

Anchorage Citizens Coalition

Title 21 Rewrite Project

Module 2 Individual Comments

Memorandum prior to Table of Contents:

1. 21.04 page 3: NCO is very confusing and needs to be explained. Examples seem to indicate only insignificant regulations will come under this VOLUNTARY regulation.
2. 21.04 page 3, paragraph 2: Site plan reviews should be public so review until Title 21 is fully implemented to ensure speedy implementation – maybe increase public’s ability to comment.

21.04.010, General Provisions:

3. 21.04.010 Table 21.04-1: Zoning Districts established- See comments late on Airport and PLI Districts.

21.04.020, Residential Districts:

4. 21.04.020 In general, eliminate all the “such as” examples; use non-ambiguous wording.
5. 21.04.020, page 2 A3: Residential Districts: - concerned that this broadens statement of Comp Plan for land conversion. What happens with past poorly zoned areas?
6. 21.04.020, page 2 A1-11: good concept!
7. 21.04.020, page 2, line 19: Delete “and by ensuring that residential development does not occur at less than zoned densities.”
8. 21.04.020, page 2, lines 19-21 Residential: some lands should be allowed to be combined because alone they may not be developable due to wetlands, streams, etc.
9. 21.04.020, page 2, line 20: A3 DELETE end of sentence “and by ensuring that residential development does not occur at less than zoned densities” because it assumes that there is a negative impact; it inappropriately presumes that the negative impacts of lower density is qualitatively greater than the negative impacts of increased density. (3 comments to this effect).
10. 21.04.020, page 2, line 34-35. Reword to: eliminate “such as…” and say “protect …from public safety hazards.”
11. 21.04.020, page 2, line 34-36. Include “noise” in the list.
12. 21.04.020, page 3, line 12: Eliminate “such as schools, parks, religious assembly, utility substations, and telecomm infrastructure.”
13. 21.04.020, page 4, lines 1-16: The intent of the 2020 plan participants is being misunderstood. We did NOT mean to force mixed use dwellings in one area, especially on such small acreage. It is inappropriate to force 2 or even 3 kinds of dwelling types in R-3 on 1 to 5 acres because the land should dictate use first. There would be NO room left for buffering or transition or open space if % of dwelling types were required. There is a lot of R-3 acreage in areas of Anchorage that do not have public utilities and the surrounding density is very low and transportation systems are not able to handle the traffic. Do away with required % of dwelling types in R-3 and let land dictate use and type of density.
14. 21.04.020, page 4, line 31: Remove mobile home allowance on R-5.
15. 21.04.020, page 4, line 34: Add to “where public water and sewer may not be available” as part of definition of R-6.
16. 21.04.020, page 6, line 4: R-10 needs a (i) to specifically address the need to minimize development that created negative visual impact to neighborhoods or communities. Hillside development impacts aesthetics across the city and these impacts should be limited to avoid the clutter and blight.

17. 21.04.020: Put in the language from 21.04.040, page 10, lines 22-24 (re streams/wetlands friendly statement). Therefore, 21.04.020 A would have a #12 to read: “Minimize any negative impact of residential development impacts on sensitive natural areas such as stream corridors, wetlands, and other important natural resources.”

21.04.030, Commercial Districts:

18. 21.04.030, page 6, line 15: “strip commercial” will need a good definition.
19. 21.04.030, page 6, line 30: Add: Minimize negative impacts of community development on aquatic resources and other natural features.
20. 21.04.030 page 7, line 12 (table) C-1 might include beauty shop, or smallish child care.
21. 21.04.030, page 7, line 12 Chart: Remove Bar and Liquor Store as allowable uses in C-1 and NMU Districts. These are not daily needs and should be discouraged.
22. 21.04.030, page 8, line 10, C2a: Restriction on ground floor activities will need to be looked at to see what is actually being used; see note at the bottom of that page.
23. 21.04.030, page 9, line 16: Encourage extensive landscaping in all commercial areas.

21.04.050, Mixed-Use Districts:

24. 21.04.050, pages 13-14: D. Mix of Principle Uses Required; 2. Required Mix...b. 50%: By forcing a percentage, may limit some very nice and applicable developments (e.g., 75% Residential, 25% Commercial).

