2016 Public Review Draft  
Fairview Community Council - Comments**

1. Page 7, Housing Space Needs: This section states Anchorage has an identified need for 21,000 housing units to meet the needs of the 2040 market. The narrative could be improved with terms clearly delineating between “residential units”, “households” and “housing units”. Typically, it is technically more appropriate to convert future population into households by estimating average number of people per household and dividing. This estimated number of households is then converted into future number of dwelling units by adding a vacancy factor as it is rare for housing within a community to be one hundred percent occupied.
2. Assuming the numbers given are for the actual number of dwelling units (including vacancy factor) expected to be needed in the year 2040 the following table shows there is a projected shortfall of approximately

Type of Land	Potential Number of Units	Housing Demand Reduction from 21,000
<b>Residential</b>	9,700	11,300
<b>Commercial</b>	700	10,600
<b>Re-Development</b>	2500	8,100
<b>Housing Gap Expected</b>		<b>8,100</b>

8,100 units. The 2012 Housing Analysis concluded that in the year 2030 there would be a deficit of 8,852 units. Assuming some of the units were constructed between 2010 and 2015 thus reducing the number somewhat, there still appears to be a discrepancy between the two projections.

- a. The narrative states this shortfall will be met by the land use changes recommended in the LUPM. However, there does not appear to be adequate documentation of this statement. This appears to be an important point warranting further examination by the Municipality.
- b. For example, the Municipality has access to GIS data that could readily show the lots in the proposed Reinvestment Areas, what currently exists and what potential number of dwelling units could be built given current Title 21 restrictions and what increase could be expected if proposed changes in the regulatory framework were implemented as suggested by the LUPM Action Table.
- c. The 2012 Analysis breaks the housing market down into segments showing a forecasted deficit of 2,389 single-family units, 2,183 two-family/duplex units, 687 townhomes and 3,594 multi-family/other units. The Analysis leaves it to the LUPM to disaggregate these units

throughout the Anchorage Bowl. However, the LUPM does not appear to provide this level of disaggregation, either for the projected number of units constructed given the base assumptions (vacant land, commercial conversion, redevelopment) or for the “deficit” units needed to meet projected demand.

- d. The implication of this information gap is that the Fairview Community Council is left wondering how the proposed land use changes will impact the neighborhood. It would be very helpful if Planning could provide an estimate of how many dwelling units by category are expected, both in the base line low-growth scenario but also in the high-growth Reinvestment Area scenario.
  - e. The Fairview Neighborhood Plan establishes our collective intent to preserve, as much as possible, the remaining owner-occupied low to medium density in East and South Fairview. *We request that the Action Table include a new item to say: “Continue working with the Fairview Community Council on implementation of the Fairview Neighborhood Plan, particularly relating to housing density, overlay zone and form-based code.”*
3. **There is a concern the proposed LUPM may not adequately address the housing needs of the Anchorage Bowl in 2040.** If this is the case, then the Municipality may need to start looking at other land use solutions that acknowledge the realities of Anchorage’s housing market. It may be time for a serious discussion of what constitutes “highest and best use” for certain transportation facilities.
  4. Page 9, Community Expansion – Other Options: This discussion omits an option that is within the control of the Municipality – Relocation of Merrill Field Municipal Airport. Merrill Field was originally located on the Park Strip but community growth caused it to be re-located to its present location. As Anchorage has grown, it is perhaps time to seriously evaluate the benefits of relocating this transportation facility from what has become a densely developed part of the Anchorage Bowl to a more remote site on the periphery of the Municipality (perhaps expansion of the Campbell airstrip). The Airport Master Planning process is the appropriate functional approach to determining the optimal alternative location.
  5. Merrill Field Airport is a locally owned facility composed of 436 acres. Setting aside approximately 15% of the site for streets, parks and greenways leaves about 371 acres for some appropriate housing-oriented development. If the site were re-developed at 15 dwelling units per acre, the site could support 5,565 new residential homes. If the site re-developed at 22 dwelling units per acre, the projected 2040 housing gap would be closed. **It is requested the Action Table include: “Conduct a cost-benefit analysis for relocation of Merrill Field Airport and subsequently reuse of the land to meet the housing needs of the Anchorage Bowl.”**

October 14, 2016

6. The “Housing Space Needs” section also states the Anchorage Bowl needs to see a net gain of 840 units per year. However, the Housing Analysis in Appendix B says the Bowl has historically experienced an annual rate of approximately 350 dwelling units per year. In order to meet projected future demand the Municipality would have to more than double the annual rate of housing construction and sustain this rate for over 20 years.
7. Such an aggressive rate of residential construction is not beyond the capacity of the market but there would need to be substantial changes in financing and development incentives.
8. While there is a discussion of total housing demand in the year 2040, there appears to be little discussion of housing demand by type or income range. A baseline approach could take the existing percentage distribution of housing units by type and apply this same percentage to the year 2040. For example:
  - a. How many units of market-rate housing units are needed to meet forecasted demand?
  - b. How many units of workforce or affordable housing are expected?
9. An ongoing concern expressed by the business community is the lack of workforce housing, especially in the Midtown area and in the urban core. The labor rates for hotel and retail employees in these areas means they are in need of options for home ownership at an “affordable” level. There is some discussion of moving forward with allowing “small-lot” development as an option. For this type of housing to be successful in Fairview, the Municipality must acknowledge the need, as stated in the 2012 Housing Analysis, to establish a “Main Street” in the area. It is requested the Action Table include: “Support efforts by the Fairview neighborhood to develop a Main Street.”
10. It is recommended the LUPM not rely so strongly on the simple mechanism of density to allocate housing units. Density without clarity creates uncertainty. Such uncertainty generates resistance from existing neighborhoods due to the lack of a more robust strategy for matching housing demand by type with geographical allocation. This is particularly important as it relates to the issue of “affordable” housing.
11. It is a normal pattern in growing urban areas that are physically constrained by topography to see land rents rise to the point where low to moderate income residents are priced out of the detached single-family market. This housing type is often supplanted by denser row or townhomes, condominiums and other similar options.
12. At some point, home ownership becomes unaffordable at a certain price point and the number of households choosing to rent increases. This is a normal occurrence and market-rate rental units tend to occupy a significant percentage of the housing stock where land rents are relatively high. As long as average household income levels rise to match the increasing land rents, the market stays in balance.

13. However, when average household incomes start to lag behind, the issue of affordable housing becomes an issue. In the past, this rental gap has been met with the use of federal and state subsidies. These subsidies are limited and in order to stretch them as far as possible, there is often a tendency to concentrate subsidized housing in areas of town where the land rents are cheapest and to develop to the highest density permitted to keep per unit costs at minimum levels. This has led to an over-concentration of subsidized high-density housing in certain parts of town, particularly older neighborhoods such as Fairview. Often to the detriment of the affected neighborhoods.
  - a. It must be noted that the United States Supreme Court, in the 2015 case titled “Texas Department of Housing and Community Affairs vs. The Inclusive Communities Project, Inc.”, found that the concentration of subsidized housing into low income neighborhoods is discriminatory and is a violation of the Fair Housing Act because of disparate impacts created by policy.
14. Thus, use by the LUPM of assigning high densities to neighborhoods struggling to maintain a sense of community without clarifying intent language on the housing type has the potential to push certain neighborhoods over the edge of civic viability. Such an occurrence would not be in the best interests of the Municipality as it would start to incur additional public safety costs and experience lower tax revenues as properties in the affected area lose their investment appeal and begin to slide toward marginality.
15. According to Table 1, page 239 of the 2012-2017 HUD Final Consolidated Plan produced by the Municipality, of the top ten Census Tracts with Median Household Income below 80% Area Median Income (AMI) three of them are in the Fairview Community Council area. It is obvious that the data clearly shows that Fairview has more than its fair share of subsidized “affordable housing”.
16. Housing is a critical cog in the economic engine of vibrant downtown areas. No housing or too much subsidized housing equates to too few people with enough disposable income to support dynamic downtowns/neighborhood shopping areas, particularly on weekends and in the evening. You need people with disposable income to support retail. **It is requested the Action Table include: “Establish policy protocols for equitable distribution of subsidized “affordable housing” to ensure a geographical balance with “workforce housing” and “market-rate housing.”**
17. The LUPM does discuss ancillary dwelling units as an alternative option for addressing the need for affordable housing. However, one cannot readily ascertain how many such units are expected to be in place by the year 2040. It is recommended the LUPM set specific quantitative goals for how many ancillary dwelling units are expected to be in place as part of a strategy to ensure “affordable housing” is distributed equitably throughout the Anchorage Bowl.

October 14, 2016

18. The Land Use Plan should include a discussion of:
  - a. Location Efficient Mortgages whereby mortgage entities allow for a higher loan to value ratio because the unit is located where the homeowner can use mobility alternatives other than an automobile. Because transportation costs can consume up to 19 percent of household income, developing an urban form whereby the automobile is not a mandatory need can allow the market to provide more affordable housing, particularly for low to moderate income residents. **It is requested that the Action Table include: “Explore how to maximize the use of Location-Efficient Mortgages in transit corridors and reinvestment areas.”**
  - b. The Municipality should be more proactive in spurring the Alaska Housing Finance Corporation (AHFC) to implement the recent law change that allows them to develop a new mixed-use development program. Since the law was passed, the AHFC has made very little progress. This funding mechanism is critical to the success of the recommendations in the LUPM for mixed-use development. **It is requested that the Action Table include: “Work with AHFC on a prototype mixed-use development financing program.”**
  - c. An urban form supporting higher densities in strategic locations such as Primary Transit Corridors, Reinvestment Focus Areas, etc. needs a different regulatory framework. This new regulatory approach would shift from the current burdensome prescriptive Euclidean zoning approach to a more flexible design and results oriented Form Based Code (FBC) approach. **It is requested the Action Table include: “Evaluate the development of form-based codes for primary transit corridors and reinvestment focus areas.”**
  - d. Implementation of the FBC would not necessitate wholesale re-working of Title 21. The FBC could instead be implemented using the “overlay zoning” identified in the LUPM. Overlay Zones for the strategically targeted sub-areas within the Anchorage Bowl would allow for well-designed denser development to merge unobtrusively through thoughtful use of transition spaces and techniques. It is recommended the Municipality work with the Fairview Community Council to develop the first FBC overlay zone.
19. There appears to be a reluctance to discuss the role of the automobile within the 2040 Anchorage Bowl. If the intent is to create higher densities within the Anchorage Bowl, then it would be prudent to shift from the current auto-centric regulatory and design framework to one more oriented around people.
20. A more evenly balanced approach to transportation in the Land Use Plan Map would include a discussion of:
  - a. Reduction and/or elimination of Minimum Off-Street Parking Requirements within the strategically targeted areas. If the labor force is located within walking/biking/transit distance of where they live, work and play then there is little practical need to require

mandatory set asides for vehicle storage. This would reduce site development costs and allow a developer to construct more affordable market-rate housing.

- b. The Municipality could manage the transition to such a new non-auto centric design approach by identifying land within the targeted areas for publically-owned structured parking facilities. The cost of which could be financed through revenue bonds retired by implementing a Payment in lieu of parking fee for development.
- c. The amount of land devoted to the movement and storage of automobiles within the Anchorage Bowl is significant. However, there appears to be no quantitative assessment and as a result the reader is led to conclude the automobile is sacrosanct. If the Municipality is truly serious about supporting a denser, people-oriented urban form that is vibrant and full of life then the amount of land dedicated to the automobile needs to be reduced and re-assigned to other uses.
- d. A people-oriented urban form does not need every arterial to be dedicated to the automobile. If the strategic objective is to convert 15<sup>th</sup> and DeBarr to a Primary Transit Corridor, then it must have a non-autocentric design. Such a *Complete Streets* design is already evident in the East Fairview section between Ingra Street and Orca Street.
- e. However, the Complete Streets design approach can only be implemented when the owner of the right-of-way is explicitly supportive of a more balanced approach to mobility. One cannot help but notice that most arterials in the Anchorage Bowl are owned by the DOT&PF and are designed almost exclusively for the movement of vehicles.
- f. It is noted for the record that the first successful major application of Complete Streets design on an arterial occurred when the Municipality assumed responsibility for the facility. Attempts to implement similar designs on arterials owned by the DOT&PF (i.e. I and L Street) have met with great resistance.
- g. The Municipality states it seeks to support higher density, people-oriented Live, Work and Play spaces at strategic locations within the Anchorage Bowl. Such a strategy requires the arterial roads within these reinvestment areas to be designed so that people are treated as equals to the automobile. This cannot occur as long as the arterials are owned and maintained by the DOT&PF. It is recommended the Municipality exercise more aggressive leadership on this important issue and assume ownership of the key transportation assets within the targeted reinvestment areas. **It is requested the Action Table include: "Develop a prioritization schedule for considering Municipal ownership of select arterials within the Anchorage Bowl to support implementation of Complete Streets Policy and Transit Corridors."**



21. The LUPM soft-pedals the land use issues associated with connecting the Glenn Highway and the New Seward Highway. The Fairview Community Council is on record requesting the Municipality to take a more assertive leadership role in resolving the land use uncertainties associated with this major piece of infrastructure. *As long as the land use issues are uncertain, there is a dark cloud hovering over the future of Fairview.*
22. The proposed alignment shown in the Metropolitan Transportation Plan makes it difficult for property owners and businesses in the impacted area to obtain long-term financing for re-development initiatives. This negatively impacts the greater community as increased tax revenues are foregone due to the lack of investment. Urban cores throughout the Lower 48 are experiencing new investment as the market responds to the larger societal shift of Mills and retiring Baby Boomers migrate back to city centers. Anchorage is missing out on the opportunities created by such change because of its inability to promote a positive land use vision for the entire urban core area.
23. Strategy 8: Special Study Areas/Small Area Plan on page 56 identifies the Fairview Gambell Street Corridor as an example of where a Special Study is needed. However, the Actions Map dated September 24, 2016 does not show one proposed. This omission needs to be corrected.
  - a. A key reason denser development is difficult to finance in the Anchorage area is identified on page 34 of the McDowell Group Housing Analysis. *“Anchorage lacks neighborhoods with a traditional “main street” architectural form where higher density development typically develops.”*
  - b. The Fairview Neighborhood Plan explicitly recognizes this omission in the urban fabric of Anchorage and recommends the restoration of Gambell Street to Fairview’s Main Street as a solution.
  - c. Taking the necessary land use and policy actions to move regional traffic below ground and restore Gambell and Ingra Street to two-way traffic is a required supplemental public policy initiative for the LUPM in order to support the higher market-rate residential and mixed-use densities recommended for the Fairview neighborhood.
  - d. Ignoring this important action will very likely lead to the market being non-responsive to the LUPM in the eastern core area.
  - e. As such, it is critical for the Actions Map to add a Special Study Area for the Gambell Main Street Corridor and for a new Section to be added to the LUPM narrative.
  - f. **A new # 6-6 should be added to Table 4: Actions Checklist to say “Advance a Special Study Area project for the Gambell Street corridor to support Fairview revitalization efforts.”**

24. The Council supports Goal 8 and its recommendation to add parks and greenbelt connections to offset neighborhood deficiencies and to support higher density development (page 16). However, while the LUPM has identified West Fairview and the Gambell Street Corridor for extensive new residential and mixed-use densities there is no corresponding acknowledgement of the need to provide additional parks and greenbelt connections to accommodate the increased number of residents. Fairview is already underserved per capita in terms of parks and green space and the LUPM approach will worsen this situation unless this omission is reconciled. This can be achieved by:
- a. *Inserting a new Section into the overall document so that it more closely aligns with the vision outlined in the Fairview Neighborhood Plan.*
  - b. The new Section should include narrative discussing the importance of the Highway to Highway connection, both to revitalization of the Fairview neighborhood, growth of the downtown urban core and mobility for the Anchorage Bowl and the Region.
  - c. The new Section should provide conceptual graphics illustrating how current traffic will be moved below grade and then covered over. The covers themselves will have mixed-used development with an appropriate amount of green space and park area.
  - d. The new Section should also provide conceptual graphics illustrating a new greenway connection between Chester Creek and Ship Creek along the rebuilt corridor. Such a new greenway connection would complete a green beltway around the urban center and it represents a critical infrastructure investment to support the sense of place characteristics and green amenities so highly desired by market rate housing occupants.
  - e. **The LUPM narrative should add a new GSD-Linear Feature bullet on page 47 to say “New greenway corridor connecting Chester Creek to Ship Creek through Fairview as part of any future Glenn Highway to New Seward Highway improvement.”**
  - f. **A new # 8-10 should be added to Table 4: Actions Checklist to say – “Evaluate the potential of an Urban Core Area Non-motorized Beltway by connecting Ship Creek and Chester Creek Greenbelts with a greenway through Fairview.”**
25. The Council wishes to note for the record that the 2012 Housing Analysis conducted by McDowell documents that existing higher density land has not historically been built out to what is allowed by zoning due to the lack of supporting amenities. The lack of such critical urban livability infrastructure for the eastern side of the urban core increases the

October 14, 2016

probability that market rate development will not occur, land values will lag behind other parts of town and there will be continued pressure for non-profit social service agencies to take advantage of below-market land values to continue their placement of facilities serving the destitute, mentally-ill and other socially challenged members of the greater community.

a. Should such a scenario be realized without mitigating actions, the eastern edge of the urban core will not take advantage of revitalization forces occurring in other similarly sized cities in the Lower 48. Instead the trend for the eastern edge will be to become what could be characterized as the “slums” of Anchorage.

26. **The Council is opposed to the recommendation converting the land east of Orca Street and south of 15<sup>th</sup> from Residential to other land uses.**

The existing housing units help to anchor the sense of neighborhood for this section of Fairview and need to be retained.

a. Retention aligns with proposed LUP 10.1 “Expand and encourage partnerships with Anchorage’s anchor institutions and facilities to promote and coordinate growth and development with surrounding neighborhoods.”

27. **The Council supports the addition of a new Greenway connection between Sitka Park and Chester Creek following the existing or re-routed north fork of Chester Creek.** Such a connection would create a new circular sub-area route for bicyclists and pedestrians and provide for an improved greenway link between the Complete Streets design of 15<sup>th</sup> Avenue (Orca to Ingra) and Chester Creek.

28. The LUPM does not adequately address the need for buffering of residential land uses from industrial land uses. This is particularly evident on Orca Street as Merrill Field developed its industrial hangers. The lack of buffering creates a visually jarring environment, is not conducive establishing livable, pedestrian-friendly streetscapes and lowers the property values of residential properties. The presence of chain-link fences topped by barbed-wire in front of a long blank industrial building wall is not consistent with the goals and policies of the Anchorage Bowl Comp Plan, the Fairview Neighborhood Plan or the LUPM. **It is requested the Action Table include: “Ensure the Merrill Field Airport Master Plan includes language requiring buffering its industrial properties from adjacent residential properties.”**

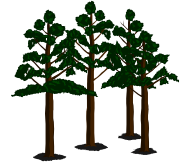
29. **The Council supports the retention of Sitka Park at its current location and is adamantly opposed to any efforts at replacing it with commercial development.**

30. The Council is disappointed in the September draft not addressing the opportunities presented by recommending moving forward with supportive land use policies associated with Innovation Districts. Knowledge based industry and intellectual commerce are anticipated to become more and more a key component of economically prosperous communities. We encourage Municipal Planning staff to reconsider this omission in the narrative of the LUPM, Actions Map and Implementation Strategies.
- a. **It is requested the following language be inserted on page 8 before the section titled “Space for Industrially Traded Sectors.”**
    - i. **“It is acknowledged the industrial needs of a 21<sup>st</sup> Century may not be similar to past industrial needs. The growing vitality of “MakerSpaces” is an example of new industries emerging from advances in 3D manufacturing and the stronger integration of creative customized product design with advanced computer technologies and industrial processes. The 2040 LUPM supports the possibility of Innovation Districts within those parts of the Anchorage Bowl already possessing or proposing to create key supportive land use elements.”**
  - b. **It is requested #9-9 of Table 4: Actions Checklist includes the language – “Support further exploration of Innovation Districts particularly in the industrial area of north Fairview.”**



# Rabbit Creek Community Council

1057 W. Fireweed Ln, #100, Anchorage, AK 99503



October 14, 2016

Planning & Zoning Commission, MOA  
PO Box 196650  
Anchorage, AK 99519

RE: # 2016-0127 Land Use Plan 2040—Request for Delay & Comments on PH Draft September, 2016

Dear Commissioners:

The Council discussed the LUP for nearly one hour at our October 13<sup>th</sup> meeting. About 30 people were in attendance. While some comments are submitted here, the members voted to request a delay in closing the public hearing due to the complexity of the Plan, the lack of time to thoroughly discuss this September draft and the numerous mistakes we found in our initial reading of this document and especially the maps.

Prior to our October meeting, the LUP Committee spent over 30 hours preparing discussion points and examining the available documents. Please note that all of the LUP maps were not available either on-line nor on a CD that we obtained from the Planning Department. Thus, our request for delay isn't for lack of trying to read/discuss this draft.

## 1. LUP Map Growth and Change by 2040:

A. Change the color of the HLB lands in upper Potter Valley to 'little growth' while retaining the dot pattern that indicates future re-zone. The HDP and PVLUA indicate this land as limited intensity (0 to 1 DUA). These HLB parcels are at high elevation, sloped, dependent on onsite services, and there is surrounding low density zoning.

B. Change the base color of the former Legacy Pointe and GCI lands west of Goldenview Drive as "little growth", while retaining the dot pattern that indicates future re-zone for these PLI parcels. Some of this land will likely be rezoned for residential; some may be conservation because of wetlands and tributaries. The GCI land may be zoned 1-3 DUA but if so, that is inappropriate for the terrain, wetlands, and 25% slopes.

C. Remove grid pattern on HLB land just north of hairpin curve on Potter Valley Rd. This is HLB #2-135 with SL from the PVLUA. It is not residential. A portion of it will fulfill a potential transportation realignment, with the rest remaining as open space.

## 2. LUP Map BL-3, Buildable Land Supply

This map has serious mistakes on it.

A. The map does not conform to the Hillside District Plan Map 5.8. Change the service perimeter (for both water and sewer) to conform to the HDP, with revisions to reflect the recent perimeter adjustment that excludes Potter Highlands, and an additional revision to exclude Villages Scenic Parkway, which is already subdivided with onsite services on large lots. There will be no public utilities in upper Potter Valley.

B. The former Legacy Pointe parcel is shown in a color that indicates 'environmentally unconstrained.' This is a mistake as the parcel contains many wetlands. Only the far eastern portion is non-wetlands. Revise.

C. The hatched parcel northwest of the former Legacy Pointe is shown both as parkland and residential. This can't be both. It is HLB's parcel #2-127, which according to the PVLUA is for parks/open space. Revise.

D. In the vicinity of Northfield Dr, Plat 87-14, notes that Tracts A and B are for open space reserve. Tract A is erroneously listed as buildable. Revise this and all other pertinent maps.

3. **LUP Map LU-2**

A. Explain legend “ UCIOA or MCH lot.”

B. The legend shows the color blue as “Public Institutional Use.” There are hundreds of parcels colored blue across SE Anchorage and this is an error. Revise.

4. **LUP Map for 2040 & Gross Density Map**

In a prior draft, the LUP maps contained a footnote that the Council had requested in early comments based on the February draft. It referred viewers to the HDP Zoning map to determine varying densities represented by the single color of “Low Density.” This footnote is not on the current draft, nor on other relevant maps in the LUP, such as the Gross Density and Zoning Map. Because maps hold disproportionate power over text, revise to reflect this earlier footnote on all pertinent LUP maps.

5. **LUP Map Zoning**

A. Storck Park’s color appears to be a ‘watershed’ given the green color on the legend. It is a dedicated park. Revise.

B. See comment 4 above requesting footnote directing viewers to the HDP.

C. The Rabbit Cr Greenbelt is a gray-green color which doesn’t appear on the legend. It is a dedicated park, as are other parklands along the creek. Correct all park colors to reflect their status.

D. The GCI land south of the former Legacy Pointe and along then north side of Potter Creek is colored as if it were multifamily zoning. The wetland, steep slopes and lack of transportation facilities are not amenable for this type of zoning. Revise.

E. South Pointe along Potter Valley Road is colored as if it is R-3. It is platted low-density. Revise.

6. **LUP Map Area Specific Plans**

The HDP is not the only adopted plan that provides specificity to SE Anchorage. Include in the legend the Potter Valley Land Use Analysis Study. It was adopted in 1999 and recently provided valuable criteria for a re-plat with details the HDP lacked.

7. **LUP Map Parks and Open Space**

A. Include the deficiencies in greenbelt corridors which are advocated in the Comprehensive Plan and the Anchorage Bowl Parks and Open Space Plan.

B. There is a colored ‘arch’ across Potter Cr; it is not a road connection. Revise.

C. Correct the issues noted in this letter under Bullet 2, LUP Map BL-3

8. **LUP Map Community Natural Assets**

A. It is unclear why only a select number of trailheads are depicted. There are numerous missing trailheads for municipal parks. Add trailheads.

B. The classified wetlands on this map don’t match the MOA classified wetlands in the HDP. Revise accordingly and review the HDP’s wetlands area for the Storck Park area southward for accuracy.

C. Watershed is conspicuously missing from this map. Watershed recharge areas and wetland detention areas (see built=green infrastructure map 2.11 of HDP) should be added to the Hillside portion of this map. Since Potter Marsh is a highly valued community asset, tributaries of Potter Marsh should be mapped.

D. There are conflicting red lines for the Rabbit Creek Greenbelt (Old RC Park) with another red line interior to the outer one (along Our Own Lane). What does the interior line mean? Review and revise.

