

### **What will District Plans achieve, or not?**

- “While lacking full citywide coverage, some plans overlap with others, which can lead to confusion for residents and property owners regarding expectations for future development, redevelopment, preservation, and infrastructure investment.” And for District G: “There are a number of overlapping plans, and inconsistent plan recommendations in this area; a District Plan could help address these issues.”
  - *There are some areas lacking a plan, often areas comprised of single family housing. Would it be simpler to create a plan for those areas?*
  - *Overlap is not all that confusing. In the Marquette neighborhood (part of District G) there is the Marquette-Schenk-Atwood Neighborhood Plan (as modified by Williamson Build I and BUILD II, and East Rail Corridor), E Washington Gateway, and Central Park. These plans address which plan prevails in the event of a conflict.*
- “More standardized plans relating to broader, citywide perspective while considering special area needs and circumstances.”
  - *What is that broader citywide perspective? I thought the citywide perspective was defined in the Comprehensive Plan, with the city reviewed as a whole and priorities defined. If the Comprehensive Plan does not provide the basis for a broad citywide perspective going forward for the 10 years, then perhaps the Comprehensive Plan’s shortcomings should at least be discussed if not addressed.*
  - *What are “special area needs and circumstances?” Page 38 states: “The City will continue to develop Plans in smaller areas where residents generally have low to moderate incomes.” The maps on pages 48 and 49 show a goodly portion of the City with 51% or higher of low and moderate income people. If one excludes the areas covered by a Neighborhood Development Plan (Areas J, K, M, A, and part of B), it looks like over half the City has 51% or more of low and moderate income people. This is especially true for the south side, but also for the downtown, isthmus, and northeast Madison. Are all these areas going to have plans? If not, what criteria would be used?*
- “More frequent plan updates”
  - *If one looks at the Neighborhood Development Plans, the format followed by the sample plan for District Plan C, it is basic information about how an area should develop. This would ignore existing neighborhood character, but it does make for easier updates.*
- “Replace decennial updates to the Comprehensive Plan GFLU Map”
  - *The GFLU Map is the Generalized Future Land Use Map. Having district plans become a section of the GFLU map would be almost the same as a zoning map (especially when the district map would be followed by proactive rezonings).*
- The district plans would be the “guiding plan for future land use and major public infrastructure investment.”
  - *Isn’t that the role of the Comprehensive Plan? Isn’t there value to taking a look at the City as a whole every ten years and making holistic determinations?*
- “One of the goals of establishing this framework was to have a more equitable process for planning for the City.”
  - *The December staff memo also spoke to “equitable land use policies.” With most of the City covered by a neighborhood plan, and with most of the areas that are not covered also being areas that have <51% low and moderate income residents, what might be*

*more equitable is to focus on creating neighborhood plans for the few areas that lack a neighborhood plan and have 51% or more low and moderate income residents.*

- “Regular updates to District Plans also provide a consistent venue that other City Departments could utilize to increase awareness and inform residents about other City initiatives. This potential collaboration among Departments could result in overall lower costs to the City and increased effectiveness when viewed from the perspective of residents.”
  - *Other departments would use the update venue to inform residents about other City initiatives? With the update only being every 10 years, perchance there might be overlap, but it is questionable whether other departments would want to change their communication mode for a short period every 10 years.*
- “The District Plan will be used to guide future development by providing City staff and elected and appointed officials a basis for reviewing private development proposals that may be submitted in the future.”
  - *Perhaps I am reading too much into this statement, but this makes me wonder if a goal is to eliminate the neighborhood and resident voices (an overt goal of the zoning upgrade ordinance).*

### **Does it make a difference what other cities are doing?**

Raleigh, NC is cited as an example. Raleigh does have 28 Area Plans. However, these plans are areas of small focus, not full city coverage (see Appendix 1). In addition, these plans date back to 1987 (see Appendix 2). In short, Raleigh resembles Madison – some areas covered by plans with other areas not covered, with plans of varying vintage. In addition, Raleigh does not have standardized plans. These are links to two plans (2018 and 2019)

<https://cityofraleigh0drupal.blob.core.usgovcloudapi.net/drupal-prod/COR22/CamHillFinalReport.pdf>

<https://cityofraleigh0drupal.blob.core.usgovcloudapi.net/drupal-prod/COR22/AventFerryFinalReport.pdf>

### **Local character**

Using a standardized format could very easily result in a loss of local character. The Comprehensive Plan recognizes the importance of context sensitive design. For example (page 75): “Every infill and redevelopment site has an existing context. Designers must understand how a new building will fit into that existing environment when developing concepts for new buildings. Context-sensitive design is particularly important in neighborhoods with an established character and where redevelopment or infill is occurring in close proximity to buildings of historic or architectural value.” Or see page 76: “Madison will need to balance encouraging redevelopment and infill with protecting the qualities that made existing neighborhoods appealing to begin with.”

