

CITY OF BLOOMINGTON



PLAN COMMISSION

March 25, 2021 @ 5:30 p.m.
Zoom Meeting:

<https://bloomington.zoom.us/j/91906891742?pwd=QkRzMlRkdG5jSHdqWTB5czBIN3ZrQT09>

**CITY OF BLOOMINGTON
PLAN COMMISSION
March 25, 2021 at 5:30 p.m.**

❖ **Virtual Meeting:** <https://bloomington.zoom.us/j/91906891742?pwd=QkRzMIRkdG5jSHdqWTB5czBIN3ZrQT09>

ROLL CALL

MINUTES TO BE APPROVED: None

REPORTS, RESOLUTIONS AND COMMUNICATIONS:

PETITIONS:

ZO-09-21 through ZO-10-21 **City of Bloomington**

Request: Multiple text amendments to the Unified Development Ordinance (UDO) and the adoption of a new Zoning Map for the City of Bloomington.

****As discussed at the March 22, 2021 meeting, it is expected that ZO-09-21 will be discussed at this March 25, 2021 meeting. Petitions can be continued as necessary.**

Specifically the following will be considered:

ZO-09-21 Duplex, Triplex, and Fourplex Text Amendments - Text amendments related to permitted, conditional, use specific standards, for duplex, triplex, and fourplex uses in the R1, R2, R3, and R4 District Zones.

ZO-10-21 New Zoning Map - Official Zoning Map will be changed to locate the new PO - Parks and Open Space, R4 - Residential Urban, and MS - Mixed-Use Student Housing zoning districts; to correct split zone lots; to rezone the MH - Mixed-Use Healthcare district, where Bloomington Hospital is currently located; to rezone Planned Unit Developments; to rezone RE to R1 while amending uses to align with RE; and to adjust some zoning district boundaries in order to align with the Comprehensive Plan.

****Next Regular Business Meeting April 12, 2021**

****Next UDO Map and Text Amendment Meeting March 29, 2021**

Last Updated: 3/24/2021

*Auxiliary aids for people with disabilities are available upon request with adequate notice.
Please call [812-349-3429](tel:812-349-3429) or e-mail human.rights@bloomington.in.gov.*

Case # ZO-09-21 Memo

To: Bloomington Plan Commission

From: Jackie Scanlan, AICP Development Services Manager

Date: March 24, 2021

Re: Text Amendments to Unified Development Ordinance and Draft Zoning Map

The Planning and Transportation Department proposes to complete the Unified Development Ordinance (UDO) and Zoning Map Update process by adopting a new Official Zoning Map and amending various sections of the UDO.

Based on guidance from the 2018 Comprehensive Plan, the Department led an effort to repeal and replace the previous UDO that culminated in the 2019 adoption of a new UDO, which became effective in April 2020. Staff has worked with the new UDO since that time and has identified portions of the code that contain errors or that may require additional amending. Staff has been compiling and analyzing those potential amendments since the new UDO was adopted in 2019. A public outreach effort was initiated in October 2020 to present a draft zoning map as well as potential text amendments. The draft map and amendments were reassessed and amended after the public outreach process. A new proposal was created, and was released in February 2021.

Written comments received via email and the website since the proposal was posted on February 12, 2021 have been distributed with each Plan Commission packet and those that have been most recently received are below. Comments received prior to posting, based on the October 2020 Public Outreach Draft, will be located at: <https://bloomington.in.gov/planning/udo/map/updates>.

The proposal is divided into ten (10) petitions by subject matter, and one (1) is discussed below. The petition proposal with redline has been posted on the webpage since February 12, 2021 and description of the proposal was included in the March 8, 2021 packet. The petition information is repeated with additional detail below. That petition is as follows:

9. ZO-09-21 | Duplex, Triplex, and Fourplex

ZO-09-21 | Duplex, Triplex, and Fourplex

Background and Purpose

Bloomington feels housing pressure related to its proximity to and relationship with Indiana University, but also exists as part of a larger regional and national housing market. According to the National Association of Realtors, a tight housing supply is fueling an increase in home prices. The median price of an existing home sold during the month of February 2021 was \$313,000. That is the highest February price on record. The number of sales were in decline for

the month, but those on the market move quickly and the prices are climbing. There is a national housing supply issue. Regionally, per Zillow.com, the value of a typical home for sale in the 47401 zip code area is \$20,000 more than it was at this time last year, at just under \$300,000, and predicted to continue to rise by almost 10% over the next year. The opportunity to add plexes as an option across the City can increase our local housing supply, potentially offering some less expensive units in desirable locations.

The question of whether or not duplexes can provide a more affordable option than a detached single-family unit was explored by streets.mn using Minneapolis, MN data. In Minneapolis, which added duplex and triplex options across the City, Assessor Parcel data showed that a typical duplex per-unit value was 52% of the value of an average single family detached home. While there is concern that duplexes will not offer traditional affordable housing options, it is clear that they can offer cheaper per-unit costs than a detached unit. Additionally, duplexes can be created through renovation and addition of existing structures, as opposed to new construction in greenfield areas.

According to the American Community Survey, Bloomington's vacancy rate is almost 9%. However, according to the Bloomington Housing Study completed in July 2020, the vacancy rate might be closer to 2%. We have a tight housing market both for owners and renters, and the opportunity to add plexes as an option across the City can increase our ability to provide varied housing options to both owners and renters.

We are currently at roughly 35% owner-occupied housing and 65% rental housing. We have been at that breakdown since at least the 2000 decennial Census, just five years after the 1995 zoning code update. While these figures are often quoted and accurate, the opportunity to re-allow plexes as conditional uses in our existing neighborhoods is not directly correlated with the rental market, as both sides of a duplex can be owner-occupied. The option to add duplexes increases the opportunity for units, units that can be either rental or owner-occupied.

Bloomington currently devotes large percentages of both its total acreage and total parcels to strictly single-family housing. Our current RE, R2, and R3, and single-family PUD zoning districts comprise 51% of our non-MI (Mixed-Use Institutional) land. That means that excluding IU and some governmental parcels, more than half of the acreage in Bloomington is devoted to single-family housing. By parcels, the percentage is 73%. These are not districts where single-family housing is permitted, but districts where single-family residential is the only Residential Use allowed, other than conditionally allowed cottage development which requires the same density as single-family detached units.

Additionally, all zoning districts allow the use single-family (detached) by-right, except the Mixed-Use Downtown, Mixed-Use Institutional, Employment, and Parks and Open Space zoning districts. Said another way, single-family detached is Permitted in 14 of 18 zoning districts. The proposal does not change any districts where single-family is allowed, does not change any Use-Specific Standards of single-family, or restrict single-family zoning.

Use	Residential								Mixed-Use								Non-Residential		Use-Specific Standards
	RE	R1	R2	R3	R4	RM	RH	RMH	MS	MN	MM	MC	ME	MI	MD	MH	EM	PO	
RESIDENTIAL USES																			
Household Living																			
Dwelling, single-family (detached)	P	P	P	P	P	P*	P*	P	P	P	P*	P*	P*			P*			20.03.030(b)(1)

This proposal seeks to add plexes as an option across Bloomington, in order to encourage additional residential units in walkable, bikeable, established neighborhoods that are transit and amenity adjacent, and served by existing public infrastructure. The proposal would work in concert with a myriad of other tools to help address Bloomington’s housing crunch. Other zoning code tools include the new Mixed-Use Student (MS) zoning district, existing Accessory Dwelling Unit regulations, reduced lot sizes for better utilization of land in new development, live/work units, and cottage development. There are other tools outside of planning as well such as down payment assistance programs. The proposal seeks to increase housing type options in the UDO in order to benefit a larger swath of the community than is currently benefited.

