

Public Review #6 - UDO Adoption Draft (Responses)

| Timestamp | Please provide any comments or information to consider for the UDO Adoption Draft. |
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| 8/6/2019 10:00:05 | <p>I think the multiple-dwelling policies in their current form will start a revolution...and not the good kind. I suggest:</p> <ul style="list-style-type: none"> * clarifying that duplex or triplex units must not just have 'separate exterior entrances' but separate entrances 'on separate streets'--ie corner lots only. (I may be wrong, but didn't notice the corners-only restriction explicitly mentioned.) * eliminating triplex altogether in R1, 2, 3--except perhaps on corners of streets of a certain minimum size (can we really imagine three units on a tight lot in the west side? On the other hand, something on Hillside or 3rd St. could be a different story) * limiting total bedrooms on multiple-unit bldgs. in R1, 2, 3 to five. * requiring that the owner live in one unit (as we would do with ADU's) * beefing up design guidelines to include limits on overall mass/size: eg no more than 20-25% greater size than previously existing bldg. <p>I understand the logic and even the necessity of housing greater numbers of citizens within the existing urban footprint. But on the ground, in the neighborhoods, I feel that the current guidelines will create rancor, fear, and potentially overcrowding. Just take it slower. Try it out with more conservative guidelines.</p> <p>Thank you.</p> |
| 8/6/2019 15:12:32 | A keyword analysis of the document reveals zero references to the phrases universal design, visitability, and lifetime community, all of which figure prominently in the values expressed in the comprehensive plan. |
| 8/8/2019 11:29:18 | I appreciate the work of the city and the advisory committee on the new UDO, and I fully support the proposed changes to the city's zoning districts. The new UDO is needed to improve the city's socioeconomic diversity, and reduce suburban sprawl that clogs our roadways and increases pollution. Thank you for your efforts. |
| 8/8/2019 12:25:35 | It will ruin neighborhoods like the near Westside if they are not left as single family homes. the single family homes are what makes up the character of the neighborhoods .it makes them more desirable that they are single family I own several homes on the near Westside and I want to keep them single family and not let others turn them into duplexes or more. This change of zoning would only help the Developers to make even more money off of people it won't make things more affordable for anybody |
| 8/8/2019 16:06:45 | <p>Eliminating single-family zoning in the West Side core neighborhoods would be a disaster. It invites gradual dismemberment of the neighborhoods as investor-backed apartment developers outbid local homebuyers, tear down older homes (Bloomington's starter homes) and replace them with Evolve-style "luxury" apartment boxes too few people in Bloomington can afford to rent.</p> <p>Bloomington is already 70% rentals. The Near West Side, a fairly typical core neighborhood, is 45% rental. Those are expensive, market rate rentals, because people think of them as desirable due to their location close to downtown. In fact, the city has gone to great lengths to sell this concept to the public. You could duplex or even triplex every house in the neighborhood and the rents would still be market rate -- NOT "affordable" -- because of their locations. The neighborhood is already dense. It's small houses (what in Bloomington pass for "starter homes," much cheaper than houses in the subdivisions because they're OLD), sitting on tiny lots, on narrow streets laid out 100 years ago. The Near West Side can't absorb a lot of new density, either all at once or piecemeal. Picture sharply increased traffic on a Tuesday morning when the garbage trucks are coming through, and then think about it on a school morning or afternoon around the Fairview School. And what I'm suggesting for the Near West Side would be even worse -- MUCH worse -- in Prospect Hill. Just walk around and see for yourself.</p> <p>There's an argument in favor of densifying the core neighborhoods as a way of keeping housing close to the center of town to avoid urban sprawl. The term "sprawl" is ridiculous in a small town like Bloomington. It's 5 miles across in every direction, max. The average American's commute these days is 16 miles. And Bloomington commutes in reverse, relative to other cities. Employment isn't concentrated downtown -- its on campus or west of I-69.</p> <p>We have too much available space within Bloomington (hospital site, all those PUDs south of downtown) where we could be intentionally building missing middle housing to justify ditching one of the city's most important and most desired housing types -- single-family houses -- which generally are small, old and really only well-suited to single-family use in the core neighborhoods. For the larger examples, we already have a perfectly good process for duplexing existing houses. Why do we need upzoning?</p> <p>I'm reading the same stuff everyone else is reading about upzoning in big cities. I have to ask: What does any of that have to do with Bloomington?</p> |
| 8/8/2019 16:14:19 | <p>The early draft of the UDO revision was objectionable because it did away with single-family zoning and allowed, on corner lots, homeowners or developers to tear down existing single-family houses and replace them with newly-built duplexes or triplexes. The new version not only doubles down on this really terrible idea, it EXPANDS it. Now, instead of only corner lots, ALL properties in the core neighborhoods are eligible for teardown-conversion to duplexes or triplexes. The draft says such conversions of existing homes are "discouraged," but doesn't say how or even what "discouraged" means. Does someone at the Historic Preservation Commission glare at the developers, wag a finger and say, "I wouldn't do that if I were you"?</p> <p>Interesting, though, that the authors of the new Adoption Draft find a rationale for hanging onto single-family ownership, which they reference specifically, in R1 ("Residential Large Lot") subdivisions. Why is it that that phrase is only applied to R1 "large lots"? It couldn't possibly be that those are the areas where the city's lawyers live, could it?</p> |
| 8/8/2019 16:22:16 | <p>There is NOTHING in the UDO revision that offers incentives for current homeowners to duplex existing (more affordable) houses instead of selling to investor/speculators who will be offering to buy these houses and tear them down to make way for new construction. Older homes that contribute to the unique character of these neighborhoods will give way to characterless multifamily flatblocks, as developers view the properties not as homes but as monthly market rate rental streams -- line items on spreadsheets. And since many developers will be from other cities in other states, those rental streams will be money leaving the local economy -- wealth draining out of Bloomington.</p> <p>Every single-family, owner occupied house lost to rental stock is a lost opportunity for someone to buy and accumulate wealth through home ownership. Couldn't some of the new multifamily housing be condos? Conceivably -- but there is NOTHING in the UDO change that provides any incentive for this. For developers, building rental units almost always makes more commercial sense.</p> <p>This upzoning is pointless and destructive. I have a strong sense that investor-backed rental apartment developers have latched onto progressive intellectuals' own well-meaning rhetoric and turned it against people in towns like Bloomington to open up stable neighborhoods to development upheaval. It's very sad.</p> |
| 8/8/2019 17:52:20 | I appreciate the changes made concerning duplexes and triplexes on corner lots in core neighborhoods, that is from "by right" to "conditional". I also appreciate limiting the number of unrelated adults in order to discourage student housing. However, given the frequency with which the city seems to grant waivers to our regulations, I would like to see something in the code assuring that if a majority of home owners in a neighborhood object to a duplex or triplex being built that building one would not be allowed. |