The background section of the draft example, District Plan C, contains facts. Contrast that to the Raleigh area plans (linked above), which spend several pages describing character – the Raleigh corridor study even recognizes 4 segments within a single corridor due to “the distinguishable change in character.” The Raleigh comprehensive plan states: “Preservation seeks to capitalize upon and nurture those distinctive places, neighborhoods, and landscapes that make our city unique. Preservation seeks to ensure that we do not overlook the existing built and natural environments that define our cultural identity.”

Many plans were created through use of BUILD funding. The purpose of Dane County Better Urban Infill Development ("BUILD") grants was: "... *to plan and implement infill development* through planning grants. Infill development is defined as the economic use of vacant land, or restoration or rehabilitation of existing structures or infrastructure, in already urbanized areas where water, sewer, and other public services are in place, *that maintains the continuity of the original community fabric*. BUILD grants help pay for planning consultants who assist communities with preparation of infill plans." (emphasis added) Do plans that were created, and adopted by the Council, for the specific purpose of defining infill that is compatible with local character still have relevance? I would say that they do have relevance if local character still matters (which it does per the Comprehensive Plan).

### **Standardized plans for developed areas**

The draft example, District Plan C, tracks the format of the Neighborhood Development Plans. While this is a convenient format for planning new developments, it does not track well with existing development.

For example, I live on a block identified as low-medium residential on the GFLU map and zoned TR-V1. My block has a density of 22 units/acre, which would be fairly typical for this TR-V1 area (the block across the street has 21 units/acre). According to the standardized draft district plan, this density would place this area into "Housing Mix 3 (21-40 du/acre)" with a height of 2-4 stories and be deemed Medium Residential. Yet the existing built environment includes 1-story and has no 4-story. The definition of Housing Mix 3 (based on the definitions provided in the Nelson NDP) does not even allow for single-family homes. Even if this area is deemed Housing Mix 2, small-scale (generally 20 units or less) multifamily buildings would be permitted (per the definitions provided in the Nelson NDP), yet the Comprehensive Plan footnote #4 says: "The 'house-like' residential character of this LMR area should be retained, and any limited redevelopment should generally maintain the current single-family/two-flat/three-flat development rhythm."

Or look at the Schley/Dewey/East Wilson area. This is an area that the Plan Commission recommended downgrading from Low-Medium Residential to Low Residential on the GFLU map. Most of it is zoned TR-C4, with an area density of 12 du/acre. This would place that area in "Housing Mix 2 (9-20 du/ac)" with a height of 1-3 stories. 59% of the residential parcels have a lot size less than 75% of the required lot size, which increases the density. Some homes are 1 story, many are 2 stories (through addition of dormers to attic spaces). Only 6 of the 39 homes have more than 1 dwelling unit. Yet classification of this area as "Housing Mix 2" would allow for (based on the definitions provided in the Nelson NDP) four units, townhouses and small-scale (generally 20 units or less) multifamily buildings.

### **Questions**

#### Boundaries

The proposed planning framework (page 14) draws boundary lines that do not take into account the existing environment. For example, proposed area G includes Marquette, Tenney and part of Atwood. These areas have substantial similarities. But the district would also include the Oscar area, an area with an entirely different character. And omitted is the section of Atwood from Fair Oaks to Olbrich.

The boundaries apparently track with the 2020 (proposed/anticipated?) Census tracts. Why is this the best way to draw lines?

Draft District Plan C: Compare to Neighborhood Plan

Perhaps half the area is not covered by an existing neighborhood plan or an in-process area plan. Since the University Hill Farms Neighborhood Plan is a recent plan (2016), it would be useful to compare that neighborhood plan to the proposed district plan. For example, the area was a University multi-use planned community with mid-century modern architecture, and is on the National Register of Historic Districts. Would the draft District Plan preserve that unique character? Or address the fact that a concern was having a multi-generational community (since the area was high in the 25-29 and over 65 age groups)?