21.04.060, Other Districts:

25. 21.04.060 Other Districts: D. PLI: This designation needs to be broken out to exclude parks. The Parks Plan Update is coming up with separate designations to cover this, i.e., Natural Open Space, organized ball facilities, etc.
26. 21.04.060 Other Districts: Major problems with designating all TSAIA as an Airport Development District. **1)** Delete the word “development” or add the word “development in most other zoning district names. **2)** By my quick count, there are 10 areas within the airport’s boundaries that should not be included in this district: Turnagain Bog wetlands not permitted for fill, Turnagain Bog East – buffer area, Parking/overlooks areas at WNL and Postmark Dr., All greenbelt buffer areas along Coastal Trail, Pt. Woronzof viewing Area and parking lot to Campbell Lake area, DeLong Lake property acquired by airport, Meadow Lake area, Connors bog/Park area, Spenard Beach Park, Lion’s Park on Lakeshore Dr. **3)** Add “Airport Protection/Buffer District.”
27. 21.04.060, page 15: There needs to be a Chugach Access Overlay district to improve and enhance access to Chugach State Park, plus a “public lands” access overlay in general. Too many neighborhoods adjacent to the park have no local access; there are few places where the community at large can access the park.
28. 21.04.060, page 15 lines 12-17: AF Districts should be either eliminated or restricted to areas with the least impact. Nothing here provides any guidance on how AF districts should be sited, or what standards should apply. The recent Near Point AF case shows that all neighborhoods are vulnerable to AF because there are no restrictions against placement in compatible areas. AF zones should not be placed in the Anchorage mountain viewshed; they should be limited, if used at all, to areas of least visual impact, to protect the aesthetic values of Anchorage that are rated highly in Anchorage 2020 Plan.
29. 21.04.060, page 15, line 14: Require that land for antenna farms is to revert to Residential zoning or adjacent zoning when technology changes thus antennas are not needed. Put this in Definitions and Use Specific Standards.

30. 21.04.060, page 15, line 18: “OL” is deceptively close to public OS in PLI. Change it to “Development Reserve” so no one is misled.
31. 21.04.060, page 15, line 18-22: OL – Open Lands. This section seems way too open to mischief without much greater description of what its purposes and standards are. Development reserves are OK in principle; but the purpose is too unclear.
32. 21.04.060, page 15, lines 5-11: AD Districts as defined violates Comp Plan’s treatment of West Anchorage as requiring a development plan that includes and addresses ALL uses on and surrounding airport lands. There is little point in an AD district if airport won’t comply anyway. Significant areas of airport land are community assets ID’d in the Comp Plan (Open Space & Recreation). AD district, to be useful, would need to include clear standards and criteria like other districts to avoid blanket and inappropriate use. There is nothing in the provision that speaks to protecting neighborhoods or natural assets such as the Coastal Trail and Turnagain Bog.
33. 21.04.060, page 15, lines 4-31 Other Districts: Each of these districts (A-E) needs a full section on: General Purpose and Intent, Criteria for Zoning or Rezoning to these districts, Development Standards. Incorporate environmental and neighborhood concerns.

21.04.070, Overlay Zoning Districts:

34. 21.04.070 page 18, line 1, C2a: Other airports to be added: Merrill Field, BLM strip??

21.05.010, Table of Allowed Uses:

35. 21.05.010: Some of the mixed use district use category regulations seem arbitrary. Will this be better coordinated? In mixed use districts some of the planning does not seem reflective of what is currently going on in the city mixed use development. In fact, some areas planned for mixed use currently are residential.
36. 21.05.010, Allowable Uses: Nothing designated “S” for R6-R10 should be allowed until Neighborhood plans and district plans are completed and certainly o site plan review should be done unless it is with a public hearing.
37. 21.05.010, Kennel in conflict with 17.05.010 page 17.05-3, definition of multiple animal facility which recognizes business as well as residential use.
38. 21.05.010, Kennel in conflict with 17.15.060 AMC 1715 special purpose license 3.20 Multi-animal fully license 3) commercial facility license.
39. 21.05.010, Mixed Use District: Grocery or food store require “S” but liquor store is permitted. Liquor should be “C”.
40. 21.05.010, page 3: Dormitory Use R-6, R-9, R-10 and quasi-institutional use. Size limits should be applied.
41. 21.05.010, page 3: R-5, 6, 9, and 10 would allow single family or duplexes. Currently Title 21 even allows multi-family on some of these). But all these areas are in fact single family and they want to stay that way. Duplexes would violate the rural, low-density character that 21.04, pages 4-5 claim in intended for these zones.
42. 21.05.010, page 4: Adult Care 1-6 and 7-10 shall not be out right permitted in subdivisions where covenants prohibit such commercial activities and where each of infrastructure and emergency response times are inadequate.
43. 21.05.010, page 4: Adult Care 1-6 persons shall not be out right permitted in any R-3 zones until ordinance is passed determining whether level of clients will be reduced below 6.
44. 21.05.010, page 4: Neighbor community center shall be allowed as a conditional use only in R5-9.
45. 21.05.010, page 4: Public Inst. Uses: commercial service facilities are inappropriate as “site plan review” facility in R6-9 because they would exceed average density and land and on-site utilities may not support and make a “C”.

