

CAPITOL

NEIGHBORHOODS, INC.
MADISON, WISCONSIN

March 4 2011

Board of Estimates
City of Madison
Madison Municipal Building
P.O. Box 2983
Madison, WI 53701

Re: Development Process Improvement Initiative - Final Report 2-16-11

Dear Commissioners,

Capitol Neighborhoods (CNI) has been involved in the review of development proposals for an extended period of time. In that time we have seen an evolution and improvement in the process. Over the past several years CNI has been continuously involved in review of proposals because of the number of developments that have occurred downtown. The vast majority of these proposals have been approved with support of the neighborhood.

CNI responded to the request of the City in *A Best Practices Guide for Developers, Neighborhoods & Policymakers* for neighborhoods to establish standards for review of proposals. To accomplish this task we engaged the help and input of residents, developers, business owners, city staff and city commission members. The result is a protocol, adopted by CNI in early 2007, which is used as the basis for neighborhood engagement in reviewing development proposals. We have published and shared this protocol with development teams, residents and other neighborhood associations.

In conjunction with the adoption of the protocol CNI established a Development Review Oversight Committee. This committee assists residents in implementing the protocol and evaluates the effectiveness of the review process. Our committee meets on a regular basis and has invited developers and their representatives, architects and city staff to provide feedback on the effectiveness of the process. The general response has been that neighborhood engagement has been effective and assisted the development team in preparing their formal application for the proposal.

In June 2010 the Mayor presented a charge to the Economic Development Committee to assess the development review process with the goal of insuring that the process is efficient, predictable & uniform, and maintains existing high standards.

As noted in their cover letter the EDC chose to review the process in a different context. "The overall goal is to make the development approval process more conducive to attracting investment, ... and increasing the tax base ... of our community."

The tone of the draft report suggests that the EDC has prepared a review of the process from a strictly economic point of view. While it may in fact be worthwhile to examine the process from an economic perspective surely this is not the only criteria of importance. The directive was to maintain the current high standards which include other important considerations. The *Case for Improvement* section which focuses solely on economics from the viewpoint of the development community does not serve the broader interests of the community.

It is important to keep in mind the original mayoral directive while reading this report. Many of the report's recommendations derive from the economic perspective of the Committee and fail to meet the original goals established for assessing the development review process. Many of these same recommendations fail to serve the best interests of the City of Madison and its residents.

CNI has been actively engaged with the EDC during their considerations. We were represented at each EDC meeting on this topic and have provided extensive written comments at each stage of the drafting of the report.

Attached you will find our comments on this report. There is a section related to the initial chapters of the report, a section that addresses each specific goal in the report, several supplemental comments and finally a set of comments we provided initially which we feel provides a framework for consideration of this topic.

Thank you for your consideration,

Development Review Oversight Committee

Capitol Neighborhoods

Peter Ostlind – Chair

Ledell Zellers

Bert Stitt

Scott Kolar

Tom Geier

Erik Paulson

Joe Schnick

Brenda Konkel

Adam Plotkin

Fred Mohs

Bill Patterson

Peggy LeMahieu

Capitol Neighborhood’s Development Review Oversight Committee review of: Development Process Improvement Initiative – EDC Final Report 2-16-11

Introductory Chapters

CASE FOR IMPROVEMENT – page 7

Frankly, this entire section could be dropped from the report. It provides no context for the recommendations that follow and strays from the Mayoral directive to the EDC.

The section establishes a tone for the report with quotes and charts unconnected to the development review process. Such as the suggestion that “some” rank the State of Wisconsin poorly as a business environment. So what does this report from the Wisconsin Policy Research Institute about a three decade decline in the State business climate have to do with Madison’s review policy? We might as well include the statement that some rank Madison as the best place to live and cite Money Magazine.

Similarly the statement that over 55% of the total area of the City is exempt from property taxes is presented without context. The average reader is likely to think that this means that 55% of the properties in Madison don’t pay property taxes. Nothing could be farther from the truth. The 55% figure includes all of the road right of ways and parks within the City in addition to State, University and other exempt properties. There is no comparison to other communities so there is no way to assess any meaning from this statement, let alone what it has to do with the development review process.