Cost

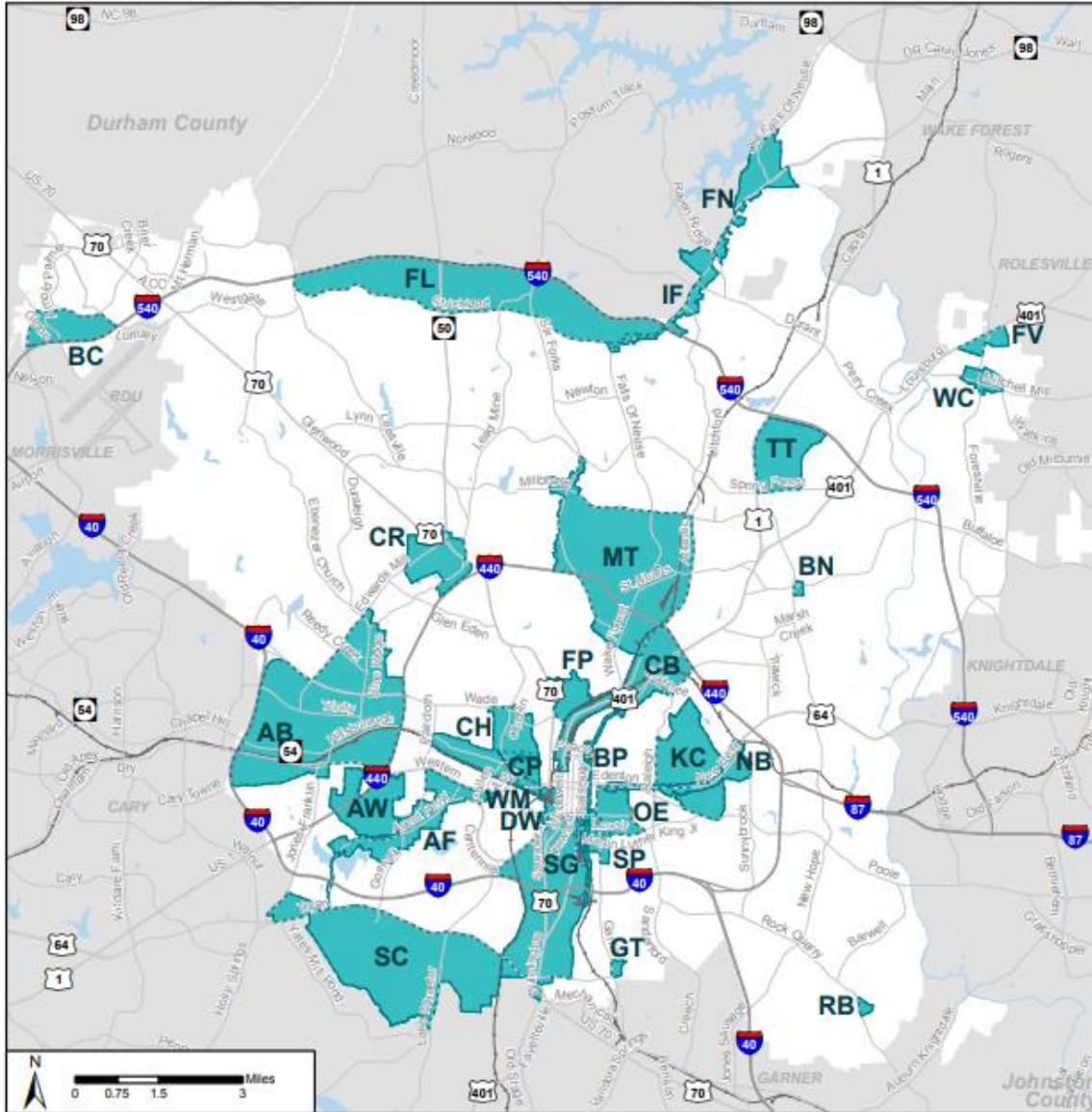
The cost is \$39,000-\$50,000 per plan, for a total of \$507,000 to \$650,000. How does this compare to the cost of the 2018 Comprehensive Plan?

Order of Preparation

Should this concept proceed, why not start with the easy plans – those which have been developed with Neighborhood Development Plans (areas A, J, K and M)? The draft District Plan C uses the same format as the NDPs, so flipping NDPs into a district plan should be fairly simple. It would also have the added advantage of decreasing staff and Plan Commission workload. For example, Legistar 31303, where the developer had properties zoned SR-V2 and wanted to change the mix of units from a series of two-family and four-unit multi-family residences to a mix of single- and two-family residences – both mixes are allowed in the zoning district, but approval of the Plan Commission was required.