46. 21.05.010, page 4: Uses: Shelters do not allow “S” in R6-9 as it may not be appropriate with on-site utilities and land may not support. Make it a conditional use in R-6-9.
47. 21.05.010, page 5: Allowable uses: Religious assembly should be “C” in R6 and certainly should NOT be allowed with a non-public hearing “S” at any time must also wait for district plans to be done.
48. 21.05.010, page 8: Allowable uses – commercial enterprises are inappropriate in R6-R10 zones such as animal grooming and kennels and should not be allowed by a “S” review. Make it “C” only and refer to district plans.
49. 21.05.010, pages 3-16: This table contains information that is not mentioned anywhere else. This seems very confusing. (e.g., neither under “R-4” in 21.04, nor under “Dwelling, two-family,” can I find which zones will have duplexes.
50. 21.05.010, page 10, Allowable Uses: Liquor stores should not be permitted uses in NMU or C1 because alcohol is not a “daily need” item as defined for neighborhood commercial areas.
51. 21.05.010, page 10: Broadcasting and recording facility: might be conditional use in residential districts.
52. 21.05.010, page 10: Retail (Personal Service) beauticians should be conditional use in residential areas.
53. 21.05.010, page 13: Recreational or Vacation Camp in R10 may not be suitable even with a CU permit due to slopes, soils, and owner should not be given hope that a CU could be obtained.
54. 21.05.010, page 15: Self storage may not belong in old B-3 zones and should be CU because self storage is a low traffic generating business and would not be adhering to intent of 2020 plan for good compact use of land in business areas.
55. 21.05.010, Telecommunications: Antenna Co-location an existing tower. Should antenna collocation automatically be permitted in all districts/ substantial additions to an existing tower may, at some point, be too great of an aesthetic impact. I suggest some level of review be required in some R districts.
56. 21.05.010, Uses: No “P” usage for 2 family dwellings will be allowed in R5-R10 zones without first adhering to 2020 policies, including being consistent with surrounding neighborhood densities and buffering and infrastructure.
57. 21.05.010, Uses: No “permitted” mixed-use dwelling areas for R4 or multifamily until analysis of land capacity has been determined including correspondence with 2020 Plan’s transportation plan and development of design standards.
58. 21.05.010, Uses: No dormitory group living shall be allowed in R5-R10 except by conditional use and public hearings. Do not allow simply by Site Plan Review.
59. 21.05.010, Uses: No Mixed Use dwellings will be allowed as “P” uses without first determining adherence to 2020 Plan policies for transportation, parks, buffering between adjacent uses, adequate infrastructure and trail connectivity.
60. 21.05.010, Uses: Multifamily and 2 family dwelling for R3 zones shall be determined first by adherence to Comp Plan policies for transportation, open space, capacity of infrastructure and land to handle capacity.

21.05.020, Generally applicable Use Standards:

61. 21.05.020, page 17, line 16-27: Generally acceptable use standards. B.1. is too preachy in wording. If such premises are so morally degrading to children and the neighborhood, why allow them anywhere?
62. 21.05.020: Need to integrate more graphics for illustration of narrative throughout document.