**9. LUP Map LU-1 Existing Housing Stock Inventory**

It isn't clear that the legend refers to overall number of units—not units per acre. Clarify legend.

**10. LUP Map CC-6 Hazard Mitigation and Resiliency**

This map is not in the map gallery on the web. This map should include coastal areas subject to rising sea levels, such as Ship Creek.

**11. LUP Text, Anchorage's Growth Strategy, Goal 1, Page 11**

LUP1.4 changes the authority for rezoning by making the LUP the overriding authority and states it supersedes 2020's Policy 4. Rezoning must be consistent with Neighborhood/District Plans and this change gives greater authority to the LUP. The LUPM is at a greater scale than Neighborhood/District Plans and thus is subject to conflicts. The LUP is meant to implement 2020 and cannot supersede its policies. Reword so that the area-specific plans are the first authority for re-zoning decisions. 2020, Policy 4 states that the "Rezoning Map shall ultimately be amended to be consistent with the adopted Neighborhood and District Plan Maps."

**12. LUP Text, Land Use Designations, Page 26**

Large Lot Residential, Density: "Where delineated in the HDP, this designation also includes subdivisions with half-acre or larger sized lots with flexibility for slightly smaller size lot, at densities up to three units per gross acre."

This is confusing because we do not know of anywhere that the HDP would allow for 3 DUA in zoning on 1/2-acre or larger lots—unless the Hillside Conservation Subdivision method is being referred to here. Delete 2<sup>nd</sup> half of sentence which would allow 3 DUA densities. If designated at 1/2-acre, maintain that minimum.

**13. LUP Text, Strategy 10: Systematic Monitoring and Amendment of this Plan, Page 57**

If the Comp Plan and 2040 LUP are considered to be living documents that will be updated, then insert via public process in this paragraph.

**14. LUP Text, Action 5-3, Develop an updatable asset inventory . . . designated for growth, Page 63**

In the proposed asset inventory of Anchorage's infrastructure, include green infrastructure; riparian corridors; wetlands and other natural hydrology features that provide water recharge and water filtration; important natural habitat connections. Without this data prominently shown on maps, there will be more unilateral actions like the moose fence that DOTPF erected along Minnesota Blvd.

**15. LUP Text, Action 7-5: Adopt a Hillside Conservation Subdivision Ordinance, Page 64**

Agree: Adopt a Hillside Conservation Subdivision ordinance. Add: "following the criteria in the HDP."

**16. LUP Text, Action 8-8: Determine which municipal parks are not . . . full dedication status"**

The phrase "potential nomination to full dedicated [park] status" indicates that all parks may not be dedicated. Remove the word "potential" and state that undedicated parks will be dedicated. Park land is too difficult to get or replace. There should also be a 'no net loss of parkland' in the LUP.

Sincerely,

Adam Lees, Chair

## Land Use Plan Map

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**From:** Jeffrey Manfull <akjeff@gmail.com>  
**Sent:** Monday, October 31, 2016 4:07 PM  
**To:** Davis, Tom G.; Cecil, Jonathan P.; Land Use Plan Map; !MAS Assembly Members  
**Cc:** Bonnie Harris; Mara Carnahan; Hans Thompson; John Thurber  
**Subject:** South Addition Resolution regarding the 2040 Land Use Plan Draft  
**Attachments:** Anchorage 2040 LUPM resolution.pdf

Please find attached a resolution passed at the 10/20/16 South Addition Community Council meeting regarding the 2040 LUP Draft.

Respectively yours.  
Jeffrey Manfull  
VP and acting President,  
South Addition Community Council



October 20, 2016

**South Addition Community Council Resolution Requesting Changes to Proposed Anchorage 2040 Land Use Plan Draft**

SACC's comments were initially submitted on October 17, 2016 by SACC Land Use Committee on behalf of the Council; they are resubmitted as a Resolution without changes. The comments were adopted by the SACC at its first membership meeting after the LUP 2040 Public Hearing Draft released for public review on September 26, 2016

**RESOLUTION:**

The public has not been given adequate time to respond to the LUP 2040 Public Hearing Draft. It was released for public review on September 26 with public comments due by October 17. Important maps and appendices have not been available for public review as long as the narrative, and staff's issue-response summary is still not publicly available. Neither the Planning and Zoning Commission nor the Assembly should take action on the LUP 2040 until adequate time is provided for Community Councils and the public to comment.

**SACC's Priority Comments:**

1. **SACC opposes the addition in the 2040 LUP that would allow increased density in areas within up to a half mile from designated City Centers.** This provision's half-mile designation applies to virtually all of South Addition and contradicts or confuses many of the zoning designations. **SACC requests that this provision be omitted.**

This provision is in the Character section, sixth bullet (p 28): "To provide greater housing opportunities, areas up to a half mile from designated City Centers may allow increased density. This is subject to compatibility standards for scale, design, lot coverage, setbacks, and alley driveway access." This provision is unnecessary and potentially confusing. The land use plan clearly addresses the goals of increased density in these areas. The map of "Areas of Growth and Change by 2040" (p. 19) clearly illustrates areas of growth. Neighborhood and area specific plans clearly outline how growth and increased density should play out in particular areas. To have a blanket-statement like this, that impacts almost all of South Addition, is unnecessary as the aspects of increased housing density have already been addressed. A blanket-statement like this bullet does not recognize the unique aspects of the neighborhoods it would cover in South Addition. It gives the impression that somehow the careful planning of the LUP and the neighborhood plans may be disregarded within a half mile of designated city centers. This should be removed so it does not lead to confusion or conflict between the city, developers and residents.

At the very least, this bullet should be amended to clearly state that neighborhood plans are the guiding force for the specifics of new and re-development, and that any diversion from the neighborhood plan should only take place after a rigorous public hearing process. This is in full compliance with Action 7-4 (p64), which states “Adopt a Traditional Neighborhood Design zoning district or overlay zone for urban neighborhoods, which reflects adopted plans. “

2. **South Addition Community Council (SACC) opposes the proposal to allow ,by right, four story buildings in R2M zoned areas near designated city centers.** For the first time in the 15 year long process of developing this plan the municipality has suddenly proposed increased height to four stories in R2M and R-3 districts, well above the long-existing dimensional maximum height of 35 ft. **SACC requests that this provision be omitted.**

SACC has repeatedly objected to the proposed four stories in R3 zones. This section is objected to as well.

Compact Mixed Residential – Medium “Character” section, fourth bullet (p 29): “Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story .” In addition, Action 4-4 in the Actions Checklist (p 62) proposes to amend Title 21 “to allow compact housing on R-2M or R-3 zoned lots near designated Centers”, which “May include increased height or allowed units per lot... .”

The LUP addresses height for zoning districts and this blanket-statement should not circumvent the careful planning of the LUP and neighborhood plan. This fourth-story provision would violate the Title 21 zoning that has been worked on for years by many parties to guide appropriate development in these areas. It also suggests there is a way to “go around” this careful planning. It is particularly distressing to South Addition residents as much of the neighborhood would be impacted. If a fourth story is desired in these areas, the appropriate public process of re-zone or variance must be observed.

### **Additional Comments**

1. LUP Goal 7. Infill development that is compatible with the valued characteristics of surrounding properties and neighborhood is a very important part of the plan. (p15). The LUP should clearly state that new Development and zoning be driven by the vision expressed in each neighborhood plan.

SACC is pleased to see that plan addresses infill as a critical component of successful growth. A Plan that increases density in a way that highlights the valued characteristics

of the neighborhood improves the quality of life and makes for a more acceptable integration of new development. This is particularly important in South Addition because of its history as one of Anchorage's earliest neighborhoods. South Addition is proud of this heritage and dedicated to preserving the unique historic character while it grows. Much of the original land use development – paved sidewalks, ample setbacks supporting landscaping and gardens, alley access for vehicles, mature trees, home scales that allow sunlight to adjacent properties – combine to make South Addition a desirable place to live and recreate. Residents from other parts of town come to South Addition to walk because of the inviting, safe, pedestrian scale of our neighborhood. Bootlegger's Cove, with its higher residential density, offers safe sidewalks and small, meandering streets that naturally slow traffic. Residents are committed to protecting the qualities that make the South Addition neighborhood a desirable place to live.

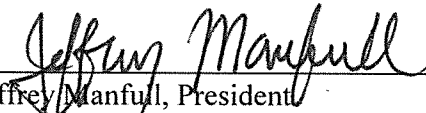
2. South Addition has little vacant land. It is imperative that new development in South Addition look to the South Addition neighborhood plan to guide them. The South Addition community is in the process of completing their neighborhood plan, and it is the express desire of the SACC that no new large developments or dramatic changes occur to zoning/land use within South Addition until the neighborhood plan is finalized. It is expected to be completed in 2017.
3. South Addition provides some housing for the downtown employment center, but that housing must be compatible with the existing character of SA. Downtown core housing opportunities should not be displaced to South Addition. Thriving downtowns are sustained and strengthened by a vibrant residential housing presence in their core. There is a great need to locate residential housing in Anchorage's downtown core, and the LUP and the city should work to ensure that residential units are constructed there. The area east and southeast of the downtown core is also ripe for redevelopment. It has stable seismic reports, fabulous views, available land, and a Fairview neighborhood plan committed to higher density residential revitalization.
4. Walkability is one of the most valued aspects of South Addition. Many residents walk or bike daily for recreation or as a primary mode of transportation to and from work. It is equally important to note that most residents own vehicles. It is necessary to ensure that there are appropriate parking requirements for all new residential construction. The recent employer and employee Housing survey conducted by Live, Work, Play showed that 79% of respondents wanted a garage as part of their housing.
5. SACC supports the Shared Design Principles delineated in the plan (p24/25). Thoughtful design is crucial to successful growth. Particular importance should be paid to design for northern climates, access to sunlight, walkability during winter, snow storage, year-round sidewalk maintenance, etc.

6. South Addition offers many greenbelts and parks. The Delaney Park Strip, Westchester Lagoon, the Tony Knowles Coastal and Chester creek trails are treasured by residents city-wide. SACC supports the LUP's Goal 8 - to maintain, improve and strategically expand parks, greenbelts and trail corridors. (p16).
7. Immediate measures are needed to protect year round sunlight on the Delaney Park Strip. As density increases along the Park Strip, the city needs to ensure that there are height limits on the south side of the Park Strip to prevent shading of this treasured community resource. Developments of even 30 feet cast a shadow on the Park Strip for at least 6 months of the year.
8. SACC supports community-minded efforts to reduce barriers to appropriate infill development and redevelopment. (p11). It is imperative that any new or re-developments are guided by the area and neighborhood plans. Neighborhood plans are painstakingly crafted by residents and stakeholders to foster new, thoughtful development that will integrate with the neighborhood to produce thriving communities. Flexibility with developers and deviation from the LUP or neighborhood plans should require public involvement.
9. SACC approves the LUP's goal to encourage corridors to evolve into mixed use, pedestrian-oriented and transit friendly environments. (p12). South Addition has several major corridors moving autos, commercial trucks, pedestrians and bikes to and from downtown. Traffic speed is a major concern for South Addition residents. Residents would like to see measures to slow this traffic through the neighborhood, to improve safety for pedestrians and bikers, and make these corridors safer all users. Traffic calming strategies such as narrower roads, trees adjacent to the street, etc., should be incorporated into all future road projects, maintenance and development.
10. We are pleased to see that transit is listed among transportation services, and want to see strong language, making transit a full partner in supporting desired infill and redevelopment with its pedestrian friendly streets. Transit is needed to remove even a small percent of drive alone auto trips from arterials now filled with high speed traffic that dominate parts of the neighborhood and make it unsafe to cross the street to get to a bus stop. Targeted transit service to and from employment centers will generate more demand for safe, walkable corridors and will help transform high speed arterials into streets that are desirable for both high quality housing and commercial uses.
11. Small scale, compact housing development would be consistent with South Addition's character. (p13). Encouraging compact housing, cottages, etc., would invite an increase

in density with multiple homes on one lot, without a dramatic change in the character of the existing neighborhood.

12. SACC supports the LUP's commitment to improving access to transit and trails as a critical component of successful growth. (p15). More frequent, predictable public transit and safe, enjoyable passages for bike and pedestrians will allow for reduced road congestion as South Addition residents walk, bike, and ride buses when possible. This nicely supports the valued characteristic of "walkability" in South Addition.
13. The Anchorage Downtown Comprehensive Plan adopted in 2007 directed that a viewshed plan be adopted within 1-2 years (p 99 and Action item UD-1, p136, Anchorage Downtown Comprehensive Plan), but that never happened. The 2040 LUP should include a viewshed plan, and take steps to protect the viewshed for downtown buildings. Building heights in South Addition will greatly impact downtown viewsheds.

PASSED AND APPROVED by the South Addition Community Council this 20<sup>th</sup> day of October, 2016 by a vote of 18 in favor; 0 opposed; and 12 abstentions.

  
\_\_\_\_\_  
Jeffrey Manfull, President  
South Addition Community Council

TURNAGAIN COMMUNITY COUNCIL COMMENTS ON THE  
**2040 ANCHORAGE BOWL LAND USE PLAN — PUBLIC HEARING DRAFT**  
 TO THE PLANNING & ZONING COMMISSION — October 17, 2016

TCC submitted extensive comments on the Community Review Draft of the Anchorage Land Use Plan and Map, which are attached to this letter. Please refer to these comments on the below items as well as other components of the Draft Plan. Also attached is **AO 2000-151 (S-2) regarding Turnagain Bog**, and our **2005 comment letter on the initial attempt by the Planning Dept. to update the 1982 Anchorage Bowl Land Use Plan**, as these contain additional information to provide rationale for TCC's long-held positions on Municipal and Airport parcel land uses in our council area.

**HIGH-DENSITY GREENWAY SUPPORTED-DEVELOPMENT ALONG FISH CREEK**

- **TCC SUPPORTS THE CONCEPT BUT OPPOSES THE PLAN NARRATIVE**  
 TCC's support of the Greenway-Supported Development is contingent on some *substantial* changes to the Plan language, in order to address concerns we have identified. These are outlined on page 3 in our September 9, 2016, comment letter.

**POINT WORONZOF PARK, AWWU-OWNED 'PARCEL 6', PORTION OF HLB LAND WEST OF AIRPORT**

- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF POINT WORONZOF PARK AS "AIRPORT EXPANSION ALTERNATIVE"**  
 The Planning Dept. changed the Community Review Draft designation of Point Woronzof Park from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 3-4 in our September 9, 2016, comment letter.
- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF AWWU-OWNED 'PARCEL 6' AS "AIRPORT EXPANSION ALTERNATIVE"**  
 The Planning Dept. changed the Community Review Draft designation of AWWU-owned Parcel 6 from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 4 in our September 9, 2016, comment letter.
- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF A PORTION OF HLB LAND WEST OF THE AIRPORT AS "AIRPORT EXPANSION ALTERNATIVE"**  
 The Planning Dept. changed the Community Review Draft designation of a portion of HLB land from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. TCC's rationale for opposing the designation and plan narrative is outlined on page 5 in our September 9, 2016, comment letter.

**TURNAGAIN BOG**

- **TCC OPPOSES THE DESIGNATION & PLAN NARRATIVE OF A PORTION OF TURNAGAIN BOG AS "AIRPORT, RAILROAD OR PORT FACILITY" AND A PORTION OF TURNAGAIN BOG AS "AIRPORT, RAILROAD OR PORT FACILITY WITH GREENWAY SUPPORTED DEVELOPMENT"**  
 The Planning Dept. changed the Community Review Draft designation of a portion of Turnagain Bog from "Public Facility/Natural Area" to "Airport Expansion Alternative" in the Public Hearing Draft. However, the document intent is still the same. The Public Hearing Draft has also changed a portion of Turnagain Bog to "Greenway Supported Development." No development should take place in these Class A, high-value wetlands directly adjacent to the Turnagain residential area — TCC has long opposed the development of a trail in this area. TCC's rationale for opposing the designation and plan narrative is outlined on page 5-7 in our September 9, 2016, comment letter.

**ANCHORAGE COASTAL WILDLIFE REFUGE**

- **TCC REQUESTS MORE ACCURATE IDENTIFICATION FOR THE ANCHORAGE COASTAL WILDLIFE REFUGE ON THE MAP**  
 There should be additional identification for the ACWR near Point Woronzof, as this is the northern boundary of the refuge. TCC's rationale is outlined on page 7 in our September 9, 2016, comment letter.



# TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils  
1057 West Fireweed Lane, Suite 100  
Anchorage, Alaska 99503

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Sent via email

September 9, 2016

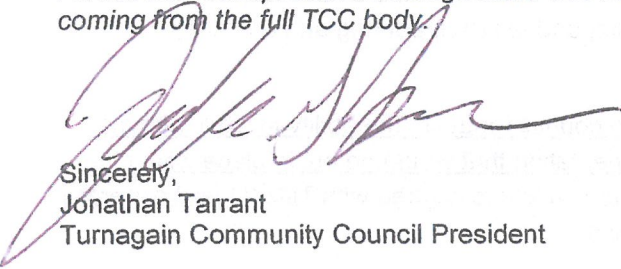
Municipality of Anchorage Community Development Department  
Planning Division  
P.O. Box 196650  
Anchorage, AK 99519-6650

RE: TURNAGAIN COMMUNITY COMMENTS ON THE  
ANCHORGE BOWL LAND USE PLAN MAP UPDATE — COMMUNITY DISCUSSION DRAFT

Dear Planning Dept. Staff:

The letter below (with a few minor edits) — which was originally sent by the Turnagain Community Council (TCC) Land Use Plan Map Committee Co-Chairs Anna Brawley and Cathy Gleason in June — was presented for affirmation to the TCC members at our September 8, 2016, meeting; the vote to do so passed, 17 Yes, 0 No.

*Please now except this Anchorage Land Use Plan Map Update — Community Discussion Draft comment letter as coming from the full TCC body.*



Sincerely,  
Jonathan Tarrant  
Turnagain Community Council President

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May 27, 2016

Sent via email

Municipality of Anchorage Community Development Department  
Planning Division  
P.O. Box 196650  
Anchorage, AK 99519-6650

RE: ANCHORGE BOWL LAND USE PLAN MAP UPDATE — COMMUNITY DISCUSSION DRAFT

Dear Planning Dept. Staff:

Thank you for the opportunity to provide input on the Anchorage Bowl Land Use Plan Map (LUPM) Community Discussion Draft. The Turnagain Community Council (TCC) recognizes the importance of weighing in on the development of this community-based plan that will set the direction for positive land use and development in our city for the next 25 years. As you are aware, TCC previously submitted comments on the 2006 update draft (attached to this letter), and our comments on the current draft Map generally support our input and positions on the previous version.

The TCC LUPM Update Committee, which was formed to follow the public involvement process for this planning document, presented initial recommendations at our TCC May 5, 2016, general meeting, which received broad support. A briefing was also presented to the council at our June 2, 2016, meeting. In order to submit comments in a timely manner, TCC is submitting these recommendations now, and they will be presented at our September 1, 2016, general meeting for formal affirmation.

## LUPM Map — Overall Designations within the TCC Boundaries

- WITH SOME SIGNIFICANT EXCEPTIONS, TCC GENERALLY SUPPORTS the Draft LUPM Map RE: DESIGNATIONS WITHIN THE TURNAGAIN BOUNDARIES

Located in the northwestern area of Anchorage along the coast, Turnagain is a primarily residential neighborhood, with popular parks/trails/natural open space, and limited commercial areas. TCC supports protection of our established coastal neighborhood by its mainly Residential and Park or Natural Area designations in the LUPM Map. TCC also supports the LUPM Map's proposed density in the Turnagain neighborhood, which reflects existing zoning density, and allows for infill of similar type housing (single family, duplex, and multi-family).

A large portion of land within the TCC boundary to the west contains Ted Stevens Anchorage International Airport (Airport) land as well as natural open space within and outside of Airport property. TCC recognizes the Airport is a vital public facility, serving not only Anchorage, but also the entire state of Alaska. With the exception of important Turnagain areas described below (see pages 3-8), TCC supports the designation of the current boundaries of the Airport as "Airport, Railroad or Port Facility."

## LUPM Map & Plan (page 36) — Turnagain Traditional Neighborhood Design Proposal:

- TCC SUPPORTS the Draft LUPM Map & Plan RE: A SIGNIFICANT AREA OF SOUTH TURNAGAIN DESIGNATED FOR A 'TRADITIONAL NEIGHBORHOOD DESIGN' OVERLAY

A significant portion of the Turnagain residential neighborhood south of W. Northern Lights Blvd. is designated for possible implementation of "Traditional Neighborhood Design" in the Draft Map, which would facilitate compact design and allow for and encourage sidewalks, and different parking and driveway standards.

While TCC supports the concept of this design designation, the council requests the ability to work with the Municipality on specific design guidelines and details of implementation that would be put in place within the Turnagain neighborhood. TCC would also like to be assured the concept is aligned with Title 21 and generally acceptable to private developers, to ensure viable implementation.

Because the Traditional Neighborhood Design designated area on the Map covers multiple neighborhoods (including neighborhoods in Turnagain, Spenard, South Addition, Fairview and Downtown), TCC feels there may be a need to split up the boundary of any future overlay districts into smaller areas. Each neighborhood may have slightly different ideas on the look and implementation of the Traditional Neighborhood Design that would best suit and enhance its area.

## LUPM Map & Plan (pages 35-36) — Greenway-Supported Development

- TCC SUPPORTS the Draft LUPM MAP CONCEPT RE: HIGH-DENSITY GREENWAY SUPPORTED-DEVELOPMENT ALONG FISH CREEK

The Draft Map shows Greenway-Supported Development along the Fish Creek corridor, starting at Minnesota Dr. and going east, to support better trail connections between western neighborhoods and Midtown. While TCC would want to work with the Planning Dept. to determine the exact location(s) for the western connecting points for trails along Fish Creek, we recommend the Greenway-Supported Corridor be extended west past Minnesota Dr., including possible redevelopment of housing in the neighborhood between Spenard and Tudor Roads, and connect with the existing Fish Creek Trail network. It is difficult and unsafe to travel on bike east from Turnagain and Spenard across Minnesota Dr., and even less safe to travel to Midtown; this corridor would significantly improve safety and quality of bike routes from our part of town.

However, TCC's support of the Greenway-Supported Development is contingent on some substantial changes to the Plan language, in order to address concerns we have identified.



• **TCC OPPOSES the Draft LUPM PLAN DESCRIPTION RE: GREENWAY SUPPORTED DEVELOPMENT ALONG ANCHORAGE CREEKS**

While uncovering or revitalizing existing creeks sections or natural functions as part of this redevelopment concept would be a very positive component of Greenway-Supported Development, TCC has serious concerns that would need to be addressed before implementation of this concept, as currently described in the Draft Plan:

- Title 21 would need to be rewritten, to enlarge the minimum creek setback width — *before any development under this proposal occurs* — to ensure natural greenbelt areas are preserved.
- Development close to creeks could negatively impact water quality and wildlife use and habitat — and set the stage for more potentially dangerous human/wildlife encounters.
- Higher density development along Fish Creek could have negative impacts on Fish Creek/Turnagain neighborhood downstream.
- TCC specifically does not support the Plan image of creek channelization with little or no greenbelt (page 35); nor do we support the Plan language description RE: “Urban greenways may be incorporated into development in various ways: as a newly constructed stream channel threaded between existing building or future buildings, streets, or parking lots...” (page 36) We recognize that this concept has been successfully executed in other places, and can be made an attractive amenity. However, the quality and function of our creeks, and the water bodies they drain into, rely on preserving natural banks, minimizing pollutants seeping into the water system, and preventing barriers to water flow, such as trash or debris building up in the creek channel. The channelized portion of Fish Creek under Spenard Rd. is a ‘good’ example of how this concept creates more problems than benefits in Anchorage. TCC would not want to see more of this type of development along currently underground portions of Fish Creek.
- TCC requests Plan language specifically reference — and the development concept incorporate — scientifically-supported practices for riparian management as an integral component of any Greenway-Supported Development, to ensure appropriate compatibility and environmental protection of Anchorage’s waterways within these higher-density areas.

**LUPM Map & Plan — Public Facility/Natural Area Designation for Point Woronzof Park**

• **TCC OPPOSES the Draft LUPM MAP & PLAN RE: DESCRIPTION OF POINT WORONZOF PARK AS “PUBLIC FACILITY/NATURAL AREA”**

Point Woronzof Park, Municipal dedicated parkland since 1994, is west of the Airport where a beautiful, naturally-wooded section of the Tony Knowles Coastal Trail and a portion of the Anchorage Coastal Wildlife Refuge is located. This area is depicted as “Important Wildlife Habitat” in the Anchorage 2020 Comprehensive Plan, and contains a significant Native archeological site.

TCC opposed the “Major Transportation Overlay” on this park during the development of the West Anchorage District Plan (WADP); TCC reiterates this position with our opposition to Point Woronzof Park designated as “Public Facility/Natural Area” on the Draft Map. Point Woronzof Park should be designated “Park or Natural Area” in the Anchorage Bowl Land Use Plan Map, which would reflect broad community support for this land to remain Municipal dedicated parkland and override the WADP by giving the park its proper designation.

The Draft Plan provides language in numerous locations that justifies this position (page 2, 10, 11) including the language that defines Park or Natural Area (page 26): “The Park or Natural Area designation provides for active and passive outdoor recreation needs, conservation of natural areas and greenbelts, and trail connections. These open spaces are municipally owned...”