GUIDING PRINCIPALS

Proportionate inputs - Page 10, 2nd to last paragraph

The last section under this heading is not written as a principal. In this paragraph the focus seems to be on marginalizing a “special-interest group” when something may be “good for the city overall”. This paragraph goes on to say that this opposition is particularly likely when proposals “vary from adopted neighborhood plans” or require “zoning map amendments...” It is actually as relevant to note that the whole process starts with a “small special interest group” (i.e. the Developer) proposing something. The developer’s proposal would most naturally be opposed if it is at odds with currently adopted plans and zoning. The report should stick to its mission and not diverge into denigrating stakeholders.

Complete Information – page 11

The key statement in this section is that “There is no substitute for complete and transparent information”. The report should focus more on insuring that this sort of information is in fact available and less on how it is distributed. The means of distribution is a tool that can be used within the process but distribution is only a tool. To suggest that this tool will significantly decrease the time involved in the process seems overly optimistic. Just how short a time frame can interested parties be confined to for reviewing information? For neighborhoods and residents who get involved in their spare moments just

what would be the minimum timeframe suggested that will allow for adequate review once information is available? It is more relevant to note that the preponderance of delays can be attributed to the lack of complete, timely and accurate information from developers.

RELATIONSHIP OF NEIGHBORHOOD, COMPREHENSIVE, AND SPECIAL AREA PLANS

Comprehensive Plan/Neighborhood Plans – page 12

To be meaningful the Comprehensive Plan must be followed and should be a significant element of the review process. The development process should recommit to being sure that development proposals are not approved if they are inconsistent with the specifically articulated provisions of the Comprehensive Plan. This is particularly important since predictability is nominally of great concern to all parties to the development approval process.

Development Approval Process Flow Charts – page 15

The timelines for simple and complex proposals shown in the graphic are typical current time frames and ones that staff feels are doable for the formal process and plan signoff/permitting sections. Yet the graphics suggest that the pre-application phase is included within these timeframes. This is not reflective of reality as obviously project development, let alone neighborhood engagement, doesn't occur within these time frames. This distortion of the facts was repeatedly noted to the EDC yet the inaccurate graphics were not adjusted.

Specific Comments on each Goal:

PRE-APPLICATION PHASE – page 17

A. Goal: Establish predictable, consistent processes and expectations for neighborhood stakeholders & staff review of development proposals during the Pre-Application Phase of projects.

A.1.a – ok as written

A.2.a - suggested change “Meet with ... Neighborhood Association President(s) or their designee, Neighborhood Business Association President(s) or their designee, ...”

Paragraphs 3 & 4

Neighborhood Associations do not necessarily want detailed information at the beginning of a pre application process. Often it is more productive for a development team to come forward with an idea that has not been fully planned. Bringing forward a concept open to input can generate more productive input and saves the development team the cost and expense of a more detailed proposal at this stage.

Single representatives from neighborhood or business associations will have insight into likely areas of interest among their groups but they are not likely to be able to foresee all of the possible questions or types of information that their constituents ask or desire.

The last paragraph urges Neighborhood Associations to develop a standardized format for review of development proposals. The footnote is a reference to two neighborhood information forms not to a process. CNI has a written and tested review process which could provide a basis for this goal.

<http://capitolneighborhoods.org/pdf/cni-protocol-%20adopted%20chapter%20breaks%20proof.pdf>

A.2.b – ok as written

B. Goal: Inclusive, fair and uniform neighborhood input into development projects

B.1 This goal is “**Require neighborhood review**” to incorporate different perspectives. The recommendation suggests that “every effort” should be made to include a wide set of voices in the discussion. There is no indication of who is responsible for this effort. Individual stakeholders cannot be held responsible for insuring that other stakeholders participate. The current process provides many opportunities for participation. At some point it is up to the individual stakeholder to stay abreast of the information available and get involved.

B.2 The choice to use city staff to facilitate meetings should be left to the Neighborhood or Business Associations.