21.05.030 Residential Uses:

63. 21.05.030, page 18, line 24: Residential uses: Use specific standards (ALL zones): this whole section should include somewhere a clause on “Drainage”. This is a huge problem in the Anchorage Hillside – both destruction of natural streams, and problems caused by new, artificial drainage patterns. Such a clause is in “Use-Specific Standards for self-storage facilities (21.05.060, page 78, lines 36-43). The new clause should say that all natural drainage flow patterns (both surface and groundwater) must be mapped before any grading or clearing and shown on a map, including for times of maximum yearly flow rate and natural streams, springs, and bogs – seasonally saturated soils shall receive a 50 foot undeveloped buffer on all sides. If full clause is not included in 21.05.030, it must be referenced there.
64. 21.05.030, page 18, line 33: ‘Common accessory uses’ does not include multiple animal facility.
65. 21.05.030, page 28, line 27: Definition of residential care facilities shall be owner occupied in residential zones.
66. 21.05.030, page 28, line 27: Residential care facilities on private utility systems (on-site septic and well) shall first be determined not to impact surrounding systems and shall be upgraded to handle the increased usage.
67. 21.05.030 page 28, line 27: Residential care facilities shall be on a road maintained by a formal organization such as a LRSA, ARDSA, or similarly responsible organization and within acceptable emergency response times, in all seasons.
68. 21.05.030 page 28-29 line 26: “Residential care” ADD standards to say: 1) Adequate off street parking for all staff and visitors 2) Municipal water and sewer 3) rapid and reliable access for emergency vehicles (ambulances) – wide enough street, not steep, icy in winter....
69. 21.05.030, page 28, line 26: Be sure it is owner occupied in residential areas and number of clients should not be more than average neighborhood density.
70. 21.05.030, page 28, line 9: Quasi-institutional houses should be required to have a permit, with language to revoke upon presentation of just cause and after due process appeal.
71. 21.05.030, page 28: Residential Care safety issues should address impacts to on-site utilities and to surrounding homes and adequate response time of ER vehicles.
72. 21.05.030, page 29, line 20-32: Number of out-right permitted clients shall be determined by an upcoming ordinance # 2003-143? In any event, # of clients should not be more than average density of neighborhood.
73. 21.05.030, page 29, line 24, B4bvi(A): Wait for passage of assisted living ordinance that is before Assembly, where number of outright permitted clients may be below 6.

21.05.040, Public/Institutional Uses: Definitions and Use-Specific Standards:

74. 21.05.040, page 30, line 34: Adult care facilities 1-6 and 7+ clients shall both be on roads maintained by a responsible formal organization like a LRSA or ARDSA and shall be located within acceptable emergency response times in all seasons.
75. 21.05.040, page 30, line 36 A2a: but not more than average density of surrounding neighborhood in any case.
76. 21.05.040, page 30-32, line 34, A2 and A2bvi: Adult Care facility (1-6 clients) on on-site well septic shall be determined not to impact neighboring systems and shall be upgraded for increased use.
77. 21.05.040, page 38, line 12: School use-specific standards: ADD “Light fixtures illuminating the buildings, grounds and playing fields shall be shielded so that there is not glare or light spillage beyond the property line.” (light pollution from schools is huge, and ADS had refused to use available technology to reduce it in any way.) The suggested language was adapted from page 67 of this document (re: gas stations).

78. 21.05.040, page 38, line 4 Schools, add iii to provide for vegetative screening for all schools and adjacent neighborhoods to minimize impacts – be sure this doesn't get lost in module 3.
79. 21.05.040, page 39, line 3, 4B: Replace word 'paved' with "pedestrian walkways and trails, either paved or with alternative pervious technology...shall be provided...."
80. 21.05.040, page 42, G and 21.05.070 D2, line 42 and 95: 7ff and 15ff: "Health Care" and "Adult Care": the distinction is confusing. Reference each section in the other one, for clarity.
81. 21.05.040, page 42, lines 9-10 "Health Care Facility": "other medical facilities provide outpatient care only." NOT TRUE: "Nursing homes" are under this section (subsection G.3, lines 36-46), and they are inpatient homes.
82. 21.05.040, page 43, H-1iii: make this a 25' buffer, not 10' buffer for screening. This is standard between subdivisions of different densities.
83. 21.05.040, page 43, line 27: H1biii: Screening should be increased to 25 feet buffer on 5+ acres of cemetery. 10 feet will not support 1 mature tree.
84. 21.05.040, page 47, lines 4-32 Utility facilities: Need to add a section for water tanks. These are common on the Hillside, are unsightly and can't be disguised.
85. 21.05.040, page 49, line 11, K2b: Table 21.05-2: I am concerned that with a building close to 75' high, the tower could be almost 30' – or 40% of building height. I believe that is excessive.
86. 21.05.040, page 95, line 15-42: Adult Care: ADD requirement for streets passable to emergency vehicles at all season (2 full lanes open, not steep or glaciated).