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| 8/9/2019 21:05:47 | <p>I think the multiple-dwelling policies in their current form will start a revolution...and not the good kind. I suggest:</p> <ul style="list-style-type: none"> * clarifying that duplex or triplex units must not just have 'separate exterior entrances' but separate entrances 'on separate streets'--ie corner lots only. (I may be wrong, but didn't notice the corners-only restriction explicitly mentioned.) * eliminating triplex altogether in R1, 2, 3--except perhaps on corners of streets of a certain minimum size (can we really imagine three units on a tight lot in the west side? On the other hand, something on Hillside or 3rd St. could be a different story) * limiting total bedrooms on multiple-unit bldgs. in R1, 2, 3 to five. * requiring that the owner live in one unit (as we would do with ADU's) * beefing up design guidelines to include limits on overall mass/size: eg no more than 20-25% greater size than previously existing bldg. <p>I understand the logic and even the necessity of housing greater numbers of citizens within the existing urban footprint. But on the ground, in the neighborhoods, I feel that the current guidelines will create rancor, fear, and potentially overcrowding. Just take it slower. Try it out with more conservative guidelines.</p> <p>Thank you.</p> |
| 8/9/2019 22:01:44 | A keyword analysis of the document reveals zero references to the phrases universal design, visitability, and lifetime community, all of which figure prominently in the values expressed in the comprehensive plan. |
| 8/10/2019 17:02:21 | <p>Pg. 202, Affordable Housing incentives: Where it describes Tier 1 and Tier 2 eligibility, under Tier 2, this point is repeated twice verbatim: "A minimum of 7.5 percent of the total dwelling units (including those on floors awarded with an incentive) are income-restricted permanently, unless otherwise adjusted or forfeited by the City, to households earning below 80 percent of the HUD AMI for Monroe County, Indiana"</p> <p>Is one of these instances supposed to say "between 80 and 100 percent of the HUD AMI"?</p> <p>Also, why did the percentages for both Tier 1 and Tier 2 decrease since the July draft? It was a total of 20% affordable housing required, and now it's 15%. Does Clarion's experience with other cities lead them to believe that we won't get any takers at 20%?</p> |
| 8/13/2019 18:40:21 | <p>20.04.60 Parking and Loading (l) Minimum Bicycle Parking E. When No On-Site Vehicle Spaces are Provided</p> <p>I think there is a typo here. "Where vehicle parking spaces are provided on-site" should be "Where no vehicle parking spaces are provided on-site." Otherwise this section doesn't make sense.</p> |
| 8/14/2019 15:14:23 | I am opposed to rezoning neighborhoods currently zoned for single family building to allow multiplex housing. Also, I would like to see a map of the proposed zoning prior to approval of any UDO. Thank you. |
| 8/15/2019 10:32:18 | <p>Greetings,</p> <p>I am a resident of the Eastside neighborhood, and I have some questions regarding potential re-zoning. Our neighborhood representative, Allison Schnable, passed along an email outlining the establishment of new "R" designations as well as a student zone. It is the latter that concerns me. My young family lives within an area increasingly dominated by student rentals. This is concerning for the following reasons: 1) Property management companies do the bare minimum to maintain their residences, resulting in block upon block of trash-littered eyesores. 2) Students have little regard for local noise ordinances on any given weekend, let alone Little 5 week. 3) Students often disregard speed restrictions on neighborhood streets where my children play.</p> <p>These are just a few of the reasons why the proposed "student zone" worries me. I would appreciate any clarification on the issue.</p> <p>Thank you for your time and consideration.</p> <p>Sincerely, Martin B. Horne</p> |
| 8/15/2019 13:18:59 | The NWS neighborhood was largely built before automobiles. Walk our neighborhood, I beg you, and imagine an additional 100 cars trying to navigate our narrow streets or trying to find a place to park. Any fantasy that you have that you can densify these core neighborhoods and somehow NOT have more cars is just that, a fantasy. |
| 8/15/2019 13:23:31 | Removing single family zoning in old, core neighborhoods while approving RE (Residential Estates) zoning reeks of classism. |
| 8/16/2019 12:09:17 | <p>The argument for densifying core neighborhoods is largely based on what bigger cities have done recently. We should push back whenever anyone suggests what's good for Minneapolis is good for Bloomington.</p> <p>Minneapolis is about twice the physical size of Bloomington. Its population is 423,000, growth rate 8%; it's part of a metropolitan area of 3.6 million.</p> <p>Bloomington has 85,000 population when the students are in town -- half that in the summer. Growth rate ~1% (and that's debatable). And it has lots of room to grow within its geographic limits (~five miles, end to end). Intentional mixed density development can be done at the hospital site and in large underdeveloped tracts south of downtown (including several large PUDs), before we start cannibalizing single-family core neighborhoods.</p> <p>Bloomington's growth pressures have virtually nothing in common with those in big cities like Minneapolis. It's just incompetent planning to accept that urbanist dogma about density and equity apply to Bloomington in the same way it might apply to Seattle or Portland.</p> |
| 8/16/2019 14:06:09 | I strongly oppose this UDO provisions. We need to protect the core neighborhoods and not allow multi family structures. |
| 8/17/2019 11:28:46 | <p>I am concerned about the requirement of retail on the first floor of new residential properties, especially the 4th Street Garage (which by the way is NOT residential. If you drive between 2nd and 3rd Streets and look at all the empty first floor retail spaces and walk into College Mall and see the empty retail spots there plus some in the downtown area, I hope you will see that requiring retail in new properties is not as needed as once thought.</p> <p>I am also concerned that the 4th Street Garage be only parking. As a person who frequents downtown restaurants and theater events, I believe the need for ALL parking at 4th Street is a must. I am aware of several people who refuse to even try eating downtown due to parking meters and difficulty in locating a parking space. I myself don't like meters but I pay them knowing that at this point it is a necessary evil. I understand that the meters do not pay for themselves. Why continue if budgetary needs are not being met with meter patrols and repair of existing meters?</p> <p>If the proposal includes making Walnut and College two way streets, I strongly object to this. Having tried to drive on both streets when deliveries are being made it nearly impossible. If the streets were 2 way, it would, to my mind, be a disaster.</p> |
| 8/18/2019 17:28:11 | <p>I'm addressing the issue of allowing the teardown of houses in neighborhoods like mine, the Near West Side, to build multi-unit dwellings. These will not be more affordable, as the cost of land near downtown, teardown, and new building will not lead to affordable rentals unless they are subsidized. And tearing down buildings and rebuilding is not environmentally friendly. There are areas near downtown (the hospital, brownfields, greenfields) that are available. Also, the idea that renters will not bring cars to a neighborhood with narrow streets and little parking is wishful thinking. The area also has old sewers which would need upgrading, another expense. Housing can be built more affordably on the edges of downtown or on the edge of the city with more frequent bus service to those areas.</p> <p>We already have 70% rentals in town, I am told. Neighborhoods like mine have some of the few affordable family homes. Destroying them will make it harder for ordinary people to buy a house, the traditional way that less affluent families build wealth.</p> |
| 8/19/2019 13:40:28 | Dear Commissioners and Committee men |

8/26/2019 16:51:19

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| 8/19/2019 14:03:14 | <p>Dear Commissioners and Committee members, I am opposed to the inclusion of duplexes in the residential single family zoning districts. I thought that these districts were meant to encourage and shelter family life in our community. Most were built with streets just big enough to accommodate two cars driving respectfully and carefully. When I look at my street - East Queens Way - it has 23 houses in all and 10 of them are on corners. Including duplexes in there would definitely bring in more traffic. Right now, children walk to school, ride bikes, and everyone walks walks over to the south east park. I suppose one could think that maintaining a sheltering atmosphere like that is irrelevant, but that sheltering atmosphere is one of that people all over are seeking. Lets maintain it. Thank you for your consideration, Elizabeth Gallman</p> |
| 8/20/2019 21:35:50 | <p>I am just beginning to review the final draft of the UDO, so my comments will be brief and not complete. I object to what I am hearing that changes are continuing to be made to the final draft; this is not a transparent process. There has been little to no real outreach to explain to neighborhoods exactly what the proposed changes will do.</p> <p>I am opposed to changing the ADU to by right; it was put forward a couple of years ago, and CONA argued for a Conditional Use permit, which was approved by Council, and now, it is back as a by right in the proposed UDO. There are so many consequences of this and most importantly it reduces transparency where it is necessary to have it.</p> <p>I am completely opposed to any by right change to single family residential zoning, and allowing triplexes and duplexes will destroy the home ownership, low as it is, in Bloomington, and make this essentially an out of town investment for wealthy real estate investors.</p> |
| 8/22/2019 13:58:49 | <p>I believe it is important to support high density mixed-SES housing within city limits. I bought a home this year after 2 years of searching. Even with 2 decent salaries, my husband and I could not afford anything within city limits. Anything remotely in our price range was bought up within hours of becoming available. It is extremely unaffordable to buy a home in this town, but after renting for 15 years, I was desperate to build equity and a long-term home. I was also tired and literally sick from all the mold and lawn chemicals that were used by landlords and outside my control. Now I'm having to commute by car because there is no access to public transit. On perfect days, I can ride my bicycle, but 6 miles of hills is rather extreme and requires that I commute early enough to shower upon arrival at the office in a bathroom also plagued by mold and the smell of sulfur. Overall, my comment is that the housing market in Bloomington is out of control and completely inaccessible to a majority of the population. Home ownership has become a luxury here, and with this the mismanaged rentals have become all too common. This does not bode well for sustaining livelihoods nor for maintaining vital ecosystems. And so these are reasons why we need more high density housing within the city that includes affordable housing, not just for rent but for private ownership by families of all SES.</p> |
| 8/22/2019 21:16:55 | <p>I am very concerned about the threat of the present udo draft to our single family neighborhoods. I am in favor of more affordable housing in our city but these proposals for multiplex units in our neighborhoods is not the answer. Affordable housing for families should be single family homes. There is no guarantee that the multiplex housing will not be student rentals. These rentals increase the number of cars in family neighborhoods with nowhere to park. Also, the density of multiplex housing threatens green spaces in our neighborhoods for families. I urge the Bloomington Plan Commission to consider our comments to redraft the udo to honor our family neighborhoods!! Thank You!</p> |
| 8/23/2019 16:32:19 | <p>Please consider these three modifications to specific sections of the UDO, regarding (1) maximum height of R2 buildings, (2) minimum parking requirement for *plex buildings, and (3) noise created by HVAC and other building equipment. Thank you.</p> <p>1. Reduce maximum height of R2 buildings from 40 feet to 28 feet. Rationale: Virtually all R2 buildings are presently two-story houses at most. The proposed 40' max would allow three-story (or even short-ceiling four-story) buildings, which would radically change the quality and character of the R2 neighborhoods. Reducing the max height to 28' would still permit two-story duplex and triplex structures. Specific reference point: p. 10, Section 20.02.20(c) R2: Residential Medium Lot (2) Dimensional Standards Table 2-4 line G: Reduce from 40ft to 28ft.</p> <p>2. Increase minimum parking requirement for *plex buildings from 0.5 space per DU to 1.0 space per DU. Rationale: Duplex, triplex, and quadplex buildings typically have relatively little curb space for vehicles, so need sufficient on-property parking. The proposed 0.5 space per DU is unrealistically small. Specific reference point: p. 136, Section 20.04.60 (d) Minimum Vehicle Parking, Table 4-9. Increase from 0.5 space per DU to 1.0 space per DU.</p> <p>3. Noise restriction should explicitly mention machinery such as HVAC equipment, ventilation fans, generators, and engines that service buildings and other structures. Rationale: Presently there is no mention of noisy machinery, but protecting neighbors from noise is just as important as protecting neighbors from unsightliness, especially because noise is a health issue not only an aesthetic issue. Specific reference point: p. 209, Section 20.04.120(e) Noise</p> |