Proposal

This petition amends the locations where the uses ‘dwelling, duplex’ (duplex) and ‘dwelling, triplex’ (triplex) are allowed (as either Permitted or Conditional) and amends the Use-Specific Standards associated with those uses and the use ‘dwelling, fourplex’ (fourplex).

The petition proposes duplex as a Conditional Use in the R1-R4 zoning districts, and triplex as Conditional Use in the R4 zoning district. The existing UDO, effective April 2020, allows the duplex use in the RE zoning district as Conditional and in the R4 district as Permitted. The current code also allows triplexes in the R4 as permitted. The current UDO also has the Use-Specific Standards asterisk (*) for duplexes and triplexes in the R1-R3 zoning districts without denoting that the uses are either Permitted, Conditional, Accessory, or Temporary. The asterisk with no use allowance designated does not make sense and cannot be administered. The current proposal corrects that situation. No other changes to the R1-R4 uses or locations of duplex, triplex, or fourplex are proposed with this petition.

The proposal would add the option for duplexes in the R1-R3 areas in Bloomington. The proposal does not mandate the building of duplexes, and includes multiple Use-Specific Standards so that duplexes can be sensitively re-introduced as an option in the current primarily single-family zoning districts.

	RE	R1	R2	R3	R4
RESIDENTIAL USES					
Household Living					
Dwelling, single-family (detached)	P	P	P	P	P
Dwelling, single-family (attached)			P*	P*	P*
Dwelling, duplex	C	*	*	*	P*
Dwelling, triplex		*	*	*	P*
Dwelling, fourplex					C*
Dwelling, multifamily					C*
Dwelling, live/work					C*
Dwelling, cottage development		C*	C*	C*	C*

Duplex and Triplex Highlighted in Current Allowed Use Table RE-R4

	R1	R2	R3	R4
RESIDENTIAL USES				
Household Living				
Dwelling, single-family (detached)	P	P	P	P
Dwelling, single-family (attached)		P*	P*	P*
Dwelling, duplex	C*	C*	C*	C*
Dwelling, triplex				C*
Dwelling, fourplex				C*
Dwelling, multifamily				C*
Dwelling, live/work				C*
Dwelling, cottage development	C*	C*	C*	C*

Duplex and Triplex Highlighted in Proposed Use Table R1-R4

Use-Specific Standards

Duplex

The Use-Specific Standards for a duplex have been amended to:

- remove the provision that related the legality of the use to how the property was zoned under a previous zoning code;
- remove the provisions that attempted to regulate the size of the structure based on whether or not a demolition permit had been recently issued;
- remove the requirement for two street-facing doors on all duplexes;
- remove the 40 foot maximum width provision;
- add a provision that the owner or registered agent for the property cannot have a Notice of Violation on file in the Department for a period of three years prior to the application for a conditional use for a duplex;
- add a provision requiring two street-facing doors for all newly constructed duplexes, but allow remodels and conversions to have a minimum of one street-facing door;
- add a provision that creates a 150 foot buffer around any approved duplex in R1-R3 for a period of two years, so that within such time no other duplexes can be approved in that buffer area in the R1-R3 zoning districts.

The use-specific standards that are removed are convoluted and some regulate current uses based on previous zoning codes, which is not ideal. The 40 foot maximum was removed as it is not appropriate in all areas where duplexes are an option, and similarly the two door requirement was amended for remodels and additions because adding a second door on the front of the house may inadvertently lead to structures that are out of character. The notice of violation provision will limit the option for plexes to those who have not been under enforcement for violating the UDO within the last three years. The buffer was included to address concerns that entire blocks would be turned to duplexes in short order. The buffer helps spread out the locations of new duplexes, both spatially and in time, while lessening the ‘first come, first served’ concern by lifting the buffer after two years.

Triplexes and Fourplexes

The Use-Specific Standards for a triplex or fourplex have been amended to:

- remove the provision that related the legality of the use to how the property was zoned under a previous zoning code;
- remove the provisions that attempted to regulate the size of the structure based on whether or not a demolition permit had been recently issued;
- remove the 40 foot maximum width provision;
- add a provision that the owner or registered agent for the property cannot have a Notice of Violation on file in the Department for a period of three years prior to the application for a conditional use for a triplex or fourplex;
- add a provision requiring a minimum of one street-facing doors and a maximum of two street-facing doors.

The use-specific standards were amended to remove the convoluted reference to a previous zoning code, as well as to demolition permits on the site. The notice of violation provision will limit the option for plexes to those who have not been under enforcement for violating the UDO within the last three years. Triplexes and Fourplexes are limited to the R4 zoning district and Mixed-Use districts, which are intended to have greater development and therefore the separation requirement is not included.

Conditional Use

As proposed, duplexes, triplexes, and fourplexes would require Conditional Use approval. Conditional Uses can be heard by either the Board of Zoning Appeals or the Hearing Officer. As was done during the introduction of ADUs, the Department would initially take all plex requests to the Board of Zoning Appeals. Additionally, the Director can require that an applicant attempt to attend the relevant Neighborhood Association meeting and would do so, as we informally encouraged for new ADUs.

Conditional Use Criteria required to be met by all conditional use requests, including duplex, triplex, and fourplex:

General Compliance Criteria 20.06.040(d)(6)(B)