21.05.050 Commercial Uses

87. 21.05.050, page 52, A.1.b.ii: Maintain 100 ft between livestock and wells due to large amount of wastes generated by larger animals. If 100 ft is required between a well and septic, then separating livestock by 100 ft also seems reasonable.
88. 21.05.050, page 54, line 8: This is too vague; needs some definition here. Who does the detecting? Additional standards re: environment impacts that affect public health and safety should be required.
89. 21.05.050, page 58, 60, E.4.a + b.vi: Motorized sports facilities should be excluded in I-1 zones when they are near residential areas, offices, hospitals, and similar areas where noise would be of concern.
90. 21.05.050, page 61, line 21: Food and Beverage Kiosk – need to distinguish between service to vehicles and service to pedestrians. Pedestrian oriented kiosks should have to comply with vehicle stacking regulations.
91. 21.05.050, page 65, 5.a: What is meant by a 'convenience store' that also sells gasoline/fuel products but is NOT a gasoline service station?
92. 21.05.050, page 65, line 41: "Stationery" is misspelled.
93. 21.05.050, page 71, line 13-32: Camper park is mentioned, but also should include ground (for tents but NOT vehicles).
94. 21.05.050, page 71, line 38: Use specific standard, "retail sale of alcohol is subject to ...Assembly alcohol approval...is mentioned for #4, Hotel and #5, Inns; should also include for #2, Extended stay lodging and #6, Motel.

21.05.060 Industrial Uses

95. 21.05.060, page 73, line 24, A.2.a: Why should janitorial maintenance services be required to be in I-2 zones if the service provided is nothing more than an office? Unless there is a lot of equipment that must be stored outside is it necessary to relegate this business to I-2? Perhaps the intent was to keep businesses that do not draw a lot of traffic separate from those that do for better use of land and traffic patterns?

96. 21.05.060, page 75, 4.a: Light manufacturing should be a conditional use in I-1 zones because those zones are often near residential areas. Airplane and auto assembly/disassembly may not be suited for all I-1 areas.
97. 21.05.060, page 75-76, footnote 56 and B.5.b. (D) (3) and (5): Add item (6), Explain footnote about removing the submittal requirements to the Title 21 Users Guide. Why was this done? p. 76, line 24—add “or interfere with on-site utilities of surrounding areas.” p. 76, line 29—does this mean the “Director” can also remove or change standards? Why should the Director be vested with this power? Currently Internal Policy #6 of Public Works is too lenient in allowing gravel extraction without a conditional use permit for certain quantities. Gravel is BIG business and needs to have defined regulations. What does Chapter 3.40 say about natural resources extraction? p. 76, Add item (6) to read that: “natural resource extraction can not destroy historical or cultural entities.”
98. 21.05.060, page 81, 3 and 3.b.i and 3.b.iv.(A), p. 79 and 3.b.x, p. 80, and 3.b.x.(D), p. 79, line 13, the draft of the self-storage ordinance that is currently waiting to be heard by the Assembly recommends no less than one acre for self-storage with a max. acreage of ____, and NO vehicle storage allowed with self-storage units (vehicle and equipment storage is a separate ordinance). It is not good use of land to allow numerous small self-storage units because by their own admission, self-storage business does not generate a lot of traffic but does take up a lot of land. Page 79, line 34: rather than require all interior surfaces to be paved, the option should be to allow pervious surfaces in order to adhere to the city’s watershed department’s recommendations and the general trend across the US to reduce the amount of impervious surfaces and the resultant excessive run-off. Page 80, line 32, the self-storage ordinance subcommittee proposed changes to the ordinance that has already passed the P/Z Commission and is waiting to be heard by the Assembly. In that ordinance, industry and citizens agreed to landscaping standards of 15 ft not 8 ft. At the last minute a P/Z member (perhaps former member at that point) testified before the P/Z for a change to 8 ft. This is not what the subcommittee agreed to and the 15 ft buffer should be reinstated. Page 81, line 28, allow “appropriate pervious surfaces” as well as paved. See above for reasons.
99. 21.05.060, page 75, line 8-19: manufacturing, light: add ‘food processing.’ Not mentioned anywhere. Anchorage does have wholesale food manufacture (bakeries, tortillas and burritos, seafood processing...)
100. 21.05.060, page 76, line 23-24 (D)(3): Resource extraction operations will not...Unduly interfere with surrounding land uses: “Unduly” is vague and unenforceable. Specify! Also, add “nor glaciation (ice buildup)” after “runoff”.
101. 21.05.060, page 76, line 25-28: Add: “and the site will be revegetated, and developer will ensure that vegetation survives at least 5 years after seeding or planting.”
102. 21.05.060, page 77, line 41-43: Seafood processing and packing in Anchorage does not occur in a Marine operations zone, but in a food processing zone. There is not room in the Anchorage Port area. (Presumably this would be in light manufacturing, although food processing isn’t mentioned there).
103. 21.05.060, page 78, line 35-43: Motor freight terminal: includes railroad terminal yard? Not mentioned.
104. 21.05.060, page 81, line 36-39 AND page 85, line 22-26: Vehicle storage yards and Storage yard, Vehicles – How do these two differ? Delete one, or cross reference, or explain difference.
105. 21.05.060, page 81, line 36-39: Vehicle storage yards: ADD; only driveable vehicles stored there, not junk cars or parts thereof.
106. 21.05.060, page 86, line 1-6: Screening is 8 ft high, whereas items can be piled up to 35 ft (page 85, lines 42-45) Change to something screening hides the junk.