Conversely, the Draft Plan provides only vague language in a failed attempt to justify the “Public Facilities/Natural Area” designation for Point Woronzof Park (page 27): “This designation applies to several municipal parcels identified as part of a conceptual, long-term resolution of International Airport area land use conflicts.” TCC opposed any comprehensive land trade with the Airport that would include Airport acquisition



of Point Woronzof Park and fought to keep this concept out of the WADP — our position opposing a comprehensive land trade has not changed.

In its most recent Master Plan Update (finalized December 2014) — intended to project future needs at the facility for the next 20 years — the Airport has not convincingly demonstrated the need for a fourth runway or other aviation/industrial development in this area for the foreseeable future — and the only “land use, ownership and open space conflicts” (page 28) that would exist for Point Woronzof Park is if the Airport is allowed to acquire the park parcel without showing any actual need for it. Airport ownership of Point Woronzof Park could result in fencing off public access, extensive vegetation clearing and other environmental degradations of wildlife habitat, and realignment of the Coastal Trail — without any Municipal authority to override these actions.

As stated in the Draft Plan (page 43), the LUPM can be amended in the future if the Airport ever demonstrates a legitimate need to acquire Point Woronzof Park and develop it for aviation purposes. In the meantime, TCC requests that Point Woronzof Park’s designation in the Land Use Plan Map reflect its 22-year status as “permanent” dedicated parkland and be shown as “Park or Natural Area.”

#### LUPM Map — Public Facility/Natural Area Designation for ‘Parcel 6’ Municipally-Owned Land Adjacent to the Coastal Trail Between the AWWU Sewage Treatment Plant and the Airport

- **TCC OPPOSES Draft LUPM MAP RE: DESCRIPTION OF MUNICIPALLY-OWNED COASTAL TRAIL GREENBELT BETWEEN AWWU SEWAGE TREATMENT PLANT AND THE AIRPORT AS “PUBLIC FACILITY/NATURAL AREA”**

A beautiful, narrow natural open space area of Municipal land (identified as ‘Parcel 6’ in the WADP) directly east of the Anchorage Water and Wastewater Utility (AWWU) sewage treatment plant, and directly east of the Coastal Trail, serves as an essential greenbelt buffer and wildlife corridor between the trail and high-impact north/south runway operations on Airport property nearby to the east.

The demarcation of this land on the Draft Map as “Public Facility/Natural Area” — and its indication by color that it lies within the Airport boundary — is *inaccurate and inappropriate*. The Airport does not own this land, nor has it demonstrated any legitimate need to acquire this Municipally-owned land through a conceptual comprehensive land trade scenario proposed during the development of the WADP — a proposal TCC opposed.

There is no basis to show Parcel 6 as anything but “Park or Natural Area” on the Land Use Plan Map. This would appropriately reflect how the community has used this land since the Coastal Trail was built in the 1980s, and it is a critical section of greenbelt/buffer that protects the integrity and user experience of the Coastal Trail through this area. Under other circumstances, locating a trail between two highly incompatible uses (sewage treatment plant to the west and Airport runway to the east) would be highly problematic. But because of careful planning and placement of the trail, and the retention of this important greenbelt area that buffers the trail, it works — and the community has long been the beneficiary.

For many years, TCC has advocated for the transfer of this land to the Parks and Recreation Dept. for parkland dedication. TCC requests ‘Parcel 6’ land be show in light green — to accurately reflect Municipal ownership — and be designated as “Park or Natural Area” in the Land Use Plan Map. This would serve to reflect the long-established, highest and best community use of this land — and would provide the Municipality Parks and Recreation Department with direction to request the transfer of this land to the Parks Dept., for formal dedication of this essential Coastal Trail greenbelt buffer.

#### LUPM Map — Parks or Natural Area Designation for Municipally-Owned Land West of Airport

- **TCC SUPPORTS Draft LUPM MAP & PLAN RE: DESCRIPTION OF MUNICIPALLY-OWNED LAND WEST OF AIRPORT AS “PARK OR NATURAL AREA”**



A portion of Municipal land currently managed by the Heritage Land Bank (HLB) along the coastal bluff is shown on the Draft Map as “Park or Natural Area.” A section of the Coastal Trail and a portion of the Sisson Loop Trail system — both highly popular recreation trails — are located in this beautiful, natural open space area. It is part of an important wildlife corridor, and identified as “Community Preference for Natural Open Spaces” in the Anchorage 2020 Comprehensive Plan.

For many years, TCC has advocated for the transfer of this Municipal land (as well as other HLB Municipally-owned uplands and tidelands in this area not currently leased or otherwise encumbered) to the Parks and Recreation Dept. and dedication as parkland. This would permanently protect the highest and best long-standing community and environmental use of this area. Designating HLB parcels in this area as “Park or Natural Area” in the LUPM Map will provide direction to the Parks and Recreation Dept. to finally make this happen.

#### LUPM Map — Public Facility/Natural Area Designation for Municipally-Owned Land West of Airport

- **TCC OPPOSES Draft LUPM MAP & PLAN DESCRIPTION OF MUNICIPALLY-OWNED LAND WEST OF AIRPORT AS “PUBLIC FACILITY/NATURAL AREA”**

A portion of Municipal land currently managed by the HLB (directly east of the above discussed area) is shown on the Draft Map as “Public Facility/Natural Open Space.” It has long been considered by the public as an essential greenbelt buffer between the Coastal Trail and high impact Airport operations and development to the east, as it is directly adjacent to Airport land that has been cleared of virtually all vegetation. In addition to serving as an important Coastal Trail greenbelt buffer, it’s also a popular recreational area, as a portion of the Sisson Loop Trail is located on this land. And the Anchorage 2020 Comprehensive Plan identifies it as “Important Wildlife Habitat.”

During the development of the WADP, this HLB area was proposed to be segregated from the connecting HLB land along the coast and included in a proposed comprehensive land trade between the Municipality and the Airport. *However, 1) the dividing line of the HLB parcel on a map was completely arbitrary and not based on any public discussion or input; 2) the Airport has publically stated that this land is of low value to them; and 3) the Airport does not show any proposed development for this Municipal land in their 20-year Master Plan Update.*

This Municipal land may be of low value to the Airport, but it is of high value to the community as an important trail greenbelt buffer and wildlife corridor (see Draft Plan page references under the Point Woronzof Park section of our letter [page 3] for re-enforcement of this position, including page 10, which states, “New parks and greenbelts are added...to function as buffers between incompatible developments.” For many years, TCC has advocated for the transfer of this land to the Parks and Recreation Dept. for permanent parkland dedication.

TCC requests this parcel be designated as “Park or Natural Area” in the Land Use Plan Map, which would reflect the highest and best community use of this land — and would provide the Municipality Parks and Recreation Department with direction to transfer this land to its department for parkland dedication status.

#### LUPM Map & Plan — Public Facility/Natural Area Designation for Portion of Turnagain Bog on Airport Land Adjacent to Turnagain Neighborhood

- **TCC OPPOSES Draft LUPM MAP RE: SIZE OF TURNAGAIN BOG AREA DESGNATED AS “PUBLIC FACILITY/NATURA AREA**

The Draft Map depicts a narrow strip of Turnagain Bog on Airport property directly adjacent to the Turnagain neighborhood as “Public Facility/Natural Area.” The Draft Map should identify a much larger area of Turnagain Bog for “Public Facility/Natural Area” designation, accurately reflecting the Assembly’s action via a portion of Turnagain Bog identified in AO 2001-151 (S-2) (Illustration 2) (attached) and described in the ordinance as, “It is in the public interest that the portions of Turnagain Bog identified as “Lands Not Permitted” in green on



Illustration 2 (including "Scenic Easement") remain as a natural buffer between the ANC and surrounding neighborhoods."

**BACKGROUND:** With the passage of AO 2001-151 (S-2), the Assembly approved Airport use of Municipally-owned areas of Klatt Bog wetlands in south Anchorage, to be used to mitigate Airport-related development in other areas of Turnagain Bog wetlands. The Airport has argued that this ordinance is not binding, as it was conceived as part of a speculative 10-year wetland fill permit application by the Airport that was never approved by the Corps of Engineers. However, 1) nowhere in the ordinance does it stipulate that this agreement was contingent upon approval of the 10-year fill permit application; and 2) over time, the Airport has used Klatt Bog wetland credits approved in the above referenced ordinance to mitigate Airport-related development in Turnagain Bog under individual fill permits.

Following TCC discussions with the Planning Department during the development of the 2006 draft Land Use Plan Map, the draft accurately reflected the boundaries delineated in Illustration 2. And during the development of the WADP, TCC strongly advocated for this Municipal planning document to acknowledge and implement the intent and actual language of this ordinance. As a result, AO 2001-151(S) is included in the WADP (Appendix A-7).

TCC assumes the narrow strip of Turnagain Bog identified as "Public Facility/Natural Area" in the current Draft Map is meant to represent the "Scenic Easement" on the Illustration 2 ordinance map. However: 1) the Draft Map area designated as "Public Facility/Natural Area" hugging the Turnagain residential boundary is much smaller than the Conceptual width of the Scenic Easement on Illustration 2 of the ordinance; and 2) Appendix I of the ordinance, titled "Conceptual Paper" is just that — conceptual — actual size of the "Scenic Easement" has never been agreed to by any of the involved parties, including TCC.

Regardless, the "Scenic Easement" does not represent the entire Turnagain Bog area identified in Illustration 2. As the ordinance language states, this larger wetland/associated uplands serves as an essential buffer between Airport development and high-impact operations and the Turnagain residential area to the east. These wetlands are designated "Class A" wetlands in the Anchorage Wetlands Management Plan, which reflects their high value to the community, including water quality/pollutant filtration, hydrology regulation for waterways and residential development in Turnagain, wildlife habitat, noise buffering and aesthetics.

Based on the above information, data the Planning Dept. used to designate the "Public Facility/Natural Area" boundaries next to the Turnagain neighborhood on the Draft Map is incorrect.

Properly depicting the appropriate size of this important buffer area next to our neighborhood in the Land Use Plan Map — as identified in AO 2001-51 (S-2) Illustration 2 — would also adhere to the 2020 Comprehensive Plan's General Land Use Policy #7 (page 72 in the Comp Plan): "Avoid incompatible uses adjoining one another." It would also support language in the Draft Land Use Plan (page 10): "This strategy also addresses transitions and buffers between different land use designations, such as between major airport facilities or industrial use and residential neighborhoods" and (page 27): "The Public Facility/Natural Area designation addresses undeveloped lands on public facility and institutional campuses, where there is community interest to preserve natural habitat, buffers, greenbelt and trail connections, scenic values, or recreational uses."

The Airport has benefited from the Assembly's decision to provide wetland fill credits to them over the last 15 years — yet, *the community has yet to see tangible action by the Municipality to see that a significant portion of Turnagain Bog "remain as a natural buffer between the ANC and surrounding neighborhoods."* By appropriately depicting all of the Turnagain Bog wetlands/associated uplands shown on the AO 2001-151(S) Illustration 2 map as "Public Facility/Natural Area" in the Land Use Plan Map, *the Municipality would be taking a big step forward in its commitment to provide an essential buffer between Airport development and operations and the Turnagain neighborhood.*

TCC requests that the size of the Turnagain Bog wetlands and associated uplands on Airport property west of the Turnagain neighborhood designated as "Public Facility/Natural Area" be substantially enlarged, to



appropriately reflect the AO 2001-151(S) Illustration 2 Turnagain Bog boundaries deserving of this designation.

### **LUPM Map — Public Facility/Natural Area Designations for Portions of Airport Land Currently Used for Community Park/Recreation:**

- **TCC SUPPORTS the Draft LUPM Map RE: THOSE AREAS BEING USED BY THE COMMUNITY FOR PARK AND RECREATION PURPOSES WITHIN THE AIRPORT BOUNDARIES DESIGNATED AS PUBLIC FACILITY/NATURAL AREA**

As with the portions of Turnagain Bog on Airport property discussed above, it is appropriate to designate areas long-used by the public for park and recreational purposes, or that serve as essential buffering between the Airport and adjacent residential areas, as “Public Facility/Natural Area” on the Land Use Plan Map. These popular community-use areas include: north areas of Connors Bog and De Long Lake, Little Campbell Lake Park, sections of Coastal Trail/Greenbelt buffering, and Point Woronzof Overlook.

This designation reflects the dual land uses for these natural areas: they are located within the Airport boundaries, but used by the public for park, recreational and land use buffering purposes. And FAA Grant Assurances allow for land within Airport boundaries to be used for community purposes: “The contribution of the airport property enhances public acceptance of the airport in a community in the immediate area of the airport; the property is put to general public use desired by the local community; and the public use does not adversely affect the capacity, security, safety or operations of the airport.” (199 Federal Register, page 7721, VII.D.

### **LUPM Map & Plan — Identification/Acknowledgement of Anchorage Coastal Wildlife Refuge Boundaries and Overlap of Municipal Land Within the ACWR Boundaries:**

**MAP:** The Anchorage Coastal Wildlife Refuge (ACWR) is identified with wording in two areas of the Draft Map — both south of Pt. Campbell — but the Draft Map does not show the actual boundary of the refuge. The Draft Plan language states, “The Plan Area Boundary depicts the extent of the land use planning area of the Plan Map.” (page 39) Since numerous parcels of Municipally-owned land falls within the refuge boundary, these areas should be demarcated on the Plan Map.

Because some of the city-owned parcels are located within our council boundaries (Point Woronzof Park tidelands and tidelands located within various HLB parcels), TCC requests that the actual boundaries of the refuge be shown on the Land Use Plan Map, to better visually indicate its location in relationship to the city’s upland western coastline and Municipal land that falls within the ACWR boundaries. At the very least, TCC requests adding “Anchorage Coastal Wildlife Refuge” wording in the water on the Land Use Map, between Pt. Campbell and Pt. Woronzof — to better represent the northern portion of the refuge, which extends to Pt. Woronzof. We have noticed other map layers (including the Community Natural Assets map) depict the ACWR boundaries, so this seems like a simple — but important — amendment to the Land Use Plan Map.

**PLAN:** As stated above, numerous parcels of Municipal land fall within the ACWR boundaries. The LUPM should acknowledge this not only in the Land Use Plan Map, but also in the text of the Plan narrative, as the city has the authority to manage Municipal land within the ACWR boundaries.

TCC requests that the second graph in the Land Use Plan Area Boundary section (page 39) be amended as follows, to better reflect the Memorandum of Understanding updated last year between the Municipality and the Alaska Department of Fish & Game (ADF&G) (AO 2015-72, Appendix A): “Joint Base Elmendorf-Richardson, Chugach State Park, Fire Island, and portions of the Anchorage Coastal Wildlife Refuge are not subject to the Anchorage Bowl Land Use Plan Map. While a 2015 Memorandum of Understanding between the MOA and the Alaska Dept. of Fish and Game allows for ADF&G to manage Municipal land within the ACRW, this agreement allows for the Municipality to “assist, where appropriate, in maintenance and development of refuge access points on the subject municipal lands, both within and abutting the refuge...”



## LUPM Plan — Public Facility/Natural Area Language

- **TCC OPPOSES the Draft LUPM PLAN RE: “PUBLIC FACILITY/NATURAL AREA” SECTION REFERENCES TO USE OF MUNICIPAL PARCELS IN A CONCEPTUAL LAND TRADE WITH THE AIRPORT**

The following language is included in the Draft Plan “Public Facility/Natural Area” section, “This designation also applies to several municipal parcels identified as part of a conceptual, long-term resolution of International Airport area land use conflicts.” (Page 27), and “Specific tracts in and around the Ted Stevens Anchorage International Airport are opportunity parcels for a possible land exchange or other mechanism to resolve land use and ownership conflicts. These include Airport tracts, municipal park and Heritage Land Bank lots, and portions of AWWU land.” (page 28).

As already stated, TCC strongly opposed the idea of a comprehensive land trade with the Airport when this idea came up as part of the development of the WADP, because of the select municipal parcels chosen to potentially be acquired by the Airport. These parcels included Point Woronzof Park, ‘Parcel 6’ Coastal Trail greenbelt/buffer, and AWWU sewage treatment plant expansion reserve land — all vital city-owned land that should be retained by the Municipality because of its long-term, high value use by the community.

The Airport has never demonstrated a real need for any of this Municipal land — and the need for a fourth runway or other aviation-related development west of its current boundaries is highly unlikely during the 25-year span of this LUPM Update. But as already pointed out, the Draft Plan’s own language states that the LUPM can be amended in the future, IF the Airport every demonstrates a legitimate need for these Municipal parcels (page 6).

Conversely, as stated on page 6 of our letter, FAA Grant Assurances allow for Airport land to be used by the public for community purposes: “Making airport property available at less than fair market rental value for public recreation and other community uses, for the purpose of maintaining positive airport-community relations, can be a legitimate function of an airport proprietor in operating the airport.” (1999 Federal Register, (p. 7721.Vii.D) This legitimizes the Airport’s many-years allowance of land within its boundaries being used for park, recreation, buffer and other purposes that benefit the community at-large (including Spenard Beach Park, Little Campbell Lake Park, sections of the Coastal Trail, the snow dump near Connors Bog, etc.) — and precludes the impression that there are land use conflicts that need to be resolved with a comprehensive land trade.

TCC was very supportive of Mayor Berkowitz’s decision in fall 2015 to withdraw a proposed ordinance by the previous administration, which would have supported the land exchange, and would have placed undedication of Point Woronzof Park on the Municipal ballot for a public vote by 2017.

Based on all of the above rationale and the current administration’s position, TCC requests language referring to Municipal land potentially being included in a land trade with the Airport in the Public Facility/Natural Area section be deleted from the Land Use Plan.

## LUPM Plan — Supplementary Policy Guidance Language

- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-5: Consistency of Area-specific, Functional, and Facility Plans**

Proposed new policy recommendations to be incorporated into the 2020 Comprehensive Plan includes LU-5 (page 12), which states, “The Comprehensive Plan shall be the Municipality’s lead and overall policy guide for growth and development in the Anchorage Bowl.” It goes on to state that, “Revisions and updates to other municipal plans...shall be in conformance with the Comprehensive Plan.”

TCC supports this land use policy and recognizes it as a way to override narrative and Implementation Actions that our council opposed in the WADP — including the concept of a comprehensive land exchange with the Airport.



- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-7: Targeted Infrastructure Investment**

TCC feels it is important to “invest in public infrastructure (i.e., parks, trails, schools, sidewalks, streetscapes, utilities) to catalyze reinvestment in priority focus areas,” as stated in LU-7 (page 12). These important community amenities enhance our city by providing a better quality of life for residents. By investing in these amenity improvements, it will provide incentives for residents to locate in mixed-use districts and other areas of Anchorage, defined in the 2020 Comprehensive Plan.

- **TCC SUPPORTS the Draft LUPM PLAN RE: Land Use Policy-10: Conserving, Enhancing, Revitalizing Neighborhoods — with Amended Language**

As housing density increases in Anchorage, TCC supports the Planning Dept.’s recognition that higher density needs to be balanced with protection of what makes Anchorage a special place to live — including protection of the environmental assets this city is fortunate to have. While it’s important for the Land Use Plan to emphasize the restoration of environmental areas that have been compromised or degraded, it’s also important to *protect* these special environmental areas in the first place.

TCC requests that the LU-10 policy statement be amended by adding the underlined text (page 12): “Balance the need to increase the housing supply and expand neighborhood commerce with the parallel need to protect and enhance neighborhood character, preserve historic resources, and protect and restore the environment.”

- **Amend the Draft LUPM PLAN RE: Land Use Policy-11: Reducing Barriers to Core Sector Growth**

TCC feels the language to describe LU-11 is too vague and does not provide a caveat that protects the existing land uses from potential incompatible uses and/or negative impacts due to inappropriate industry expansion. An excellent example of this is referenced on page 7 of our letter, with regard to Airport expansion into the Turnagain Bog wetlands/uplands buffer adjacent to the Turnagain neighborhood; or Airport expansion that would destroy dedicated parkland and popular sections of recreational trails to the west of its current boundaries.

TCC requests that the LU-11 statement be amended by adding the underlined text (page 12): “Assist Anchorage’s core sector and growth industry employers, by resolving land use constraints, where appropriate and compatible with existing and surrounding land uses, so they can continue to grow, expand job opportunities, and provide a diverse, stable economic base.”

- **Amend the Draft LUPM PLAN RE: Land Use Policy-12: Coordinating Institutional Growth**

Similar to our comments above on LU-11, the LU-12 policy statement should include additional language in the Land Use Plan that qualifies advocating for expansion of Anchorage’s large institutional facilities, to ensure appropriate growth and land use compatibility occurs. Unconstrained growth in these areas can cause additional traffic, noise, loss of natural open space, etc., which would have negative impacts on the surrounding areas.

TCC requests that LU-12 be amended by adding the underlined text (page 12): “Expand and encourage partnerships among Anchorage’s large educational, research and medical institutions to coordinate future growth and development of these institutions, where appropriate and compatible with surrounding land uses and neighborhoods.”

## **LUPM Plan — Land Use Designations/Growth Supporting Features and Landscaping/Natural Area Preservation**

- **Amend the Draft LUPM PLAN RE: Higher Density, Development in General & Landscaping Standards**

Within the various 2.2 Land Use Designations and 2.3 Growth Supporting Features sections of the Draft Plan, higher density housing in select areas is presented as a way to provide more housing within the Anchorage



Bowl, to accommodate projected future city growth. And additional commercial and industrial development will be needed to continue providing necessary goods and services to our community.

However, the Land Use Plan needs to include stronger language and better examples of development than some of those in the Draft Plan, to emphasize the need to balance high-density housing on smaller lots (with limited front and side-yard setbacks), and commercial development (very close to sidewalks and streets) with appropriate space for aesthetic landscaping and preservation of wooded areas that provide aesthetics and buffering. Unfortunately, the Draft Plan includes more bad examples, than good:

**Good examples (where landscaping is integrated into the development):** Photo 4 on page 18; Photo 5 on page 19; Photo 20 on page 30.

**Bad examples (where little or no landscaping is visible):** Photo 11 on page 23; Photo 12 on page 24; Photo 13 on page 25; Photo 19 on page 29; Photo 24 on page 31; Photos 26, 27 & 28 on page 32; Photo 30 on page 35; Photo 35 on page 38.

Clearly, implementation of higher density, smaller lots, and more compact development should not occur until Title 21 landscaping/preservation of natural wooded areas requirements are strengthened, to avoid more development like the examples all too often depicted in the Draft Plan — and currently found throughout our city.

While TCC generally supports the Land Use Designation and Growth Supporting Features, we request that the Land Use Plan include language throughout these sections that more strongly emphasizes the need to provide appropriate landscaping setbacks and higher landscaping/natural area protection standards (with accompanying better photo examples) within high density housing and other developed areas in our community. And strengthening landscaping requirements should be included as an Action Plan in the Land Use Plan.

A specific example of amended language to better emphasize the above points: TCC requests that language in the Industrial Land Use Designation statement be amended by adding the underlined text (page 32): "Greater buffering and screening should [MAY] be required to enhance public rights of way and improve land use compatibility."

### LUPM Plan — City Center Land Use Designation and Retail Businesses

- **Amend the Draft LUPM PLAN RE: City Center Location Criteria**

As Midtown has developed over the last several years, more office and non-retail development has occurred within this general area. While there are still numerous retail shopping opportunities in Midtown for those living in the surrounding residential areas, including Turnagain, TCC requests that language in the City Center Location Criteria (last bullet) be amended by adding the underlined text (page 24): "Not to expand at the loss of residential and retail." This will ensure that long-term development of the Midtown area retains a balance of residential, retail and office development.

### LUPM Plan — Lakes and Streams Land Use Designation

- **Amend the Draft LUPM PLAN RE: Lakes and Streams Protection Language**

The Lakes and Streams Land Use Designation (page 39) states, "The Plan is not intended for use in determining the location of streams or stream protections setbacks." As we stated on page 2 (Greenway Supported Development), Title 21 stream setback requirements need to be enlarged, in order to properly protect riparian habitat along Anchorage streams. While TCC understands the limitations of mapping all the waterways within the Anchorage Bowl, TCC requests inclusion of the following sentence as the last sentence of this section (page 39): "The Plan recognizes that proper setback protection for waterbodies is an important component of land use for Anchorage and will be addressed in Title 21." This serves as an important acknowledgement of water resource protection in this section of the Land Use Plan.



## LUPM Plan — Targeted Area Rezoning

- **TCC SUPPORTS the Draft LUPM PLAN RE: Targeted Area Rezoning Language & Parkland Dedication**

The Targeted Area Rezoning section (page 46) states, "Individual rezonings will occur over time, as growth and the need arises." TCC see this as an opportunity for the community to 'target'/identify parks currently under designated status, and formally dedicate these parks, as part of a targeted area rezoning effort. This action should simultaneously incorporate the rezoning of these dedicated parkland parcels to PR District.

As more development occurs to accommodate population growth, it is important that parkland/natural open space within our community that provides a high quality of life are given the highest level of protection.

TCC has already worked with the Parks and Recreation Dept. staff to identify all designated parkland within our boundaries long enjoyed by Turnagain residents and the community-at-large, and passed a resolution (March 2015) supporting formal park dedication and rezone of these parcels. TCC hopes to work with the Parks Dept., the Parks and Recreation Commission, and the Assembly to accomplish this in the near future.

## LUPM Plan (pages 54-55) — Table 5: Action Checklist

- **Draft LUPM PLAN RE: Table 5 Action Checklist:**

- **PAGE 54 — INDUSTRIAL LAND PRIORITIZATION ACTION ITEM VII-12: Support application of Foreign Trade Zone (FTZ) on TSAIA lands.**
  - Development in Foreign Trade Zones within the TSAIA boundaries areas should be carefully placed, in order to minimize potentially negative impacts on surrounding land uses (noise, pollution, traffic through adjacent neighborhoods, clearing of natural open space buffer areas, development on high value wetlands/natural wildlife areas, etc.).