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| 8/23/2019 16:51:02 | <p>To the Council:</p> <p>I speak as a resident of Bloomington for 41 years and as an owner occupant of my home in Eastside for 30 years. I have read the UDO document. I am against the destruction of SF zoning as someone who has experienced Bloomington's neighborhoods both before and after the institution of such zoning. I have heard the arguments that Bloomington "must" meet the "crises" of a lack of affordable housing and climate change. Such easy rhetoric masks the actual challenges facing Bloomington, while it ushers us down a path that will not only not positively mitigate such challenges, but create actual harm to current and future residents.</p> <p>Bloomington has long tried to balance two unique challenges: an artificially low income base and an excessively high cost of living, particularly a high cost of housing. Two factors have fueled this cycle: IU is the single dominant employer and keeps wages low; and the extremely high proportion of rental housing to owner occupancy keeps housing costs high. In a normal circumstance, an oversupply of housing would lower pricing—basic supply and demand. This is not the case in Bloomington, however, as IU shifts the burden of student housing to the city's residents, creating unpredictable cycles of increased demand and a pricing structure independent of the local economy. This situation has been exacerbated by the City's recent promotion of huge student complexes built by national development companies. Such properties are sustained by investor-backed capital and held within investment portfolios, creating a disincentive to rental pricing being tied to the supply and demand cycle. Just as a single dominant employer is able to depress income, the investment portfolio housing providers are able to push rental pricing upward throughout the community. This pricing inflation will not be tempered by increasing the supply of rental properties which simply push all rental property values higher.</p> <p>Plex units, at best, will provide 15% of those renting them with cost subsidy. That leaves 85% of plex units replicating and enhancing rental price inflation, putting more property out of the reach of those seeking affordable housing.</p> <p>The UDO, as written, does nothing to prevent the destruction of existing homes for profit. The UDO, as written, encourages structures of 40' in height. Most homes in my neighborhood are @ 26' in height. Such disparity will dwarf adjacent structures and destroy the character of the very neighborhoods which make Bloomington a desirable place to live.</p> <p>Let's also note that such plex units will not be built by local developers, who lack the capital necessary to meet the excessive restrictions on building imposed by the City's pursuit of the highest Green standards; these structures will be built by non-local developers, who have already assessed Bloomington for such opportunities. They will have no incentive—indeed, they will have a disincentive—to "fit" such structures within the character of the neighborhoods. They will build in whatever way insures the greatest profit margin, to satisfy the investors backing the enterprise, resulting in more money leaving the community, rather than sustaining it. Both the lack of build quality and the size imposition of plex units will result in a lowering of the property values of adjacent homes. It's easy to accuse owners whose homes are put at risk of greed: I would point out that as owner occupants "age out" of their homes, many will be dependent upon the maintenance of their home values to fund their elder needs. If we cannot depend on such financial security—at a time when we are already past our working years and have no other options to make up for such losses—we will become dependent upon City services to an extent that is not sustainable. It is immoral to place such a burden onto the next generations.</p> <p>I have also heard a number of demographic reasons for why Bloomington has a housing "crisis." That Bloomington's population is "exploding": in fact, Indiana's population has been "mired in its slowest stretch of population growth since the mid-1980s," (https://www.ibrc.indiana.edu/studies/IAR_2018_Final.pdf) despite a modest gain of 5% over the last 8 years (much of that attributable to non-permanent resident foreign students).</p> <p>While there may be a projected modest increase in one segment of population needing housing (largely 25-44yr olds), the likelihood is that growth among one demographic will be impacted by declines in another. IU's domestic student population is declining, reflecting the birthrate. Attempts to off set such declines by increasing foreign student recruitment is both speculative and precarious, as past attempts have shown. And the demographic of those retiring to Bloomington seek SF homes/condos or self-contained retirement communities. Those 25-44 year olds aspire to home ownership in suburban-type neighborhoods, yet national statistics show that, as a generation, they do not meet the stringent credit requirements for conventional loan mortgages (https://www.urban.org/urban-wire/us-homeownership-rate-has-lost-ground-compared-other-developed-countries). Plexes do not solve their problem.</p> <p>The other demographic group facing housing unaffordability is working families, many of whom have a combined income of under \$50,000. A family with a combined income of \$45K can afford to spend \$13,500/year on housing, following the strict standard of 30% of income/housing costs. At a 30 yr fixed rate of 4%, that family can afford a purchase price of \$150K, with a monthly payment of just over \$700, incl est tax and insurance, and still have \$5K/yr left over for assoc costs and maintenance. The obstacle is the down payment of \$30K. A plex renting for \$1500 a month will not help them. But a City/private equity financing partnership initiative perhaps could do so—and not disrupt all of our neighborhoods in the process.</p> <p>But where is the supply of \$150K homes? Local builders cannot afford to build homes in such a moderate price range because of the City imposed costs of regulations and restrictions. There is simply no profit in it. Some do exist: Naturally Occurring Affordable Housing (NOAH). This was the option that allowed me to become a home owner 30 yrs ago. More is needed. But developers will erase such existing home stock because there is nothing in the language of the proposed UDO to stop such destruction—and much to incentivize it.</p> <p>There is much climate concern over notions of "sprawl," but comparing Bloomington, with its population of @ 85K and area mass of 24 sq mi to a metro area such as Minneapolis/St Paul, with a population of @700,000 and an area mass of @ 6300 sq mi is ludicrous. And it expresses a mixed intent, at best, that the City continues to pursue annexation, if, indeed, there is real concern about notions of "sprawl." We have plenty of land within our borders for both in-fill downtown and development outside of downtown.</p> <p>Bloomington housing options are already @ 70% rental. Past administrations, who implemented SF zoning saw a burgeoning rate of property turning rental and had the wisdom to stem the tide, stabilizing property values and rental inflation, while strengthening our neighborhoods for both owner occupants and renters. I have personally experienced how their actions laid the groundwork for the diverse and thriving neighborhoods Bloomington can be justly proud of today. Do not squander their foresight.</p> <p>Respectfully, Jean Simonian</p> |