107. 21.05.060, page 86, line 32 ff: Waste and salvage: ADD a section for recycling of dry household and office discards – both receiving (now in Anchorage) and processing (some occurs here now). Paper, plastic, glass, aluminum, cardboard...
108. 21.05.060, page 88, line 1-6: Landfill – Inadequate! Add site specific standards for preventing drainage of contaminated water, disposal of hazardous and toxic wastes, timely covering of wastes with soil, prevention of blowing trash, prevention of bird attraction...distance from other things (including airports and wetlands), odor control, setbacks, screening, sealing of bottom, noise, traffic, control of litter, and dust.
109. 21.05.060, page 89-90, line 33: Solid waste transfer facility: ADD most of same standards as for landfill, as appropriate for size of facility.

21.05.070 Accessory Uses & Structures

110. 21.05.070, page 90, line 16; Accessory purposes: ADD section for dog lots (for sled dog teams). They are not covered anywhere. (Page 102, line 7, says ≤ 5 pets allowed, which makes most dog teams illegal). Dog lots need standards for zones where permitted and prevention of polluted drainage.
111. 21.05.070, page 93-94, chart: *Adult care*—the new Assisted Living Ordinance should be coming before the Assembly and until it is decided who many outright permitted clients a facility can have, it should not be stated in the chart as “6”. The same applies to p. 94 under Residential Care. Assisted Living facilities should be permitted according to the average household density of the neighborhood. They should also be located on a maintained street within reasonable distance of emergency vehicle response. Does Adult care mean day care or an assisted living facility? *Accessory Uses*—no use should violate the covenants of the subdivision they are in. *Beekeeping*: reconsider permitted use for beekeeping in high density residential areas like RMX! *Farm, hobby, home occupation and home/garden-related* uses should NOT include wood-cutting for resale due to excessive noise. This is already a problem in low density residential areas. Perhaps limits should be placed on all of the above uses for noise, dust, and water contamination issues. *Vehicle repair* should not be an outdoor hobby in R-5-R10 rather indoor only with requirements to ensure environmental guarantees and avoidance of a junk-yard character.
112. 21.05.070, page 95, D.2 and D.2.b.i: Assisted living facilities should be located on a road that is accessible year-round and maintained by some form of organization such as within the ARDSA or a LRSA. Locations should be within a reasonable response time of emergency vehicles. Assisted living facilities should be owner-occupied (for small facilities in neighborhoods) and should not violate the subdivision covenants. Limits for out-right permitted number of clients should wait until passage of the Assisted Living Ordinance that is coming before the Assembly. Number of clients should not exceed the average neighborhood density.
113. 21.05.070, page 97, D.3.b.i: What is the purpose of obtaining an event permit for events at a B/B over 100 people?
114. 21.05.070, page 98, D.4: Beekeeping isn't appropriate for RMX high density residential areas.
115. 21.05.070, page 99, D.8: Farm, hobby—number of animals needs to be considered in light of amounts of waste produced by large animals especially on smaller lots that have private wells. Need to keep 100 ft distance from wells and animals just as septic systems and wells must have 100 ft separation.
116. 21.05.070, page 100, line 25: What's a spa? Substitute sauna (although that could be in a house).
117. 21.05.070, page 101, line 18: “no traffic...in greater volume than would normally be expected in a residential neighborhood: CHANGE “a” to “that”. (Neighborhoods differ greatly in normal and acceptable traffic levels!)