TCC requests more information/details on the criteria/process for choosing specific areas located within TSAIA boundaries that could be designated as FTZs — and what development/operations would be allowed to occur within those FTZ designated areas.

- **PAGE 54 — COMPATIBLE LAND USE ACTION ITEM VIII-1: Include neighborhood buffering standards in TSAIA Targeted Area Rezone in Action VII-1**
  - This action item should not be limited to Sand Lake residential areas along Raspberry Road. Appropriate buffering areas on Airport land should be designated for all adjacent neighborhoods and other land uses surrounding the Airport — not just those areas designated as Targeted Area Rezone areas along Raspberry Rd. As stated earlier in our comment letter (pages 5-6), the size of Turnagain Bog wetlands/associated uplands designated as a buffer needs to be significantly enlarged than what is shown on the Draft Map.

TCC conceptually supports neighborhood buffering standards, but needs more information on the details. Our council would want to be part of a group involved in the development of these neighborhood buffering standards, to ensure protection of quality of life, and consistent application and land use compatibility around the Airport.

- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-5: Conduct a valuation study of the natural economy of Anchorage's ecosystem to determine current watershed and wetland protection, economic value, and land use development impacts.**

**TCC SUPPORTS** this Action Item — it is important to assess the intrinsic value of our natural waterbodies as Anchorage grows and moves forward with higher density housing and other development. This information will be very useful to ensure proper protection to the city's watersheds and remaining wetlands/natural areas.



- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-6: Conduct scenic viewshed assessment for Bowl and determine strategies for viewshed protection.**

**TCC SUPPORTS** this Action Item — as with Anchorage’s watersheds and wetlands, it is important to identify and protect high value viewsheds in our city. Scenic viewsheds enhance our quality of life, provide greater economic property assessments, and elevate the visitor experience while in our city.

- **PAGE 55 — COMPATIBLE LAND USE ACTION ITEM VIII-7: Identify development standards and incentives to mitigate impacts to wildlife near wildlife habitats.**

**TCC SUPPORTS** this Action Item — but requests the Action Item be amended as follows: “Identify development standards and incentives to protect and mitigate impacts to wildlife near wildlife habitats.”

Any proposed development near wildlife habitats should first be evaluated for adherence to wildlife *protection* standards, so that impacts to can be prevented, rather than mitigated.

- **PAGE 55 — IX OPEN SPACE AND GREENBELTS ACTION ITEMS**

**TCC GENERALLY SUPPORTS** these all of these Action Item, but has a specific amendment for Action Item IX-4, as follows:

**TCC SUPPORTS** Action Item IX-4 — but requests the Action Item be amended as follows: “Conduct housekeeping to dedicate parks currently classified as designated parks, followed by rezoning [REZONE] of dedicated parks to PR District, and some T zoned lands to PLI.”

As stated on page 10 of our letter, TCC has already collaborated with the Parks and Recreation Dept. to identify all designated parks within our boundaries, and has passed a resolution for dedication and rezone of these parks to the PR District. This should be done throughout the city, to ensure the highest level of protection for these public facilities.

- **PAGE 55 — ANCHOR INSTITUTIONS AND FACILITIES X-5: Develop TSAIA, Merrill Field and JBER interface compatibility overlay zone.**

During the development of the WADP, TCC (and Spenard CC) opposed the concept of “Airport Influence Overlays” as well as the “Airport Disclosure through Plat Notes” proposal (page 133 of WADP). These requirements would put all the burden, which could have financial consequences, on owners of property that would fall into these overlay boundaries — and no action required by the Airport to minimize noise and other negative impacts on the nearby neighborhoods.

A “Compatibility Overlay Zone” proposed in the Draft Plan sounds very similar to what was proposed in the WADP. TCC requests more information as to how these overlay zones would be determined, what criteria would be used, what the potential negative ramifications could be to property that falls within these zones, etc. before the Municipality considers moving forward with this Action Item.

- **PAGE 55 — ANCHOR INSTITUTIONS AND FACILITIES X-6: Resolve land use, ownership, and open space conflicts around TSAIA through a land exchange.**

**TCC OPPOSES** Action Item X-6. As expressed earlier in our comments, TCC continues to be strongly opposed to the concept of a land exchange that would presumably “resolve conflicts,” just as we did during the development of the WADP. Only if Municipal land long used by this community as parkland, natural open space and recreational areas is traded to the Airport will there be major conflicts — and these conflicts will not be able to be realistically

resolved if this land, including dedicated parkland, is developed for aviation purposes.  
TCC requests this Action Item be deleted from the Land Use Plan.

### LUPM Supporting Maps

TCC also found some errors on some of supporting maps posted on the Land Use Plan Map website. TCC requests an opportunity to meet with Planning Dept. staff to discuss the specifics, to ensure the LUPM is based on accurate data.

Once again, TCC appreciates the opportunity to provide detailed comments on the Draft Land Use Plan Map Update and accompanying Plan narrative. We are an active council who has dealt with many of the land use items discussed above for many years. TCC hopes that our input during this important LUPM Update process — and our continuing dialogue with the Municipal Planning Dept. — result in a positive outcome for the Turnagain neighborhood and our community.

Sincerely,

Anna Brawley & Cathy Gleason  
Turnagain Community Council Land Use Plan Map Committee Co-chairs

Attachments:

9-16-2005 Turnagain Community Council Comment Letter on Land Use Plan Map Draft  
AO 2001-151 (S-2) Illustration 2 Map



Illustration 2 - Detail

Legend

Airport Property Boundary

Permitted Land

Lands Not Permitted

Scenic Easement





**From the Board of Directors of  
Turnagain Community Council**  
c/o Mark Wiggin, President  
2213 Douglas Dr., Anchorage, Alaska 99517

September 16, 2005

sent via e-mail

Municipality of Anchorage Planning Department  
P.O. Box 196650  
Anchorage, Alaska 99519

**RE: ANCHORAGE BOWL LAND USE PLAN MAP — Community Discussion Draft**

Dear Planning Staff:

Thank you for the opportunity to provide input on development of the Anchorage Bowl Land Use Plan Map, an essential component of the Anchorage 2020 Comprehensive Plan. It is vital that comments submitted by the public at this early draft stage are reflected in the final version of the Land Use Map, as this map will provide current and future administrations, and appointed and elected leaders guidance on land use policy decisions for years to come.

While we support and desire achievement of all 10 Key Principles, as listed on pages 2-3 of the Land Use Plan Map Overview, The Turnagain Community Council Board (TCCB) comments at this time will largely focus on Key Principal #10: *“Parks, Natural Open Space and Ecological Functions are conserved and enhanced to preserve the unique livability of the growing city.”*

Turnagain is especially fortunate to have within and near our boundaries some high value parklands and other natural open space and coastal areas that our neighborhood as well as visitors and the community at large use and enjoy. Long-term protection of these important areas is essential as our city continues to grow, so that future generations have the opportunity to benefit from the recreational, natural open space and wildlife assets we now value as a community. (This sentiment dovetails into Key Principal #1 — *An Emphasis on the Overall, Long-Term Welfare of the Entire Community.*) Therefore, our comments are directed specifically to the Community Facilities Map Layer, which includes draft designations of Parks and Natural Resource Use areas. Of course, these comments would then apply to the General Land Use Plan Map and the Land Use Plan - Composite Map as well.

**SPECIAL STUDY AREA DESIGNATIONS:**

On the Community Facilities Map Layer, four areas are designated “Special Study Areas” in the west part of Anchorage. In the Overview document on page 15, the definition for a Special Study Area includes the following: “There are several public land parcels for which a specific use has yet to be identified. These areas are subject to a site-specific land use study before use

designation or development.” While this designation *category* has merit (see comments under “C. & D. Airport-Owned Land” below), the areas chosen for this designation don’t fit with the definition. Specifically, the following areas in West Anchorage are designated Special Study Areas in the draft:

- A. Municipally-owned land south of Pt. Woronzof and east of the Anchorage Water and Wastewater (AWWU) sewage treatment facility;
- B. Municipally-owned Heritage Land Bank (HLB) land west of Ted Stevens Anchorage International Airport (Airport);
- C. Airport-owned land south of Raspberry Road and adjacent to Kincaid Park;
- D. Airport-owned land covering the northern half of Connors Lake and adjacent bog and upland areas.

**A Municipally-Owned Land South of Pt. Woronzof & East of the Sewage Treatment Facility:** TCCB finds it hard to imagine how this small, but extremely significant piece of land could be designated as a Special Study Area. Because of its narrow east/west boundaries and incompatible land uses on both sides (Pt. Woronzof Road and the North/South Runway to the east and sewage treatment plant to the west), the entire parcel is considered by the public as a trail greenbelt for the portion of the Tony Knowles Coastal Trail (Coastal Trail) that runs through the area. The land to the east of the trail, which is sloped and wooded, serves as an essential buffer between the trail and high-impact land uses to the east. If there is one parcel that demands the designation of “Park and Natural Resource Use,” it is this parcel.

TCCB also notes that the color of this area is blue, implying that the land is part of the Airport’s “Major Transportation Facility.” This does not accurately reflect how the public is currently using this land and because it is city-owned property, this land does not fall within the Airport’s transportation facility boundary.

- **RECOMMENDATION:** TCC requests that the above described parcel of city-owned land be colored in green and designated “Parks and Natural Resource Use” on the Community Facilities Map Layer.

**RATIONALE:** Historically, there are several Municipal documents that reflect the intention for this land to be designated as protected open space parkland/greenbelt and support a Park and Natural Resource Use designation, including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan (1982 Comp. Plan):** The above-described parcel is designated in the 1982 Comp. Plan Parks and Open Space Plan as “Areas to Develop as Parks, Open Space and Related Facilities.” Goals listed under “Greenbelts and Open Spaces” (page 46) include a. To accommodate trails and recreation facilities; and d. To lend identity to communities and provide buffers between incompatible land use.
- **1983 The Coastal Trail Route Study:** Plan Sheet 12, 12.4 indicates this was the intended route for the Coastal Trail in this area. General goals stated on page 1 of this document include:

“Provide a greenbelt corridor linking existing and future park and open space plans.”

“Help protect marginal and environmentally sensitive areas from improper development.”

- **1993 Heritage Land Bank (HLB) Resource Inventory:** According to this document, this land has a Covenant/Title restriction — “Use restricted to Park, Recreation or Other Public Purposes Only.”
- **1997 Anchorage Areawide Trail Plan:** The accompanying maps to the Trails Plan validate the existence of the Coastal Trail in this area.
- **1999 Open Space Inventory for Anchorage Map:** A “Combined Community and Neighborhood Preferences for Natural Open Space” map was produced by The Great Land Trust and the Municipality of Anchorage (Municipality) in an “Open Space and Wildlife Habitat Mapping Project.” The above described parcel was included on this map as preference for natural open space and identified to have the following values:
  - Aesthetic Value
  - Recreation Value
  - Wildlife Habitat Value
  - Environmental Education Value
- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan (Anchorage 2020 Plan):** The Conceptual Natural Open Space Map (page 63) was also based on the Open Space and Wildlife Habitat Mapping Project, between The Great Land Trust and the Municipality. While it is difficult to tell the exact mapping boundaries, this area was definitely identified “Community Preference for Natural Open Space,” and most, if not all, identified as “Important Wildlife Habitat.”
- **2005 (draft) Anchorage Bowl Park, Natural Resource and Recreation Facility Plan:** Map 7 “Recreation Trails and Connections” designates this area as “Scenic/Greenbelt Trail Network Connections to Parks and Schools.”

#### **B. Heritage Land Bank Land:**

Clearly, the land encompassing city-owned HLB parcels west of the airport do not fall into the description of “a specific use has yet to be identified.” Just ask anyone who uses the section of the Coastal Trail — one of the most popular recreational assets in this city — which runs through this area. Trail users have viewed this land as de facto trail greenbelt/natural open space since the trail was built in the mid-1980s. This area also serves as an essential buffer between two incompatible land uses (passive recreation in a natural setting along our beautiful coastal area and a major transportation facility whose operations generate high and far-reaching negative impacts). Finally, this coastal, natural open space also serves as important wildlife habitat and a part of a wildlife travel corridor that connects the Kincaid Park area with Earthquake Park.

TCCB also notes that the eastern section of this area is colored blue on the map, implying that the land is part of the Airport's "Major Transportation Facility." This does not accurately reflect how the public is currently using the land and because this is Municipally-owned property, this land does not fall within the Airport's transportation facility boundary.

- **RECOMMENDATION:** TCCB requests that the entire boundary of city-owned land discussed above be colored in green and designated "Park and Natural Resource Use" in the Community Facilities Map Layer.

**RATIONALE:** Historically, there are several Municipal documents that reflect the intention for this land to be designated as protected open space/parkland and support a Park and Natural Resource Land Use Map designation, including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan:** Most of the land within the city-owned HLB parcels is designated in the 1982 Comp. Plan Parks and Open Space Plan as "Areas to Develop as Parks, Open Space and Related Facilities" or as "Other Open Space (Non-Municipal)". (NOTE: At that time, the State apparently owned land in this area that is now owned by the Municipality).

- **1982 Pt. Woronzof-Pt. Campbell Wetlands Master Plan:** Land within most, if not all, of the three HLB parcels fall within the Land Use Study area of this document. Chapter III Master Plan, Vehicle Access Parking section (page 31) states, "Parking areas should be provided . . . just north of the Clitheroe Center . . . This will provide more convenient access to the viewing facilities for users who do not ride bikes or walk long distances."

The Viewing Platform section (page 32) of the same document states, "Further [sic] south on the trail, just west of the potato patch, another viewing area should be provided." (NOTE: The old potato patch is in the vicinity of the Clitheroe Center.)

- **1983 The Coastal Trail Route Study:** Plan Sheet 15, between 14.5 and 15.1 discusses access to the Coastal Trail and states, "Potential coastal park with trail link to Point Woronzof Drive, parking facilities, shelters, restrooms and information signing." This area is near the Clitheroe Center.

- **1987 Revised Anchorage Coastal Management Plan:** (NOTE: This information is also included in the 1982 Comp. Plan) It is difficult to determine exact boundaries, but most, if not all, of the HLB land falls within the Anchorage Coastal Zone Management boundaries and is designated either "Preservation" or "Conservation" Environment. This land is identified as "High Hazard," "Marginal," and/or "Scenic Vistas." You may question the wisdom of advocating for parkland in geologically high-risk areas, but as residents of Anchorage, we know about earthquake zones and how to wisely manage land use in high hazard areas. Passive recreation and natural open space would likely be the highest and best use for this land because of its high hazard/marginal designations, not to mention its scenic vistas.



- **1993 Heritage Land Bank Resource Inventory:** According to the descriptions of HLB parcels 4-032, 4-033 and 4-034, whose boundaries generally conform with the city-owned land designated Special Study Areas in the Community Facilities Map Layer, these parcels have a Covenant/Title restriction — all are to be used by the Municipality for “public” and “recreation.”
- **1999 Open Space Inventory for Anchorage Map:** A “Combined Community and Neighborhood Preferences for Natural Open Space” map was produced by The Great Land Trust and the Municipality. While it is difficult to determine precise boundaries, it appears that all of the city-owned HLB land is designated as a preference for natural open space on this map and identified to have the following values:
  - Aesthetic Value
  - Recreation Value
  - Wildlife Habitat Value
  - Environmental Education Value
- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** The Conceptual Natural Open Space Map (page 63) was also based on the “Open Space and Wildlife Habitat Mapping Project,” between The Great Land Trust and the Municipality. The entire boundary of the HLB was identified as “Community Preference for Natural Open Space.” Ironically, this map identifies the eastern part of the HLB land as “Important Wildlife Habitat,” but not the western part. It is hard to imagine how the eastern part qualifies for this designation and the western part does not and this contradicts the map referred to above, which shows the entire HLB land area having habitat values. Regardless, this map was compiled from interviews with local wildlife experts and from scientific reports, and it stands to reason that both the eastern and western areas have important habitat values since they are contiguous.

### **C. & D. Airport-Owned Land:**

As for the other two Airport-owned parcels identified as Special Study Areas on the Community Facilities Map Layer, TCCB feels that this is an appropriate designation, title-wise, but *the definition of a Special Study Area should change*. These areas as well as others listed below are being used for a specific purpose by the public as parkland and/or are important natural open space areas, but because they are owned by the Airport, obviously there is some disagreement, conflict and/or nonresolution regarding long-term use of the land.

- **RECOMMENDATION:** TCCB requests that the definition of Special Study Areas be rewritten so that it addresses the land use conflicts of Airport-owned land currently being used by the public as parkland — whether because of a formal agreement between the Municipality and the Airport or because of its value to the community as natural open space for recreation, wildlife habitat and/or trail greenbelt corridors — and that a Special Study designation is needed so that the highest and best use can be determined through a public process — regardless of ownership. (See discussion of development and implementation of the West Anchorage District Plan below.)

**RATIONALE:** During the development of the Comp. Plan, several major issues were identified and ultimately addressed in the final plan document. One of these major issues related to the

community and how it was being negatively impacted by growing Airport operations and development. The Comp. Plan acknowledges the impacts generated by the Airport and their effects on surrounding land uses (i.e., recreational, residential, educational, environmental) as well as land use conflicts within the Airport boundaries by dictating the following:

- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** On page 57 of the Comp. Plan, it states, “In response to airport growth, community growth surrounding the airport, recreational uses on the airport, and related airport impacts to the surrounding community, **Anchorage 2020** creates the West Anchorage Planning Area [also referred to as the West Anchorage District Plan.] Along with related strategies, this planning district serves as a mechanism to formally identify, address, and resolve land use conflicts within and near the airport.”

➤ **RECOMMENDATION:** In addition to the already referenced Airport-owned properties (see page 2) identified as Special Study Areas in the Community Facilities Map Layer, TCCB requests that the following Airport-owned parcels be identified as Special Study Areas (as per TCCB’s rewritten definition) as well:

- E. Land west of Earthquake Park that runs along the coast and up to the boundary of the Anchorage Coastal Wildlife Refuge at Pt. Woronzof<sup>1 2</sup>
- F. Land at Pt. Woronzof, down to the northern boundary of AWWU sewage treatment facility<sup>1 2</sup>
- G. Land along the coast south of Pt. Woronzof Park<sup>1 2</sup>
- H. Land west of the East/West Runway<sup>1 2</sup>
- I. Land in the Little Campbell Lake area<sup>2</sup>
- J. Land directly west and adjacent to Kincaid Elementary School
- K. Spenard Beach Park along Lake Shore Drive
- L. Lions Club Picnic area along Lake Shore Drive
- M. All remaining areas of Turnagain Bog and associated uplands, with priority for special study on the land directly adjacent to the Turnagain residential boundary
- N. All lands currently zoned “Transitional,” as defined in the current Title 21, Land Use Planning, Anchorage Municipal Code (Title 21).

**RATIONALE:** As noted in the footnote section below and elsewhere in this letter, the Coastal Trail runs through a number of these parcels. Throughout the years — since the Coastal Trail was built — various city officials as well as residents have expressed the need for the trail to run through a permanently protected greenbelt area in nonMunicipally-owned lands. Ideally, this should occur by the city acquiring trail greenbelt and dedicating it as parkland. An alternative is to ensure permanently platted easements sufficient enough to protect not only the trail footprint itself, but an adjacent area wide enough to buffer it from incompatible, high-impact land uses, such as those generated by the Airport.

<sup>1</sup> The Coastal Trail runs through this area.

<sup>2</sup> This area is striped green (Park and Natural Resource Use) and blue (Major Transportation Facility) on the Community Facilities Map Layer. The Community Facilities Map Layer legend does not explain these dual and contradictory designations.

Footnote #2 indicates there are a number of parcels whose land use designations on the draft map are contradictory. Clearly, their final designation needs to be Parks and Natural Resource Use, based on the documentation listed below, and a Special Study public process via the West Anchorage District Plan can ultimately resolve this.

Other parcels listed above, particularly Little Campbell Lake Park, Spenard Beach Park, and the Lions Club Picnic Area, have historically been used by the public as parkland for many years because the city has leased these lands and identified them as public parkland with signage. The Airport continues to threaten to shut down these parks and restrict public access. The public deserves a permanent resolution to these land use conflicts. Designating them Special Study Areas is appropriate and can move a public process forward to bring about that permanent resolution.

Historically, there are several Municipal documents that reflect the intention for the above listed Airport-owned parcels (including the ones listed on page 2) to be designated as protected open space/parkland and would ultimately support a Park and Natural Resource Land Use Map designation through a Special Study public process; they including the following:

- **1982 Anchorage Bowl Comprehensive Development Plan:** All of the above listed parcels are designated in the 1982 Comp. Plan Parks and Open Space Plan as either “Existing Municipal Parks and Open Space” or “Other Open Space (Non-Municipal).”
- **1983 The Coastal Trail Route Study:** Plan Sheets 9-12, indicate this was the intended route for the Coastal Trail, from Earthquake Park to Pt. Woronzof. On page 45, it states, “One of the important routing considerations was to keep the trail away from the edge of the bluff to avoid additional erosion of the highly unstable slopes.” Protecting a buffer of land along the length of trail and dedicating it as permanent trail greenbelt is critical to ensure the viability of the trail (which a portion has already had to be moved inland because of erosion) for many years to come.

Plan Sheet 12 12.2 notes, “Pt. Woronzof scenic area views, parking facilities, trail access to water, shelters, restrooms.” This area is now widely used by the community and visitors as a scenic viewing area and parking area for Coastal Trail user access.

Plan Sheet 15 validates that the Coastal Trail was intended to run through this area and be used for recreational purposes, regardless of land ownership.

Plan Sheets 16-18 It is difficult to determine exactly where the Airport property boundaries are on these drawings, but the Coastal Trail Route Study clearly validates the Coastal Trail running through this area, regardless of ownership.

- **1987 Revised Anchorage Coastal Management Plan:** (NOTE: This information is also included in the 1982 Comp. Plan) All the parcels listed above where the Coastal Trail is routed fall within the Anchorage Coastal Zone Management boundaries and is designated

either "Preservation" or "Conservation" Environment. This land is identified as "High Hazard," "Marginal," and/or "Scenic Vistas."

A large portion of Turnagain Bog, including the wetlands directly adjacent to the Turnagain residential boundaries, falls within the Preservation Environment and identified as "Preservation Wetlands." A significant portion of Turnagain Bog is labeled as Conservation Environment and identified as "Marginal" and "Scenic Vistas."

Most, if not all, land zoned "Transitional" falls within the Anchorage Coastal Zone Management Boundaries and identified as "Preservation" or "Conservation" in the Management Plan.

- **1996 Anchorage Wetlands Management Plan:** With the exception of the extreme south end of Turnagain Bog north of Lake Shore Drive, all of Turnagain Bog is designated as "A" Preservation wetlands and ranks high in Hydrology, Habitat and Species Occurrence.

Wetlands in the northern Connors Lake/Bog area are designated "A" Preservation in the Wetland Plan.

- **1997 Anchorage Areawide Trail Plan:** The accompanying maps to the Trails Plan validate the existence of the Coastal Trail through the applicable land parcels (#1 Footnote).

- **1999 Open Space Inventory for Anchorage Map:** A "Combined Community and Neighborhood Preferences for Natural Open Space" map was produced by The Great Land Trust and the Municipality. With the exception of the land directly west of Kincaid Elementary School, every Airport-owned parcel of land TCCB recommends to be identified as Special Study Areas are shown as preference for natural open space on this map and are identified to have one or more of the following values:

- Aesthetic Value
- Recreation Value
- Wildlife Habitat Value
- Access Value
- Environmental Education Value
- Other Values

- **2001 Anchorage 2020 Anchorage Bowl Comprehensive Plan:** The Conceptual Natural Open Space Map (page 63) was also based on the "Open Space and Wildlife Habitat Mapping Project," between The Great Land Trust and the Municipality. Most of the Airport-owned land TCCB is requesting to be identified as Special Study Areas are identified as one or more of the following

- Community Preference for Natural Open Space
- Important Wildlife Habitats
- Existing Municipal Parklands (Spenard Beach Park & Lions Club Picnic Area)

• **Currently adopted Title 21:** A significant portion of Airport-owned land is zoned “T” Transitional, including but not limited to, the Turnagain Bog area. According to Title 21 of the Anchorage Municipal Code, “This district is intended to include suburban and rural areas that, because of location in relationship to other development, topography or soil conditions, are not developing and are not expected to develop in the immediate future along definitive lines. The permitted uses in these districts are intended to be as flexible as possible consistent with protection from noxious, injurious, hazardous or incompatible uses.” It goes on to state, “**As development patterns start to emerge within these areas and the sophistication of their protection becomes more critical to the general public interest, it is anticipated that such lands within the T districts will be proposed for more restrictive zoning classifications.**” (TCCB emphasis)

Clearly, circumstances have changed and “development patterns are emerging.” The Airport has already built a large General Aviation (GA) parking area (Echo Parking) in Turnagain Bog, with plans for expansion. It also proposes to develop additional GA-related projects “along definitive lines” that would not be compatible with other existing land uses to the east and north, and would allow for “noxious, injurious and hazardous uses.” (See Draft Lake Hood and ANC General Aviation Master Plan, Chapter 4, Alternatives C and D.)

The Land Use Mapping public process now in progress must evaluate the need to rezone this land to a more restricted designation, which would definitely be in the general public’s best interest. This area should formally be zoned so that it becomes a permanently protected buffer, helping to protect the surrounding area from airport-generated impacts in proposed “Major Transportation Facilities” on Airport property. This rezoning would occur in conjunction with the development of the West Anchorage District Plan.