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| | <p>My biggest concern with the UDO is that it seems to not protect core neighborhoods that have worked hard to be communities with families, single professionals, and retirees mixed with students living close to town. If duplexes/quadrplexes can be built by right on every corner, what happens to neighborhoods with established families and homeowners in areas like Bryan Park and others, where many streets only have 3 or 4 houses per block because the blocks so short? Do you want a street like Allen St. turning into 50% duplexes?</p> <p>If there is a housing crisis for affordable housing, and sustainability is a goal for the city, please target this kind of development in underdeveloped neighborhoods: Switchyard Park area, the vacancy the hospital will leave, east 3rd St., the former Kmart. All of these areas are still close to the downtown and could be higher density without destroying core neighborhoods.</p> <p>I have live in the Bryan Park area (both east and west of the park) for more than 30 years and have seen how what once was largely unkept rentals have over the years converted into homeowned houses by families, retirees, singles, and some rentals for students. This is the mixture we want to keep.</p> <p>In addition, what is going to happen to the housing market/rental market when the projected enrollment cliff happens at universities? Many project that to happen in 5-10 years. Will we have new duplexes that were built by developers aimed at renting to 3-5 students go vacant as families once again head out to the sprawling outskirts?</p> <p>Please respect the work the past city government has done to help us maintain core neighborhoods and think carefully about developing the many areas close to downtown that do need to be developed or will be free to be developed.</p> |
| 8/23/2019 21:26:36 | <p>Thank you for this opportunity to comment.</p> |
| 8/23/2019 23:16:04 | <p>I'm unable to attend the public hearing Monday evening (my son starts music lessons at that time), but I wanted to drop a line to say that I very much support the general drift of the proposed UDO. I am particularly excited about the prospect of having sidewalks on all of Bloomington's streets. I live in Prospect Hill with a young family and own rental property in the neighborhood as well; it seems to me that graceful urbanization and incentives to build dense but not soulless housing stock, mixed with retail throughout the downtown core and in neighborhood centers across the city, is precisely the right direction in which to go. In fact I would support going even further in this direction by further reducing parking minimums and by adding traffic-calming bicycle and pedestrian infrastructure to dangerous streets in the central city like West Kirkwood, Rogers, South Walnut, and Atwater, which currently disrupt the sense of neighborhood flow for those of us who want to live within convenient walking distance of life's necessities but not worry about our children being run over by cars blazing through crosswalks on their way from one side of town to the other on streets that are effectively highways cutting through dense residential neighborhoods. In general, I think this plan is an excellent step towards a vision of Bloomington as a city that can thrive even as it grows.</p> |
| 8/24/2019 16:39:49 | <p>I am strongly opposed to changing the zoning to support an increase in rentals, duplexes, and triplexes in residential areas. This will be devastating to low-income and fixed-income residents who cannot afford the higher property taxes which will result from tearing down single-family homes to allow 9 unrelated adults (+ their 9 cars/trucks) in our core residential neighborhoods. Those "unrelated adults" are likely to be out-of-state/international students who can afford to pay much more in rent than is currently being asked in middle/low income neighborhoods such as Bryan Park and the Near West Side. If you truly believe that this change in zoning is a way to encourage affordable housing, I urge you to read the following article: https://www.bloomber.com/news/features/2019-08-13/if-the-tuition-doesn-t-get-you-the-cost-of-student-housing-will?utm_source=pocket-newtab&fbclid=IwAR0bj13ask98MLjibHQ8Q-ovW_0NtBxQ6cnPwVGWnRxQDv-9H8plrCD7M Please do what is in the best interest of the low-income and fixed income residents who live in our residential core neighborhoods and vote NO to replacing the zoning ordinance. If you vote yes, you are voting in the interest of wealthy, out of state/country developers over our local residents. That is NOT the way to help our most vulnerable citizens.</p> |
| 8/24/2019 18:36:12 | <p>I am really concerned about adding multi-family housing to the single-family housing zones that's being proposed in the UDO. The proposed up-zoning will make the few affordable homes that are available even more attractive to developers and less attainable to young people who are having a difficult enough time as it is finding affordable homes to purchase.</p> <p>I researched the GIS site and found the sales data for my neighborhood's single-family home sales in 2015 so I could compare the referenced in the Comprehensive Plan, (page 59). My core neighborhood had 22 single-family home sales and three duplexes. None of the duplexes were occupied by the owners. Here's what I found:</p> <ul style="list-style-type: none"> · Average price of all single-family house sales \$146,140.95 · Owner-occupied Average Average= \$153,025.00 · Rental Average Average=\$134,094.00 <p>The most affordable houses in the neighborhood went for rentals rather than home ownership. The house sale price averages in our core neighborhood were below the average prices of Monroe County, Indiana statewide prices and all the townships listed the Comprehensive Plan.</p> <p>This data shows this core neighborhoods offer the most affordable single-family housing options in Bloomington.</p> <p>Not all core neighborhoods are the same. The impact of this legislation on single-family zoning will not be felt equally across all neighborhoods. Any neighborhood whose housing stock is primarily composed of small footprint houses on small lots are going to be radically impacted. Allowing duplexes, triplexes and quads to be built in single-family zones threatens this small footprint affordable housing stock.</p> <p>Currently, duplexes, triplexes and quads can be built in the RM zone. (There are RM zones that are almost exclusively composed of small footprint bungalows). Why aren't these forms being built there? If the answer is that the land in RM is too expensive, then the intent of up-zoning the single-family must be to create cheaper land for these multi-family forms. --Essentially trading the smaller footprint affordable single-family home for the multi-family forms.</p> <p>Single-family housing in wealthier neighborhood will not be torn down for one of these multi-family forms as it simply would not be economically feasible. The lots are too expensive. This legislation will hit the poorer neighborhoods disproportionately harder than the wealthier neighborhoods.</p> <p>I understand that we need more affordable housing. It is wasteful and backwards for this plan to encourage the conversion of already affordable single-family housing, something we're extremely short on, to build multi-family... Eliminating one form of the missing middle (small footprint cottages) for the sake of the other and at the expensive of our poorer neighborhoods.</p> |

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| | <p>As a professional biologist and active citizen, I am acutely aware of the existential environmental crisis we face today. I applaud the Draft Bloomington UDO for including environmental values in the statements of purpose (6. Preserve and enhance...environmental integrity of the city, 15) Prevent and mitigate pollution..., 22) Encourage sustainable forms of development that reduce avoidable negative impacts on the environment).</p> <p>I am deeply concerned that some of the proposed zoning changes work against these purposes. In particular, allowing tear-downs of single-family homes to be rebuilt as much larger duplexes and triplexes in what are now Residential Single-Family and Residential Core neighborhoods – which will become R2 and R3, Residential Medium Lot and Residential Small Lot districts – will result in immediate environmental degradation. Any long-term environmental benefits of increased human density in these specific locations are uncertain and too far in the future to justify the risks.</p> <p>I'm thinking about the neighborhood I live in, the Near Westside. If you look at it from the air (Google Maps satellite view) you will see a functional greenspace in spite of its current already-dense settlement. Lots are narrow but relatively deep, with mainly small houses sited near the streets, leaving ample space at the back for vegetation. Over the long span since the houses were built, in many spots soil has remained undisturbed. Quite a few trees are large and provide local cooling via shade and transpiration that saves energy. A lot of residents are avid gardeners, each with a different approach, resulting in a mosaic of flowers and shrubs that maintain pollinators and entertain the neighbors. Not many of us use pesticides as a regular part of lawn care, reducing air and water pollution.</p> <p>Having green space like this arise within the neighborhood as a natural result of how land is used provides every resident with tangible benefits on a daily basis, and its loss cannot be mitigated by green space preserved somewhere else. Besides physical benefits such as local climate moderation, living amongst all the other species that share these spaces is psychologically important. How do you quantify the benefits of being surrounded by thousands of fireflies every July night without leaving home, seeing red-headed woodpeckers fledge in the alley, or watching for that one Eastern box turtle to emerge each spring from its winter burrow by your birdbath – who may have lived in this spot longer than you have? These daily experiences that provide irreplaceable richness and perspective are rare in urban settings and can so easily be destroyed.</p> <p>In other words, there is a lot to lose by disturbing this already-functioning landscape within our vibrant city. Please do not take this risk: maintain the current zoning of our core urban neighborhoods.</p> |
| 8/24/2019 19:23:51 | <p>Sincerely, Marti Crouch</p> <p>Proposed Amendments</p> <p># 1) Remove Duplex and Triplex as conditional use in RE, R1, R2, R3 . These more dense structures should be built on corridors, buffer zones RM and on new ground, which is supported in the Comprehensive Plan. Subtracting from our existing single family housing, much of which is relatively affordable, is a mistake. Upzoning will cause more investor competition with homebuyers and will also raise the price of real estate. The core neighborhoods are dense enough with all the grandfathered denser uses. The parking situation is also fragile and already tight. Furthermore, adding zoning that contradicts known covenants is irresponsible and will cause conflicts.</p> <p>#2) Keep RM zoning as is. It is a small and fragile zone that is sometimes a part of core neighborhoods and sometimes on the edges. Many of these are existing large homes and medium sized homes that will be removed for denser structures, if this RM zoning is made indistinguishable from RH zoning. The change in density should be done more carefully when the mapping is done. Some of the RM could go to RH but a careless conversion of this zone does not take into account the varied types of structures and various densities of the existing zone.</p> <p>#3) Keep the ADUs as a conditional use. This was clearly affirmed by the city council in an action that overrode the planning departments position. Instead, the council supported the citizen's who pushed back on this proposal. Conditional use will be very close to by-right with planning department support. However, the fine details of neighborhood context will be considered with a public process. This will also insure that the rules for duplexes will be taken into account. While a duplex with an ADU might be a good idea for a new development, that simply won't work in these dense core neighborhoods. This will also call attention to suburbs where the conflict with covenants can be addressed up front instead of a nasty law suite after the structure is built.</p> <p>#4) Demolition Delay : 20.06/2a-iii Allowing 50% demolition of all Contributing Structures on the SHAARD based on whether the structure should be locally designated does not take into account the meaning of the rating. The rating means that the structure is part of a potential historic district. Bringing the property to the HPC allows discussion with the owner who often makes simple changes to plans out of respect for the property's rating. It also allows time to consider whether there is a small potential district that is endangered by this demolition. The amendment suggests a simple modification to give staff more leeway to bring the endangered property to the full Historic Commission and reads as follows: "Staff's decision shall be based on the same criteria used by the Historic Commission when it renders a determination about whether_ NEW -(the partial demolition could result in the historic structure's loss of its "Contributing" rating and listing on the SHAARD.)"</p> |
| 8/24/2019 22:47:13 | Chris Sturbaum |
| 8/25/2019 10:04:52 | Changes in the new UDO will destroy core residential neighborhoods in pursuit of illusory benefits from density. In spite of predictions that cities of the future will grow vertically, right now small houses with yards are highly desirable and lend significantly to Bloomington's charm. Why destroy what exists to pursue a planner's dream of what the future may bring? |
| 8/25/2019 12:22:09 | <p>I oppose the elimination of single family zoning. I believe this would destroy family neighborhoods and open up Corner lots to developers with a single purpose of building apartments for students in residential family neighborhoods.</p> <p>Developers come in to make money as stated by a developer. To believe they come in to make available affordable housing is faulty thinking.</p> |
| 8/25/2019 13:58:23 | <p>My comment regards this section: 20.05.50 Subdivision Design (5) (N) Eyebrows: Eyebrow street designs shall be permitted for residential subdivisions only and constructed for one-way traffic with an island in the middle that contains a sidewalk for pedestrians to efficiently and safely travel on the pedestrian network. No parking is allowed within eyebrow areas.</p> <p>I think what you are referring to is what Bloomington has in the Winslow Woods neighborhood, on S. Bent Tree Dr. and Wylie Farms Rd., in my district. I feel strongly that these bump-outs of the street should NOT be allowed. They put the homes further apart from the roadway and thus encourage higher speeds for cars and less of a sense of community for pedestrians. These are a vestige of auto-centered suburban development that have no place in 21st-century cities.</p> |
| 8/25/2019 14:24:06 | <p>These comments are about section 20.05.50 Subdivision Design Standards, (7) Arterial Frontages.</p> <p>1. I am opposed to frontage roads at any location except along highways. Therefore, I would strike (7)(A)(ii) that allows an Access Street to be built along arterial roads to allow access to residential buildings there. All such access should be via alleys behind the buildings. Access roads are an additional separation between street and buildings that disconnects pedestrians and other road users from the built environment. They make passage less friendly and interesting for pedestrians and make speeding more likely for cars. Access roads are not appropriate for urban settings where we want to encourage density and multi-modal transportation, as stated in the Comprehensive Plan.</p> <p>2. I think there are some wording/syntax problems with this section: Alley Access - Individual single-family (attached and detached), duplex, triplex, or fourplex residential lots may use directly front arterial level streets as fronts for setback purposes if rear alleys are used for all lots fronting the arterial street.</p> |