Planning staff assistance to stakeholders in collecting feedback will be useful for some. Each stakeholder should have the opportunity to present their feedback themselves. Staff should not be relied on to filter feedback on behalf of any stakeholder unless that stakeholder does not have the resources to present this information on their own.

Stakeholder disclosures should include information about any member of the group who has a financial interest in the proposal. Lack of such disclosure has been a significant problem.

B.3 – Paragraph 4

While a purpose of the pre application phase may be for a developer to decide whether to proceed with a proposal this is not a primary goal of the other stakeholders who are participating.

B.4 The basic statement in this recommendation, to use multiple means to solicit feedback through Neighborhood Associations is supportable at face value but it does raise some underlying questions. To what extent should a neighborhood association be responsible for getting people to participate in a development review? The comments seem to be stretching to suggest that neighborhood associations are doing nothing or not enough. What level of solicitation or participation would be considered adequate? Consideration should be given to the fact that neighborhood associations are made up of volunteers with day jobs who participate in their spare time. An earlier draft of this report included business associations as well in this goal. Curiously the requirements of this goal are no longer applied to business associations.

C. Goal: Increase property and development information available to residents, property owners and investors/developers.

C.1.a – ok as written

C.2.a – ok as written

Additional Preapplication Phase Goal Recommended

An additional goal should be added to this section: “Increase the preparedness of the Applicant”. Applicants should have knowledge about applicable plans, zoning designations, historic district requirements and the neighborhood process. Also, an increase in preparedness will assist the applicant in bringing information forward in a timely, accurate and complete manner. A number of the report’s recommendations support this goal by making information more readily available.

APPLICATION, REVIEW & APPROVAL PHASE – page 25

D. Goal: Clarify and simplify the process for development proposals that require more than internal staff approvals.

D.1 – ok as written

D.2 – Empowering staff to make decisions within the context of adopted standards is reasonable. For programs such as the Façade Grants where City funds are expended to improve the appearance of the City the oversight of the Urban Design Commission is appropriate.

E. Goal: Compliance with Commission / Board conditions and recommendations

The goal is unclear and does not seem to directly relate to the implementation options that follow. Is the goal to improve Applicant compliance with conditions and recommendations?

E.1. This implementation option does not follow from the goal. If the EDC believes that the commission mission statements should be revised in specific ways they should state those revisions. Otherwise this option adds nothing to the report. We believe the mission statements as currently written are appropriate.

E.2.a – ok as written

E.2.b – ok as written

E.2.c – An annual review by commissions is sufficient. It is useful to periodically step back and “grade the paper”, looking back at approved proposals how well the standards have worked in ensuring that development is enhancing the livability of the City. Unfortunately there are numerous examples of projects that have been constructed which are truly lackluster.

F. Goal: Reduce development approvals required and overlapping jurisdiction and conflicts among development approval entities.

F.1 - The Urban Design Commission, Landmarks Commission and the Plan Commission each has different ordinance standards for review and brings different expertise to their review. The recommendation to limit review of proposals within the downtown to UDC and to limit review of certain demolitions to just Landmarks thereby eliminating the Plan Commission from these reviews will be detrimental to the City. Each Commission performs an important function. This recommendation is counter to maintaining our existing high standards.

F.2 There has been no information presented to the committee that the super majority requirement is a detriment to development in the city. Quite to the contrary the super majority vote is seldom involved in development related decisions. Passing anything through the Council requires 11 votes. The additional three votes required for the super majority is not an insurmountable burden in those few instances where issues of particular concern are involved. The super majority vote requirement is primarily related to budgetary changes and in instances when the vote has the capacity to irretrievably harm Madison’s cultural, historic and architectural resources. Changes to the super majority voting requirements are not appropriate and again would lower our existing high standards.

G. Goal: Streamline and clarify Commission review of applications

G.1 – ok as written

G.2 – ok as written

G.3 – ok as written

G.4 – ok as written

G.5 – This differentiation should include clear articulation by the committee/commission of the basis of their findings that the proposal adheres to ordinance requirements.

G.6 – ok as written

G.7.a – ok as written

G.7.b – ok as written

G.7.c Staff sign offs on changes requested by commissions should be at the discretion of the commissions. This is the current practice and allows commissions to review again only those changes which they feel are of critical importance.