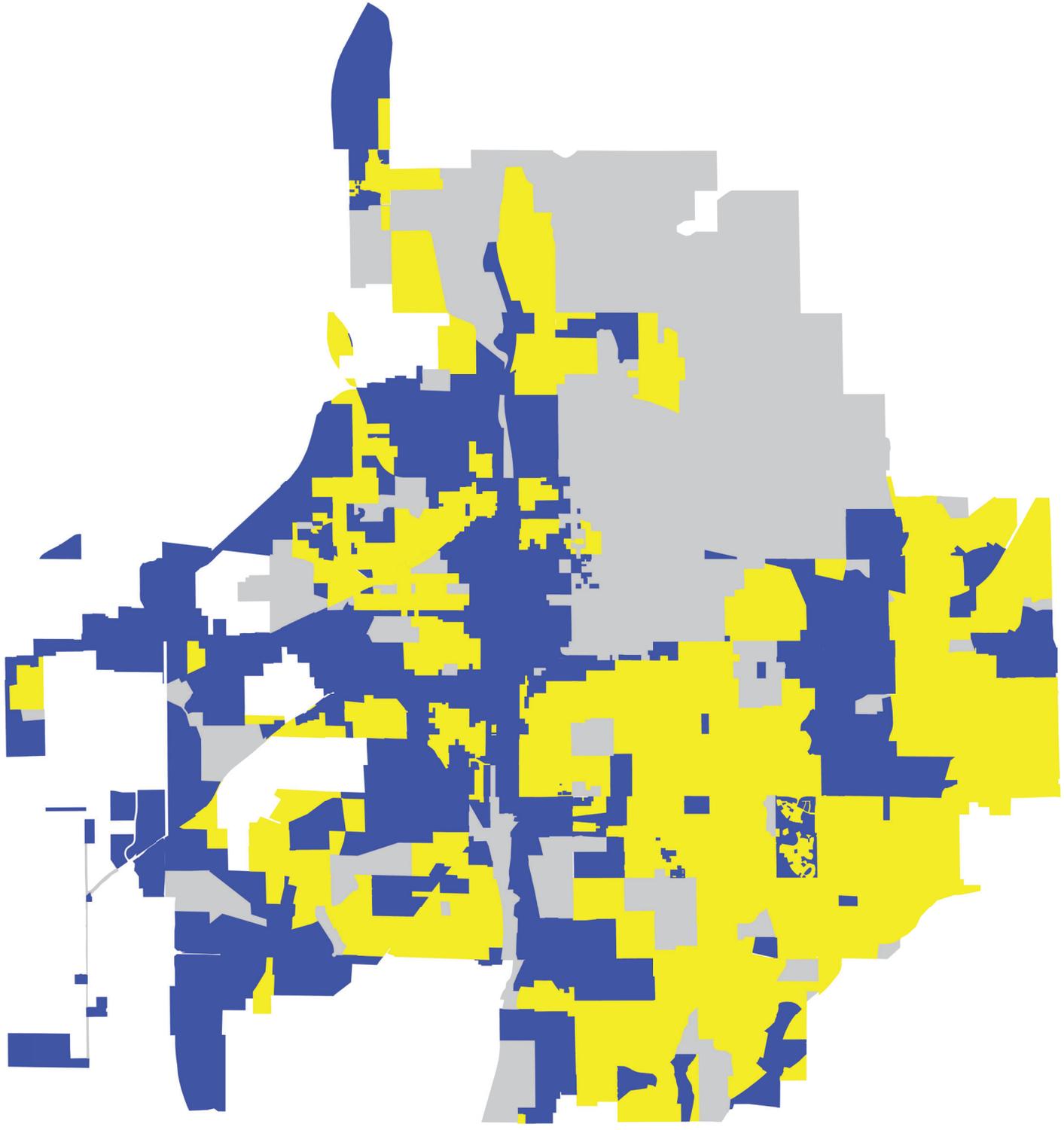
- i. Compliance with this UDO
- ii. Compliance with Other Applicable Regulations
- iii. Compliance with Utility, Service, and Improvement Standards
- iv. Compliance with Prior Approvals

Additional Criteria Applicable to Conditional Uses 20.06.040(d)(6)(C)

- i. Consistency with Comprehensive Plan and Other Applicable Plans
- ii. Provides Adequate Public Services and Facilities
- iii. Minimizes or Mitigates Adverse Impacts
 1. The proposed use and development shall not result in the excessive destruction, loss or damage of any natural, scenic, or historic feature of significant importance.
 2. The proposed development shall not cause significant adverse impacts on surrounding properties nor create a nuisance by reason of noise, smoke, odors, vibrations, or objectionable lights.
 3. The hours of operation, outside lighting, and trash and waste collection shall not pose a hazard, hardship, or nuisance to the neighborhood.
 4. The petitioner shall make a good-faith effort to address concerns of the adjoining property owners in the immediate neighborhood as defined in the pre-submittal neighborhood meeting for the specific proposal, if such a meeting is required.

A Conditional Use approval is not a by-right approval. The petitioner must demonstrate that the proposal meets all ten criteria that apply to conditional use approvals. As can be seen above, the approval must demonstrate compliance with the regulations in the UDO, the guidance in the Comprehensive Plan, as well as demonstrate no excessive destruction of natural, scenic, or historic features of significant importance. The petition must meet local, state, and federal utility requirements, and must make a good-faith effort to address concerns of adjoining property

owners as defined in the neighborhood association meeting. Compliance with all ten requirements is required for approval.



Primary Allowed Use in District

- Single-Family
- Multifamily, Mixed-Use, or Employment
- Institutional

Comparison of Land Area by Primarily Allowed Use



February 22, 2021

City of Bloomington Plan Commission
401 N Morton St
Suite 130
Bloomington IN 47404

Re. March 8, 2021 public hearing for Zoning Map and text amendments

Dear Plan Commission,

Thank you for the countless hours you have dedicated to this community with your service and the good work you are doing to seek solutions for the City's ongoing affordable housing issues. It is a complex problem and despite the research, data collection, listening sessions and goodwill, there is no single nor clear solution.

However, I (and the other members of my family) am opposed to some of the changes proposed in the new "Map Proposal" and "Zoning Amendments" being publicly discussed on March 8, specifically;

- proposing to allow "C = conditional use permits" to Zones R1, R2 and R3;
- the conversion of R3 residential neighborhoods to R4 zoning.

The City of Bloomington has many great strengths, including its vibrant downtown filled with dynamic independent businesses, incredible cultural offerings, a stellar Research One University and its amazing parks. However, nothing competes with its vibrant neighborhoods. I urge the Plan Commission to protect these neighborhoods and explore some of the other proposed strategies and goals in the 2020 Bloomington Housing Study. In addition to "adding density" to "existing neighborhoods," the plan suggests;

- Identify policies for sharing risk on development of new "affordable lots"
- Leverage older commercial corridors for higher density residential development
- Secure and conserve existing housing as away to provide affordable housing and reduce the impact on the environment.
- Establish education program for tenants and land lords
- Leverage opportunity sites to expand housing options within the city

Before rezoning and opening ordinances to higher-density options within our current single-family neighborhoods, perhaps more of these strategies can be employed to see if they can close the gap and make an impact.

The study presents information on Bloomington's growing population (roughly 1%/year), the associated housing needs and recent construction. Figure 1.9 of the study graphically illustrates 'Building Construction Activity from 2010-2018'. Summarizing, it states "Multi-family construction has dominated the market since 2015." An average of 300-400 units were completed per year between 2015-2018, with

numbers surely higher in 2019 and 2020. It would be great to know what percentage of these fit the criteria of 'affordable housing', as defined by the study. Perhaps there is more opportunity for creative and strategic partnerships with developers in this area as new projects are presented and approved.

Luxury apartments continue to lure students away from campus housing options, impacting the City's housing needs. Perhaps some of the projections in the study will be curbed by the introduction of the new Indiana University residence halls and declining enrollment trend.

I would also like to highlight the study's findings on maximum affordable rental rates, based on Bloomington's median household income of \$28,660. The plan acknowledges that "Indiana University students account for about 50% of the city's total population." A high percentage of students have little to no income while attending as undergraduates. This surely skews the median household income, which in turn skews the maximum affordable rental rates. I am not debating the need for more affordable housing, but I am also not sure how to best accommodate a resident population that changes every four years and influences these decisions.

Bloomington is a diverse and amazing community, "rich with cultural, educational and economic opportunities for its residents," as you state. I would hate to see its neighborhoods change their dynamic before fully engaging some of the other strategies you have already invested time in developing.

Thank you for reading this, your good work and open minds.

Sincerely,



Jon Vickers
Southside Bloomington Resident
jon.w.vickers@gmail.com

Beth Cate
Plan Commission
City of Bloomington, Indiana
401 N Morton St. Suite 130
Bloomington, IN 47404

March 7, 2021

Taking into consideration the points outlined below please vote 'No' on the revised upzoning proposal that will come before the Plan Commission soon. If you feel you must vote 'yes' please amend the proposal to 1) require that the title holder of a new duplex be required to inhabit one of the two units and 2) make the 150 foot spacing between new duplexes permanent.

