

November 17, 2020

Municipality of Anchorage Planning Department  
Attn: Collin Hodges  
Senior Planner  
P.O. Box 196650  
Anchorage, Alaska 99519-6650

Re: Case #2020-0118/Northern Lights Subdivision Rezone

Dear Collin Hodges,

The Spenard Community Council hereby opposes the above rezone because it doesn't not meet the requirements as laid out in the Zoning Map Amendment Standards (AMC 21.03.160) as discussed below:

1. The rezoning would not be in the best interest of the citizens of Anchorage or promote public health, safety, and general welfare.

The history of the loss of residential housing in Midtown has been well documented. In the late 1990s, the Plaza 36th Mobile Home Park was rezoned to B-3 and 211 trailers and the families that lived there were removed. This loss has never been mitigated, at all, in either Midtown or the Anchorage Bowl as a whole. While many might argue that the housing was probably substandard, the fact is that there has been no housing added to replace that loss in the twenty years since it happened. This proposed rezone exacerbates that loss with two large parcels being sought for rezone from residential to commercial.

In the Midtown Draft Plan, which has never been formally adopted but which had many useful statistics, demographics and information, it states that as of 2009, when the Draft Plan was published, the Midtown District had only 1% of the undeveloped land in the Anchorage Bowl of which 12 acres of vacant land was zoned residentially (Midtown District Draft Plan, District Overview, Section 2-9). Since that time, there has been an explosion in commercial growth and even the public sphere has expanded, but the housing stock has not increased. The Midtown Park, along with Loussac Library, is now central as public space in Midtown. There are more restaurants, shops, and even a rock climbing gym. It would better serve the community to have residents who can live nearby and walk, bike or take the bus to these various attractions and services.

2. The rezone does not comply with the comprehensive plan and exacerbates a land use pattern that is inconsistent with the comprehensive plan.

According to the Anchorage 2040 Land Use Plan, there is a need for 21,000 new households by 2040 (LUP page 10). Redevelopment of existing residential lots will play a role in filling that gap. (id) That is why the LUP finds that "housing remains essential" and that the role of residential mixed use development is to "retain and grow" local housing capacity, not to "erode the residentially zoned land supply". (id page 65) Unfortunately, this rezone, which would

convert two large parcels from residential to commercial, would erode the residentially zoned land supply. Rather, mixed use housing is encouraged in Midtown, even along commercial corridors. (id pages 46-49)

For too long, the argument has been that no one wants to live along main commercial corridors, as cited by the developer, such as those next to this site. However, there are several instances where that has been proven to be false. One need look no farther than all the housing along Tudor and Muldoon, which includes some higher end houses, and there have been many multi family housing units added to the neighborhoods along the Glenn Highway. Arctic Boulevard is not an extremely busy street, with one lane in each direction and a turning lane. This isn't likely to be altered at any time in the near future as it was only recently redone by ADOT. To improve connection between neighborhoods and the more commercial parts of Midtown, west 32nd and west 33rd are being re-engineered to be a multi use access from Spenard to Midtown.

It is ironic that DOWL Engineers are now doing a Midtown Congestion Study. Clearly there is a problem with traffic in Midtown that is only going to get worse as time passes. We also have to acknowledge that Climate Change is affecting Alaska and that there is a need to place people closer to where they work, shop, eat and recreate. We cannot be solely focused on commercial needs without those considerations and, one could argue, there is a surfeit of vacant commercial buildings not just in Midtown, but throughout the Anchorage Bowl.

On a technical note, the application does not contain a site plan or discuss infill design principles. Generally, residential mixed use development in existing residential zoning districts which requires rezones are expected to incorporate site plans or development agreements (LUP page 66). The LUP also requires that any discretionary decisions including rezones shall be guided by infill design principles (id page 34). These principles apply where, as here, high density zoning is sought (id page 40). Not only are these principles not discussed, but as the petitioner admits, no proposed drawings even exist. Therefore, it is impossible to evaluate the merits of this proposal.

This is actually in an area that is identified as a Reinvestment Focus Area. These parcels are not being served well as a deteriorated trailer park, but redevelopment is possible using grants, private/public funds and tax incentives. These parcels are exactly where the Midtown District Plan discusses creative uses for the land.

3. The rezone is incompatible with the surrounding zoning and development, particularly the Arctic/Benson Park.

The petitioner states that the parcels on Arctic and Benson Boulevards, directly to the south, north, east, and west, are comparable commercial lands. However, directly to the south is Arctic/Benson Park and there is nothing in the application that mentions the park or protects it from the commercial development petitioner proposes.

This rezone should not be granted. There is a housing shortage in Anchorage. There is too much commercial land being developed without consideration for traffic congestion. Retaining this as residential land, or at least as mixed use, will follow the needs of the community, will meet the

Anchorage 2040 principles and standards and will actually strengthen Midtown's future as a place to work, live and play.

Approved by the Spenard Community Council Executive Committee  
November 17, 2020