Section 21.40.240 of Title 21 specifically describes prohibited uses of land zoned “T”: E.1: “Noxious, injurious or hazardous uses, which are defined as any use that may be noxious, injurious or hazardous to surrounding property or persons by reason of production or emission of dust, smoke, refuse matter, odor, gas fumes, noise, vibration or similar substances or conditions, or the production or storage of explosive materials.” E.2.: “Any use or structure which is likely to be incompatible with established permanent uses within the area to be affected by the proposed use or structure.”

By nature of what occurs during normal operations at GA parking lot /lease lot areas, noise, odors and fumes are routinely produced and emitted. Aviation fuel can be categorized as an “explosive material,” and is routinely stored in these areas. Because Municipal code specifically lists these as prohibited under T-zoned land, even if the land were not rezoned to a more restrictive designation, under T zoning, development of GA projects would be in direct violation of city land use laws and regulations.

Under “21.40.240 M. *Land contiguous to land zoned for less intensive use,*” it states, “No building or land use permit shall be issued in a T zone except for a permitted use. Land zoned T lying contiguous to residential-zoned land shall be permitted to be used only in accordance with provisions and standards less intense or equal to provisions and standards allowed under this title for the least intensive land use zone within a 1,000-foot radius of the

boundary of existing T-zoned property for which a building permit or land use permit has been requested.”

The Airport has developed “T” zoned lands throughout the years since the current Title 21 was written, with no regard to Municipal code adherence. It is imperative that all T-zoned land be designated Special Study and become part of the West Anchorage District Plan, so that conflicts and incompatible land use issues can be resolved.

**CONCLUSION:**

Because of our West Anchorage location, Turnagain residents and our community council have a long history of dealing with parkland, Coastal Trail, wetland, and natural open issues and are all too familiar with land use conflicts and impacts regarding the Airport. The Community Facilities Map Layer — and ultimately the Generalized Land Use Plan Map and the Land Use Plan - Composite Map — need to reflect historical intent and public use of important parkland/natural open spaces remaining in our area. By appropriately designating the above discussed parcels of land on these maps as “Parks and Natural Resource Use,” and using the West Anchorage District Plan planning process to facilitate final designations on Special Study Areas (per our requested new definition of this designation), long-term protection of these important areas to our community will be ensured.

Sincerely,

Mark Wiggin, Turnagain Community Council President  
Cathy L. Gleason, Vice President  
Breck Tostevin, Interim Secretary/Treasurer  
Bob Durst, Board Member  
Kelly Smith, Board Member  
Pat Redmond, Board Member

Mark Wiggin for  
TCC Board  
Sept. 16, 2005

## Land Use Plan Map

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**From:** Cathy Gleason <cathy.gleasantcc@yahoo.com>  
**Sent:** Tuesday, November 1, 2016 3:49 PM  
**To:** Land Use Plan Map  
**Cc:** Anna Brawley; Gloria Manni; Kennis Brady; tccpresident@yahoo.com  
**Subject:** 2040 LUP - Turnagain CC Comment Addendum  
**Attachments:** 2016-11-1 TCC Addendum Land Use Plan Map Public Hearing Draft.pdf;  
10-31-2016 Isaacs Forest Park Dr. rezone comments.pdf

Tom and the Planning Staff,

Please accept the attached Turnagain Community Council comment addendum on the 2040 Land Use Plan Public Hearing Draft. This letter specifically addresses the proposed designation for two areas of residential parcels within the TCC boundaries that we did not address in our previously submitted comments. Also attached is Marie and Jon Issacs October 31, 2016, Memorandum, which is referenced in our letter.

Please don't hesitate to contact me or Anna Brawley, if you have any questions or need more information. As stated in the letter, these comments will be presented for ratification by the TCC body-as-a-whole at our general meeting this Thursday, November 3rd.

Sincerely,  
Cathy  
248-0442

# TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils  
1057 West Fireweed Lane, Suite 100  
Anchorage, Alaska 99503

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Sent via email

November 1, 2016

Municipality of Anchorage Community Development Department  
Planning Division  
P.O. Box 196650  
Anchorage, AK 99519-6650

RE: **ADDENDUM TO PREVIOUS TURNAGAIN COMMUNITY COUNCIL COMMENTS  
ANCHORAGE 2040 LAND USE PLAN - PUBLIC HEARING DRAFT**

Dear Planning & Zoning Commission and Planning Dept. Staff:

Thank you for the opportunity to provide additional input on the 2040 Anchorage Land Use Plan (2040 LUP) Public Hearing Draft with the extension of the comment deadline. The below comments provide [input on items not previously addressed in our October 17<sup>th</sup> handout or May 27<sup>th</sup>/September 9<sup>th</sup> comments](#). In order to submit comments by the extended November 1<sup>st</sup> deadline, the Turnagain Community Council (TCC) Land Use, License & Permit Review Committee is submitting this input now; this letter will be presented at our November 3, 2016, general meeting for formal ratification.

## [2040 LUP Map — Designation of Parcels West of Forest Park Dr.](#)

- **TCC OPPOSES the Draft 2040 LUP Map RE: DESIGNATION OF SPECIFIC PARCELS WEST OF FOREST PARK DR. AS “NEIGHBORHOOD – COMPACT MIXED RESIDENTIAL – LOW”**

TCC thanks Commissioner Spring for bringing this particular item to our attention at the October 17<sup>th</sup> hearing. After discussing this with active TCC members who have a home located within the parcel area proposed to be designated “Neighborhood - Compact Mixed Residential - Low (Compact Mixed Res.),” and seeing what kind of development this designation would allow (page 28 of the Draft Plan), TCC does not support the proposed designation.

Instead — *excluding the two most southern parcels located within the proposed Compact Mixed Res. designation* — TCC requests that the parcels located directly along the west side of Forest Park Dr. be designated “Neighborhood – Single Family and Two Family” on the 2040 LUP Map.

- *Reasons for this request include:*
  - As the “Areas of Growth and Change” map (page 19 of the Draft Plan) indicates, the proposed land use designation for these parcels along Forest Park Dr. would change uses currently allowed by existing zoning, which is R-2D. This zoning was specifically requested (and approved) by homeowners in 1979, to protect the existing single and two-family homes vulnerable to higher-density development under the R-2 zoning that was in place at that time.
  - The existing single and two-family homes are consistent with the development density of other homes in the Forest Park Dr. area to the east and north.
  - Potential higher-density development would likely increase traffic on Forest Park Dr., which has a Local Street designation. There are no sidewalks or bike paths along this street, yet it is regularly used by pedestrians, joggers and bicyclists; more traffic would create a greater safety risk for these non-motorized users.



- Higher density housing should be avoided in this area, as these parcels fall under the “High Seismically Induced Ground Failure Hazard” in the Hazard Mitigation and Resiliency Map (CC-6).
- Even though the West Anchorage District Plan Land Use Map (page 73 of that plan) designates these parcels along Forest Park Dr. as “Low/Medium Intensity (>8-15 units per gross acre), which is consistent with a Compact Mixed Residential - Low designation, **TCC sees development of the 2040 LUP as an opportunity to override that inappropriate designation — and ensure that the parcels directly west of Forest Park Dr. in the Turnagain area have the proper designation of “Neighborhood – Single Family and Two Family” on the finalized 2040 Land Use Plan Map.**

*Please see additional rationale for TCC’s designation request in comments submitted October 31, 2016, by Marnie and Jon Issacs, long-time residents who live in this area along Forest Park Dr. (Their comments are attached to our comments as well.)*

**Parcel Designation Along La Honda Dr.:** In hindsight, the parcels along La Honda Dr. (west of Forest Park Dr.) should probably not have been built on — or built at a lower density — due to their location within the “High Seismically Induced Ground Failure Hazard” in the Hazard Mitigation and Resiliency Map (CC-6) and the Fish Creek floodplain. But because they are already developed at a higher-than-single/two-family density, TCC’s designation request for “Neighborhood – Single and Two Family” does not include these parcels.

#### 2040 LUP Map — Designation of the Mobile Home Park along Hillcrest Dr.

- **TCC UNCERTAIN RE: DESIGNATION OF MOBILE HOME PARK ON HILLCREAST DR. AS “NEIGHBORHOOD – COMPACT MIXED RESIDENTIAL – LOW”**

Again, TCC thanks Commissioner Spring for bringing this particular item to our attention at the October 17<sup>th</sup> hearing. After review of this land use designation proposal, TCC submits the following for consideration by the Planning & Zoning Commission, as we have mixed feelings about this proposal:

- Unlike TCC’s strong position stated above with regard to supporting a change to the WADP Land Use Map, TCC is uncertain whether this would be a wise change for this area of the Turnagain residential neighborhood.
  - First and foremost, has the owner of the mobile home park land been contacted by the Planning Dept. regarding this proposed land use designation change — and, if so, what was the response?
  - As the “Areas of Growth and Change” map (page 19 of the Draft Plan) indicates, the proposed land use designation for the mobile home park parcel along Hillcrest Dr. would not only change the use currently allowed by existing zoning, but would also change the land use designation in the West Anchorage District Plan (page 73 of that plan), which is “Low Density – Attached and Detached” (< 5-8 units per gross acre).
  - The residential density provided by the mobile home park, which has been in this location for many years, has provided relatively low density, compatible homes adjacent to the surrounding residential areas north, west and south of the development (West High School is to the east).
  - The proposed designation of “Compact Mixed Residential – Low” would allow a higher density development of 8 to 15 units per gross acre. This increased density would likely created more traffic on Hillcrest Dr., which is a high-use street for both vehicle traffic and student pedestrian and bicyclers to the West/Romig campus. While the TCC Safe Routes To Schools Committee identified the need for a sidewalk along the south side of Hillcrest Dr. from Forest Park Dr. to the campus (and TCC has included this project in its CIP list), currently, no sidewalk or bike path exists.
  - While mobile home parks may not provide an ideal housing option for many Anchorage residents, the remaining mobile home parks in our city have been providing affordable

housing for many years. Neighbors who reside in mobile home parks may not be able to afford other forms of housing, such as apartments. And most apartments provide little or no yard for pets, gardens, storage, etc., which the mobile home park on Hillcrest Dr. does offer its residents.

Once again, TCC appreciates the opportunity to provide additional comments on the Anchorage 2040 Land Use Plan Public Hearing Draft. This comment addendum — along with our previously submitted comments — reflect long-held positions and proposals we hope will be incorporated into this important land use document for our city. TCC hopes that our input — and our continuing dialogue with the Municipal Planning Dept. — result in a positive outcome for the Turnagain neighborhood and our community.

Sincerely,

Anna Brawley & Cathy Gleason  
Turnagain Community Council Land Use, License & Permit Review Committee Co-chairs

CC: Turnagain Community Council President Jonathan Tarrant  
Turnagain Community Council Treasurer Gloria Manni  
Turnagain Community Council Board Member-at large Kennis Brady

Attachment:  
10-31-2016 Memorandum from Marnie and Jon Issacs

## MEMORANDUM

**TO:** Mr. Tom Davis, Senior Planner  
Municipality of Anchorage

Commissioners, Planning and Zoning Commission  
Municipality of Anchorage

**FROM:** Marnie and Jon Isaacs  
2418 Forest Park Drive

**RE:** Public Comments  
Draft Anchorage 2040 Land Use Plan

**DATE:** October 31, 2016

We have reviewed the draft Anchorage 2040 Land Use Plan and offer the following comments. These comments are restricted to the proposed land use designations contained on the map found on page 19 of the draft and only address the proposed changes as they apply to the west side of Forest Park Drive.

**BACKGROUND:** We have lived at the current address since 1978, and have been pleased to be part of this diverse and integrated neighborhood. The proposed changes presented on the land use map appear to recommend a land use designation of Compact Mixed Residential Low for a section of Forest Park Drive. This would allow “single family, attached single family and small lot housing. Townhouse and smaller multifamily are also considered as long as the areas scale and density are maintained.” This designation would likely be vigorously opposed by residents in the area.

In 1979 homeowners along the west side of Forest Park Drive requested and received approval of a re-zone from R-2 to lower density R-2D to protect the residential character of the neighborhood’s single family homes and duplexes. The older housing stock on some lots was vulnerable to high density re-development, including ours. The area’s homeowners believed the protection offered by R-2D zoning over time would allow improvements and/or replacement of these older homes with newer single family or duplex structures while also protecting the area’s quiet neighborhood characteristics. An additional consideration was avoiding an increase in traffic volume associated with higher density development in an area used by joggers, bicyclists and pedestrians. Since that time, new single family homes have been constructed in this specific area and substantial improvements have been made to existing single family and duplex residences, enhancing the Forest Park Drive neighborhood as a desirable area to live.

**BASIS FOR ARGUMENT:** The proposed land use designation of Compact Mixed Residential Low is inappropriate on the west side of Forest Park Drive specifically because:

- Higher density residential is not compatible with this residential area;
  - Existing inventory is 1-2 stories, not three
  - Existing inventory is largely single family/duplex, anything larger would overwhelm the “area’s scale”;
  - There are no vacant lots or abandoned buildings in this area so higher density would require destruction of current housing.
- The lots in this area are narrow, long and drop off steeply to the Fish Creek floodplain which limits the actual square footage available for higher unit development.
  - The area is in seismic zone 4
  - Seeps and springs in the slope bordering Fish Creek create unstable soils
  - The designated floodplain boundary prohibits development and location of the required parking areas.
- Higher density residential development will add traffic and create unsafe access/egress conditions

Due to the extremely compressed public comment period for citizens to review the final draft of this plan, not all of the area’s property owners could be contacted. The attached petition reflects unanimous opposition by those homeowners that could be contacted, including nearby homeowners accessing Forest Park Drive from Huntington Park.

**CONCLUSION:** We request the designation of Compact Mixed Residential Low in the Draft 2040 Land Use Plan be removed from the Forest Park Drive properties and that they remain designated for Single Family and Two Family structures. This would be in keeping with the area’s existing land use and maintain the quality and character of the neighborhood.

## Land Use Plan Map

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**From:** paulrstang@gmail.com  
**Sent:** Friday, October 7, 2016 12:21 AM  
**To:** Land Use Plan Map  
**Cc:** Mayor Berkowitz; cshutte@anchoragedowntown.org  
**Subject:** Comment on the Land Use Plan Map from the UACC  
**Attachments:** Comment to Anchorage P&Z.docx; ATT00001.txt

Please consider the attached comment from the University Area Community Council.

October 6, 2016

The University Area Community Council (UACC) has reviewed the Anchorage Bowl Land Use Plan Map. While we are generally supportive, we have a major concern - housing.

We believe that the Muni's Plan does not have adequate provisions to assure that housing is given a high priority in real estate development in the UMED area.

The Muni needs to take the lead in assuring more housing capacity, especially as a mix of commercial development and housing. Rezoning must be done in conformance with the Land Use Plan Map. For instance, requests for rezoning from R-3 to R-O seem too often leads to new office space, but no associated housing. This results in more vehicular traffic, more parking lots and more commuting. If associated housing were a part of a commercial office development, people could walk or bike to work, diminishing the need for parking and commuting, making for more environmentally sound neighborhoods. This is a strong trend in most cities, but unfortunately not in Anchorage. The Muni should take steps to promote developments that contain a combination of office space and housing at every opportunity.

The UACC would support a change to commercial use zoning if the development includes at least a minimum number of dwelling units per acre attached to the new zoning designation.

The UACC requests a response to the above comment.

Thank you.

Paul Stang,  
President,  
University Area Community Council

# General Public

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## Land Use Plan Map

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**From:** Seth Andersen <arete.seth@gmail.com>  
**Sent:** Wednesday, November 2, 2016 12:44 AM  
**To:** Land Use Plan Map  
**Subject:** 2040 plan comments

Good Evening.

Great job in following through on LUPM changes and the 2040 plan!

A few comments for your consideration:

a. There is an area north of DeArmoun Road between Mainsail and Arboretum that is currently zoned R6 but is subdivided similar to R1 lot sizes. R6 requires minimum 1 acre and 2 acre parcels for single family and duplex respectively. The referenced neighborhood is developed as single family and duplex residences with subdivided lot sizes typically between 10,500 and 16,500 SF (a few larger but none conforming to R6 min). My suggestion is to change the LUMP designation to R1 use/density. The reason for the suggested change is because there are still vacant lots in this neighborhood and some lots are undergoing additions or demo and reconstruction. because the lot sizes are non-conforming and are so small they can not conform to R6 setbacks, each property owner has to apply for variances. It would be great if the LUPM and zoning could be updated to match the existing built/subdivided condition to facilitate and simplify future permitting and development.

b. This is maybe a T21 comment but the 2040 plan could setup support by including in the Actions Checklist- Current trends and markets put value on commercial amenities in neighborhoods. The only residential district that allows commercial is Urban Residential High and the amount of commercial at 5% is pretty small to be useful unless it is a large development. In the 2040 plan can you set the stage for allowing higher percentage or a different criteria? one option would be to encourage by allowing x sf of commercial per block or per acre. If the area of commercial on any one block is already used up there can be no more created? R3 neighborhoods could similarly benefit from neighborhood amenities, maybe smaller ratio of commercial per block than R4 is appropriate. B1A has proven to be a very effective zoning to create neighborhood authentic neighborhoods but we have no way to make any more B1A or similar uses (rezone criteria of min 1.75 acres). Maybe something similar to 21.40.140 in the old T21 code for commercial in R4 and R3?

c. great to see support for urban neighborhoods by including potential density and height increases near to town centers - Identifying specific design criteria for eligibility will probably be specific to each location and important to include on the actions checklist.

d. Page 13, 5th paragraph - where you talk about encouraging infill, cottage type housing mention unit lot subdivision which is currently being considered?

e. Page 13 - Consider adding a LUP 4.\_ policy to allow and encourage neighborhood commercial amenities?

- f. Page 14, 4th paragraph - discusses place-making under the infrastructure investment topic. This seems odd and out of context. I think peacemaking is important and maybe goals 2, 3 or 4 is a better place for the discussion. Maybe Place-making should be its own goal since it applies across the spectrum of uses to make desirable places, industrial, commercial residential, park etc. Seems odd in the infrastructure section.
- g. Page 14, LUP 5.4 alternate funding - use a MOA or ACDA fund to finance utility upgrades at low low interest rates from bonds?
- h. Page 14, Goal 6 - add encourage obvious and enhanced ped/bike trail connections from existing green belts into neighborhoods not currently connected. i.e. fairview or the spenard & 36 mixed use area are islands from a trail/greenway perspective. linear trails and greenways are proving very effective a making desirable places.
- i. Page 15 - add a LUP 6.\_ that encourages addressing the unknown transportation plans at gamble/ingra, a/c, and 3rd avenue with the state of alaska. The vague and unknown about what will happen to roads in these areas will continue to discourage any investment in the area.
- j. Page 16, Goal 6 - This is tricky because existing neighborhood/character throughout anchorage is typically under-built for its existing zoning and allowed uses. Just building up to the allowed development standards will change the existing character. Maybe encourage neighborhood specific plans to identify forms, features and uses they value rather than intensity, density and height. This goal is very contradictory to most of the other goals.
- k. Page 16, Goal 8 - This goal should have a higher priority or status. In Anchorage and other cities greenways and trails have proven very transformative. Add a LUP 8.\_ encourage and prioritize greenway trail extensions into reinvestment focus areas and isolated neighborhoods. Should also encourage and prioritize very obvious, visible and intuitive trail/greenway connections from neighborhoods to city centers. i.e. obvious line of sight pedestrian corridor from downtown to parkstrip or costal trail or ship creek. Not only very nice for neighborhoods but also for visitors and tourists.
- l. Page 25 - relationship of infill to existing neighborhoods, refer to comment 10 above.
- m. Page 26 - for large lot, single-family and two-family, and Compact mixed residential - low, if you are considering smaller lots and increased density maybe one of the "characters" of allowing smaller lots or higher densities is smaller sized houses so the neighborhood character is maintained.
- n. Page 28, compact mixed residential - low. Consider an additional "character" *to provide greater housing opportunities, allow a trade for additional density or additional principal structure for small houses (limited square footage and height)*. This could apply to areas further from town centers and in combination with proper design criteria, could provide more compatible housing types than a by-right development. This should be considered for the single-family and two-family, and compact mixed residential - medium areas also.

- o. Page 29, compact mixed residential - medium and urban residential - high, consider adding neighborhood supportive commercial amenities as a character.
- p. Page 29, Based on existing T21 development and dimensional standards, R4, in certain areas, should be included in compact mixed residential - medium. Lots less than 14,000 sf, near to city centers or transitions can't be developed to the desired character under the current R3 development standards. The 2040 plan should either acknowledge R3 development standards on small lots doesn't allow R3 type development or include R4 in this designation.
- q. Page 28-30, residential low, medium and high - under the "zoning" it says .... in certain areas. It is not clear what certain areas refers to. would be helpful to clarify or state the purpose/intent to avoid future user confusion.
- r. Page 34, Corridors - I think a corridor section for "urban villages" should be added. There is a big difference between a main street, such as mountain view and spenard compared to an urban village street (inner neighborhood commercial) which might be closer to what the area around Fire Island in south addition, government hill commercial malls, and East Fairview might look like with some enhancements. Every neighborhood probably has a section or neighborhood street that has existing commercial that could become neighborhood centers with the right direction.
- s. Page 45, Greenway Supportive Development - This section is great. I think it is very important that proposed GSD's are connected to existing trails and greenways and not isolated segments. For example, the fish creek GSD is great but if there is not an obvious, safe and easily accessible connection to exiting or enhanced trails it won't be used.
- t. Page 53, Financing and Taxing - MOA could consider low rate loans for utility improvements backed by bonds. MOA or ACDA could offer low interest money for equity portions of developments so developers return on cost gets closer to industry acceptable returns. Could be especially useful in situations where developers have options in other cities with better returns.
- u. Page 60, goal 2 - action item to identify RFA guidance plans with community/neighborhood coordination?
- v. Page 61, Actions checklist - add action to amend T21 to allow density increases in certain zones (low and medium densities) with associated max house size and height.
- w. Actions checklist - add action to modify T1 to change allowed SF for neighborhood supporting commercial in R3 and R4 (current 5% or 1,500 SF max isn't very realistic or useful)
- x. Actions checklist is awesome!

## Land Use Plan Map

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**From:** Teresa Arnold <teresa.arnold@me.com>  
**Sent:** Friday, October 21, 2016 9:24 AM  
**To:** Land Use Plan Map  
**Subject:** Re: Public comment

Good morning, Jody! And, thank you for getting back with me. I would like to state my opposition to the current land use plan, specifically how it effects South Addition. South Addition is a historic neighborhood, with a charm, walkability, and unique aesthetics that comes with such a neighborhood. If housing is crammed into this area, parking will absolutely become an issue. I have driven by the proposed Weidner apartment complex, approximate location - 14th and C, and parking is already a big issue! I'm not certain why this is the plan for South Addition/Downtown when there appears to be plenty of space in South Anchorage. In a nutshell, I am opposed to 3+ story housing in South Addition.

Respectfully,

Teresa

Sent from my iPad

## Land Use Plan Map

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**From:** Mara Carnahan <maracarnahan@hotmail.com>  
**Sent:** Tuesday, November 1, 2016 3:14 PM  
**To:** Land Use Plan Map  
**Subject:** LUP Comments

Honorable Planning and Zoning Commissioners:

I urge you to take the time to carefully and thoroughly read the proposed 2040 Land Use Plan and the community's responses to this draft. As this document will guide our growth for decades, it is imperative we consider it thoroughly.

As a resident of South Addition, I was heartened to see the plan reference the importance of careful infill and redevelopment. My neighborhood is historic and beloved by its residents. South Addition is experiencing growth and redevelopment, and it is imperative that this development be carefully planned to integrate with the existing neighborhood. We need to protect the sunlight, setbacks, alleys, sidewalks and mature landscaping that make South Addition such a wonderful place to live.

The scale and height of new development must be carefully guided to protect the unique and historic character of our neighborhood. We can increase density in South Addition without compromising the characteristics of the neighborhood that are so beloved.

**I was particularly distressed to read on page 28 (5th bullet under Character) and 29 (4th bullet under character), bullet points that appear to give a blanket increase in density and possible fourth stories in areas within 1/4 and 1/2 mile of a city center.** Those points will impact almost all of South Addition as well as Fairview and Government Hill. These bullets could be interpreted as canceling out the careful planning done by the planning department and neighborhood plans.

**Please remove these two bulleted statements from the the Land Use Plan.** They are unnecessary as the plan already outlines ways to encourage increased density near the city center, and citizens have dedicated hundreds of hours to craft neighborhood plans to specifically outline how they would like to see development occur within their individual neighborhoods. The above mentioned bullets on page 28 and 29 of the plan appear to nullify all of that citizen effort, and could lead to conflict between existing residents and new development. New development and infill of a higher density is already occurring without these two blanket bullet statements.

In addition, it is critical that the downtown core see increased residential density, not only because people would love to live, work and play in the same area, but because is it critical to the health of downtown to have a vibrant residential component in its core. Downtown will be buoyed by residents who shop, eat and recreate outside of the normal workday hours and who provide a year-round customer base to downtown businesses. Taller, more dense residential units must be located in the downtown core, not in South Addition.

Thank you for your time and consideration.

Respectfully,  
Mara Carnahan  
South Addition Resident

October 31<sup>st</sup>, 2016

Re: Anchorage 2040 Land Use Plan

To Whom It May Concern:

It has come to my attention that the Municipality of Anchorage is proposing a change in its Land Use Plan that could very negatively impact the land values and community character of the Forest Park Drive Neighborhood.