The Mayor's effort to re-zone my neighborhood has been profoundly disappointing both in terms of how he has pursued his proposal and its effect.

The fatal flaw of the zoning proposal is that it treats all areas of the city the same, ignoring the nearly universally recognized notion that the most important factor in real estate is 'location'. The proposal may have little or no effect in Hyde Park, located miles from the Indiana University campus. But because of demand for housing near campus it will have a serious and deleterious effect in my neighborhood, Elm Heights.

There does appear to be a shortage of work force housing, but any new housing located in Elm Heights will be desirable for students, which in turn will make it undesirable for people with jobs. Indiana University President Herman Wells wrote in "Being Lucky":

"Since from time immemorial organization houses have on occasion "entertained" and that entertainment has frequently been noisy, there has been constant friction between student groups and neighboring householders. When I became president, I discovered that one of the most frequent complaints we received at the president's office concerned the sleep-disturbing din from fraternity and sorority houses."

And referring to what is now named Collins Living Learning Center:

"The first residence halls, those constituting the present Wells Quadrangle and Men's Residence Center (M R C), were constructed close by the academic campus. But particularly in the case of M R C, private homes stood all around and we had some of the same problems we had with the fraternities and sororities, namely students disturbing worthy householders."

Wells goes on to explain how the University planned the growth of the University campus such that student housing was located on the periphery of campus, away from "worthy householders". Unfortunately, Wells' successors have not taken the necessary steps to increase on-campus housing and the increased student

population has spilled over to areas adjacent to the campus. This householder can attest that students in off-campus housing are no less noisy than those on campus. I live in the 700 block of S. Park Avenue, where the balance of owner-occupied houses and rentals is about 50/50. Noise at night has been a significant problem for the 25 years I have lived here. Two blocks north of me every house is a rental occupied by students. The only reason my block is still habitable by someone who must report to work at 8am is 1) single family zoning and 2) the three unrelated person rule. For 25 years conversions from owner occupied to rental and from rental to owner-occupied have maintained an equilibrium on my block. This proposed zoning change will destroy that equilibrium.

The planning department has argued that duplexes will not change the character of my neighborhood because accessory dwelling units have not changed it. But this claim ignores the requirement that the owner inhabit one of the units on the property where the ADU is located. There currently is no such requirement for duplexes. If you feel you must approve the zoning proposal, please amend it to require that the title holder (not their children) occupy one of the two units in the duplex. This will likely prevent undergraduate student rentals and make any new housing suitable for workforce housing and graduate students.

If you feel you must vote 'yes', please also remove the two-year limit for spacing new duplexes 150 feet apart, making the spacing requirement permanent. It is profoundly unfair to place the burden on neighborhood residents to prove that this experiment has failed, rather than on the administration to prove that it has succeeded.

However, I would much prefer that you vote 'no'. The process to date has been an undemocratic, top down process that ignores essential elements of the Comprehensive Plan. Notably, the Comp plan repeatedly indicates that the core neighborhoods should not be the target of increased densification. The Comp plan is not a three-ring binder that a Mayor can remove undesirable pages from; it is a document created by a long process of community involvement. If the Mayor wants to ignore parts that he does not like he should start his rezoning process over, clearly and convincingly stating the goals at the outset, engage the many members of our community who have relevant expertise, attempt to gain community buy-in for his very different vision of what Bloomington should look like and then craft a new proposal. Hopefully, the result would consider unique neighborhood characteristics. But if it did not at least I could take solace in the notion that the process was democratic. Having to fight this same fight two years in a row has left me with the sense that Bloomington is anything but democratic.

Sincerely,



William V. Coulter
715 S. Park Avenue
Bloomington, IN 47401-4927



Jacqueline Scanlan <scanlanj@bloomington.in.gov>

[Planning] UDO

Bruce Gingles <gingles.bruce@gmail.com>

Wed, Mar 24, 2021 at 9:10 AM

Reply-To: gingles.bruce@gmail.com

To: planning@bloomington.in.gov

Question:

If approved, will the UDO conform to the current ratio of owner-occupied homes in neighborhoods affected by the ordinance?

There has been a lot of discussion about density but seemingly much less about renter-occupied and owner-occupied density. Bloomington has added an unprecedented number of rental units over the past 20 years yet proponents for the UDO claim that there is insufficient "affordable" housing.

Question:

At what threshold will plexes accomplish the city's goal of "diverse, sustainable and affordable" housing?

The Mayor was quoted in today's paper saying, ".....local zoning laws can and should be tweaked as new data become available and/or the community sees that unintended consequences or changing preferences require new approaches."

Question:

Who will take responsibility for demolishing and replacing failed plexes once they are constructed? This outcome should be addressed before further action is taken on the UDO.

Kindly,

Bruce Gingles

Sent from my iPhone



Jacqueline Scanlan <scanlanj@bloomington.in.gov>

[Planning] Please Share My Comments with the Planning Commission

Jonathan Wunrow <jonwunrow@gmail.com>
Reply-To: jonwunrow@gmail.com
To: planning@bloomington.in.gov
Cc: Leslie Skooglund <laskoogs@yahoo.com>

Wed, Mar 24, 2021 at 7:17 AM

Greetings,

Please share the following comments with the Planning Commission. I live in the Near West Side neighborhood.

Regarding Duplex, Triplex, and Fourplex Text Amendments ZO-09-21: Please permit plexes, especially duplexes, by right though all residential zones. This will reduce the administrative burden created by conditional use, as well as create unnecessary burdens for small developers. Plexes will help diversify our neighborhoods and provide more affordable housing stock.

Also, regarding Zoning Map, ZO-10-21: I support expanding R4 zoning to include areas proposed by City Staff in October 2020.

Thank you,

Jon Wunrow

801 W. 9th Street, Bloomington

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Make it a Great Day!

Jonathan Wunrow
Program Manager/Grant Writer
Cell - (907) 617-9956



Jacqueline Scanlan <scanlanj@bloomington.in.gov>

[Planning] Plexes

'Leslie Skooglund' via Planning Department <planning@bloomington.in.gov>

Wed, Mar 24, 2021 at 8:26 AM

Reply-To: laskoogs@yahoo.com

To: "planning@bloomington.in.gov" <planning@bloomington.in.gov>

Dear Commissioners:

Please share the following comments with the Planning Commission. I live in the Near West Side neighborhood.

Regarding Duplex, Triplex, and Fourplex Text Amendments ZO-09-21: Please permit plexes, especially duplexes, by right through all residential zones. I look forward to living in a more diversified neighborhood with additionally affordable housing options. There are already many multi-family unit homes in our neighborhood and it has never presented any kind of problem. We chose to live in the Near West Side because of the diversity and we want it to continue.

Also, regarding Zoning Map, ZO-10-21: I support expanding R4 zoning to include areas proposed by City Staff in October 2020.

Thank you,

Leslie Skooglund



March 22, 2021

Bloomington City Hall
401 N. Morton St.
Bloomington, IN 47404

To: Mayor John Hamilton
Common Council: Matt Flaherty, Isabel Piedmont-Smith, Dave Rollo, Kate Rosenbarger, Susan Sandberg, Sue Sgambelluri, Jim Sims, Ron Smith, Stephen Volan
Plan Commission: Flavia Burrell, Beth Cate, Chris Cockerham, Israel Herrera, Jillian Kinzie, Neil Kopper, Susan Sandberg, Karin St. John, Brad Wisler

RE: In Support of “Go Farther Together: Hit the Pause Button”

The League of Women Voters of Bloomington-Monroe County supports the attached proposal called “Go Farther Together: Hit the Pause Button,” which represents a rational, citizen-based way to address consequential and contentious issues regarding housing in Bloomington. We strongly urge the City to consider pausing the current UDO revision process and adopt a time-limited approach along lines similar to what are laid out in this proposal—a process that is driven by comprehensive data and involves the perspectives of the range of stakeholders, and which can lead to a broad consensus about what is best for the future of Bloomington.