Respectfully Submitted,  
Linda Lehnertz

Map AP-1: Area Specific Guidance



- |                                |  |                                      |                                      |
|--------------------------------|--|--------------------------------------|--------------------------------------|
| <b>AB:</b> Arena-Blue Ridge    | <b>CH:</b> Cameron Village & Hillsborough St | <b>FV:</b> Forestville Village       | <b>RB:</b> Rock Quarry-Battle Bridge |
| <b>AF:</b> Avent Ferry         | <b>CP:</b> Cameron Park                      | <b>GT:</b> Garner-Tryon Neighborhood | <b>SC:</b> Swift Creek               |
| <b>AW:</b> Avent West          | <b>CR:</b> Crabtree                          | <b>IF:</b> I-540/Falls of Neuse      | <b>SG:</b> Southern Gateway          |
| <b>BC:</b> Brier Creek Village | <b>DW:</b> Downtown West                     | <b>KC:</b> King Charles              | <b>SP:</b> South Park                |
| <b>BN:</b> Buffalo-New Hope    | <b>FL:</b> Falls Lake                        | <b>MT:</b> Midtown                   | <b>TT:</b> Triangle Town Center      |
| <b>BP:</b> Blount-Person       | <b>FN:</b> Falls North                       | <b>NB:</b> New Bern Avenue           | <b>WC:</b> Wake Crossroads           |
| <b>CB:</b> Capital Boulevard   | <b>FP:</b> Five Points East                  | <b>OE:</b> Olde East Raleigh         | <b>WM:</b> West Morgan               |

Map created 1/5/2021 by the Raleigh Department of City Planning



The following Area Plans are included in the Comprehensive Plan:

- *Arena Blue Ridge (merging of Arena 7/17/2001, Blue Ridge 9/4/2012, Jones Franklin 12/6/2011, and RCRX 3/8/2016)*
- *Avent Ferry (adopted 9/17/2019)*
- *Avent West (adopted 3/15/2005)*
- *Blount Street/Person Street (adopted 7/16/2003)*
- *Brier Creek Village (adopted 4/6/2004)*
- *Buffaloe New Hope (adopted 5/19/2005)*
- *Cameron Park (adopted 7/20/2004)*
- *Cameron Village/Hillsborough Street (adopted 2/6/2018)*
- *Capital Boulevard (adopted 8/7/2012)*
- *Crabtree (adopted 6/4/2002)*
- *Downtown West Gateway (adopted 9/21/2004)*
- *Falls Lake (adopted 10/2/2001)*
- *Falls North (adopted 5/21/2019)*
- *Five Points East (adopted 4/1/2003)*
- *Forestville Village (adopted 9/21/2004)*
- *Garner Tryon Neighborhood (adopted 4/1/2003)*
- *I-540/Falls of Neuse (adopted 6/1/1999)*
- *King Charles (adopted 9/21/2004)*
- *Midtown (adopted 12/15/2020)*
- *New Bern (adopted 1/7/2012)*
- *Olde East Raleigh (adopted 9/18/2007)*
- *Rock Quarry Battle Bridge (adopted 9/21/2004)*
- *South Park (adopted 5/15/2007)*
- *Southern Gateway (adopted 2/7/2017)*
- *Swift Creek (adopted 7/21/1987)*

- *Transit Station Areas (adopted 3/2/2021)*
- *Triangle Town Center (adopted 12/5/2000)*
- *Wake Crossroads (adopted 2/15/2005)*
- *West Morgan (adopted 6/7/2011)*

The following Area Plans have been substantially revised or replaced by recent planning efforts:

- *Wade/Oberlin (adopted 11/5/20003) and Stanhope (adopted 10/1/2002) were replaced by Cameron Village/Hillsborough Street*
- *Falls of Neuse (adopted 11/21/2006) was replaced by Falls North*
- *Mission Valley (adopted 4/17/2007) was replaced by Avent Ferry*
- *Six Forks (adopted 6/5/2018) was replaced by Midtown*

As additional area plans and studies are carried out for different parts of the city, this Area Specific Guidance section will continue to evolve with the addition of new Area Plan excerpts and the replacement of superseded plans through the ongoing process of Comprehensive Plan amendments and updates.

*Additional information about keeping the Comprehensive Plan current can be found in '17.3: Comprehensive Plan Amendments and Updates' within Section 17: 'Implementation.'*