I have been a real estate Broker in Anchorage since 1980. I am presently the Broker/Owner of RE/MAX Dynamic Properties, one of the leading real estate company in the State of Alaska. Additionally, I have been a property developer in Anchorage and the Valley since early 1980. My personal residence is located in the Huntington Park Subdivision, near the Forest Park Drive area in question. Recently, I invested considerably in improvements to a property I owned at 2512 Forest Park Drive, now a single family home. I recently sold that property and am convinced that the current R-2D zoning protected my investment as well as the current owner's property value.

The 2040 plan proposes a change towards higher density land use. I am concerned that this change would encourage developers to invest in this area with the intent to construct multi-family units. Presently, this neighborhood consists of a good mix of a variety of housing categories; higher density would add traffic, parking issues already existing, and mostly would impact property values for the homes already in the area.

The Southern area of Forest Park was re-zoned in 1979 from R-2 to R-2D to protect the neighborhood from high density development. Since then, the older homes have steadily been updated/remodeled or replaced in some cases, which was the intent of the re-zoning. As a resident of Huntington Park, I would like to see the process of positive neighborhood evolution continue, with Forest Park remaining a quiet neighborhood with mainly single family homes and duplexes.

I would like to request that the final Anchorage 2040 Land Use Plan remove the proposed higher density land use designation for Forest Park Drive to allow this neighborhood to remain as it is today, zoned R-2D.

Thank you in advance for your consideration.

Sincerely Yours,



Jackie Danner  
[jdanner@gci.net](mailto:jdanner@gci.net)  
907.242.7611

## Land Use Plan Map

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**From:** Dael Devenport <dael.devenport@gmail.com>  
**Sent:** Tuesday, November 1, 2016 5:25 PM  
**To:** Land Use Plan Map  
**Subject:** Height and Density Increases

The administration is fast tracking the latest draft Land Use Plan (LUP) leaving little time for neighborhoods to learn about and communicate major zoning changes.

There needs to be a public process to adopt "additional urban design and neighborhood compatibility standards" and community councils need to adopt Neighborhood or District Plans that address height and density in established neighborhoods prior to revising height and density requirements.

It is essential that these "additional urban design and neighborhood compatibility standards" are in place before developers are allowed to add height or density beyond what Anchorage's zoning districts currently call for.

Thank you,

Dael Devenport

*With compassion for all beings*

## Land Use Plan Map

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**From:** Janie Dusel <jdusel@awr-eng.com>  
**Sent:** Friday, October 14, 2016 3:36 PM  
**To:** Land Use Plan Map  
**Subject:** Comments on Draft Land Use Plan Map  
**Attachments:** 87-14.pdf

Hello,

I'm writing with comments regarding the draft Anchorage Land Use Plan Maps, as viewed from your online map gallery. Below are my comments:

- In south Anchorage, there is an undeveloped area west of Prator Road that is shown incorrectly on all of your maps. This area plat (see attached plat 87-14) shows two large tracts (Tracts A and B) that are platted as "Open Space Reserve." The LUPM shows only one of these tracts as open space. The other (Tract A) is shown as buildable land on the Buildable Land Supply map and is not shown as open space on the Parks and Open Space map. This should be corrected. Developing this tract as residential (which is what is shown on the LUPM) would require a re-plat of the area.
- I was able to see the above-described error because I am familiar with this area. However, the mapping could contain many other errors like this one, that would not be easily identified by the general public. The MOA should carefully review the mapping along with plats of undeveloped areas to ensure that other mistakes are corrected before the mapping is finalized.
- The online format of the maps is GREAT! Very user-friendly. Is there a reason the website says to use google chrome? I used Firefox and it seemed to work well.
- I found the Existing Housing Stock Inventory map to be confusing. It wasn't immediately clear that the Planned Residential Development colors were indicating *total* residences, not number per acre. Also, the above-refereed "Open Space" tracts from Plat 87-14 should not be shown as residential on this map.
- On several of the maps, I think the different colors are hard to distinguish. (For example, the many shades of yellow and green.) Is there a way to make the colors more distinguishable?

Thank you so much for your work on this great project!

Best,

Janie Dusel







**RECEIVED**

NOV - 1 2016

PLANNING DEPARTMENT

**November 1, 2016**

**Tom Davis, Senior Planner  
Jon Cecil, Senior Planner  
Jody Seitz, Associate Planner**

**Commissioners, Planning & Zoning Commission**

**RE: Draft Anchorage 2040 Land Use Plan; Forest Park Drive**

**Attached please find comments from residents of the Forest Park Drive neighborhood concerning the proposed land use change for a portion of Forest Park Drive to "Neighborhood Compact Mixed Residential Low".**

**There is strong opposition to this proposed change and residents request the land use designation remain "Single Family & Duplex". This neighborhood is an older, established area of mixed residential use. Higher density development on the steep, narrow lots would need to be located in the front third to -half of the lots creating a wall-like effect. Eventually this would destroy the woodland character and quality of the area known as Forest Park.**

**The residents of this area request the current designation "Neighborhood Mixed Residential Low" be amended to "Single Family & Duplex" in the final Anchorage 2040 Land Use Plan to be brought before the Anchorage Assembly.**

**Thank you.**

**Property Owners, Forest Park Drive**

# NEIGHBORHOOD PETITION

## OPPOSITION TO PROPOSED LAND USE RECLASSIFICATION FOR FOREST PARK DRIVE

### Draft Anchorage 2040 Land Use Plan

We the undersigned are residents of the Forest Park Drive neighborhood between Arcadia Drive and Northern Lights Boulevard. The draft Anchorage 2040 Land Use Plan proposes to change the area's land use designation on the west side of Forest Park to higher density from the current R-2D which is single family/duplex. The proposal in the plan would allow:

*"single family, attached single family and small lot housing. Townhouses and smaller multifamily are also considered as long as the area's scale and density is maintained."*

If this language is allowed to remain in the Plan the character of our neighborhood would likely change significantly in the coming years with the addition of higher density multi-unit buildings. We petitioned the Assembly in 1979 to designate the area R-2D to protect the neighborhood. We request the proposed land use change be deleted from the Anchorage 2040 Land Use Plan. We further request this portion of Forest Park Drive remain R-2D to protect the quality of this established and desirable neighborhood.

Marvise & Jan Isaacs 2418 Forest Park Dr.

Richard Weet / Michelle McArthur 2442 Forest Park Dr.

Paul & Barnett 2226 Arlington Dr. N.

Tatiana Coe 2200 Arlington Dr N.

Edward & Sarah Hattness 2215 Arlington Dr. 99517

Patricia 2253 FOREST PARK DR

Myrna M. Maynard 2237 Forest Park Dr. 99517

Kenneth Maynard 2237 Forest Park Dr. 99517

Chris McConnell 2410/2412 Forest Park Dr. 99517

Jessie Banas 2410/2412 Forest Park Dr Anchorage - 99517

Stanislava Cooper 2255 Forest Park Dr. Anchorage AK 99517

~~Stanislava~~ M.S. Cooper 2255 Forest Park Dr. Anchorage AK 99517

Gene Mueller 2434 FOREST PARK DR. 99517

Walter For 2402 FOREST PARK DR  
Arthur MARTIN & STORRY BUSTIE ANCH, AK 99517

Frank & Jackie Danner 2206 Belair Dr. 99517

Frank A. Danner 2206 Belair Dr 99517



October 31<sup>st</sup>, 2016

Re: Anchorage 2040 Land Use Plan

To Whom It May Concern:

It has come to my attention that the Municipality of Anchorage is proposing a change in its Land Use Plan that could very negatively impact the land values and community character of the Forest Park Drive Neighborhood.

I have been a real estate Broker in Anchorage since 1980. I am presently the Broker/Owner of RE/MAX Dynamic Properties, one of the leading real estate company in the State of Alaska. Additionally, I have been a property developer in Anchorage and the Valley since early 1980. My personal residence is located in the Huntington Park Subdivision, near the Forest Park Drive area in question. Recently, I invested considerably in improvements to a property I owned at 2512 Forest Park Drive, now a single family home. I recently sold that property and am convinced that the current R-2D zoning protected my investment as well as the current owner's property value.

The 2040 plan proposes a change towards higher density land use. I am concerned that this change would encourage developers to invest in this area with the intent to construct multi-family units. Presently, this neighborhood consists of a good mix of a variety of housing categories; higher density would add traffic, parking issues already existing, and mostly would impact property values for the homes already in the area.

The Southern area of Forest Park was re-zoned in 1979 from R-2 to R-2D to protect the neighborhood from high density development. Since then, the older homes have steadily been updated/remodeled or replaced in some cases, which was the intent of the re-zoning. As a resident of Huntington Park, I would like to see the process of positive neighborhood evolution continue, with Forest Park remaining a quiet neighborhood with mainly single family homes and duplexes.

I would like to request that the final Anchorage 2040 Land Use Plan remove the proposed higher density land use designation for Forest Park Drive to allow this neighborhood to remain as it is today, zoned R-2D.

Thank you in advance for your consideration.

Sincerely Yours,



Jackie Danner  
[jdanner@gci.net](mailto:jdanner@gci.net)

907.242.7611

## MEMORANDUM

**TO:** Mr. Tom Davis, Senior Planner  
Municipality of Anchorage

Commissioners, Planning and Zoning Commission  
Municipality of Anchorage

**FROM:** Marnie and Jon Isaacs  
2418 Forest Park Drive

*Jon & Marnie Isaacs*

**RE:** Public Comments  
Draft Anchorage 2040 Land Use Plan

**DATE:** October 31, 2016

We have reviewed the draft Anchorage 2040 Land Use Plan and offer the following comments. These comments are restricted to the proposed land use designations contained on the map found on page 19 of the draft and only address the proposed changes as they apply to the west side of Forest Park Drive.

**BACKGROUND:** We have lived at the current address since 1978, and have been pleased to be part of this diverse and integrated neighborhood. The proposed changes presented on the land use map appear to recommend a land use designation of Compact Mixed Residential Low for a section of Forest Park Drive. This would allow "single family, attached single family and small lot housing. Townhouse and smaller multifamily are also considered as long as the areas scale and density are maintained." This designation would likely be vigorously opposed by residents in the area.

In 1979 homeowners along the west side of Forest Park Drive requested and received approval of a re-zone from R-2 to lower density R-2D to protect the residential character of the neighborhood's single family homes and duplexes. The older housing stock on some lots was vulnerable to high density re-development, including ours. The area's homeowners believed the protection offered by R-2D zoning over time would allow improvements and/or replacement of these older homes with newer single family or duplex structures while also protecting the area's quiet neighborhood characteristics. An additional consideration was avoiding an increase in traffic volume associated with higher density development in an area used by joggers, bicyclists and pedestrians. Since that time, new single family homes have been constructed in this specific area and substantial improvements have been made to existing single family and duplex residences, enhancing the Forest Park Drive neighborhood as a desirable area to live.



**BASIS FOR ARGUMENT:** The proposed land use designation of Compact Mixed Residential Low is inappropriate on the west side of Forest Park Drive specifically because:

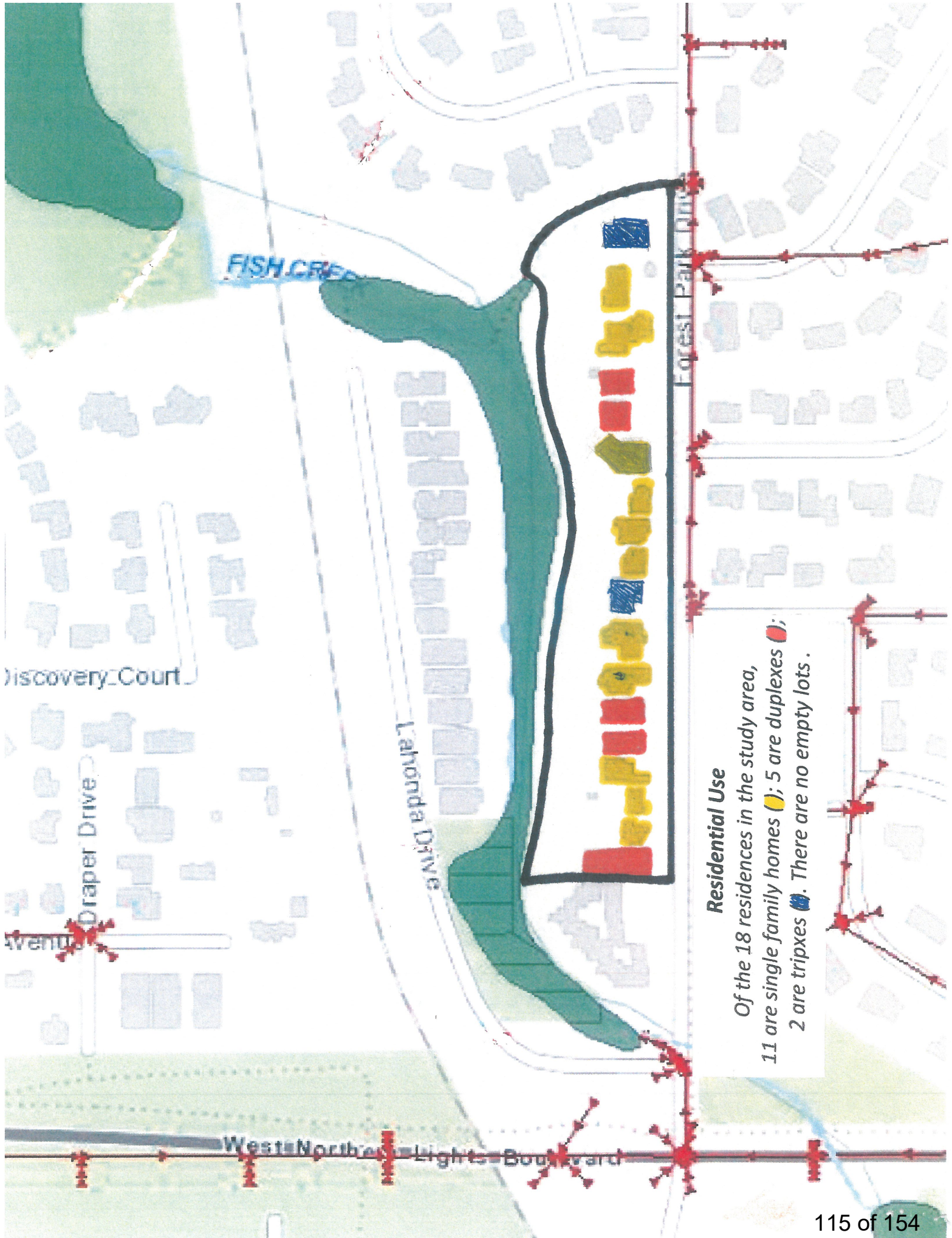
- Higher density residential is not compatible with this residential area;
  - Existing inventory is 1-2 stories, not three
  - Existing inventory is largely single family/duplex, anything larger would overwhelm the “area’s scale”;
  - There are no vacant lots or abandoned buildings in this area so higher density would require destruction of current housing.
- The lots in this area are narrow, long and drop off steeply to the Fish Creek floodplain which limits the actual square footage available for higher unit development.
  - The area is in seismic zone 4
  - Seeps and springs in the slope bordering Fish Creek create unstable soils
  - The designated floodplain boundary prohibits development and location of the required parking areas.
- Higher density residential development will add traffic and create unsafe access/egress conditions

Due to the extremely compressed public comment period for citizens to review the final draft of this plan, not all of the area’s property owners could be contacted. The attached petition reflects unanimous opposition by those homeowners that could be contacted, including nearby homeowners accessing Forest Park Drive from Huntington Park.

**CONCLUSION:** We request the designation of Compact Mixed Residential Low in the Draft 2040 Land Use Plan be removed from the Forest Park Drive properties and that the area remain designated for Single Family and Two Family structures. This would be in keeping with the area’s existing mixed residential land use and maintain the quality and character of the neighborhood.

Attachments:

- Current residential use of the Forest Park Drive area under review



**Residential Use**

Of the 18 residences in the study area,  
11 are single family homes (●); 5 are duplexes (●);  
2 are triplexes (●). There are no empty lots.

Jordan and Susan Marshall  
2336 Forest Park Drive  
Anchorage, Alaska 99517

Messrs. Tom Davis, Jon Cecil and Ms. Jody Seitz  
Long-Range Planning Division  
Planning Department  
P.O. Box 196650  
Anchorage, AK 99519-6650

**Subject: Draft Anchorage 2040 Land Use Plan – West Anchorage District Plan (WADP) – Turnagain/Spenard Land Use Detail**

To Whom It May Concern:

The Draft Anchorage 2040 Land Use Plan for West Anchorage, Turnagain/Spenard proposes to change a stretch of the southern west side of Forest Park to higher density land use designation. There are several reasons this is problematic.

First, the current R-2D, which is single family/duplex, is currently consistent on both sides of the street and further north up Forest Park. What could possibly be the justification for selecting one side of the street, and only the southern half of Forest Park, for higher density housing? This is an established neighborhood. Singling out one section arbitrarily is oddly discriminatory.

Second, among the goals of the Draft Anchorage 2040 Land Use Plan is to “encourage redevelopment of underutilized land.” However, the plan appears to overlook the fact that more than half the land on the parcels along this length of Forest Park Drive is unsuitable for construction. The back half of the properties are comprised of wetland and bluff. To suggest that these properties can accommodate Residential (Low-Medium Intensity) construction is to suggest it is possible to put 6 to 10 units on footprints smaller than ½-acre.

Third, another goal of the Draft Anchorage 2040 Land Use Plan is to “maintain the density and character of established residential areas.” How does one designate this length of Forest Park Drive as higher density while at the same time state in the same document, “[higher density is achievable] as long as the area’s scale and density is maintained.” Higher density is not compatible with maintaining current density. This illogical juxtaposition of definitions is both troubling and ambiguous, and should be rectified before any new designations along this length of road are approved.

Thank you for your consideration.

Regards,

Jordan and Susan Marshall  
Property Owners, Taxpayers

*E-mailed by  
Marshall's to MOA*

## Land Use Plan Map

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**From:** J Penelope Goforth <cybrrcat@gmail.com>  
**Sent:** Sunday, October 30, 2016 5:12 PM  
**To:** Land Use Plan Map  
**Cc:** Kurt Marsch; lynnepaulson@gmail.com  
**Subject:** Comment on Land Use Plan in South Addition

To Whom It May Concern:

As a resident (F & 11th and before that 10th & Barrow) of the area on and off for 16 years I would like to see a lot more time for public comment on this plan. I only heard about some of the issues that relate to this neighborhood two days ago.

My comments are specifically:

1. Draft LUP p. 29: I like our neighborhood without huge multi-story buildings which change the character totally. We are mainly single family dwellings or duplex/4 plex and I like it that way. You can see the sky and sometimes even the aurora. Four stories high means more traffic, more crime, more people, and will change the look and feel of our community. I say NO to higher buildings. Build higher multi-dwellings out around 3rd or 4th beyond Cordova. Lots of room out there with derelict buildings already.
2. Draft LUP p. 28: Ditto. I don't want to see more density of the kind multi-dwellings at 4 stories and above will bring. One of the charms of the area is the fact that many properties have lovely gardens and open lawns that give the area a nice feel and make it family friendly. Again, there are many other places within a half mile as mentioned above where derelict buildings and houses already exist and could be better utilized as opposed to tearing down livable properties in South Addition to build taller and bigger developments.
3. Draft LUP p. 62: Yes, protect us from these incursions! I join my neighbors in calling for calling first for a public process to adopt "additional urban design and neighborhood compatibility standards" and bring in the SACC and hold public hearings and do the democratic thing and take a vote before skidding any of these plans past the residents without adequate notice.
4. I'd also like the LUP to include protections from crime. One possibility is giving property owners rebates and or reimbursements for installing crime-preventing lighting on their properties. It isn't very pricey (less than \$100 in many cases for several lights) and a few more lights in the alleys and streets have been proven to reduce crime.

Thank you for considering the voice of the local residents!

Cordially yours,

J. Penelope Goforth

"Hello wind! Have you kissed my son's cheek? Have you brought a message from him? Is he happy out there? I know he is! What's inside his mama is inside of him, I've seen it in his eyes. Aningaa that exquisite corruption, that love of the sea! "

*-Piama Oleyer*

<http://seacatexplorations.com/>

SeaCat Explorations:

Adventures in Alaska's Maritime History

POB 240165

Anchorage, AK 99524-0165

Tel: 907.227.7837

## Land Use Plan Map

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**From:** John Havelock <jehavelock@yahoo.com>  
**Sent:** Friday, October 28, 2016 5:19 PM  
**To:** Land Use Plan Map  
**Subject:** Objection

We (Mona and I), object to the allowance of 4th stories within a quartermile of downtown. South Addition is largely a single family neighborhood and many houses have bits of view which will disappear. It is a neighborhood made up largely of single story or two story homes. Let's keep it that way. John and Mona Havelock



## Davis, Tom G.

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**From:** Dianne Holmes <dianneholmes@alaska.net>  
**Sent:** Wednesday, October 5, 2016 2:04 PM  
**To:** Seitz, Jody L  
**Cc:** Davis, Tom G.  
**Subject:** LUPM comments and corrections needed

Jody,

I am now looking at the maps on the map gallery page and have the following questions and comments that I hope you will include in your I/R:

1. Existing Residential density LU-2, show a lot of blue parcels which the legend says is "public institutional use." I wasn't aware of this and wonder what it means.
2. The legend on LU-2 says the blue hatched areas are "UCIOA or MCH Lot" What do these codes stand for?
3. The Area Specific Plans map does not include the Potter Valley Land Use Analysis Study (PVLUA) which was adopted as an element of the Comp Plan in 1999.  
Because the HDP has not been fleshed out with details to handle its goals/policies, and because the PVLUA does have specifics that cover certain critical parcels (held by HLB), it is important to include the PVLUA with the HDP in this map.
- 4 The BL-3 Buildable Land Supply map shows Section 36 as being "Designated Future Parkland." Please note that the park has already been dedicated. Please delineate as a park.
5. BL-3 has repeated the mistake from prior maps in the Potter Valley area for the boundary of areas that will not be receiving public water. Please see map 5.8 in the HDP and the text of p. 5-33. Correct the base map and all subsequent maps that reflect this mistake. Public water will not be available east of the new sewer boundary.
- 6 BL-3 Buildable Land Supply shows (when blown up), a series of trails across SE Anchorage and across private property. This GIS project some years ago erroneously included these 'social trails' on base maps and they should NOT be shown. No social trails on private property should ever be reflected on MOA maps. Only designated trails in parks and greenbelts should be shown. Remove these trails from the base map--particularly east of Pickett St and NE from there. Also remove social trails south of Little Rabbit Cr to Sandpiper and south of Paine Rd. Ensure that other maps in the LUPM series do not reflect these social trails--particularly the Area Specific Plans map among possible others.
7. Implementation Actions Map shows blue hatching for "Special Study Areas." Neglected are the three special study areas from the HDP for SE Anchorage. Please include these areas--see HDP map 4.1.
8. Parks and Open Space (CI-6) reflects that Sec 36 park (southern half) is designated for open space use. The Master Plan for Sec 36 states that this area (and the rest of the park) will be developed with trails. Please reflect on the map that Sec 36 is a Community Use Park and that it is a dedicated park.
9. Parks and Open Space (CI-6) reflects an orange colored arch across Potter Cr. I believe this is a platted walkway easement held by the MOA, not private land. Please recheck your other maps and other documents.

10. Zoning map does not reflect that Sec 36 is a dedicated park.

11. Zoning map colors imply multi-family or two-family residential area for lower Potter Creek area and in the area between Villages Scenic Pkway and Miller Dr. This must be a mistake. Please reconfirm and correct.

12. The colors on most of the map legends are very difficult to discern. They are too much alike to figure out what they mean.

13. Community natural assets map shows a red-lined area within another red-lined area in the vicinity of Our Own Lane and the Old Rabbit Creek Park Greenbelt.

What does the interior red line mean in relation to the outer line?

14. Replace the prior legend comment, "See the HDP text) on all pertinent maps (including the LUPM) where residential zoning and density is displayed. This important comment was placed on earlier versions after community councils requested this change. Please bring back this note. The maps are too hard to understand because of similar colors and the size of the maps does not allow for specific information about density/zoning. It is disheartening to find that once council comments have been addressed, that they then are changed. This makes a lot more work for councils who have to re-invent the wheel and read every single line of the document again.

## Land Use Plan Map

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**From:** Genevieve Holubik <frogstop@gci.net>  
**Sent:** Monday, October 31, 2016 1:18 PM  
**To:** Land Use Plan Map  
**Subject:** comments on draft Land Use Plan

While I do not think of “density” as a dirty word, recognizing it as one of the defining characteristics of a city, and know that it can be achieved and result in a high quality of life for neighborhood and city residents, I also know that density achieved with “site condo” characteristics is WRONG! Access roads too narrow for fire and police protection, buses, and snow removal, and parking too limited in length and width and number of spaces so that it also limits access and forces residents to park on public streets outside their “condo” area puts the problem on all of us while developers go away with higher profits at our expense. Height is another characteristic of city that can promote quality of life or lead to its degradation, especially in latitudes such as Alaska’s where daylight is limited and not generally from directly overhead resulting in long and strong shadows and shading. Covering all open space with parking is not an answer, especially given our icy surfaces which provide unsafe footing for both autos and people.