Sincerely,

A handwritten signature in black ink that reads "Ann F. Birch".

Ann F. Birch, President
League of Women Voters of Bloomington-Monroe County
president@lww-bmc.org

Go Farther Together: Hit the Pause Button

“If you want to go fast, go alone; if you want to go far, go together.”—African Proverb

Why We Should Hit the Pause Button

In recent months, a complex upzoning proposal that would dramatically reshape our community has been pressed forward on an ambitious timeline during an especially difficult time to communicate. Coupled with the challenges related to COVID, social discord and a faltering economy, this process has left the community divided and may, if left uncorrected, lead to further unnecessary acrimony.

While the revised upzoning proposal of the amendments was a significant change, several concerns remain. We propose a time-limited pause on the most controversial aspects of the City’s UDO proposal—the plexes and mapping of the R4 zoning districts—in order to collect quality data, consider a variety of alternatives, and ensure meaningful community participation.

The purpose is not simply to delay a vote on the UDO amendments and map. Rather, we propose that the most controversial aspects of the City’s text and map amendments involving upzoning and plexes be tabled for a limited amount of time, and a process be set in motion to strive for community consensus on the most promising strategies through which Bloomington can address the critical questions of housing availability, inclusivity, affordability and sustainability.

What Will Be Accomplished during the Pause?

- Engage the Community More Fully in a Substantive, Time-Limited Process
 - Representatives of the Council, neighborhood associations, and Mayor’s office develop a strategy/timeline for data collection and active community involvement
 - That group will also define an ending date/criteria for completion of the pause
 - Conduct a survey similar to the Neighborhood Housing Survey (776 responses to date) to more fully assess community concerns
 - Ensure closer City/County collaboration to assess and meet housing needs
 - Consider zoom and in-person meetings (by fall, most should be fully vaccinated)
- Develop a Coherent Understanding of the Population Projections for Bloomington and Monroe County. Some data are already available, while other data will be available in 6-9 months
 - City and County Data
 - What are the City’s and County’s population forecasts? Do they align?
 - Do estimates of housing need include both City and County data?
 - State Data
 - Study of statewide housing needs: Indiana Housing and Community Development Authority (Fall, 2021)
 - Federal Data
 - Incorporate US Census data: Available September, 2021

- Indiana University Data
 - IU's on-campus 2021-2022 enrollment (June, 2021)
 - Better understand IUB's projected enrollment cliff
 - Do the City's and IU's data align?
- Compare Bloomington to College Towns of Comparable Size
 - Directly engage comparable college towns, targeting Ann Arbor, West Lafayette, Iowa City, and possibly Ithaca, NY, and Athens, GA, on how they address:
 - Housing density
 - Upzoning
 - Issues of equity, inclusivity and affordability
 - Collaboration between city and county on issues of land use
- Develop a Consensus on Our Housing Goals and How Best to Achieve Them
 - Recognizing that one size does not fit all, move toward a more neighborhood-based approach to housing
 - Maintain the Comprehensive Plan's focus on the important role of all neighborhoods
 - Identify best new areas for both student and workforce housing
 - Explore form-based zoning as method for achieving neighborhood-specific design
 - Expand demand-side housing, such as subsidies and down-payment assistance
 - Ensure that infrastructure impact assessment will be conducted

Conclusion

The pause strategy is designed to include all parts of the community in a comprehensive approach, maximizing data-based decision making and meaningful public engagement, and honoring Bloomington's longstanding tradition of participatory democracy. All of us working in collaboration can best address the current housing issues and future pressing problems that Bloomington will continue to face.

This appeal was informed by Go Farther Together, a group of concerned citizens from neighborhoods across Bloomington who share a common commitment to find a pathway for the City administration and the community to work more closely in addressing the zoning and related changes now being advanced by the City. We believe that a time-limited pause will allow the City and other key stakeholders to better collect quality data, consider a variety of alternatives, and ensure meaningful community participation throughout the process, resulting in a more sustainable and widely embraced outcome.

For more information contact: Russ Skiba rjskiba72@gmail.com

Proposal included here with permission.

General Comments

Please vote in favor of the amendment removing duplexes as an acceptable use for R1, for the following reasons: 1. The comprehensive plan specifically and repeatedly states as a goal “no additional density in core neighborhoods”. Duplexes in R1 contradict that goal. The comprehensive plan is not a three-ring binder from which one can take what is desirable and discard the rest. 2. The administration claims to have addressed resident objections to increased numbers of undergraduates in core neighborhoods by disqualifying landlords for additional duplexes if they have violations in existing units. This plan is unworkable. It will result in an influx of undergraduates and attendant loss of quality of life for current residents. Those residents already spend inordinate time policing and reporting other types of violations. They would have the additional and ultimately futile burden of policing not only landlords in their own neighborhood but in all neighborhoods across the city. Think of e-scooters and the mythical ‘dismount zone’ on Kirkwood Avenue. The administration talked a good game during debate but failed to deliver enforcement. 3. A zoning ordinance passed in April of 2020. While technical adjustments a year later are to be expected, re-consideration of a defeated proposal is neither usual nor appropriate. This was defeated less than a year ago; it should not even be at question, but since it is, duplexes should be removed - again. 4. The administration has yet to state a clear and compelling rationale for upzoning. The mayor has advanced and subsequently abandoned a number of goals that, upon analysis, cannot be achieved with a zoning ordinance. What is the real goal? 5. The mayor while addressing the Elm Heights Neighborhood Association on March 14th suggested viewing his upzoning proposal as ‘an experiment’. It is disturbing to think that city government would experiment with a community, its social relations and its residents housing choices, based as they frequently are on the schools that their children will attend and the quality of life that the neighborhood offered at the time of signing a lease or a purchasing a home. Additionally, for many who own their home it is their main store of wealth, another subject unsuitable for experimentation. 6. There is a better alternative. The ‘Go Farther Together Working Group’ has proposed a plan called ‘Hit the Pause Button’. ‘Hitting pause’ would enable a clear statement of goals, the collection and clarification of information and the start of a democratic grassroots process involving the entire community, some of whom have relevant specialized knowledge. It would also allow for investigation of how cities similar to Bloomington in size and population handle zoning issues (Ann Arbor or Ithaca, not Minneapolis or Vancouver). People have made consequential decisions based on expectations grounded in the comprehensive plan. Changes that conflict with the comprehensive plan deserve nothing less than such a process, but so far, we have seen only a top-down public relations campaign. Neighborhood residents have tired of spending excessive numbers of what would otherwise be leisure hours wrestling with a bureaucracy that makes little or no effort to mask its indifference to their concerns and treats them as amateurs ignorant of our own neighborhoods. They actually know quite a lot. Please ‘hit pause’.

