



## RALEIGH CITIZENS ADVISORY COUNCIL

August 13, 2009

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Dear Members of the Raleigh City Council,

At the July meeting of the Raleigh Citizens' Advisory Council, the chairs agreed that a document should be compiled to summarize the broader themes of concerns expressed among the CACs regarding the Draft 2030 Comprehensive Plan. The comments are summarized below. We respectfully ask that you consider these comments as you discuss approval of the Draft Plan.

Sincerely,

Ana Duncan Pardo  
Chair, Hillsborough Citizens' Advisory Council  
Chair, Raleigh Citizens' Advisory Council

### TRANSITIONS BETWEEN LAND USE CATEGORIES

The Future Land Use Map shows many areas across the city where the designated land uses for neighboring areas differ significantly. The most obvious example of this is the edge of the Central Business District, especially where CBD borders single-family residential neighborhoods.

Land Use categories in the 2030 Comp Plan lump several zoning districts together. In the past, each zoning district was used to mitigate transitions between densities, such as R-6 zoning between an R-4 and R-10 neighborhood. The new 2030 Comp Plan utilizes the broader Land Use categories in a similar manner. In the plan, Moderate or Medium Density Residential land use designations are considered an appropriate transition from Low to High Density Residential development. That means a low density R-4 neighborhood could have R-15 to R-28 (versus R-6 or at most R-10 in the old plan) as the appropriate transition zoning. The transition policies in the new plan are likely to result in very abrupt changes in density and use.

Several changes have been made to the Comp Plan policy document, and a new map has been created to address some of the most significant transition areas. However, more language is needed regarding how the transition policies will actually be implemented. Will it be done parcel by parcel through the regular rezoning process, as part of the updated zoning code, or through some other means? The plan should more concretely articulate how it will mitigate transitions.

### INSTITUTIONAL IMPACTS

As Raleigh has grown, churches, schools, large childcare centers and civic centers are morphing from relatively low impact neighborhood facilities to relatively high impact destination facilities. As a consequence, the quality of life in neighborhoods is either threatened or eroding as residents experience the adverse effects from more noise, intrusive lighting and additional traffic and parking congestion.

**INSTITUTIONAL IMPACTS, cont'd** - Because most of these institutions were considered neighborhood facilities in the past, they are typically zoned residential. However, the increases in scale and activity make the residential zoning classification obsolete. A change of use (or more robust regulations) is now needed for these properties to mitigate the adverse impacts on adjacent properties. Other cities require large institutions to be in O&I zoned areas. As organizations grow there should be strict limits to ensure that, for example, parking is accommodated on site and not in neighborhood streets blocking access for residents and emergency vehicles.

## **CLARIFYING MIXED USE DESIGNATIONS**

There needs to be a clear definition of appropriate levels of mixed use within each of the categories. There has not been enough detail provided to ensure that a true mix of development will be achieved. It is our concern that each category will have a token amount of a different use but will be mostly one type of development; either heavily favoring retail or alternatively very dense residential apartments. Specific guidelines should be created so that Staff and Planning Commission decisions on rezoning cases, site plans and redevelopment plans will not be left to the subjective views of those involved but rather to fulfill the specific intent of City Council to manage appropriate growth and development away from suburban sprawl and more towards the existing urban infrastructure.

## **NEIGHBORHOOD/SMALL AREA/CORRIDOR PLANS & OVERLAYS**

During the last several years, communities throughout the city engaged in the process of creating Small Area Plans, Neighborhood Plans, Corridor Plans, etc. to address the pattern of anticipated growth. These plans were the result of extensive democratic public engagement, and it was the Planning Department's intent to incorporate these plans into the Comprehensive Plan. However, in many instances, the plans have either been stripped of contextual guidance or seemingly excluded from the Comp Plan altogether. More community education is recommended regarding the rationale for inclusion/exclusion of the various Small Area/Neighborhood/Corridor Plans.

Also, overlay district zoning such as the NCOD process has served as a significant tool to protect existing neighborhoods, direct development to prescribed areas and serve the city's objectives for growth. However, NCODs are barely mentioned in the new plan.

## **PUBLIC NOTIFICATION OF CHANGES TO DRAFT**

Initially there were many public hearings where citizens came together to speak. Ideas were discussed, drafted, reviewed and in many cases incorporated into the Comprehensive 2030 Draft Plan, which was shared with the public through meetings and published documents. Since the initial release of draft Comp Plan, many changes have been made both to the policy document and the Future Land Use Map (FLUM), and a number of specific areas had their FLUM designation changed. The process in many cases involved land owners/future developers having their lawyers present a proposal for change for their properties to be reviewed by the Planning Department. Most of the requested changes to the Draft Plan were designed to increase density of development, and many of those changes took place without reasonable public notice or discussion.

Since there was not a process in place to notify these citizens nor their elected representatives –City Council members, CAC chairs, Homeowner Associations - there has been limited opportunity to have the community input on how these changes could impact future development in their neighborhoods. We need an efficient mechanism to communicate these changes to CAC chairs (etc.) specific to their CAC so that they can 1) notify residents of these changes 2) provide a forum for discussion 3) bring input back to the city before the changes are incorporated. We have missed an important opportunity to have all parties at the table as these changes are incorporated in the draft plan. We maintain that neighborhood input is essential to the development of a great Comprehensive Plan for our community.