G.7.d Changes to the Landmarks ordinance over the years have resulted in an ordinance section which is difficult to follow. Changes to improve the order and flow of the sections of the ordinance to improve its readability are reasonable. Care must be taken with any revisions not to change the intent of the current ordinance or in any manner to weaken the provisions of the ordinance.

G.7.e This goal for a “simple recommendation process” is actually an attempt to eliminate the option of referral. When information is incomplete or a proposal has not met the appropriate standards, but might with changes, referral is an appropriate option for Commissions. See comments on Goal G.10 for additional information.

G8.a – ok as written

G.8.b The Urban Design District zoning ordinance has some of the most specific and objective standards used for any development review. These standards are not subject to change through a PUD process. What sorts of changes are being proposed?

G.8.c The idea of a “small project” can mean vastly different things to different people. What might be literally a small change to a building within an Urban Design District might have significant impacts on the overall design of the building. For example “small” changes to a door, window or overhang could significantly alter the look of the building.

G.8.d – ok as written

G.8.e This goal for a “simple recommendation process” is actually an attempt to eliminate the option of referral. When information is incomplete or a proposal has not met the appropriate standards, but might with changes, referral is an appropriate option for Commissions. See comments on Goal G.10 for additional information.

In the second paragraph is the intent to find a different word for “approval” since the UDC is advisory to the Plan Commission? If so what does this actually accomplish?

G.8.f We are not often directly involved in this aspect of the sign ordinance, so we have no specific comments.

G.8.g As noted above with recommendation D.2 when City funds (such as façade grants) are expended for changes to the built environment UDC review is appropriate.

G.9 Including a member of the UDC on the Plan Commission might improve communication. The same could be said for the Landmarks Commission. The concern is the burden placed on commissioners in terms of time and being able to adequately represent all views of their commission. An alternative would be to improve the documentation of actions by the commissions including a written review of proposals in the context of the applicable requirements.

G.9.a This goal for a “simple recommendation process” is actually an attempt to eliminate the option of referral. When information is incomplete or a proposal has not met the appropriate standards, but might with changes, referral is an appropriate option for Commissions. See comments on Goal G.10 for additional information.

G.10 This is a recommendation that Commissions must act on a proposal in a single meeting and referrals would only be allowed if requested by the applicant. This recommendation is particularly misguided and will lead to more delays and frustration for those involved in the process. This will shortchange the due diligence of a commission’s review. When inadequate information is available the commissions will be left with the options of approving a proposal that is not fully considered or rejecting what may be a meritorious proposal that is simply not quite there yet. The result could be that the new approval standard becomes “almost good enough”.

Rejected proposals have a waiting period before a reapplication can be submitted and there are additional costs. A referral allows a Commission to provide feedback, changes can be considered in a reasonable manner outside of the immediacy of a commission meeting and then the proposal can be brought back to the next meeting.

H. Goal: Develop clear standards for application materials and review criteria for applicants, staff and public use.

H.1 – Clear application forms and checklists are important. In addition applications should not be allowed to proceed to a committee until all of the required information had been submitted.

H.2 – ok as written

H.3 With any cost-benefit analysis a key component is to identify to whom the costs and benefits accrue. Whose costs and benefits will be considered? Are these costs and benefits readily quantified? Is reliable and auditable data provided on the costs and benefits? What weight should any cost-benefit analysis be given in relation to other considerations in the decision making process?

Additional Application, Review and Approval Phase Goal Recommended

As an additional recommendation we suggest In addition to the compilation of specific zoning text in 'Standards for Review of Certain Types of Development Proposals', that Planning Staff has prepared, a layman's version would be useful for stakeholders. This would be an aid to help focus the public's comments on the specific criteria to be used for Commission decisions. Trying to read and comprehend directly from the ordinances can be a frustrating process as it bounces from one section to another. The landmarks and design zone standards can be particularly confusing in this regard.