RE: In Support of “Go Farther Together: Hit the Pause Button” The League of Women Voters of Bloomington-Monroe County supports the proposal called “Go Farther Together: Hit the Pause Button,” which represents a rational, citizen-based way to address consequential and contentious issues regarding housing in Bloomington. We strongly urge the City to consider pausing the current UDO revision process and adopt a time-limited approach along lines similar to what are laid out in this proposal—a process that is driven by comprehensive data and involves the perspectives of the range of stakeholders, and which can lead to a broad consensus about what

is best for the future of Bloomington. Ann Birch, president, League of Women Voters of Bloomington-Monroe County

Written Objections ZO-09-21

I object to this text amendment. It has never been clear to me what exactly the problem is we are trying to solve with this amendment. The answer to my question has changed several times. I believe we need to pause this change to consider all the information that is relevant to this idea and also bring the various stakeholders to the table in fostering a solution once the real problem is identified. Right now it feels as though this process is pitting neighbor against neighbor which is the last thing any of us want in our community. This is not about a neighborhood welcoming others to it. This is about identifying the best way to move forward given our KNOWLEDGE (i.e. DATA) of the growth anticipated and needs of our future community. We need to seriously look at what is currently being built and the future Hospital and K-Mart sites as well as other undeveloped sites in the city. There are many people in the community willing to work with city officials and others to bring more information to this process. Let's work together for a solution we can all believe in and is a win-win for Bloomington. We can do this. We can be different. This does not have to be a charged contentious issue.

There is clearly an affordable housing crisis in Bloomington, resulting in an ever-growing need for rental space which is affordable for residents who are struggling with poverty and lack of resources. The highest priority of our Mayor and our City Council representatives should be to support those in desperate need of shelter. The old houses near downtown have always been the least expensive rentals in the area and have allowed residents with lower-paying jobs or those on a fixed income to afford rent. Under the proposed UDO zoning map, those small, affordable houses will be permitted to be torn down and replaced by expensive duplexes, triplexes, and quadplexes. The older houses which can currently be rented for around \$400-\$500/month per bedroom are at risk of being replaced by multiplexes which, based on similar new construction near downtown, will rent for \$1000-\$2000/month per bedroom. Minimum wage workers will be displaced and unable to find affordable housing close enough to walk to work downtown...and there isn't any less expensive housing available for them to move to if they are evicted or if their leases aren't renewed when their landlords get a better offer from a developer. Please vote against allowing plexes in the core neighborhoods and protect the low income housing that currently exists in those neighborhoods. Thank you for all your work to support our community!
Michelle Henderson Bloomington, IN

My objections are as follows: First, after a prolonged public comment period the Council voted approve the UDO in November 2019. After ample opportunity for discussion and objection, the idea of "plexes" in certain core neighborhoods was rejected by elected officials through the democratic process. This should be authority enough to allow it to stand. Second, to the timing of this amendment: I believe the timing of this amendment speaks to the motives of those involved. The "plexes" amendment was introduced in October 2020, at a time when the nation was in the throes of a pandemic, an economic crisis, a racial equality crisis, and a presidential election of unprecedented contentiousness. The nation, and our community, continues to be in the midst of all but one of these crises. Third, due to the aforementioned pandemic and economic crisis, it is unknown what the future of the housing market will be, with particular reference to "walkability."

As we learned, many if not most professionals can work from home. Due to this discovery, many young professionals no longer feel tied to urban living, and in fact there is a trend towards living outside of urban areas. Fashions can and do change. The fallout of the pandemic and recovery are unknowns. Significant changes should be deferred until the full impact of these cultural changes are understood. I believe this kind of understanding and long term thinking to be critical to urban planning. Therefore, I oppose change to a Development Ordinance that has already been voted on and decided by the community.

Bring back unconditional permission for plexes! 2/3/4 plexes are already an established and valuable use within each core neighborhood. Without these plexes, these neighborhoods would not be as good. As these neighborhoods are redeveloped, we cannot afford to lose housing at the same time! Conditional use is not good enough. Conditional use does not discourage the kind of big money developers that NIMBYs oppose, while it harms the kind of small-time landlord that I support.

I support by-right plexes (duplexes, triplexes, quad plexes) in all residential zones in Bloomington. I believe this will increase the stock of affordable housing in the city so that renters (like me), 1st time home buyers of modest means, and older retirees can have alternatives to prohibitively expensive single-family homes.

I appreciate the time and commitment of the Plan Commission members. My thoughts are in 3 parts, with part 3 actually being a request to any and all Plan Commission members. 1) I am disappointed that, following a bruising process in regarding the UDO in 2019, the administration decided on a top-down approach to dismantle the decisions and votes that were made - after a lengthy public and democratic process. Anyone I speak to agrees that our community needs to find ways to provide a greater quantity of affordable housing. Had the administration truly engaged the community before maps and amendments were drawn by Planning staff, our community could have begun from our points of agreement to create a plan to try to deliver on affordable, inclusive, and diverse options for members of our community, particularly for those in income segments of workforce levels and below. Instead, neighborhoods once again have been forced to mount defensive responses to a top-down, aggressive approach that has painted "plex" opponents as racist, elitist, etc. - while willfully disregarding the very clear instructions in the 2018 Comprehensive Plan to preserve core neighborhoods and find opportunities for density along arterial paths. Truly unfortunate. 2) My objections to plexes themselves is that, by definition, they are not a vehicle to promote either affordability or increased home ownership in our community. Unlike ADUs (of which I am a fan), for which the city can enforce homeowner occupancy in 1 of the units, state law prohibits Bloomington from enforcing owner occupancy in plexes. So we are limited in promoting home ownership through the plex vehicle. And, unless developers are seeking federal and/or municipal grants to lower construction/property costs, the plexes will be built at cost and then either sold or rented at (the high end of) market rates. The market itself will not produce affordability. This, despite some pro-plex opinions that are now advocating a Reagan-era trickle-down theory, this time applied to housing: Let the more affluent move into the new plexes, while others with lesser means will take the housing crumbs that no doubt will be

cheaper. This ignores a) the peculiarities of a college town, where demand keeps rates remain artificially high; and b) federal tax structure, which credits landlords more to take a loss on their vacant units rather than offer below-market rents. 3) Given the above, I would ask that a member or members of Plan Commission move to observe the request from the recent "Go Farther Together" group proposal (I am not a member of that group, by the way) and observe a time-limited pause while clear, reliable housing, census, and income data are collected and aligned among city, county, and IU. There should be no rush to deliver major UDO changes mid-pandemic, in the midst of a homeless crisis, without clear definitions of shared goals and aims, from which we can reach consensus on next steps. Please move and approve to pause the portions of the UDO changes involving R4 in residential core neighborhoods and the corresponding amendments. Thank you for considering this request. --Richard Lewis.

I support changes in zoning requirements! It is long past time to open up our neighborhoods to greater diversity of housing rather than a "one-size-fits-all" approach to housing that results in sprawl and lack of affordability. My one objection is that I would urge the commission to allow plexes, especially duplexes, by right. The conditional process slows things down and causes additional expenses for both the city and smaller, "mom-and-pop" builders.