Anchorage needs urban design standards that address our weather realities in ways to make this a city we can all be proud to call our city, and neighborhood compatibility standards that result in all neighborhoods being places we are all proud to call home. And Anchorage needs these standards in place before a Land Use Plan is finalized. We do to allow for innovation in design and financing that results in high quality homes at all price points and community, not just higher profits and more of the same old same old. Too many people that I have met as they come to this town have said as their first remarks - “this town is ugly, good you’ve got the mountains to look at” or “where’s your architecture?” or “they wouldn’t let me build this where I come from”. We can and must do better than we have.

Thank you for your time and attention. This is not an easy task you - we - have. We can do it.

Genevieve V Holubik  
1700 Nunaka Dr  
Anchorage, AK 99504

907-337-0703  
frogstop@gci.net



## MEMORANDUM

**TO:** Mr. Tom Davis, Senior Planner  
Municipality of Anchorage

Commissioners, Planning and Zoning Commission  
Municipality of Anchorage

**FROM:** Marnie and Jon Isaacs  
2418 Forest Park Drive

*Jon & Marnie Isaacs*

**RE:** Public Comments  
Draft Anchorage 2040 Land Use Plan

**DATE:** October 31, 2016

We have reviewed the draft Anchorage 2040 Land Use Plan and offer the following comments. These comments are restricted to the proposed land use designations contained on the map found on page 19 of the draft and only address the proposed changes as they apply to the west side of Forest Park Drive.

**BACKGROUND:** We have lived at the current address since 1978, and have been pleased to be part of this diverse and integrated neighborhood. The proposed changes presented on the land use map appear to recommend a land use designation of Compact Mixed Residential Low for a section of Forest Park Drive. This would allow "single family, attached single family and small lot housing. Townhouse and smaller multifamily are also considered as long as the areas scale and density are maintained." This designation would likely be vigorously opposed by residents in the area.

In 1979 homeowners along the west side of Forest Park Drive requested and received approval of a re-zone from R-2 to lower density R-2D to protect the residential character of the neighborhood's single family homes and duplexes. The older housing stock on some lots was vulnerable to high density re-development, including ours. The area's homeowners believed the protection offered by R-2D zoning over time would allow improvements and/or replacement of these older homes with newer single family or duplex structures while also protecting the area's quiet neighborhood characteristics. An additional consideration was avoiding an increase in traffic volume associated with higher density development in an area used by joggers, bicyclists and pedestrians. Since that time, new single family homes have been constructed in this specific area and substantial improvements have been made to existing single family and duplex residences, enhancing the Forest Park Drive neighborhood as a desirable area to live.

**BASIS FOR ARGUMENT:** The proposed land use designation of Compact Mixed Residential Low is inappropriate on the west side of Forest Park Drive specifically because:

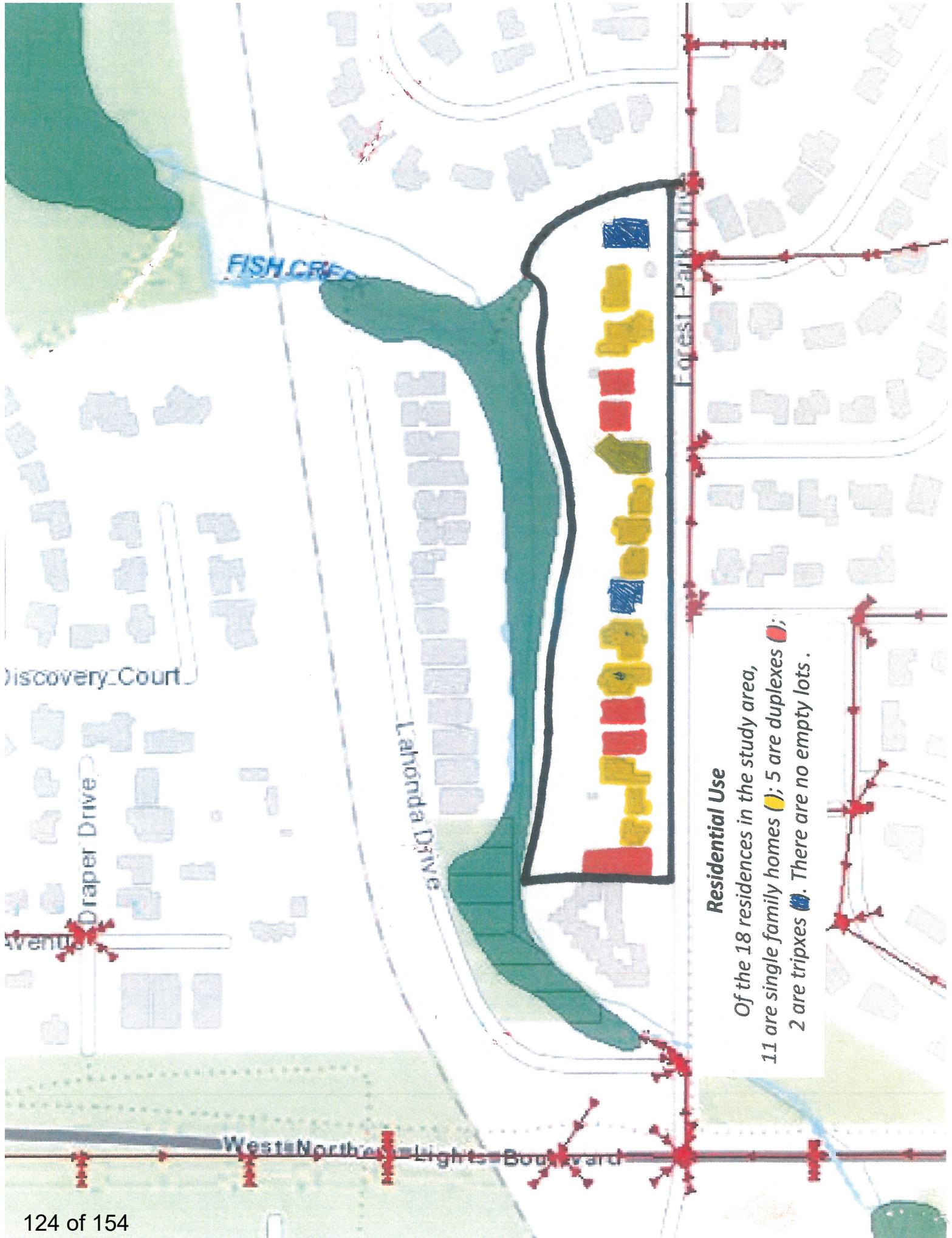
- Higher density residential is not compatible with this residential area;
  - Existing inventory is 1-2 stories, not three
  - Existing inventory is largely single family/duplex, anything larger would overwhelm the “area’s scale”;
  - There are no vacant lots or abandoned buildings in this area so higher density would require destruction of current housing.
- The lots in this area are narrow, long and drop off steeply to the Fish Creek floodplain which limits the actual square footage available for higher unit development.
  - The area is in seismic zone 4
  - Seeps and springs in the slope bordering Fish Creek create unstable soils
  - The designated floodplain boundary prohibits development and location of the required parking areas.
- Higher density residential development will add traffic and create unsafe access/egress conditions

Due to the extremely compressed public comment period for citizens to review the final draft of this plan, not all of the area’s property owners could be contacted. The attached petition reflects unanimous opposition by those homeowners that could be contacted, including nearby homeowners accessing Forest Park Drive from Huntington Park.

**CONCLUSION:** We request the designation of Compact Mixed Residential Low in the Draft 2040 Land Use Plan be removed from the Forest Park Drive properties and that the area remain designated for Single Family and Two Family structures. This would be in keeping with the area’s existing mixed residential land use and maintain the quality and character of the neighborhood.

Attachments:

- Current residential use of the Forest Park Drive area under review



**Residential Use**

Of the 18 residences in the study area,  
11 are single family homes (●); 5 are duplexes (●);  
2 are triplexes (●). There are no empty lots.

## Land Use Plan Map

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**From:** Jacquelyn Korpi <jrkorpi@fastmail.com>  
**Sent:** Monday, October 31, 2016 9:32 PM  
**To:** Land Use Plan Map  
**Subject:** 2040 Land Use Plan - South Addition

To Whom It May Concern,

"Fast-tracking" the 2040 Land Use Plan leaves Anchorage residents little time to learn of, review, and/or respond to proposed zoning changes affecting their neighborhoods.

The idea to increase height and density in South Addition is particularly detrimental. These are among the oldest city streets in Anchorage and should be, as much as possible, preserved in their existing dimensions. This community is well-proportioned for its size, the neighborhood is not equipped for major traffic increase and the city is already unable to provide law enforcement for the existing population.

These plans certainly favor mercenary developers over locals who have lived here decades and sometimes lifetimes. I strongly urge the planning committee to reconsider these proposals and to extend the window for comments.

Jacquelyn Korpi

## Land Use Plan Map

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**From:** M.G. Langdon <mgerardl@hotmail.com>  
**Sent:** Monday, October 31, 2016 7:32 PM  
**To:** Land Use Plan Map  
**Subject:** 'by right' height & density increases near Town and City Centers.

Dear Planning & Zoning committee members:

I have been a resident of the Bootlegger Cove area for the past 13 years. I am writing because I am concerned about some of the Anchorage 2040 land use proposals and about the notion of fast tracking the latest draft.

I would like to make the following two points for your consideration.

1) I am concerned with the concept of fast tracking any government legislation. That terminology and process smacks of trying to pull a fast one on the unsuspecting, and getting something through the legislative process surreptitiously. I also cannot understand why land use planning proposals would ever need to be fast tracked; especially now at the beginning of winter, and in the state and local environment of a downturned economy.

2) I am concerned about the following proposal: “Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story.” 9/25/16 Draft LUP p. 29”. I do not want to see the max height restriction in Bootlegger Cove increased beyond what it is currently (I believe it is at 35’ currently). As my education did not include learning the language of municipal codes, it is difficult for me to decipher the intricacies of the proposals, though I will continue to study them. I have attended public forums several months ago with colorful maps about the current view and future thoughts about how Anchorage could (?will) develop. I found the information to be broad brush, thus difficult to discern from the map if where I live could be impacted by the change in height proposal. However, as best I can tell from the colorful muni map my neighborhood would be impacted by the above proposal. Even if I misread the map, I do want to give voice to my view. I urge PZC not to increase height restrictions as proposed. There are likely others in different neighborhoods with similar concerns. We all deserve time to review concrete, user-friendly proposals, and to be meaningfully heard.

I have also communicated my thoughts to the mayor’s office as well as my assemblyman.

Thank you for your consideration.

Sincerely yours,

Mary G. Langdon, M.D.



29 October, 2016

Jordan and Susan Marshall  
2336 Forest Park Drive  
Anchorage, Alaska 99517

Messrs. Tom Davis, Jon Cecil and Ms. Jody Seitz  
Long-Range Planning Division  
Planning Department  
P.O. Box 196650  
Anchorage, AK 99519-6650

**Subject: Draft Anchorage 2040 Land Use Plan – West Anchorage District Plan (WADP) –  
Turnagain/Spenard Land Use Detail**

To Whom It May Concern:

The Draft Anchorage 2040 Land Use Plan for West Anchorage, Turnagain/Spenard proposes to change a stretch of the southern west side of Forest Park to higher density land use designation. There are several reasons this is problematic.

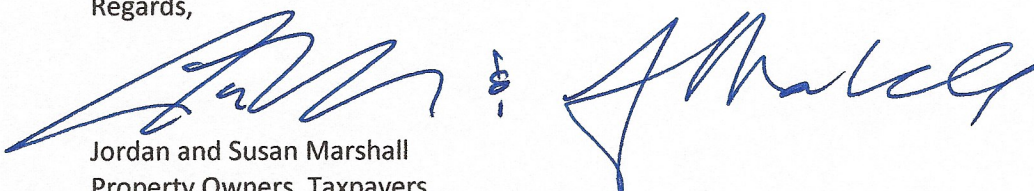
First, the current R-2D, which is single family/duplex, is currently consistent on both sides of the street and further north up Forest Park. What could possibly be the justification for selecting one side of the street, and only the southern half of Forest Park, for higher density housing? This is an established neighborhood. Singling out one section arbitrarily is oddly discriminatory.

Second, among the goals of the Draft Anchorage 2040 Land Use Plan is to “encourage redevelopment of underutilized land.” However, the plan appears to overlook the fact that more than half the land on the parcels along this length of Forest Park Drive is unsuitable for construction. The back half of the properties are comprised of wetland and bluff. To suggest that these properties can accommodate Residential (Low-Medium Intensity) construction is to suggest it is possible to put 6 to 10 units on footprints smaller than ½-acre.

Third, another goal of the Draft Anchorage 2040 Land Use Plan is to “maintain the density and character of established residential areas.” How does one designate this length of Forest Park Drive as higher density while at the same time state in the same document, “[higher density is achievable] as long as the area’s scale and density is maintained.” Higher density is not compatible with maintaining current density. This illogical juxtaposition of definitions is both troubling and ambiguous, and should be rectified before any new designations along this length of road are approved.

Thank you for your consideration.

Regards,

Handwritten signatures of Jordan and Susan Marshall in blue ink. The signature on the left is more fluid and cursive, while the one on the right is more angular and blocky.

Jordan and Susan Marshall  
Property Owners, Taxpayers



**RECEIVED**

October 26, 2016

OCT 28 2016

**PLANNING DEPARTMENT**

Long-Range Planning Division  
Planning Department  
P.O. Box 196650  
Anchorage, AK 99519-6650

and via email: [landuseplanmap@muni.org](mailto:landuseplanmap@muni.org)

Re: Anchorage 2040 Land Use Plan (2040 LUP)

Subj: Error in Map LU-2

Dear Planners,

Please correct the error in the Existing Residential Density Map (LU-2), which incorrectly identifies our private R-6 Residential lot as Public Institutional Use.

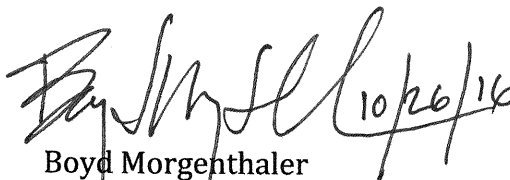
Our property is Lot 2, Block 8 Skyway Park Estates, parcel 019-201-09-000. This is private land in active use and we have no intention of converting it to public land; nor has any such conversion from private to public use ever been advanced to us.

On Existing Residential Density Map (LU-2), our property is shaded blue, indicating Public Institutional Use. We trust that this is a simple graphics error. The correct shading should be gray, indicating vacant land.

Please correct this mistake before issuing the final Anchorage 2040 Land Use Plan document.

In the event that the Municipality has a different intent in this matter please contact us in writing immediately.

Sincerely,



Boyd Morgenthaler  
1180 Shore Drive  
Anchorage, AK 99515

907-249-6523

[Morgenthaler@gci.net](mailto:Morgenthaler@gci.net)

October 16, 2016

Planning and Zoning Commissioners  
Hal Hart, Director, Planning Department  
Tom Davis, Senior Planner

RE: comments on public review draft of 2040 Land Use Plan

Please consider the following revisions to the draft Land Use Plan map. I apologize for discrepancies in the formatting: I'm traveling.

General comments:

1. Transportation land use. Denser land use development MUST be accompanied by a concerted shift in the transportation system. MOA's and AMAT's current emphasis on more lanes and more interchanges does not support compact land use, does not reduce vehicular emissions, and does not benefit non-driving residents. Where is the analysis of the percent of Anchorage land that is occupied by parking lots, private parking areas, and roadways? How does Anchorage to other cities in our ratio of transportation acreage to all acreage?
2. Watershed and riparian lands. The LUP maps should portray riparian/watershed resources. The Actions Checklist should promote protection of riparian corridors and wetlands as part of future land use. Southeast Anchorage, especially, relies on watershed function because of onsite wells and septic systems. HLB should NOT enter the wetlands mitigation bank business; HLB has the unilateral and much- faster ability to protect municipal wetlands through conservation easements or dedication of parks and watersheds, and the LUP should direct HLB to do so.

## GOALS

Page 10

Goal 1 is vague and incomprehensible. It refers to a collective vision for the future, but this isn't specifically laid out in this text. Revise Goal 1 so that it specifically refers to the land use pattern, which is the purpose of the LUP.

Goal 1. Anchorage achieves residential and commercial growth in a pattern that [WHICH] improves transportation efficiency, community resiliency and citizens' quality of life [BY SUPPORTING THEIR VISION FOR THE FUTURE].

Anchorage's Growth Strategy, Goal 1, Page 11

Rezoning must be compatible with Neighborhood/District Plans. LUP 1.4 gives greater authority to the LUP. The smaller scale of Neighborhood/District Plans is intended to resolve and minimize land use conflicts, and therefore the LUP should not be given override authority. Reword LUP 1.4 so that the area-specific plans are the first authority for re-zoning decisions. Policy 4 of the 2020 Comp Plan states that the "Rezoning Map shall ultimately be amended to be consistent with the adopted Neighborhood and District Plan Maps."

Page 13

LUP 4.1 is vague. Reword it:

LUP 4.1 Provide sufficient areas to meet the diverse housing needs of Anchorage's citizens, where the residential neighborhood character and cohesion is defined and preserved [INTEGRITY IS PROTECTED FROM ENCROACHING ACTIVITIES]. 'Encroachment' has specific legal meanings. 'Integrity' is vague. 'Neighborhood character' is a common term, and is supported in the 2020 Comp Plan.

Comments on draft LUP - Nancy Pease  
10-16-16

Page 16

Goal 8 is incomplete. It doesn't note the watershed and habitat values of parks and open spaces—which have inherent value, beyond real estate value. None of the other goals mention habitat or watershed protection. That is a glaring omission in a city that is proud of its natural setting and Big Wild Life. Add those values.

Goal 8. Anchorage maintains, improves, and strategically expands parks, greenbelts, riparian corridors, and trail corridors to protect natural hydrology and habitat, and enhance land values, public access, neighborhoods, and mixed-use centers.

Land Use Designations, Page 26

Large Lot Residential, Density: "Where delineated in the HDP, this designation also includes subdivisions with half-acre or larger sized lots with flexibility for slightly smaller size lot, at densities up to three units per gross acre." Delete 2nd half of sentence which would allow 3 DUA densities. If designated at ½-acre, maintain that minimum.

Strategy 10: Systematic Monitoring and Amendment of this Plan, Page 57

Amendment of the Land Use Plan should include public input.

Refer specifically to "amendment via public process" in this paragraph.

Page 60

Goal 1-1 Add green infrastructure to the inventory database

Actions Checklist III: Centers and Corridors

Page 50 (of draft)

Add a new Action III-8: Require minimum FAR for commercial -zoned lands in Centers and Corridors. This is a parallel intention to requiring minimum residential densities in certain zones. Currently, commercial centers are allowed to build sprawling, inefficient, one-story buildings, such as Huffman Business Park.

Page 62

Goal 4-7 Add specific language that "small-lot housing will be approved as part of a Planned Unit Development, Planned Re-development, or Conservation Subdivision to ensure that common open space, circulation, and parking are sufficient." Add specific maximums for Floor-Area Ratio (FAR) to deter monster houses on small lots.

Page 63

In infill areas and areas of proposed higher density, the quality of life and work environment will depend on accessible open space. Action Section 8 should have a new Action item for no-net loss of park lands, similar to no-net loss of residential lands (4-13); and a new Action item for revisions to Title 21 to protect--not reduce--common open space. Recent revisions to T21 have chipped away at common open space and landscaping.

Action 5-3, Develop an updatable asset inventory . . . designated for growth, Page 63

In the proposed asset inventory of Anchorage's infrastructure, include green infrastructure: riparian corridors; wetlands and other natural hydrology features that provide water recharge and water filtration; important natural habitat connections. Without this data prominently shown on maps, there will be more unilateral actions like the moose fence that DOTPF erected along Minnesota Blvd.

Comments on draft LUP - Nancy Pease  
10-16-16

Action 7-5: Adopt a Hillside Conservation Subdivision Ordinance, Page 64  
Add the words: "following the criteria and the Built-Green Infrastructure in the HDP." The HDP has specific density bonuses and these should be respected.

Action/Section 7 is mis-named. It should be called Commercial Lands Prioritization, not Industrial Lands Prioritization.

This section sanctions rezoning that will deplete and dilute the industrial land base. These actions seem contradictory to earlier chapters that state the importance of an industrial lands bank.

Action 7-1. Do not allow a Targeted Area Rezoning of the TSAIA land on the west end of Raspberry Road adjacent to Kincaid Park and neighborhoods. The airport and the former Kulis Nat'l Guard base offer other developable land with better road access and fewer land use conflicts.

Action 7-2 and 7-3. Do not rezone industrial lands to commercial use along south C Street and North C Street. These re-zones create sprawl: especially on South C Street. South Anchorage already has Dimond Center, O'Malley Center, and Abbott Center in close proximity to the South C Street area. Target & Cabellas have already usurped industrial land--stop right there.

Goal 8-1 The creek corridors and wetlands that have potential for restoration or public acquisition should be shown on the asset inventory and on Map 2 (Natural Community Assets).

Action 8-8: Determine which municipal parks are not . . . full dedication status, Page 65  
The phrase "potential nomination to full dedicated [park] status" indicates that all parks may not be dedicated. Remove the word "potential" and state that undedicated parks will be dedicated.

Action 9-1  
Change this action to specify that HLB will apply conservation easements to municipally-owned wetlands that provide public benefits or maintain the natural hydrologic functions of re-charge, water quality, and wildlife habitats. HLB can protect wetlands WITHOUT a wetland mitigation bank. The effort to collect funding for protect municipal land simply diverts funding that could protect private wetlands and yield public benefits.

Action IX-3. This is a vague directive on stream setback ordinances. Specify that setbacks should be expanded to 50-feet or greater throughout the Municipality. I hope the intent is not to weaken stream setbacks.

Add a new Action IX-4. Amend T21 to create incentives in future subdivisions and redevelopment areas to create open space tracts along riparian corridors and wetlands. Tracts, whether transferred to the MOA or held in common ownership, offer more protection than setbacks on private parcels. T21 recognizes a similar situation with transportation corridors: ROWs are favored over easements.

Thank you for your consideration.  
Signed, Nancy Pease  
19300 Villages Scenic Parkway

Comments on draft LUP - Nancy Pease  
10-16-16

## Land Use Plan Map

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**From:** sramseyoffice@gmail.com on behalf of Sandra Ramsey <sramsey@alaska.net>  
**Sent:** Monday, October 31, 2016 11:35 PM  
**To:** Land Use Plan Map  
**Subject:** Comments on Draft LUP

RE: Draft Anchorage 2040 Land Use plan

To Whom It May Concern:

My name is Sandra Ramsey. I've been an Anchorage resident for 49 years, a South Addition resident for 27 years.

I have a BS in Interior Design and Housing from Drexel University, Philadelphia, PA and a MAT from Alaska Methodist University, Anchorage AK. For the past 34 years my profession has involved designing livable spaces.

My comments pertain to the downtown area and South Addition.

Item 2.2, page 28

One reason South Addition is desirable is because of the individual open spaces surrounding older houses; lawns, flowers and trees. Adding density to this area doesn't contribute to desirability. Years ago, in downtown - north of the Park Strip, there were many multi occupant, small, housing opportunities. Many of these catered to young, vibrant occupants who gave our city a can do atmosphere. Almost all have been demolished instead of being re built or remodeled, changing the dynamics and atmosphere of downtown. Often, downtown has ugly parking lots in their place. I assume the land owners are waiting to build tall commercial buildings; in some cases they've been waiting 30 years. Maybe it's time for a public/private partnership to develop parcels north of the Park Strip for smaller size (under 1000 square feet), more dense housing with roof top gardens. Existing national polls show young professionals and retired citizens welcome and support low maintenance housing within walking distance of grocery, bakery and department stores, parks, arts centers and restaurants.

Item 2.2, page 29

4 story structures will damage the look and livability of the South Addition. The Land Use planning Map (LUP) should to take into account our extreme sun angles throughout the year. Allowing taller buildings in an existing low rise residential area blocks winter sun from existing adjoining homes and public areas. This was addressed in planning that was done years ago - and should be continued. In South Addition, legal, newer 3 story homes are blocking winter sun from their northern neighbors; winter access to sun on the park strip is already being limited. As of mid-October, the new construction on 10<sup>th</sup> Avenue, between H and I streets, has blocked the sun on the Park Strip south sidewalk for half of that block. As the sun gets lower on the horizon and we have more snow and ice, that part of the sidewalk and park will be in shadow (cold and possibly very slippery) for 4 months of the year. Additional higher construction (blocked sun), in South Addition, will inhibit some residents from walking to local destinations during the winter and destroy one of the LUP reasons for choosing to live in this part of town.

#### Miscellaneous

There are many places in the 9/25/2016 Draft LUP that address the need to meet "compatibility" standards. I've been unable to find a definition of compatibility standards in the LUP document. If these standards do not exist, they should be developed and approved prior to the Draft LUP approval to eliminate confusion. If they exist, they should be easily identified.

Thank you

--

Sandra Ramsey Associates  
200 West 34th Ave. #110  
Anchorage, AK 99503

907-278-6916 - Voice  
907-278-6919 - Fax  
[sramsey@alaska.net](mailto:sramsey@alaska.net)



I am writing to update submit my comments on the latest draft of the Land Use Plan (LUP) with respect to height & density increases in South Addition.

Firstly, I am concerned that the administration is fast tracking the latest draft with little time for neighborhoods to learn about and communicate major zoning changes.