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| 8/25/2019 17:39:23 | The changes to the UDO are supposed to provide more affordable housing. But what is sure to happen is small houses, such as in core neighborhoods, will be demolished and multi-family housing will replace them. The rents will still be high, and the charming, affordable houses will be gone. Also, how can it be true that the housing market is saturated. IU is NOT growing, yet new, huge apartment buildings are being built. The rentals that the students are vacating should be available to workers and families. If this is not happening, the commission should be finding out why. I have yet to see any real data on the subject -- how many housing units are there in Blm, and how many people other than students are looking to buy or rent? |
| 8/25/2019 17:42:49 | |
| 8/25/2019 17:46:43 | I am against changing single family zoning to rental zoning and especially I am against allowing duplexes and triplexes to be built in our core residential neighborhoods. If we allow this change to happen it will END single-family zoning as it has existed for 25+ years and change all current residential zones (which don't allow more than three unrelated adults in one house/lot) to allow up to NINE unrelated adults on one lot. This will lead to tear-downs and massive parking problems in our residential neighborhoods, not to mention a huge increase in property taxes. |
| 8/25/2019 19:07:27 | We strongly oppose a change in the zoning being considered that would increase rentals, duplexes, etc. in residential neighborhoods such as the Near West Side. |
| 8/25/2019 19:07:40 | <p>This rezoning has the potential to drastically change the character of Bloomington's family neighborhoods. In addition, people trying to buy a house could potentially have to compete with developers, in which case they would be outbid. Why would we want to decrease the number of single-family homes?</p> <p>There are already a great deal of multi-family dwellings in Bloomington. Why aren't these areas being expanded instead of changing our existing neighborhoods of single-family dwellings?</p> <p>I am terribly disappointed with the proposal to allow triplexes and possibly fourplexes on corner lots in my SFH neighborhood. I live in the Eastside neighborhood and density is a challenge already. We single family homeowners are already equaled by rental homes, all of which are rented by students. For instance the home on my right is a 3 bedroom rental and the one across the street is a 4 bedroom rental. There is a minimum of one student/bedroom and each student has their own car. In just those two houses, there are seven occupants and seven cars. Make those properties (both corner lots) a duplex and I will likely have 14 occupants and 14 cars. A triplex will increase that.</p> <p>There are seven houses that are corner lots that are within 2 houses from me. If these houses all convert to greater density triplexes, I will be the one who is forced to move toward the country, especially as I cannot afford to buy a home in our more secluded neighborhoods.</p> <p>Some people support more density in our neighborhood because they say it will create less sprawl out from the city. This clearly will not be true in my case. Some say there will be less car traffic as more people will ride bikes and walk. I do not believe that is true. Nor do I believe converting the corner lots around me will create more affordable housing. It is my opinion the current houses will be razed and they will become rental properties that will be rented for the current going price/bedroom (or possibly higher rents if the cost of rebuilding can be recouped by the landlord).</p> <p>Yes, our homes are over priced. Rental prices are too high. Taxes are high, and the cost to park in front of our own homes now costs \$45/vehicle. Increase the density around me and you have greatly increased the noise factor (my greatest annoyance), the number of cars and trash bins, light pollution, and landlords who don't live on the properties and are not as committed to property upkeep.</p> <p>I was an IU student at one time. I lived in dorms, apartments, and rental houses. I am a grown adult now. I purchased my home because I value a less noisy, less transient environment. If it weren't for the "Quiet Nights" program installed by Mayor Kruzan's administration, I would have had to move years ago.</p> <p>Just because I don't want to live in a high density setting doesn't mean I am against students. It does not mean I am against neighbors who are "not like me."</p> <p>I believe the city has ample space downtown, around switchyard park, and the old hospital site to create more dense housing, and it wouldn't infringe upon homeowners who wish to maintain a less dense neighborhood.</p> <p>If I read the UDO correctly, the corner lot "plexes" could be 40 feet tall. I currently have one story buildings all around me, and while I would not oppose a neighbor who wanted to add a story to their existing home, I cannot fathom 40 foot buildings surrounding my home. This height restriction is particularly alarming, as are concerns regarding driveways, setbacks, and parking.</p> <p>On Friday night, my husband and I were driving home through Elm Heights at 10 pm. We passed a small house (on a small lot) that had close to 100 young adults in the driveway and yard. Can you imagine the noise? It sent chills up my spine. Not because I don't like young people or believe others should not be allowed to entertain at their homes, but because I live only one mile away and foresee that my neighborhood will become completely student housing when loud, overcrowded parties such as this become the norm in my neighborhood.</p> <p>The city used to care about my privacy and sense of peaceful living. It enacted codes that restricted the number of unrelated person's who could rent the houses next to me. The new proposal makes a complete u-turn and encourages two to three times the number of people who occupy the homes next to me.</p> <p>When I was looking to buy my first home 30 years ago, I was restricted as to where I could buy due to my income. I believe this happens in every city across American and the world. Why is it okay for my city government to tell me that they are going to change the zoning in our city so people who can't afford to buy and live in the house next to me can move in? If a person can't afford to buy the house next to me now, how will they be miraculously able to buy it just because it can become a triplex? This logic does not play out. The house will be bought by a developer who will raze the house, turn it into a triplex, and rent it to 3 times the number of people who currently live there. Does that mean that housing has become more affordable? Not from my viewpoint.</p> <p>I have read in several sources that Bloomington is already 2/3 rentals. Where do you plan for families to live? I raised my three children in this neighborhood which is where I could afford to live when it came time to purchase a home. I would not have been comfortable doing so if there had been parties of 100 students in the yard next to me. We nearly could not drive down the street Friday night for all the cars parked down the road. There was alcohol everywhere, and although I did not drive by after 11 pm, I'd bet the neighborhood was anything but quiet.</p> <p>So where are families to go? I am at retirement age now. Where will I go? I don't wish to give up my privacy and yard for a condominium lifestyle yet. Where will the other retirees and grandparents who wish to have their families visit go?</p> <p>Are there neighborhoods that will not be affected by the UDO zoning changes? How about HydePark, The Stands, Kensington, and Stirling Woods? And Hoosier Acres and Blue Ridge neighborhoods? Homes there are larger and more expensive, so it seems unlikely they will be razed to build tri or fourplexes. It would not be economically feasible, but in my neighborhood, Arden Place, Park Ridge, Green Acres, and other core neighborhoods that is not the case.</p> <p>I deliberately did not buy a home adjacent to a shopping mall, an apartment complex, a bar or commercial property. I bought a home in a relatively quiet neighborhood where I could raise my children, garden, and live in a peaceful setting. It is such a betrayal for my city to change the zoning that will take my serenity away, especially when there are so many other options to explore.</p> |
| 8/25/2019 19:08:38 | |

