

**Midtown Community Council**  
1057 West Fireweed Lane, Suite 100 Anchorage, AK 99503

November 2, 2020

Planning & Zoning Commission  
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Long Range Planning, MOAA  
4700 Elmore Rd  
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Reason: 2022-0090 Title 21.05.070.D.1 Amendment to ADU Regulations

Thank you for accepting our comments concerning the regulation of ADU's in the Anchorage Municipality. The Mid-Town Community Council (MTCC) supports the building and benefits of ADU's to individuals, but feel a well-drafted policy is necessary. The MTCC finds the following shortcomings in the Proposed amendments to 21.05.070.D:

**Home ownership and neighborhood stability.** 21.05.70.D states the purpose of ADU's is to support continued homeownership and protect neighborhood stability and character. The provisions to remove the requirement for owner-occupancy, works against continued homeownership and residential stability.

**Targeted infill.** The proposed amendments appear to contradict the intent of the 2040 Land Use Plan to promote targeted infill and redevelopment, supported by public investment in infrastructure and services. Instead, the ADU regulation changes allow for a random doubling of housing density and will create pockets of density without additional services or infrastructure.

**Substantive amendment.** The proposed ADU amendments are substantive enough to require one or more comprehensive plan amendments. The ADU amendments pose a potentially large change in residential neighborhood character and use patterns: the amendments will allow a doubling in density, and will accelerate short-term visitor rentals by absentee owners as a commercial use in residential neighborhoods.

**Lack of need.** The city has not offered evidence or data that there is any need for the proposed amendments, particularly the dimensional amendments. The general impediment to any residential change is cost and financing. The staff analysis provides no evidence that increases in height, decreasing setbacks, and increasing the size of ADU's are necessary to reduce costs or improve financing.

**Decrease in resident housing capacity.** In many cities that are tourist destinations (like Anchorage), conversion of homes to short-term rentals has reduced the resident housing capacity and driven up rents and housing (Girdwood is a perfect example). The removal of the owner-occupancy requirement for ADU's would increase this possibility.

**Parking.** One or more parking spaces should be available for tenants so they are not forced to park in the streets. Parking on the street is a safety hazard because there is no room for the removal and storage of snow, especially with increased population density.

**Covenants.** Neighborhood covenants should not be overridden with subject ordinance. If a home owner decides they want to participate in building an ADU, they can go through the process of changing an applicable covenant with their HOA.

Please see the attached documents from the Rabbit Creek and Rogers Park Community Council. The Mid-Town Community Council supports their thoughts and suggestions.

Kristine Stoechner  
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President  
Mid-town Community Council

CC: Anchorage Mayor and Assembly  
Rogers Park Community Council  
Rabbit creek Community Council