COMMENTS FOR UDO HEARINGS • One-Size-Fits-All. We need to pause the process. The idea that there is one solution that will fit every core neighborhood does not take into account the differences in Bloomington's early development. The earlier neighborhoods were established before the turn of the last century, the late 1880s, pre automobile. Lot dimensions are very different here than in developments in the 1920s, 30s and early 40s. Another issue is the scale of the housing in the older neighborhoods. The housing in my neighborhood, Prospect Hill, is mostly single story or one-and-a-half story in height. A large modern duplex is not going to fit in this context. There need to be different solutions for different neighborhoods. Duplexes might work, but they will need to be tailored to fit the individual site demands of each core neighborhood. That's why we need to pause the process so that a wider variety of options can be designed to meet a wide variety of neighborhood conditions. • We Need A Ground Up Decision Making Process. We need to pause the process. Many homeowners in the core neighborhoods are very worried and scared about the speed of this amendment. They thought the issue was resolved when the City Council eliminated plexes from the Ordinance in 2019. This amendment is like an "earth quake" that has upset their world. For many, perhaps most, their home is a homeowner's most valuable asset. To find that their neighborhood could become another college rental site with the development of duplexes causes anxiety. The process needs to be paused and started over with a new process that includes informed comment. Informed by housing and population data, reviews of similar situations in other college towns, and better understanding of the actual need and the solutions that would fill those needs without threatening our most valuable assets. We need more time to have face-to-face community workshops and meetings to work through these complex issues. • Zoom and The Pandemic. We need to pause the process. The use of Zoom meetings is very inadequate for the discussion that we trying to have about these amendments. When the UDO was in process before the pandemic there were opportunities for citizens to sit down with planners and elected officials to discuss the community needs. Now we

are having one-way Zoom meetings that do not adequately fill the need for in-person citizen participation. As we have heard recently from the CDC (Centers for Disease Control) and Dr. Faucie, the chief medical officer to the President, that if vaccination rates continue to increase, we will likely be able to safely have in person events by late summer or this fall. That is only a few months away. Pausing the process until then will give us all a better opportunity to ask and answer questions, present data and information relevant to the issues at hand and reinforce our faith in the process.

My husband and I are “nearly natives” of Bloomington, Indiana, a city where we met as IU students in the 1960s, returned to as faculty and staff in the 1970s, reared our now-adult children, and, after 50+ years of marriage, intend to live out our retirement years. Why am I getting into this personal stuff when writing to you? It is just to make the case that we have a longstanding, emotional attachment to Bloomington, truly our home city that we love. I am sure that as evidenced by your service on the Planning Commission that all of you share that love for Bloomington and want to help the city evolve into the future in the best ways possible. Just a brief look at the Table of Contents and quick scroll through some of the pages of the UDO give one a feeling of how detailed and complex the document is. And the pleas of us members of the public for or against any specific part of the document must at times seem annoying or trivial to you in doing your important work. However, I implore you to seriously consider the feelings of the majority of residents of the core neighborhoods as determined by a recent citywide survey that found that nearly 60 percent of respondents oppose the construction of duplexes within our neighborhoods. In particular, we strongly support the action as proposed by the newly formed Go Farther Together group, and as they have suggested, we request that you “hit the pause button” on the duplex issue for a limited time. This group has very reasonably proposed that the Planning Commission table consideration of the duplex issue until further study can: 1) engage the community more fully, 2) get a handle on accurate population projections for the city and county, 3) look more closely into plans being followed in comparable college towns, and 4) form a consensus on housing goals and how to best achieve them. We don’t want our neighborhoods to be a place where plexes are built as experiments to see if they work out, and with the very uncertain possibility that if not deemed a success, perhaps sometime in the remote future modifications in zoning could be made so that these structures would not be allowed. Thank you for listening to our concerns and suggestions for a way of dealing with this issue and to work toward being able to Go Farther Together. Sincerely, Gail and Dave Weaver 901 S. Jordan Avenue Bloomington, IN 47401 gail.weaver.iu@gmail.com weaver@indiana.edu

Arguments against the Up-zoning from someone who has studied, participated in and even legislated local planning for forty five years now: 1) It won’t create affordable housing (Planners have admitted this publicly) 2) Up-zoning will increase the property values, not decrease them, making them less available to local homebuyers but more attractive to investors to add more people paying more rent. 3) It could change the character of the neighborhoods which are already on both sides of 50 % rentals in a city that is 66 percent rental to 33 percent homeownership. Even though the core neighborhoods in Bryan Park and the west side have the most affordable rentals in the city, it is more affordable to own than to rent. Rents have doubled in the last 12

years. Up-zoning works against home ownership. Why 4) Apartments and row houses closer to downtown will have more positive climate impact than Up-zoning the old neighborhoods. Last time this was done in the 90s, people fled to the suburbs. More commuters is a negative environmental outcome. 5) This Up-zoning contradicts the Comprehensive Plan that says single family neighborhoods in the core should be protected. Allowing duplexes in all single family neighborhoods is literally overturning all Single Family Zoning. This is a radical change that is not supported by the Comprehensive Plan. 6) Since the 2018 Study that declared Bloomington's need for more rental housing, over 4,000 units have been built or committed to. At least half as many have been built or committed to in the county. The hospital site has plans for more rental housing and duplexes and row houses. Many sites close to the B-Line are open and ready for more apartments closer to downtown than the neighborhoods. The need for rentals is not demonstrated. 7) The need for single family homes either owned or rented is the real need in Bloomington. Just talked to a realtor and houses are truly in short supply. Rentals not so much. People are buying in Ellettsville and the counties due to a shortage of homes to buy in Bloomington. Allowing more occupants in houses will price out buyers and eliminate the most affordable housing in Bloomington. 8) The displacement of renters in Naturally Occuring Affordable Housing (NOAHs) is real. When an investor buys the old rental units to convert to duplexes, the rents are going to be higher and the previous affordable rental is gone. Conclusion: Our local grass roots citizen groups are trying to stop Bloomington from making the same mistake that was made in the 90s when neighborhoods up-zoned to 5 unrelated. This was a disaster and resulted in the single family zoning we are currently defending. Please don't sell out our city even with the best of intentions..... Chris Sturbaum

Please read the true tale below. Bloomington is a college town, and it is not right to deny that living next to undergraduate students is a problem for permanent residents, Or to deny that conversions of single-family homes to multiplexes will result in more students in residential neighborhoods. Bevendean: A cautionary tale Patricia L. Foster This is a story about Bevendean, a small urban community on the edge of Brighton, England. Our story is summarized from a research paper by Joanna Sage and colleagues that appeared in 2012 in the journal "Housing Studies" [1]. The paper documents how this low-income community situated close to two universities (Brighton and Sussex) was rapidly destroyed by an influx of student housing. This influx was the result of a change in government policy and how that policy facilitated individual greed. Bevendean was originally a "council housing" estate built in the 1930s. Council houses were government subsidized housing built and maintained by the local council (township) and rented to low-income residents. Council housing was prevalent in the UK until recently but was changed dramatically in 1979 by the Thatcher government's passage of "right to buy" legislation allowing tenants to buy their houses at below market rates. While this legislation meant that renters could become homeowners, it also opened up an unrestricted resale market. That was the first important event that led to the "studentification" of Bevendean. The university student population grew, as it did elsewhere in the UK, and housing for students available in other, more desirable areas of Brighton filled up, resulting in increased housing prices and rents. This made Bevendean vulnerable to development. One particularly aggressive developer played a key role in driving out the original low-income residents and converting Bevendean into a student enclave.