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| 8/25/2019 20:28:15 | <p>I am concerned about the elimination of single family residential zoning. I will speak here about my concerns for my neighborhood, which is now in the Residential Core (RC) (it would shift to R3 if the UDO is approved). In general, please consider that a university town where students comprise half of the population does not behave the same way as a non-university town.</p> <p>(1) I believe that it is misguided to think that upzoning is going to increase affordability. I think it likely that the opposite will occur: increasing density will lead to increased housing costs. Our RC neighborhoods will be under tremendous pressure. Developers will be likely to buy up relatively affordable, older single-family houses and demolish or renovate them to become duplexes and triplexes, which are likely to appeal to students and others who can afford the increased costs. New construction is extremely expensive, and these prices will not be affordable. I think it a virtual certainty that over time, current residents will be pushed out or will choose to leave because the fabric of their residential neighborhoods will come undone.</p> <p>(2) Core neighborhoods are already dense. The RC infrastructure does not support increased density. Parking alone is already in short supply on many of our RC residential streets.</p> <p>(3) Tearing down perfectly good houses is ecologically unsound. We do not need to build in 2019 for "climate refugees" who are not even a reality yet, and who will also have many other options between the coasts and Bloomington.</p> <p>(4) Bloomington already has plenty of room to grow within the city limits.</p> <p>I also do not support by-right ADUs. Imagine a scenario where a block sees several ADUs, which become Airbnb rentals. The character of the residential neighborhood can completely change. Is this what we want?</p> |
| 8/25/2019 20:53:08 | I would like to preserve single-family housing in ALL core neighborhoods. |
| 8/25/2019 21:51:59 | <p>Exclusionary zoning that allows only single-family homes has deep roots in racist housing practices.</p> <p>The current UDO creates more opportunities for social equity with ADUs allowed by-right and duplexes and triplexes allowed by conditional use in R1, R2, and R3 zones and by-right in R4. We need this "missing middle housing" in ALL NEIGHBORHOODS to add to local housing supply.</p> |
| 8/25/2019 21:55:39 | <p>Accessory Dwelling Units: Currently, the UDO draft allows for 1-bedroom and 440 sq. ft. maximum for unattached ADUs. This is too small. Other accessory structures, such as garages, are allowed to be much larger.</p> <p>ADUs should be allowed to have the same footprint as these other accessory structures: in R2 and R3 zoned areas this is 840 sq. ft. and 580 sq. ft.</p> <p>ADUs should be allowed to be 2 bedrooms. 2 bedroom ADUs would allow for a small family, or a couple with a remote worker, or a single parent and child, or a senior and caretaker, to live in an ADU.</p> <p>Proposed ADU specifications are too restrictive. Almost no property in Bryan Park meets the minimum lot size and more than half of all RC properties don't meet minimum lot size.</p> |
| 8/25/2019 22:01:16 | 20.02.20 Residential Zoning Districts, (h) RMH: Manufactured/Mobile Home Park. There is currently no maximum impervious surface requirement for the entire development, although each dwelling site has a max. 65% impervious surface coverage. I think the entire development should be required to have some PERVIOUS surface, even if it's only 10%. Too much impervious surface is bad for stormwater runoff, and providing additional green space helps as a carbon sink and beautification as well. |
| 8/25/2019 22:04:45 | 20.02.40 Non-Residential Zoning Districts, (b) Parks & Open Space. Why is there no maximum for impervious surface coverage? This is particularly important here, and totally normal for PARKS to have lots of pervious surface. Is this just an oversight? Even if other rules for this zoning district ensure there is greenspace, the chart on pg. 50 should also include a maximum amount of impervious surface. |
| 8/25/2019 22:08:50 | 20.03.10 General (e) Additional Use Standards in the MD Character Overlay Areas. pg. 61. (3)(C) University Village Character Area. I see that "personal services" are not allowed in the UV character area. It seems to me that professional services such as a psychologist or lawyer should be allowed, at least on upper floors. That seems a great second-floor use in this district. |
| 8/25/2019 22:10:26 | Why is "Recreation, outdoor" not an allowable use in the Parks/Open Area district? It makes no sense! |
| 8/25/2019 22:11:01 | <p>Missing Middle Housing addresses social equity needs in neighborhoods. Development is not keeping pace with the number of people who want to live in Bloomington.</p> <p>Housing prices continue to soar to new heights because supply is not keeping pace with demand. In single-family zoned neighborhoods, neighborhoods are turning into preserves for wealthy/middle class as housing costs increase beyond what lower-income families can afford. This is exclusionary zoning.</p> <p>The most socially equitable way to densify is to include a wide diversity of housing types, and specifically "missing middle" housing, as the Comprehensive Plan calls for. Some people may never be able to purchase a home or rent an entire house, but that doesn't mean they should be excluded from our neighborhoods and segregated in certain areas of town (often with poorer access to jobs and amenities, and with greater exposure to air pollution).</p> <p>Missing middle housing, such as the duplexes, triplexes, and accessory dwelling units allowed in the Adoption Draft, would mark a long overdue end to exclusionary, single-family zoning.</p> |
| 8/25/2019 22:13:22 | 20.03.30 Use-Specific Standards. (b) Residential Uses, (4) Dwelling, Triplex and Fourplex. (pg. 69, pdf page 87). I think there is a typo here. (4)(A) says "In the R1, R2, and R3 zoning districts, duplex dwelling shall only be allowed on a lot or parcel..." This should be "triplex and fourplex" instead of "duplex." |
| 8/25/2019 22:15:11 | Pg 72 of the document (pg. 90 of the PDF), (10)(A) has two typos. First sentence says PD instead of PUD, then later in the sentence it says "Chapter 20.07Definitions)" Remove) and put a space after 20.07. |
| 8/25/2019 22:17:58 | 20.03.30 Use-Specific Standards, pg. 74 (PDF pg. 92): (C) Soil Quality. Does a property owner or tenant have to prove the soil is not contaminated even if they are just growing food for themselves? This seems onerous. If the intention is to require soil sampling and testing only if the food is to be sold, that needs to be specified. |

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| 8/25/2019 22:18:04 | <p>Missing middle housing is important for climate action. The carbon savings from 'middle housing' are voluntary, self-financing and immense. A duplex, a triplex and a fourplex can cut a block's carbon impact 29% Duplexes, triplexes and quads can also reduce driving—and save everyone money</p> <p>As Bloomington continues to grow, density is far better than sprawl. But to achieve this, we must diversify our housing stock.</p> <p>Exclusionary zoning exacerbates housing affordability challenges by creating artificial scarcity, driving up prices. This in turn prices out from our community an increasing number of low- and moderate-income individuals (the "drive 'til you qualify" phenomenon). This, too, increases commute times, vehicle emissions, and congestion. It also reinforces cycles of poverty by forcing lower-income individuals to spend a large portion of their income on vehicle ownership, maintenance, and fuel.</p> <p>As a rule, detached single-family zones (exclusionary zoning) have the largest carbon footprint among housing types. This is because they are, typically, larger than other housing types and also don't share walls, floors, or ceilings with other units, leading to greater energy use. Exclusionary zoning that only allows this least-efficient housing type can have a significant climate impact.</p> |
| 8/25/2019 22:20:11 | <p>20.03.30 Use-Specific Standards. Page 75, PDF page 93: (7) Methadone or other treatment facility... (B) mentions "donors", but the patrons of these establishments are not donors. Maybe this is left over from some kind of blood or plasma bank regulation, but the wording is not appropriate here.</p> |
| 8/25/2019 22:21:02 | <p>Plan Approval Process: This UDO creates the streamlined and predictable plan approval process for housing developments that Bloomington sorely needs. Shorter approval times keep costs down. Long review periods increase project costs.</p> <p>Part of the determining factors for rent price or purchase price of a new housing unit is cost to build. Decreasing the amount of time it takes to get housing developments approved, can help to keep developer costs down.</p> |
| 8/25/2019 22:23:11 | <p>Pg. 86 (PDF pg. 104) - Accessory Dwelling Unit. How would someone know they needed a permit for an ADU if they are not doing significant building or renovation? For example, an attached ADU when a separate building entrance and kitchen were already present? In this case no building permit would be required.</p> |
| 8/25/2019 22:27:24 | <p>20.04.30 Environmental Standards, (d) Siltation and Erosion Prevention (pg. 103, PDF pg. 121). (9) Soil Constraints. I think there is a wording error here. The way the paragraph is written makes it sound like stabilization measures shall be minimized to the maximum extent practicable. I don't think that's the intention. NEXT: (j) Lake Watershed Areas, (6) Redundant Stormwater Quality Measures. This section assumes there will be a homeowners association that will provide financing. But what if it's a single property owner? The language should be expanded to allow for this possibility. (PDF pg. 131)</p> |
| 8/25/2019 22:30:10 | <p>20.04.50 Access and Connectivity. (d) Pedestrian and Bicycle Circulation. (8) Minimum Tree Plot Width. "Except as specified elsewhere in this UDO, tree plots may not be less than five feet and shall be planted with grass." Shouldn't the default be that they be planted with trees?</p> |
| 8/25/2019 22:37:45 | <p>20.04.60 Parking and Loading. PDF pg. 165. (8) Electric Vehicle Charging Stations. I disagree that EV parking spaces should not count toward the maximum number allowed. The future of passenger vehicles is EVs, so we should not be building these spaces as ADDITIONAL parking, but rather as part of the maximum allowed parking. We want to discourage gas-fueled vehicle use and encourage the use of EVs, per the principles in the Comp Plan.</p> |
| 8/25/2019 23:53:05 | <p>1. I understand the push for affordable housing in cities all across the country, as well as in Bloomington. I also believe that Bloomington is somewhat different than the average city because of the large number of IU students & our 75% rental rate. Bloomington does not have many city neighborhoods right around the downtown. If we want young professionals to move to town with start ups & other businesses, then we need to have some single family neighborhoods as a choice for their young families. I believe that they want safe, quiet family-oriented neighborhoods for their kids to grow up in. And I don't think that quadplexes on every corner intersection in a neighborhood, with 8x4=32 adults & their cars will enhance family life at all. In particular, there's no control for those 32 on each corner not to be all students. 2. I'm assuming the most of these '-plex' buildings will be rentals. To me, that means more concrete for parking, less landscaping, & way more cars, so less appealing look for a neighborhood. It also means to me that there will be money leaving town to out of town developers, not staying in town to increase local value.</p> |
| 8/26/2019 4:28:57 | <p>The current draft of the UDO calls for allowing duplexes and triplexes to replace single family homes in the core neighborhoods. This would be extremely destructive to these neighborhoods. The result would be that developers would buy single family homes in what are now the most affordable neighborhoods in the city and replace them with apartments. Most of these would become student rentals. The neighborhoods would become less desirable for families, and less affordable. Parking is already at a premium in the old neighborhoods that were originally settled before cars were common. Families which usually have one or two cars would be replaced by 6 to 9 students with up to 9 cars. Lawns, gardens, and trees would be replaced by larger buildings and parking, thereby increasing stormwater runoff and harming sustainability.</p> <p>The mayor has talked about existing neighborhood restrictions placing hardships on minorities, especially African Americans. My neighborhood, the Near West Side, was for over half a century the only part of Bloomington where African Americans could buy homes, and many did. A great many of the homes in the Near West Side were owned and occupied by African Americans, and some of those families still live here. The current UDO draft would seriously degrade the quiet residential character of this historically diverse neighborhood.</p> <p>William Baus 1210 West 8th Street Bloomington, Ind. 47404 Baus1210@gmail.com (812) 339-1210</p> |
| 8/26/2019 4:59:19 | <p>I am very happy that the UDO draft has made denser housing options a permitted and conditional use for the majority of zoning districts within Bloomington. Denser housing located near community amenities (grocery stores, restaurants, event venues, schools, places of work or worship, etc.) lend a positive effect on both the natural and built environment by reducing reliance on inefficient personal vehicle usage. Furthermore, denser residential communities can be serviced more efficiently by public services and utilities by removing a geographic and spatial constraint; thus reducing operations, maintenance, and sustainability costs to the infrastructure of these services and utilities that Bloomington and its citizens would be burdened with.</p> |
| 8/26/2019 5:27:55 | <p>I am proud to see that the city has decided to take steps towards moving away from single family housing. Single family housing has the unfortunate history of being exclusionary to all but the mildly affluent or greater. With the shift towards allowing multifamily units, this added density will desegregate communities by the inclusion of attainable housing options for residents of Bloomington at all levels of the economic spectrum.</p> |

