

South Addition Community Council Executive Committee

John Thurber, Daniel Volland, Cathleen Hahn, Patrice Parker, Fran Durner, Tamas Deak, Harry Need
C/O John Thurber, southadditioncommunitycouncil@gmail.com

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Long Range Planning Division
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Attn: Tom Davis (davistg@muni.org), (907) 343-7916
RE: R-2 Zones Height and Bulk Amendment Project AO No. 2022-36

Tom,

On behalf of the South Addition Community Council, we would like to express our gratitude for your continued support in the coordination and education about the details of the project and your careful effort in shepherding it through the public review processes.

Significant effort is represented in the P&ZC approved package and the current assembly package to improve many aspects of the project as it relates to the R2 districts in the Anchorage Bowl and - most specifically for us – within the South Addition Community Council.

As we emphasized numerous times throughout this process, neighborhood character is paramount when evaluating infill and redevelopment projects that are initiated by developers and private homeowners to enrich South Addition. The continued economic and cultural vitality of our older neighborhood depends on the preservation of its physical character. It is the draw that fosters new investment, new projects, and brings new neighbors. Our goal is to maintain this vibrancy and we all are committed to its preservation.

The Assembly ordinance proposal improved the previous draft proposal by offering more nuanced development rules for buildings, more neighborhood protection by using the exemption process and more opportunity to develop in the R2 zoned districts in Anchorage.

Our major concerns that remain are the approval processes for three-story entitlements and administrative variances for height encroachments. We consistently noted in previous comments that the administrative site plan review process does not provide the open, public dialogue that is necessary to ensure the preservation of our neighborhood character. The criteria that were developed and included under 21.06.030.D.7.e may provide some guidelines, but the decision-making proposal is flawed. We have similar concerns about the administrative variances for height encroachments proposed under 21.03.240.

Since the impact of the 3-story entitlement is higher in South Addition generating great public interest due to the existing context, the bar a 3-story entitlement needs to clear in the planning process needs to be similarly higher. The proposed administrating site plan review process is not meeting this bar and is unacceptable.

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Similarly, granting administrative variances for height encroachments carry the same concern. The specific rules are so well researched, well-coordinated and nuanced after a yearslong code development effort that it is simply inconceivable to think that designing to them would require administrative remedies. In cases when such remedy may be warranted due to extraneous circumstances the bar should be higher like a public process to ensure that the proposal meets the intent of the code.

We offer two ideas to remedy these shortcomings while preserving the intent of the current code language.

The first idea is to require all projects seeking 3-story entitlement in South Anchorage - or within Anchorage's Four Original Neighborhoods - to be a public hearing site plan review process rather than an administrative site plan review process. This ensures the integrity of the public engagement process during the planning of these projects with clear and open outcomes. For height encroachment variances the process could be the same as it is likely that the 3-story exemption would also be requested at the time. Alternatively, the variance process through ZBEA could be remain the path forward like for any other variance. The Four Original Neighborhoods include Government Hill, Downtown, South Addition and Fairview according to the Historic Preservation Plan and would affect each differently due to the varied amount of R2 districts within them.

The other potential idea is to change the process to be a public hearing site plan review process instead an administrative site plan review in the ordinance. This change would affect all R2 land areas within the bowl. Based on our understanding of the project, the first idea seems to fit the intent of the ordinance better, but we support either solution.

We also have concerns about the ½ acre exemption in South Addition where a half block would be a more appropriate size for redevelopment with less impacts on neighboring lots. While 21.06.030.D.7.b.i is appropriate for underdeveloped and/or redeveloping R2 districts a separation of streets and alleys, public rights-of-way, from neighbors would be warranted in the fully developed historic neighborhood of South Addition.

We do not offer other specific comments regarding the specific rules of engagement within the ordinance as those rules are exhaustive and carefully crafted. The complexity of the project indicates that all projects would receive ample scrutiny during the building permitting process.

Please, contact SACC President John Thurber or I with any questions you may have.
Thank you.

Sincerely,



Tamas Deak, Member-at-Large
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