I. Goal: Designate project staff/liaison as a means for efficient application review.

I.1 – ok as written

I.2 – ok as written

I.3 – ok as written

POST-APPROVAL PHASE – page 37

J. Goal: Better coordinate/expedite City agency sign-off on approved development plans.

J.1 – ok as written if all stakeholders are offered this opportunity.

J.2 – ok as written

J.3 – ok as written if all stakeholders are included.

ADMINISTRATIVE IMPROVEMENT – page 38

K. Goal: Neighborhood Plans, Training & Feedback

K.1 - ok as written

K.2 The basics of this recommendation are sound. The statement that neighborhood plans should consider "economic feasibility and market realities" is followed by a statement that plans looking out 10 years cannot really accomplish this. Plans are a community's vision for the future. By their very nature plans may include items which do not seem economically viable at present since these very items may be what the plan is trying to encourage.

K.3.a – ok as written, note that the term "customer" should include all stakeholders.

K.3.b – ok as written

K.3.c – ok as written

K.3.d - ok as written

K.4 – ok as written

K.5 – All stakeholders should be invited to meetings to assess the development review process.

L. Goal: Development Guidelines, Website & Development Assistance Team

L.1 – ok as written

L.2 What are the referenced “web modules from Best Practice cities”?

L.3 – ok as written

L.4 –All stakeholders should have the option to appeal.

M. Goal: Physical facilities to facilitate development review process.

M.1 – ok as written

M.2 Improvements to council chambers should be made so that all can see and hear presentations and discussions.

M.3 – Improvements to meeting rooms should include modifications so that all can see and hear presentations and discussions.

N. Goal: Revisit and review the development process on a regular basis to identify improvement opportunities.

Ok as written

Supplemental Comments:

1. Throughout the report the words “project” and “proposal” are used interchangeably. Until approval the concept which is brought forward for consideration is a proposal. Certainly for the development team the work in preparing for the approval phase is a project internally for them. In the broader City sense until this concept is approved it remains a proposal and becomes a project upon final approval. Using the word proposal throughout this report will reinforce the proper understanding that concepts brought forward for approval are not guaranteed to be built but are proposals for consideration. This is a subtle yet important distinction which will help all stakeholders to maintain an appropriate perspective.
2. A basic requirement which would aid the entire process has been completely overlooked by the report. If there were a strict policy that proposals would not be placed on an agenda until all of the required information had been submitted by the applicant, Commissions would function more efficiently and the number of referrals would diminish.
3. We note that there are a number of recommendations that Neighborhood Associations be required to do something with no consideration for the range of experience or abilities of the associations. Nor do these recommendations consider the range of proposals that are brought before Neighborhood Associations. With some interest we also note that no other stakeholders in the process are called out in a similar fashion with requirements.

Comments and statements which frame the discussion:

General:

1. The City process and the CNI process have worked well for most proposals.
2. The City process has several steps and commissions to provide for consideration of immediate and long term values considered important in Madison.
3. In discussions with outside developers Alders, staff, neighborhood representatives and the development community will best serve the future health of development in Madison if all focus on the positive aspects of developing in Madison and the benefits derived from engaging the community in the review. We will do well to eschew perpetuating the image that Madison, as a community, makes development difficult.
4. There has been discussion that significant changes in the current process are required. The documents submitted to the EDC provide little if anything in regards to specific hindrances to development that need to be fixed. Before making recommendations the community will best serve this process by identifying a specific process that requires correction; and then assess it with full involvement of all interested parties rather than a unilateral 'economic' perspective.
5. The specific economics of any given development proposal are not currently part of the review process nor are they relevant to basic planning considerations. (The exception would be proposals requesting economic assistance from the City.) While neighborhood associations, Commissioners, staff and Alders will be cognizant of development economics, it is neither their role nor part of the City review process to ensure the economic vitality of any proposal.
6. If economic considerations are to be made part of the review process then it would make sense for the city to add one more appearance; that being before the Economic Development Commission, with full and auditable disclosure as to financial information being represented by the developer. The use of unsubstantiated claims of economic hardship has long been a matter of significant concern to neighborhoods. There have been occasions when developers claim economic hardship to justify their preferred approach to projects. These claims do not currently have any requirements for auditable substantiation.