118. 21.05.070, page 103, line 3-15: Paddock stable, barn...inadequate. ADD No water, or runoff contaminated with feces is permitted to enter any stream or groundwater; no commercial activity allowed (including transport of animals kept on premises to commercial uses elsewhere – e.g., trail rides, carriage rides).
119. 21.05.070, page 104, D.17.b.iii.(B).(1) and (2): Satellite Dish Antennae location and screening—this is very limiting and probably can not be complied with in some residential areas.
120. 21.05.070, page 105, D.18: Vehicle repair/rebuilding, outdoor, hobby--What about placing environmental safeguards here?
121. 21.05.070, page 105, lines 4-19: Vehicle repair: GOOD, including must work on one vehicle only, within 1 year, and at rear of property. ADD: Whether frequent repair of operative vehicles is permitted (many boys and men work on their principal vehicles every day!) and standards for noise (mainly revving noisy engines).
122. 21.05.070, page 110, line 11-17: GOOD. Variances for ADU in residential zone): should NOT granted because lot has “limitations due to natural features...building layout,” etc. This should be added to ALL site specific standards.
123. 21.05.070, page 111, line 28-31: Are grandfathered auto repair shops in residential zones included? There’s one on Rabbit Creek Road.
124. 21.05.070, page 113, line 11-12, 18-19: “...without disturbing sensitive or protected resources and ...without...creating a negative impact on existing buffers...: ADD must not enter or affect any streams or other water body, or its buffer, or create or pollute runoff into same 9not covered by lines 24-34, “100 year floodplain.”)
125. 21.05.070, page 115, after line 15: Issues to add; 1. Number and size of private, operational vehicles to be parked on private property, and whether screening required. (Some private houses have several cars and trucks, large RV, boat, horse trailer, large off-road vehicle...) 2. Large, brightly colored tarpaulins (bright blue is common) - require brown or some other dull, color that blends in to neighborhood, above a certain size and length of time.

21.05.080 Temporary Uses & Structures

126. 21.05.080, p. 112, B.2.b: Temporary use permits—change wording for allowable garage sales per yr per dwelling unit to read up to “seven days, total.”

21.06.010 Dimensional Standards Tables

127. 21.06.010, Dimensional Standards Tables: R6, R9, R10 need to have limits on vegetation removal/retention. Some areas are on steep slopes, high wind areas, or wet ground where excessive vegetation removal would impact the residence, surrounding areas, and watershed drainage. Foot print of structures should not be so large as to cover the whole lot especially in environmentally sensitive areas and in lower density residential areas. Depending upon size of lot and terrain, about 40-60% of vegetation should be retained. Re-contouring and re-vegetation of disturbed areas does not necessarily guard against watershed damage and doing so should not be considered an alternative to retaining natural vegetation.

21.06.020 Measurements and Exceptions

128. 21.06.020, page 13, Table 21:06-4: Measurements and Exceptions. Lot and Site Requirements for R-10—40% allowable impervious surface is way too much for areas of steep slopes on large lots. Vegetation retention standards should apply and pervious surface treatment should be encouraged. This is encouraged by the MOA’s watershed section regulations.
129. 21.06.020, page 14-15, B.1.f.i.(A) and (D) and (D).ii: Yard, usable—roofs should not be considered as ‘usable yard’ space and neither should sidewalks because they are for pedestrians and

are public, not private. Usable yard space means private usable space, correct? If perimeter landscaping and slopes in excess of 15 % are not included in usable yard space requirements, then why should roofs and public sidewalks? There is confusion with the definition of sidewalks and common walks' on p. 16.

130. 21.06.020, page 16, B.2.c.i: Usable Yard—decks and balconies should not be counted for up to 50% of required usable yard space. Twenty square feet minimum deck/balcony is not usable yard space by anyone's standards and certainly should not count for 50% of a usable yard area. Snow storage is a concern with usable yard space and needs to be accommodated. See foot note 16, p. 16.
131. **Nowhere** is there mention of funeral homes, crematoriums, dog lots, (private or commercial operations). Please include or make it clear where this is handled.