Public Review #6 - UDO Adoption Draft (Responses)

| Timestamp | Please provide any comments or information to consider for the UDO Adoption Draft. |
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| 8/26/2019 10:48:33 | <p>We NEED a YES AND approach to housing, YES to more Single Family Homes AND Yes to more TYPES of housing. We need to diversify our housing stock so people get to choose where they live and in what style of home. We need ALL of these options and more in the housing crisis we are in today. Why is this a Anti-racist issue... well because of classism and racism an their intersection. LESS affordable housing mean less housing for black and brown people period. Less diversity in housing means less affordable housing. Yes to SFH but yes to duplex, condos, urban farmsteads, co-housing and more.</p> <p>We have to think outside of the box these Neighborhood Associations want to keep us in. I listened to Chris Sturbaum BRAG about how he and his father picked and chose who lived in the Prospect Hill neighborhood for the last 40 plus years because they bought and sold so many houses in that area. And of course they didn't seek out diversity or inclusion in who they sold homes to. They didn't try to include affordable housing so that their neighborhood could would be diverse NO they bought and sold to other white people who have in turn bought and sold to other white people. Over and over again locking out change.</p> <p>Replicate that ALL OVER town by 1000% All of the B-town neighborhoods have done the same. We have to change how we do things to gain equity, diversity and inclusion in our community on ALL levels.</p> |
| 8/26/2019 11:05:36 | <p>https://newrepublic.com/article/154618/new-american-homeless-housing-insecurity-richest-cities?utm_source=pocket-newtab</p> <p>This is article describes the way upzoning/upscale development destroys affordable housing. Please don't vote to do this to our currently affordable core neighborhoods. Our low income and fixed income residents don't deserve to be homeless in order to make wealthy out-of-state developers richer. I live on the Near West Side and treasure the sense of community, diversity, and history which our neighborhood enjoys. We don't want duplexes and triplexes forcing our property taxes higher and destroying the peaceful (and extremely sustainable and climate friendly, by the way) community which has been here for over 100 years without being significantly altered. If you don't have time to read the article, at least read the following paragraph:</p> <p>"A clue lay in the neighborhood's accelerating transformation. Up and down her street, old, shabby dwellings—many of them, like the one she rented, casualties of the previous decade's foreclosure crisis, purchased at rock-bottom prices by investors who had simply waited around until they appreciated in value—were being sold, gutted, and reconstructed. Goodman's landlord, a doctor who runs an international nonprofit, told me recently that she didn't renew the lease for financial reasons. "With the area taking off," she explained, "it was the perfect time to unload the property." When we spoke, she was preparing to sell the house."</p> |
| 8/26/2019 11:30:24 | <p>Dear Members of the Commission:</p> <p>I am writing to express my strong support for the Unified Development Ordinance. It helps prepare the City to meet the two great challenges of our time: environmental sustainability and social justice. The proposed changes meet both of these by moving away from a housing model centered exclusively on the single family home and allowing accessory dwelling units, duplexes, triplexes, and in some cases four plexes.</p> <p>The city needs a diverse housing stock that offers affordable options for rent and purchase for those who are working their first jobs or are early in their careers. Currently many such people must live outside Bloomington, and the lack of appropriate housing in town in turn affects the willingness of employers to locate here.</p> <p>Buildings where more than one family lives are more environmentally sustainable in several ways. Shared walls reduce heating and cooling costs and energy use. People tend to live in somewhat smaller spaces. Denser neighborhoods can sustain a better transit system, and they put people within distance of town, so they can also bike and walk.</p> <p>Some residents have expressed concern that these changes would be a boon to speculators. I support any measures to prevent that and to make housing affordable. However, such concerns are not a valid argument against greater density. New housing may, temporarily, be more expensive than old, but that will make older stock (and accessory dwelling units) more affordable, and, over time, it will expand the pool of housing and thus lower prices or at least temper their rise.</p> <p>In voting on the UDO, you will be shaping the Bloomington of 2050. We can expect the climate crisis to become much more acute and the flow of both refugees and those moving from other parts of the country greatly to increase. The question is not whether we want these changes but whether we will be prepared for them. For this reason, the UDO's proposals (perhaps supplemented by others to prevent predatory speculation) are both wise and necessary.</p> <p>Yours sincerely,</p> <p>David Keppel 890 East Sherwood Hills Drive Bloomington, IN 47401-8107 Keppel@sbcglobal.net</p> |