Attitude:

1. All participants will better serve our city when they bring an open, constructive and receptive attitude to discussions.
2. City Staff, Commissions and Neighborhoods will enhance the ultimate well being of our community by welcoming development teams and maintaining a receptive stance in considering proposals. At the same time development teams will better serve their own interests when they understand that existing zoning plans or districts have important functions in providing efficiency, predictability and uniformity.
3. A constructive attitude on the part of staff, commissions and neighborhoods does not equate with acceptance of every development proposal which may be brought forth. Questions intended to provide complete information and a full understanding of a proposal are both reasonable and important.

4. Neighborhoods are better served if they have prepared in advance for consideration of development proposals. (In some neighborhoods with very infrequent development proposals this is less likely to always be possible.)
5. Development teams get better results when they are open to discussions about the details of their proposal and expect that all aspects of a proposal may not receive universal support.
6. Development teams must prepare themselves by studying and getting clarification of neighborhood processes. They need to be prepared to engage the neighborhood, understanding the neighborhood structure, process for review of proposals and relevant plans for the development site.
7. All parties will better serve themselves and the community if they strive to maintain a civil dialogue that is considerate of all points of view. Understand that there will be differences of opinion and that it is counterproductive to everyone's interests to attempt to silence objections or require unanimity.

Commissions:

1. Commissioners bring specific experience and expertise to Commissions which benefit the City as a whole.
2. Commissioners who are well informed on the development review process and the standards for their own Commission's decision making will be the most effective.
3. Commissioners do not serve the community well by only representing their own particular interests or those of other special interests. (except for appointments which are reserved to represent a particular group) The process is not well served by Commissioners who may have to recuse themselves on a regular basis or are not able to regularly attend meetings.
4. All parties of the review process are well served when the presentations and discussions at Commissions are well focused within the particular parameters and standards of the Commission. Commission Chairs play an important role in this regard to focus the discussion on issues that are germane to the Commission. Staff, development teams and neighborhoods are also responsible for keeping their input focused on the specifics of a given Commission.
5. Commission discussions which consider proposals in direct comparison to the given standards for review will enhance the review process. Commission decisions that are framed in the context of these standards establish a basis for the community to assess future proposals and aids in providing predictability.
6. In addition to the compilation of specific zoning text in 'Standards for Review of Certain Types of Development Proposals', that Planning Staff has prepared, a layman's version would be useful for speakers. This would be an aid to help focus the public's comments on the specific criteria to be used for Commission decisions.
7. Commissions inherently must make some subjective decisions. If the decisions were simply technical in nature following a specific list of readily defined standards there would be no role for Commissions.
8. It will serve the development review process if each year the Chairs of Commissions related to development meet with key development staff and the mayor's office to assess information, strategies and plans for encouraging appropriate growth in line with city plans.
9. All parties providing input to Commissions must be clear and transparent about who they represent and how the statements being made were formulated. Separate standards for

- neighborhood associations or any other organization related to justifying their integrity or ability to represent their chosen group will not serve the well-being of the community.
10. When proposals are asking for City financial assistance or 'higher zoning', such as additional floors for exceptional design within Design Districts, these proposals must be held to a higher standard. The standards must be articulated as clearly as possible to provide assistance to Commissions in considering each proposal.
 11. Urban Design Commission speaking guidelines that allow the development team effectively unlimited time but restrict all other speakers to 3 minutes each is neither equitable nor effective.

Neighborhoods:

