

August 23, 2013

Dear Plan Commission Members and Planning Staff,

We are strongly opposed to the proposal to change the zoning of 210 S. Brooks St. from medical/administrative use to residential (Item #18 on the Plan Commission agenda for August 26, 2013). This proposal will add 104 new rental units to the block south of Mound St and North of Chandler St. According to definitions obtained from the City Comprehensive Plan, this would be defined as High Density Residential (41-60 units per acre).

1. The City Comprehensive Plan stresses in multiple sections that development (where it should occur and the type of development) in neighborhoods should be directed by existing Neighborhood Plans and other special plans. *This development does not take into account the following underlying planning documents prepared by and with the assistance of the neighborhood.*
 - **Greenbush Neighborhood Plan**
 - This plan was adopted by the City Council in July 2008.
 - It specifically identified areas for infill that included Bowen Ct to Mound St with a recommended density no greater than 25 units/acre.
 - It called for a Neighborhood Conservation Overlay Zone District from Mound St south to Erin St to protect existing character of residential areas.
 - Wanted to encourage Meriter expansion to be of neighborhood scale and pedestrian friendly asking that the buildings that abut residences reflect the residential building's size, scale and massing.
 - One of the most important goals indicated in the plan was expanding home ownership and owner occupancy.
 - **Meriter General Development Plan**
 - This plan had neighborhood participation and approval and was adopted by city in 2009.
 - The plan stated uses for Meriter property at 210 S. Brooks were: renovated building and new addition to include medical and administrative offices, education space and childcare.
 - The designated Employment zoned area was then taken into account when creating the recommendations for the Greenbush-Vilas Revitalization strategy.
 - **Greenbush-Vilas Revitalization Strategy**
 - The Greenbush Neighborhood plan was amended in November 2010 to include this report.
 - As with the Greenbush Neighborhood Plan, the revitalization strategy pinpointed several areas in the neighborhood that were appropriate for infill.
 - Large scale projects for workforce housing that were > ½ block were considered appropriate in an area north of Mound St.
 - The focus on redevelopment north of Mound recommended a change from Low Density Residential (LDR) to Medium Density Residential (MDR) with a *maximum of 25 units per acre.*
 - 100 block of S. Mills St for workforce housing

- The Revitalization strategy recommended broadening the range of housing options to attract and retain *long term residents*.
- 2. This development involving Longfellow school, differs from what the City Comprehensive plan mentions as a major objective in land use: that it should be to “maintain a balanced city growth pattern with planned development and redevelopment locations *throughout* the city”. The percentage by which this development along with similar high density developments (already approved or waiting approval: the Ideal, Lanes, Vicinato) increases the population in the Greenbush Neighborhood community cannot be ignored.
 - In 2000 the number of units listed in the Greenbush Neighborhood was 1171
 - The total projected additional units in GN alone in this year will be 275. This is almost a 25% increase in rental units
 - This is at a time when city growth is expected to be only 27.3% from 2000 -2030 (City Comprehensive Plan)!
- 3. The Longfellow development is not consistent with current zoning in all areas adjacent to the proposed development.
 - Current zoning for areas surrounding the proposed multi-family unit development are all Low Density Residential (LDR).
 - Current zoning lists this area as TR-C3 and TR-C4: multi-family dwellings are not permitted or listed as a conditional use in these zoning districts
 - According to the zoning code, TR-C Districts are “established to stabilize, protect and encourage...the essential characteristics of the residential areas...and to promote and encourage a suitable environment for family life while accommodating a full range of life-cycle housing”
 - The Greenbush Neighborhood already includes many types of housing, including single-family homes, 2 and 3 flats and small (usually 4-unit) multi-family dwellings.
- 4. Longfellow plans are contrary to the major goal stated in both the Greenbush neighborhood plan and Greenbush-Vilas Revitalization Strategy: *increase owner occupancy and owner occupied buildings*.
 - According to the neighborhood plan, 53.3% of the units in the Greenbush Neighborhood were non-owner occupied compared with 31.6% city-wide.
 - We have struggled as a neighborhood over many years to increase owner occupied homes. We have tried to increase owner occupancy through enforcement of existing zoning codes that regulate property standards and occupancy. This has proved to be a time-consuming and frustrating experience.
 - This has always been a home-owner led initiative and has not been initiated by city staff. We have had to check often confusing occupancy records, verify number of occupants and follow-up on abuses.
- 5. The Longfellow development undermines the proposed TID #43 (Park/Drake).
 - Proposed TID #43 (Park/Drake) stresses blight elimination and neighborhood stabilization
 - Stated purpose was to implement the Greenbush-Vilas Revitalization Strategy Report by increasing the number of owner-occupied single –family homes in the neighborhood and halting deterioration of the housing stock.
 - This TID area includes the area surrounding the proposed high density development. The proposed high density, non-owner occupied housing does not increase

neighborhood stabilization and certainly does not and will not increase the number of owner-occupied houses.

To conclude, this proposed zoning change for 210 S. Brooks directs high density residential development in an area not defined by neighborhood planning documents. It is not consistent with exiting zoning codes in adjacent areas, and differs dramatically from stated neighborhood goals of increasing owner-occupied housing.

We have seen many changes to this neighborhood since 1979 when we purchased our house at 1157 Emerald St. We believe that those who live and have lived in the neighborhood are the best people to direct how to make their community united and vibrant. Please respect the efforts of those who have contributed to the development process reflected in our Greenbush Neighborhood Plan, the Greenbush-Vilas Revitalization Strategy and the Meriter GDP. We respectfully ask that you review these documents, as well as objectives and policies from the City Comprehensive Plan, current zoning code, and owner-occupied housing initiatives (TID #43) in making a decision on this proposal.

Thank you!

Sincerely,

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