Bevendean was typical of council developments, consisting of modest “semi-detached” and “detached” single-family houses of one or two stories. Such houses can easily and cheaply be converted into multi-occupancy by gutting and reconfiguring the interior, and, perhaps, building a modest expansion. Such conversions did not require the licensing that a larger structure would. By renting to multiple occupants, the minimum investment for conversion would yield a maximum return. The aggressive developer, mentioned above, was the first to recognize this opportunity. The developer rapidly bought and converted many of these modest homes into multi-occupancy housing and then rented them to students at prices unaffordable to low- and modest- income residents. Other developers followed. In the seven years from 2001 to 2008, the student population of Bevendean increased 125%. Today Bevendean is about 30% rentals [2]. This rapid studentification led to an exodus of former residents, escalating the turnover of housing. Potential buyers were priced out of the market by the deep-pocketed developers. In addition, houses ceased to come onto the open market. A seller would contact an “estate agent” (realtor) who would contact a developer, and the sale would go through. The responses of the remaining residents to surveys taken in 2007-2008 describe the erosion of the community due to the influx of students. The permanent residents complained of intolerable noise, trash that was left out, and (typically English) neglect of gardens. They felt the losses of families with children and the neighborhood support structure for the elderly were particularly destructive to the community. Current home-owners in Bevendean are still complaining about students ruining their neighborhoods [3]. Three important take-away lessons from this story are relevant to the Bloomington administration’s current push for allowing plexes in the core neighborhoods close to the university. First, a single decision – namely, the decision to allow renters to buy their council houses without any subsequent restrictions on resale – resulted in an inevitable and irreversible erosion and replacement of a community. Second, small, affordable houses are the most vulnerable to conversion into multi-occupancy rentals. Third, the opportunity for unrestrained greed is a key driver of the irreversible conversion of modest residential neighborhoods into unaffordable rentals. References 1. Sage, J., Smith, D., Hubbard, P., The diverse geographies of studentification: living alongside people not like us. *Housing Studies*, 2012. 27(8). 2. iLiveHere.co.uk. Bevendean Property Ownership & Rental Statistics. Available from: <https://www.ilivehere.co.uk/statistics-bevendean-brighton-and-hove-3399.html>. 3. Argus, T. Letter of the Day: Students have made our lives worse and council has failed to act. 2017; Available from: <https://www.theargus.co.uk/news/15163331.letter-of-the-day-students-have-made-our-lives-worse-and-council-has-failed-to-act/>.

Hi, I live on the Near West side and am strongly in support of permitting plexes, especially duplexes, by right through all residential zones. I believe that conditional use only serves to increase administrative burden and creates barriers for small developers. Thank you. I strongly support pausing this upzoning so that we can better evaluate what the need for housing really is. We do not know what Bloomington’s population is even today, much less what it will be in 5 or 10 years. The last reasonably accurate count of the population was the 2010 census. The census bureau conducts periodic surveys, the American Community Survey, of only about 1 % of the population and estimates the total population. They estimate Bloomington’s population growth at 0.7%, that is, less than 1 %, but their margin of error is greater than that. Bear in mind

that a difference of 2000 people, easily within the margin of error, is a difference of about 800 housing units (or 2000 bedrooms). Added to the uncertainty is the impact of the pandemic, which may change people's work habits permanently. People may be moving out of Bloomington to more rural areas for all we know. Why not put off this decision about plexes until after the 2020 census data comes out. One source of data we do have is IU Bloomington's enrollment. IU students make up half of our population, and enrollment is dropping, It started declining in 2017 independently of the pandemic, and is now down by 1%. That 1% is 500 bedrooms. IU expects enrollment to continue to decline. The dean of the college said the other day that the "high school cliff" is expected in 2025. In addition, we do not know how many students will continue to enroll on line and not even live in Bloomington. We will know much more about the number of IU students in Bloomington next year when things get back toward normal. Also the city should be working closely with the IU administration because they have an extreme vested interest in predicting their student body. In conclusion, there are currently many unknowns and it seems misdirected to make such a radical change to our neighborhoods until we have more information.

I am writing to urge that the rezoning process be put on a time-limited pause so there can be a comprehensive discussion by a broad range of stakeholders to achieve consensus. I am a resident in the Elm Heights Neighborhood. My only exposure to city planning was active membership on the ad hoc committee that wrote the Elm Heights Historic District Guidelines adopted in 2012. I do not claim expertise in urban planning. My concerns in this case revolve around my personal observation that more and more fine single-family housing around me is being turned into rentals, especially by large rental agencies. Most of these rentals are geared toward students and do not address the needs of families, the missing middle, diversity, or affordability. In fact, this trend is making houses in my neighborhood less affordable for families and working people. The result is loss of single-family housing in the core, something that the recently adopted Comprehensive Plan calls for the City to protect. Making duplexes easier to create here will only accentuate this trend and reduce the diversity of residents in my neighborhood. I want to be clear that I am not against student rentals per se, but the City needs to be smart about where and how they are concentrated. I fully recognize that housing needs and zoning are complicated issues and that neighborhoods can be vastly different. Permitted placement of housing types should be addressed by including a broad range of stakeholders, even the County and University, and by employing the best data and needs projections available. We should study what truly comparable cities have done and how successful they were. I am not convinced that the proposed rezoning will address any particular problem in a useful way. It has the danger of accelerating current trends that discourage families and working people from living in the City's core. So I support a time-limited pause in the rezoning process to achieve a much greater degree of consensus about how to move forward.

I) I object to changes to table 03-1: Duplexes and Triplexes should NOT be Conditional in zone R4; instead they should remain Permitted. Duplexes should NOT be conditional in zone R3; instead they should remain Permitted. ALL building projects - including single family homes - are already "conditional" in that they are required to demonstrate to the Planning Department that they are following UDO standards. As such, I believe the addition of "Conditional" requirements in this

table - the purpose of which simply provides for additional neighborhood input - is an unnecessary burden on the both the land owner and on the planning department since UDO standards have already been passed and are clear. 2) 20.03(b)(3)(C)(i): Although the changes to sub-section i are an improvement, I would prefer to see this sub-section deleted altogether. Dictating the number and location of entrances is unnecessary given that many attractive duplex designs include shared entrances. Likewise, given that each parcel's orientation relative to its surrounding structures is unique, the positioning of one or more entrances on a side or at the rear of a duplex may offer more privacy to its surrounding parcels and/or more safety to the occupants of the duplex. 3) 20.03(b)(3)(C)(ii): I approve of deleting this sub-section. 4) 20.03(b)(3)(D): I strongly object to this additional section. Is "150 foot buffer" a typo? That's the equivalent of approximately 3 lots, so is this section suggesting that if a home owner wants to expand their single-family home to make it a duplex AND they receive approval to do so, they nevertheless have to wait for 2 years unless their home happens to sit in the middle of a giant lot (greater than 300' X 300' in dimension)? Ridiculous. 5) 20.03(b)(4)(C)(i): Similar to 20.03(b)(3)(C)(i), the changes to this sub-section are an improvement, but I would prefer to see this sub-section deleted altogether. Again, dictating the number and location of entrances is unnecessary given that many attractive triplex designs - especially those built on corner lots - include three separate entrances. Likewise, given that each parcel's orientation relative to its surrounding structures is unique, the careful positioning of one or more entrances may offer more privacy to its surrounding parcels and/or more safety to the occupants of the triplex. PERMIT PLEXES BY RIGHT in all residential zones throughout the city. Remove the requirement for all entrances to face a public or private road or street. Remove the buffer and 2 year development exclusion.