1. Neighborhoods include residents, both owner occupants and renters, businesses and other property owners.
2. Neighborhood Associations should strive to involve as many residents as possible in considering development proposals. Others need to recognize the voluntary nature of members of Neighborhood Associations and the limited number of people who choose to become involved. The absolute number of residents involved in a neighborhood's consideration of a development proposal does not inherently add to or subtract from the value of the input they bring to the process.
3. Neighborhoods are encouraged to welcome non-resident property owners and business owners in discussions, but may choose not to represent the views of these groups.
4. Neighborhood associations are generally organized around the interests and concerns of residents. While the interests of residents may sometimes blend with business interests this is not always the case.
5. It is possible to have a development review with alders engaging both residents and business interests at the same time. This is best done by the alder rather than by a neighborhood association or business organization and does require some modestly sophisticated facilitation skills such as taking pains to have the different 'interests' be transparent about their interests.
6. Neighborhood Association input into review of development proposals is important and can provide valuable information for development teams and Commissions.
7. Neighborhood Associations can most fully participate in the consideration of development proposals if they have an established and consistent process.
8. Neighborhood Associations play an advisory role to decision makers in the development review process.
9. Neighborhood organizations will do well to avoid taking 'positions' on development matters and rather offer "Advisory Statements" that reflect the range of thinking and preferences. This approach does not exclude the possibility for any 'contingent' to independently and aggressively represent their position(s) on a given development. It does ensure that the neighborhood organization fairly provides the spectrum of views of residents while allowing the same kind of 'lobbying' that the developer undertakes.
10. Costs of development review meetings requested of neighborhood organizations by developers must be borne by the developer making the request: Mailings, room rentals, audio/video equipment etc. Neighborhood organizations do not typically have large budgets and it doesn't make sense that they be required to underwrite the costs of activities they do not initiate.

11. Elected Alders have the responsibility to reach out to all interests in their district. The Neighborhood Association represents the interests of the resident neighbors and are organized and governed according to the wishes of their membership. The City should not infringe on the rights of the neighborhood organization to determine their self-governance.

Notification:

1. Notices provided prior to submission of an application for the formal City review process allow parties to more effectively engage in the process. The current notification requirements of 30 or 60 days to City recognized neighborhood and business associations work well.
2. Notices do not need to include all the final details of a proposal.
3. Development teams are encouraged to meet with Neighborhood Associations prior to submission of formal applications. A Developer's resources can be more effectively used if a conversation begins early. In the long term this early engagement can actually simplify the process and shorten the overall time frame.
4. The current notification requirements of 30 or 60 days to City recognized neighborhood and business associations have practical value and will best be maintained. These notices improve the efficiency and efficacy of the review process by providing interested parties advance notice of pending development proposals. Groups are able to adequately prepare and provide better input to decision makers with the time provided by these notices.
5. Any changes to notification requirements must first serve the long term interests of the community and only then consider current short term economic conditions. The results of the development review process, i.e. the buildings, will be part of our community for 75 - 100 years and more. The review process will best serve the community when we maintain a long term outlook.

Plans

1. The Comprehensive Plan, Neighborhood Plans and other City Plans are intended to provide a guide to future development. Plans are the community's vision for the future.
2. Plans can provide development teams with information of what the community has decided it would like to see. Plans provide property owners, residents, business owners and developers with predictability.
3. Plans are not intended to be static or rigid documents. Plans often offer ranges within their guidelines to allow for variation of conditions and ideas. Flexibility for plans to adapt to changing conditions can be useful so long as it does not undermine the inherent intent of planning to provide guidance towards a predictable future.

Miscellaneous Items

1. Commissions will better serve the community when they establish limits on presenters speaking times which allow for proposals to be holistically presented as well as for organized stakeholders to likewise present a cohesive version of their assessment of the proposal.
2. Current speaking guidelines do not always allow for this type of presentation. Breaking presentations up based on speaker time limits can be counterproductive.
3. When a proposal is seeking multiple approvals which have different approval standards it will work better if the items are considered individually. This can focus the discussion on the review standards and allow speakers adequate time to speak to these specific issues.
4. Room 201 needs work, as does LL110 and Room 260. The audio in any room used for Commissions must be sufficient for all people in the room to hear the full discussion.
5. The broad use of PUD's seems to have given rise to an expectation that this provides the opportunity to "design your own zoning". This expectation has been at the center of many contentious development reviews. PUD's are intended to provide some flexibility in situations where the current zoning has not kept pace with more recent planning efforts. Current plans and zoning provide the starting point for PUD proposals. This provides predictability and efficiency in consideration of development proposals. PUD's are not intended as opportunities for wholesale disregard of existing plans, ordinances, policies and zoning.