Specifically with respect to my neighborhood, South Addition, these include the following changes from the 9/25/16 Draft LUP :

1. "Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story." 9/25/16 Draft LUP p. 29

And,

2. "To provide greater housing opportunities, areas up to a half mile from designated City Centers may allow increased density. This is subject to compatibility standards for scale, design, lot coverage, setbacks, and alley driveway access." 9/25/16 Draft LUP p. 28

As a South Addition homeowner and resident for 26 years, I do not support either of these provisions. Increases in building height and density in south addition will further impact the unique character of our neighborhood and the noted historical significance of South Addition, An ongoing problem, increasing vehicular traffic, has not been addressed, but will be exacerbated by the proposed zoning changes. Many US cities support thriving single family neighborhoods in downtown areas and provide a model for building sustainable neighborhoods without the loss of character and quality of life that the proposed zoning would incur. South Addition is a desirable neighborhood with mixed economic demographics that attracts families, retirees, professionals and vibrant diversity. I do not support any zoning changes that will detract from this unique character.

Janine Schoellhorn

1302 G St,  
Kjschoellhorn@gmail.com



## Land Use Plan Map

---

**From:** Fred Traber <fredtraber@gmail.com>  
**Sent:** Sunday, October 30, 2016 2:36 PM  
**To:** Land Use Plan Map  
**Subject:** Comments on the 2040 LUP

### **Comments from Fred Traber on the draft *Anchorage 2040 Land Use Plan (2040 LUP)*, submitted October 30, 2016**

Anchorage Planning Director Hal Hart introduces the 2040 LUP, in part, with this comment: “To ensure efficient and equitable growth within our limited geographical area, Anchorage will need to maximize land use efficiencies while protecting and enhancing our valued neighborhood characteristics and natural resources.”

As a property owner in the unique and fragile area known as Bootlegger’s Cove (South Addition), I am focused on his words “protecting” and “enhancing”. Since I am not a land use specialist, I found the 2040 LUP a complicated read and challenging to apply to my specific neighborhood.

However, I do recognize the importance of a *public process*. Property owners are taxpayers and we must be afforded the opportunity to be part of any government process which affects us. I suggest that a plan which may well influence the value of my property and the quality of my neighborhood needs to have a public process built-in.

With that in mind, I reviewed the 2040 LUP. I looked for ways where I would be able to help “protect” and “enhance” Bootleggers Cove. I searched the 86 page document for common key words which would suggest the provision for a public process in the 2040 LUP. Here are my results:

<b>Key Word</b>	<b>Occurrences in the 2040 LUP</b>
Public Notice	0
Hearing	0
Notice	0
Community Involvement	0
Advertise	0
Community Council	0

***I am surprised to find no mention of any public process in the Plan.***

In my experience, the public process is key to livability. While sometimes cumbersome, it is critical to all concerned. Three years ago, we had a problem with transient camps in our neighborhood in trees and brush on Alaska Railroad property. We offered to pay for tree and brush removal. The Railroad agreed

to consider our permit application, but required a public hearing by the South Addition Community Council prior to Railroad approval. It took extra time, but neighbors were kept informed.

I urge revision of the Anchorage 2040 Land Use Plan to specifically include detailed requirements for public notice and hearings.

Fred Traber

804 P Street

Anchorage, AK 99501

## Land Use Plan Map

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**From:** Fred Traber <fredtraber@gmail.com>  
**Sent:** Monday, October 31, 2016 9:40 AM  
**To:** Land Use Plan Map  
**Subject:** Re: Comments on the 2040 LUP

Thanks, Jody.

And just to make clear, my comments are directed at the fact that the *plan itself* does not have require public notice, hearings, notices, community involvement, advertising or community council input to implement the plan.

Your office may have included the public in creation of the plan, but, I am concerned that I and the rest of my neighbors and community council will be adequately noticed and when it comes time for an adjoining neighbor of mine to build a high-density, five-story building with no parking provisions. I see no provision in the 2040 LUP to require the prospective building to notify anyone of his intentions.

Fred Traber

On Mon, Oct 31, 2016 at 10:14 AM, Land Use Plan Map <[LandUsePlanMap@muni.org](mailto:LandUsePlanMap@muni.org)> wrote:

Good Morning Mr. Traber:

Thank-you for sharing your thoughts with us. We will incorporate these into the Issue/Response that goes to the PZC for its deliberations. We will also be posting online the Public Involvement Plan which will hopefully reassure you that there has been significant public involvement in this plan. That should be online by the end of this week, if not sooner.

Thank-you again for your comments.

Jody

## Land Use Plan Map

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**From:** Kathryn Veltre <veltre@gci.net>  
**Sent:** Tuesday, November 1, 2016 4:52 PM  
**To:** Land Use Plan Map  
**Subject:** Building heights and increased density

As residents of South Addition, we read with alarm the suggested zoning changes that would allow four story buildings in our area. For those of us who live in this older section of Anchorage on small lots, the prospect of four stories going up next to us is alarming. The need for increased density in this area is understandable, but it makes more sense for the taller buildings to be downtown.

We are concerned that most of our neighbors have no idea that changes that would profoundly affect their quality of life are being considered. Are there any plans to inform them?

Thank you,  
Doug and Kathie Veltre



## Seitz, Jody L

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**From:** Patrick SW <patricksw@ak.net>  
**Sent:** Wednesday, September 28, 2016 11:32 AM  
**To:** Seitz, Jody L  
**Subject:** Agricultural zoning

Jody,  
I have briefly reviewed the latest Land Use Plan version and I am still concerned about the lack of mention of agricultural uses. I have no idea what zoning classification an urban farm would fall under. For example, the 10 acre site off Northwood next to Fish Creek would be an excellent location for an urban farm or community gardens and is currently zoned high intensity residential. Would a farm be allowed under this classification? If not, which classification would it fall under? Industrial? Open Space?

If the plan as a whole represents our vision for Anchorage's future there needs to be a discussion of our basic need for locally grown food and ways we can encourage people to grow and where it is appropriate to grow. Given the success of the Mountain View community garden in empowering a diverse community to be involved in positive community development it is in our best interest to encourage these activities at the city level. Please include a discussion of farming and gardening uses into the plan.

Patrick Solana Walkinshaw  
907-230-3686

Sent from my iPad

## Seitz, Jody L

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**From:** Patrick SW <patricksw@ak.net>  
**Sent:** Thursday, October 27, 2016 1:13 PM  
**To:** Seitz, Jody L  
**Cc:** Davis, Tom G.  
**Subject:** Re: Agricultural zoning

The example for agricultural zoning I'm referring to is the BOETTCHER TR 3 ( Residential Property) Tax ID: 01024428 across from where W 45th ends at Northwood Dr. This 10 acre parcel is currently being developed as high density housing much to the chagrin of neighbors. There is an easement on the property for the soon to be installed Fish Creek trail extension. I think it is an ideal location for a community garden and urban farm. It would expand the greenway along Fish Creek and give local schools, the Spenard rec center and neighbors a place to spend time outdoors growing food and connecting to place.

The only place I see community gardens mentioned in the plan is under the description of Other Open Space. I think that agriculture uses should also be mentioned in Greenway-supported Development and there should be an action item to identify land that would be suitable for agriculture development to increase local food security and improve quality of life.

I believe a planning vision for Anchorage must include a discussion of food production as a foundational part of a healthy and livable community.

Thanks,  
Patrick

Sent from my iPad

> On Oct 21, 2016, at 3:29 PM, Seitz, Jody L <SeitzJL@ci.anchorage.ak.us> wrote:

>

> Dear Patrick:

>

> I have looked up the zoning for community gardens, hobby farms, and large domestic animal facilities. Title 21 has the following to say:

>

> \* Community Gardens are permitted (allowed) in the R-2M, R3, R-4, and R4A residential zones, as well as in the B-1A, B-1B, B-3, and RO districts.

>

> \* Commercial horticulture is a Conditional Use in the R-1, R-1A R-2A, R-2D, R-2M and PLI zoning districts. It is permitted (allowed) in the B-3, I-1, and I-2 districts.

>

> \* Large domestic animal facilities are conditional uses in the B-3, I-2, PR, and PLI districts. They are permitted in the I-1 district.

>

> \* Farmer's markets are permitted in the B1A, B1B, B-3, MC, I-1, I-2, and PLI districts.

> \* Commercial food production ia permitted in the i-1, I-2, MI, and PLI districts. It is a conditional use in the B-3 district.

> \* Aquaculture is a conditional use in the MC, I-2, and PLI districts. It is permitted in the MI district.

>

> The area off of Northwood next to Fish Creek - could you please give me an intersection? Remember that the Land Use Plan map is not a zoning map. It indicates what uses are planned for the future, but doesn't dictate zoning.

>

> As you can tell from the above, community and commercial food production is allowed in a variety of zoning districts.

>

> Maybe you could suggest where you think that such land uses should be planned.

## Land Use Plan Map

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**From:** Michelle Wilber <katmainomad@gmail.com>  
**Sent:** Friday, October 28, 2016 4:47 PM  
**To:** Land Use Plan Map  
**Subject:** I support the greater Height and Density in Land Use Plan

Hi,

I am writing to comment in support of greater height and density allowed in the Land Use Plan as below:

1. "Areas within a quarter mile walking distance of Town Centers and City Centers may allow up to a fourth story." 9/25/16 Draft LUP p. 29
2. "To provide greater housing opportunities, areas up to a half mile from designated City Centers may allow increased density. This is subject to compatibility standards for scale, design, lot coverage, setbacks, and alley driveway access." 9/25/16 Draft LUP p. 28

I believe that increased density within its core is key to helping Anchorage be a more livable (walkable/transitable etc) city. I also support mixed use, lower (ideally no) off street parking requirements, and other things that would help us have a more European-feel person-centric (as opposed to car-centric) feel - this would make us a much more vibrant place to live and visit, and in days of less oil revenue, visitor dollars are important. I am not a developer (although I do own a 4-plex and a lot in Spenard), so my comments are really just from the point of view of a resident and parent - wanting a more livable, healthy city - not sprawl.

Thanks!

-Michelle

**February 29, 2016**

# **Community Discussion Draft Comments**

**(Comments unintentionally left out of previous compilation  
of the Community Discussion Draft)**

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August 5, 2016

Long-Range Planning Division  
Planning Department  
P.O. Box 196650  
Anchorage, AK 99519-6650

**CAPITAL PROJECTS**

**TEL 907.265.3095**

**FAX 907.265.2638**

RE: Anchorage Bowl Land Use Plan

To whom it may concern:

As you are likely aware, the Alaska Railroad (ARRC) continues the development of regularly scheduled, year-round passenger service from Anchorage throughout the state of Alaska. State, municipal and railroad planning documents all reference ARRC's steps toward providing commuter rail service in the Anchorage bowl, connecting to the Mat-Su valley and Girdwood. While the mapping provided in the draft Anchorage Land Use Plan correctly identifies the ARRC's corridor as a transportation corridor, we feel that it needs further designation as a "Transit Supportive Development Corridor" to accurately reflect the efforts of the ARRC and others to initiate commuter rail service in the future.

If you have any further questions in this matter, please feel free to contact me at your convenience.

Sincerely,

Brian A. Lindamood, PE, SE  
Director, Capital Projects

cc: David Greenhalgh  
Wendy Lindskoog



## **South Addition Community Council Resolution Requesting Changes to the Proposed Land Use Plan Map, April 21, 2016**

**IT IS HEREBY RESOLVED**, the residents of the **South Addition Community Council (SACC)** request the following changes to the proposed Anchorage Bowl Land Use Plan Map 2016 (LUPM):

Whereas, South Addition is presently zoned consistent with the community values held by the residents of SACC, which include low to medium density development, historic homes, sidewalks, alleys, mature trees and walkability;

Whereas, the scale and height of structures are critical factors that define South Addition as a highly valued, historic neighborhood, all future development should be compatible with the current character and scale of the South Addition neighborhood;

Whereas, South Addition residents find the narrative with the current land use map confusing, particularly when compared with current zoning, and find it difficult to understand the implications of proposed designations on the Land Use Plan Map.

**Now, therefore, SACC opposes the proposed increase to a high intensity urban neighborhood as outlined on the current land use plan map in the areas between:**

1. L to I Street, 10<sup>th</sup> Avenue – SACC supports height limitations not to exceed 35 feet to protect the sunlight onto the Delaney Park Strip year-round;
2. L to I Street, 11<sup>th</sup> to 13<sup>th</sup> Avenue, and on the southeast and northeast corners of I Street and 11<sup>th</sup> Avenue – SACC supports height limitations not to exceed 45 feet;
3. C to A Street, 10<sup>th</sup> to 12<sup>th</sup> Avenue – SACC opposes High Intensity development in this area and instead resolves that this area be designated Compact Mixed Use Housing consistent the area between A and Cordova Streets, and also consistent with the use and values in this historic neighborhood;
4. C to A Street, 13<sup>th</sup> to 14<sup>th</sup> Avenue – SACC supports this area to stay multi-family zoning, with a height limitation of 30 feet;
5. C to A Street, 14<sup>th</sup> to 15<sup>th</sup> Avenue – SACC support residential mixed-use development in this area with building heights limited to 30 feet;
6. A to Cordova Street, 10<sup>th</sup> to 11<sup>th</sup> Avenue – SACC supports the proposed change to compact mixed use, consistent with the historic district designation of this pocket neighborhood;

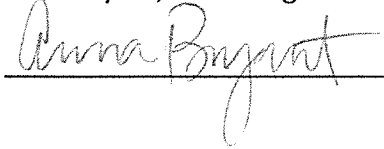
7. A to Cordova Street, 13<sup>th</sup> to 15<sup>th</sup> Avenue – SACC proposes this area be designated Medium Intensity Residential development with neighborhood conveniences and a height limit of 35 feet. SACC opposes High Intensity or Residential Mixed Use in this area; it is only a short distance from the Gambell Street business area that is currently underdeveloped.

Passed this day, April 21, 2016 by a vote of 14 for, 1 against, and 1 abstention.

Jeffrey Manfull, President

Handwritten signature of Jeffrey Manfull in cursive, written over a horizontal line.

Anna Bryant, Recording Secretary

Handwritten signature of Anna Bryant in cursive, written over a horizontal line.

## **South Addition Community Council Resolution Requesting Changes to Proposed Land Use Plan Map regarding: Transportation**

**IT IS FURTHER RESOLVED**, South Addition Community Council (SACC) requests the Municipality address important transportation issues associated with development in the proposed Anchorage Bowl Land Use Plan Map 2016 (LUPM):

Whereas, the SACC neighborhood very much values its safe and walkable character, at the same time the neighborhood is divided by four high speed arterials (A, C, I, and L Streets) that are dangerous and deter people who want to walk, bike or catch a bus;

Whereas, A and C Streets are located near or adjacent to a playground and elementary schools;

Whereas, there is history of Anchorage school children being hit by cars and killed on high-speed arterials adjacent to playgrounds on both Lake Otis and Tudor roads;


Now, therefore, SACC resolves that the Municipality should:

1. Implement strategies that encourage shifting resident's trips via automobile to transit, biking and walking, and discourage drive-alone trips into the City Center.
2. Before adding higher density residential development ensure bus service operates every 15 or 20 minutes along A, C, I, and L Streets.
3. Implement a safe pedestrian crossing for children and adults at the intersection of 12<sup>th</sup> Avenue and C Street.
4. Reduce vehicle speeds on the four arterials north of Fireweed to 25 mph through effective street design and aggressive speed enforcement.
5. Ensure neighborhood streetscape standards before approving new construction, including curb and gutter, paved alleys, separated sidewalks with landscaped buffers from the street.
6. Make the following changes to LUPM narrative, in "Actions" at page 53:
  - a. VI-2a - Ensure neighborhood streetscape standards before approving high intensity residential construction, including curb and gutter construction, paved alleys, separated sidewalks, landscaped buffers.
  - b. VI-6a - Develop an implementation plan to promote transit, walking and biking, and discourage drive alone travel into the City Center.

c. VI-8a - Protect neighborhoods planned for significant redevelopment into multifamily and high intensity residential by ensuring transit service every 20 minutes supported by safe and convenient walking and bicycle infrastructure with the redevelopment.

Passed this day, April 21, 2016 by a vote of 14 for, 1 against, and 1 abstention.

Jeffrey Manfull, President

Handwritten signature of Jeffrey Manfull in cursive, written over a horizontal line.

Anna Bryant, Recording Secretary

Handwritten signature of Anna Bryant in cursive, written over a horizontal line.

## **South Addition Community Council Principles Supporting Resolution**

### **I. Important Elements of the Anchorage Bowl Land Use Plan's Intent**

A primary intent of Anchorage Bowl Land Use Plan is to recognize the importance of growth intensity, continuity and compatibility of community development. The Anchorage Bowl Land Use Plan Map Narrative (LUPM) explains that the new land use plan offers “guidance when developing other plans and making land use and development decisions, public infrastructure investments, and evaluating proposed zoning changes, in coordination with other elements of the Comprehensive Plan”.

The Anchorage Bowl Land Use Plan Map narrative makes it clear that in order to build a community that meets our development needs, a seamless sense of continuity between unique and valuable districts and neighborhoods must exist. To achieve that end, we must respect the character, value and potential that each sub-district contributes to the whole. The following excerpts from the LUPM Narrative outline the guidance for how a seamless sense of continuity between unique and valuable districts and neighborhoods will be created.

#### **Community Goals Driving the MOA Land Use Map:**

##### **Section 1.3 Community Goals Driving this Plan: Compatible Development Goal**

“Development that respects the scale and character of existing neighborhoods, contributes to neighborhoods of lasting value and vitality, and is supported by investment in local amenities and services.” (p. 10)

##### **Section 1.4 Coordination with other Plans**

“Anchorage 2020 called for Neighborhood or District Plans to help achieve Comprehensive Plan policies, and respond to specific issues that arise in particular parts of the community... Together, the Anchorage Bowl Land Use Plan Map and area-specific plans guide future growth and development to achieve citywide and neighborhood goals, and maintain or improve the essential character of Anchorage’s communities.” (p. 3)

##### **Section 1.9 Anchorage’s Growth Strategy**

“A strategy is a long-term engagement, implemented through actions, which involve partnerships among multiple organizations and people in the community—relationships that continue and evolve over time to meet the community’s goals and needs.” (p. 7)

### **Section 1.9 Anchorage's Growth Strategy, Strategy 8. Compatible Use**

The Land Use Plan Map takes into consideration compatibility of uses. This refers to types of uses as well as the physical characteristics of buildings and density of dwelling units, noise, appearance, and traffic. The size, or bulk of buildings, building design, the shadowing and wind effects of tall buildings can impact neighboring structures and lots. Compatibility issues are generally addressed through more specific area, neighborhood or district plans, transportation plans, and through zoning. (p. 10)

## **II. Key Considerations to Compatible Development in South Addition**

South Addition is an irreplaceable, established, valued, historic neighborhood that has been and is still being created with unique nature and scale and close proximity to downtown.

1. The physical characteristics and scale makes it a sought-after place to live for people of all ages. The neighborhood is defined by sidewalks yards, gardens, alleys and tree lined streets, as well as a mix of single-family and medium density historical and contemporary residential architecture.
2. It is an interesting blend of variety of housing -- a mixed stock of mostly one or two stories single family homes, duplexes and fourplexes. It also includes a number of three story larger apartments and condominiums that maintain the nature and scale of the neighborhood. There are few four-story buildings.
3. South Addition offers an intimate and welcoming scale for walking and biking with streetscapes that encourage residents to watch the street they live on, and enjoy safe and healthy community engagement with their neighbors.
4. The scale, sidewalks and green landscape nature of South Addition are extremely important to the city as a whole and should be maintained and supported. As more higher-density housing is developed in the downtown core (as recommended in the Downtown Plan) South Addition will serve as the nearby, lower density, safe, walkable neighborhood that offers needed intimate character and scale supporting good quality urban living.
5. The larger Anchorage community appreciates and enjoys South Addition. It is the home of citywide public areas including Delaney Park Strip and Westchester Lagoon, and many public walking and racing areas. Downtown workers and visitors walk in South Addition for exercise and pleasure. However the high speed on A, C, L, & I Street thoroughfares create an uninviting safety hazard for pedestrians and bikers who use or live in the neighborhood.



6. The Downtown Plan calls for more high-rise and High Intensity housing in the urban core. South Addition should not compete with Downtown for high-rise/High Intensity development. South Addition serves as the nearby, low to moderate density, safe, walkable neighborhood that offers needed intimate character and scale supporting good quality urban living.

7. The South Addition neighborhood plays a valuable role in protecting downtown's important viewshed. From the new Dena'ina Convention Center and most of the major downtown high-rise buildings, South Addition's low heights and plentiful landscaping allow clear views to the south and east of our growing and beautiful city framed by the Chugach Mountains and Cook Inlet.

### **III. South Addition Community Plan Process is Underway**

South Addition is currently undertaking the development of a neighborhood plan. The plan will provide a specific guide to define and promote development that is compatible with the neighborhood. The planning process recognizes that the continuity of character and quality of life from the eastern to western edges of South Addition are very important. It will address development considerations such as the physical bulk, size and characteristics of buildings, setbacks, density of dwelling units, noise, appearance and traffic as well as viewsheds, shadowing and wind effects of taller buildings.

### **IV. South Addition is Unique, Requiring Its Own Development Solutions**

South Addition is a unique and historic neighborhood. Consequently its plan will likely propose development solutions that are different from other areas in Anchorage but common for highly valued historic neighborhoods in cities across the country.

For example, the plan may propose an overlay district accompanied by an infill housing ordinance as a tool to ensure the traditional character of the community is preserved while also ensuring an efficient use of existing development sites. Infill housing ordinances provide the structure for development to take place in the context of the valued qualities of the existing, developed neighborhoods. A variety of compatible housing types are allowed while the ordinance helps guide new infill construction and area redevelopment in a manner that mixes land use densities while reinforcing the scale and physical characteristics of the established neighborhood.

### **V. Anchorage Ordinance 2015-100 Significantly Changed the LUPM's High Intensity**

The approval of MOA AO 100.2015 changed the significance of the High Intensity land designation in the Land use Plan Map by allowing the right to build six story buildings in areas designated as High Intensity regardless of the area's existing zoning that requires significantly smaller building heights. In 2010's Provisionally Adopted Title 21, R4 was limited to three to four storied (35 to 45 foot tall) buildings. Now the coupling of AO 2015-100 with the Land Use Map designation of High Intensity can destabilize existing neighborhood by allowing randomly constructed six story, or 70 feet tall buildings, in existing R4 neighborhoods that are soft mixes of single family houses across from low, two or three story apartments. Land Use Plan Map designations of High Intensity R4 zoning now fundamentally threaten the physical characteristics of South Addition.

Great caution must be taken to not allow the combination of the Land Use Plan Map High Intensity designation and AO 2015-100 to erode the effectiveness of other municipal plans. The Downtown Plan calls for High Intensity urban housing. SACC agrees High Intensity housing needs to be built downtown in order to fill in and redevelop our urban core.

High intensity development should be built on lands already zoned for it, where landowners will welcome it:, such as Downtown and certain areas in Fairview. Building to high densities in a medium density neighborhood damages the neighborhood while delaying High Intensity development where it is already zoned and welcomed.

#### **VI. Transportation Issues related to the LUPM.**

Before adding higher density residential development to South Addition, measures should be taken to ensure that streetscapes include curb and gutter, separated sidewalks and landscaping, as well as adequate bus service operating every 20 minutes along A, C, I and L Streets. Vehicle speeds on the four arterials north of Fireweed should be lowered to 25 mph through effective street design and aggressive speed enforcement.

Development should improve South Addition, and produce as high quality pedestrian environment east of C Street as is enjoyed west of C Street. A and C Streets function mostly to rush cars going to and from downtown, with narrow sidewalks right next to speeding cars. There are no protected pedestrian crossings on A or C between 9th and 15th Avenues, and the "Transit Supportive Development Corridor" on 15th has no bus service at all in South Addition. School children and bus riders should have basic pedestrian protection when crossing A and C.

Unfortunately, Metropolitan Transportation Plan (MTP) goals and strategies are heavily weighted to move cars, and have little intent to improve the neighborhoods they transect. Many South Addition residents enjoy walking and biking close to home, but use their cars if

going beyond the neighborhood and downtown because north and south bus service is infrequent, and A and C Streets are inhospitable and dangerous for pedestrians and bicycles.

Along with its usual road construction schedule, the MTP needs to incorporate a number of Anchorage 2020 policies and target transportation investments in areas slated for infill and redevelopment, including several from Anchorage 2020:

- "Design, construct, and maintain roadways or rights-of-way to accommodate pedestrians, bicyclists, transit users, the disabled, automobiles, and trucks where appropriate."
- Improve "Anchorage's overall land use efficiency and compatibility, traffic flow, transit use, pedestrian access, and appearance."
- Build "A pedestrian-oriented environment including expanded sidewalks, crosswalks, street furniture, and bus shelters and landscaping."
- Design "with a goal of reducing vehicle trips and distance for neighborhood residents and minimize traffic impacts on nearby residential areas."
- "Improve public transportation service between residential areas and employment, medical, educational and recreational centers."
- "Design, construct, and maintain roadways or rights-of-way to accommodate pedestrians, bicyclists, transit users, the disabled, automobiles, and trucks where appropriate."
- Place greater emphasis on pedestrian to transit linkages, minimizing individual and cumulative air quality impacts and impacts on neighborhoods.

Placing more emphasis on walking, biking and transit improvements in areas targeted for infill and redevelopment will come closer to achieving Anchorage 2020 goals to provide "a safe, energy efficient transportation system that is designed and maintained for year-round use and that respects the integrity of Anchorage's natural and northern environment," and offer "affordable, viable choices among various modes of transportation.

Unless Anchorage expands its transportation goals to promote transit, biking and walking, and discourage drive alone traffic, additional residential density will burden existing neighborhood streets with even more unwanted demand for parking and traffic.