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| | <p>The Environmental Commission of the City of Bloomington makes the following comments (please find specific comments at the bottom):</p> <p>The Environmental Commission's mission is to advise the City of Bloomington on how its actions and policies may preserve and enhance the quality of Bloomington's environment, including the life-supporting processes that natural ecological systems provide to humans and other organisms. We recognize the importance of maintaining wildlife habitat and biodiversity in Bloomington for these systems. We know the Unified Development Ordinance (UDO) is central to all planning decisions made by the City, which means a re-imagining of the code presents Bloomington with a meaningful opportunity to require and incentivize sustainable development and environmental stewardship as we continue to face the reality of a changing local climate. Additionally, we believe the guiding principles outlined in Bloomington's Comprehensive Plan (BCP) necessitate a number of changes to the UDO.</p> <p>As we point out in the attached comments, the proposed changes to the UDO actually increase impervious surface allowances in some zoning areas and do not sufficiently protect riparian areas or flood zones at a time when sound water management strategies are of critical importance both to our local economy and to the health of our waterways. The BCP states that Bloomington will "continue to limit the amount of impervious surface in new development or public improvement projects and increase green infrastructure to reduce urban runoff into storm drains, creeks, and other watersheds" (BCP, 2018). The BCP (2018) also suggests implementation of best practices to reduce nonpoint pollution and encourages the protection of local water sources. These important goals adopted by our Common Council to guide the City's long-term growth and development will only be achieved through development requirements or a thoughtful incentives system, but neither are a substantial feature of the proposed version of the UDO.</p> <p>We know Indiana's climate is changing and our city needs to prepare for warmer seasons and more precipitation. Climate scientists in our own state found that annual precipitation has increased by 5.6 inches and that downpours are more common (Wildhalm et al., 2018). More precipitation means more flooding, which stresses our local infrastructure. Additionally, increased runoff threatens water quality and increases flood risk for communities and wildlife downstream. In light of these threats, we strongly urge the City to make UDO requirements more consistent with the Comprehensive Plan and more reflective of a changing environment.</p> <p>Please let us know if we can provide additional context for the attached comments and recommendations. Our comments are not restricted to water management topics and also highlight some of the proposed UDO changes we support.</p> <p>Thank you for your consideration, The members of the Environmental Commission</p> <p>Resources Bloomington Planning & Transportation Department (2018). Comprehensive Plan. Retrieved April 23, 2019, from https://bloomington.in.gov/planning/comprehensive-plan</p> <p>Widhalm, M., Hamlet, A. Byun, K., Robeson, S., Baldwin, M., Staten, P., Chiu, C., Coleman, J., Hall, E., Hoogewind, K., Huber, M., Kieu, C., Yoo, J., Dukes, J.S. 2018. Indiana's Past & Future Climate: A Report from the Indiana Climate Change Impacts Assessment. Purdue Climate Change Research Center, Purdue University. West Lafayette, Indiana. DOI: 10.5703/1288284316634</p> <p>The following comments are organized by section number, then section title, and then state the comment.</p> <p>20.01.010 (a) Ordinance Foundation, Title Need to better introduce what UDO is, define what UDO stands for.</p> <p>20.01.010 (b) Ordinance Foundation, Purpose Add an additional purpose line that explicitly addresses climate change</p> <p>20.02 Commentary Zoning districts Please define what "missing middle" means when discussing minimum lot area and minimum lot width</p> <p>20.02.020 Zoning districts Front Building Setbacks should include a maximum of 25 feet from the front property line. Sustainability best practices for a compact and complete development for single-family residential blocks use a max 25 feet front setback from the property line (See STAR Communities Credit BE-3). Proposed UDO standards set a minimum, and do not specify a maximum. They should specify a maximum.</p> <p>20.02.020 (a) (1) RE: Residential Estate Would like inclusion of language from old UDO RE district intent to include the purpose to "promote compactness in city structure". It seems like we should encourage compactness all around.</p> <p>20.02.020 (a) (2) RE: Residential Estate This UDO increases impervious surface from 15% to 20%, would like a reduction.</p> <p>20.02.020 (b) (2) R1: Residential Large Lot Unsure how to judge this newly proposed zoning district. Allows for more compact lot, but also has a very high maximum impervious surface coverage 40%. Perhaps there can be a trade off that allows increased vertical density on this type of lot while allowing a lower maximum impervious surface?</p> <p>20.02.020 (b) (2) R1: Residential Large Lot R1 is 20,000 sqft and allows for 40% impervious surface coverage, meaning 8,000 sqft could be impervious surfaces. This is almost the entire lot size of R2, which is 8,400 sqft (and also 40% impervious surfaces), and much larger than R3 altogether which is only 5,500 sqft (45% impervious surfaces). 40% of a 20,000 sqft lot size seems high.</p> <p>20.02.020 (d) (2) R3: Residential Small Lot Reduces min lot area from 7200 sqft to 5500 sqft and lot width from 50ft to 55ft. No issue with this, makes sense when placed with other lot types and stepwise decrease in lot size and width.</p> <p>20.02.020 (e) (2) R4: Residential Urban Unsure how to judge this newly proposed zoning district. Allows for more compact lot, but also has a very high maximum impervious surface coverage 50%. With this being the smallest residential lot offered, why does it also have a decreasing trend in vertical height?</p> <p>20.02.020 (f) (1) RM: Residential Multifamily Would like inclusion of language from old UDO RM district intent to include the purpose to "facilitate compact development patterns..."</p> <p>20.02.020 (f) (2) RM: Residential Multifamily Would like some more explanation/clarification for the calculations for the lot area and change in lot width. Would like a reduced impervious surface coverage, changed from 40% to 60%.</p> <p>20.02.020 (g) (2) RH: Residential High Density Would like some more explanation/clarification for the calculations for the lot area and change in lot width. Would like a reduced impervious surface coverage, changed from 50% to 65%.</p> <p>20.02.020 & 030 RM, RH, & MS "The draft shows an increase in the percentage of impervious surface coverage for several zoning districts. This seems inconsistent with the Master Plan. These should be reduced, at least for the larger lot districts. Common Areas are defined as managed by the development association. All common areas with good quality natural features should be preserved by a Conservancy Easement."</p> <p>20.02.020 (f) (2), 20.02.020 (g) (2), & 20.02.030 (a) (2) RM, RH, & MS Can parking be converted to be a level within the building footprint? This could reduce impervious surface.</p> <p>20.02.020 (g) (2) & 20.02.030 (a) Commentary & (2) RH & MS Mixed Use Student Housing If the stated goal of the newly proposed zoning district MS is to "reduce housing pressures on other areas" by encouraging student housing to locate in areas of the City that will "help realize the goals and intent of the Comprehensive Plan", why are the requirements different between student housing and RH: Residential High Density, if they are to be different only in their locations in Bloomington? Differences include 70% impervious surface cover in MS vs 65% in RH and maximum</p> |

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| 8/26/2019 12:27:04 | I support promoting more housing in core neighborhoods of Bloomington. The nationwide housing shortage affects young adults' ability to afford housing and forces people to live in car-dependent suburbs. |
| 8/26/2019 12:37:01 | <p>For your consideration:</p> <p>The Adoption Draft says it will "discourage" demolition of a single-family house for construction of duplex, and triplex. Amend with specific rigorous language about the forms of this "discouragement."</p> <p>Amend to require owner occupation of one unit of a duplex, triplex, or quadplex. That is, follow the practice for ADUs. Otherwise, especially in single-family residential neighborhoods close to the university, these will benefit developers and rental companies to the detriment of existing neighborhoods without any gains in affordability.</p> <p>How will requirements about occupancy, parking, etc. be enforced? In existing student neighborhoods, over-occupancy is rampant because there is no clear and simple mechanism for determining occupancy and penalizing landlords who violate maximum occupancy regulations.</p> |
| 8/26/2019 12:37:50 | Adding duplexes or triplexes to residential neighborhood has the potential negatively to impact neighborhood in a major way. Rather than a wholesale permission, each case should be separately considered and its neighborhood impact carefully considered. Please do not approve this draft as it presently stands. |
| 8/26/2019 12:42:58 | <p>According to the Comprehensive Plan, Bloomington needs to improve access to affordable housing for a continuum of needs in Bloomington, including people experiencing homelessness, low-income, and moderate-income households.</p> <p>Aligning with that goal (and with many other elements of the Comprehensive Plan), while the the proposed UDO does move in the right directly by allowing and encouraging more density, especially in core areas that already have access to transit, grocery stores, schools, and other community resources, it doesn't go far enough. ADUs should be permitted to be larger to match the square footage of garages.</p> |
| 8/26/2019 13:18:12 | <p>I want to state first that I fully support the proposed UDO as detailed in the August draft. While there are some issues here and there that I would like to see some additional work done, the proposed UDO as written is a big improvement over the status quo.</p> <p>My support for the proposed UDO stems from a number of considerations. First, Bloomington--like most desirable cities big and small across the country--has a serious housing supply problem. By allowing modest missing-middle housing options like duplexes and triplexes throughout our neighborhoods, we provide a way to more easily add housing units. Like with any other good, whether it's a car or food or clothing, the greater the supply, the lower the price. Many people argue that new construction of multifamily units will only make prices and rents increase, pointing to the fact that so many large apartment buildings have been built over the last decade in Bloomington with no corresponding reductions in rent. This is an understandable but misleading reaction. To truly assess whether increased supply improved affordability, we need to examine the counterfactual situation: What would have happened to rents if all of those new multifamily housing units were not built? In that scenario, thousands of people--many of them students--would have been filling up a smaller number of apartment buildings, driving up rents even higher than they are now. The new UDO recognizes this reality by making it marginally easier to add housing. It's also important to recognize the full scope of the dynamics involved in housing markets. People criticize new construction as being far too expensive for most families. And it's true--new construction is more expensive than older housing. But people who move into new housing open up spots in the older housing they move from. This process, known as filtering, is how housing becomes more affordable as more (newer) housing is constructed within cities.</p> <p>Second, the new UDO will right some wrongs by making Bloomington a more racially and economically inclusive place to live. Lower- and moderate-income residents are priced out of many of our city's neighborhoods in part because such neighborhoods are exclusively zoned for single-family homes. Look at a current zoning map of Bloomington and it looks a lot like the zoning maps found in unaffordable cities throughout the U.S.: large uninterrupted swaths of single-family neighborhoods. This contributes to segregation and is one reason why our great schools have such dramatically unequal student populations. Ninety percent of Fairview Elementary students are on free and reduced price school lunch compared to just ten percent of students in Child's Elementary--two schools located only 11 minutes apart from one another. If MCCSC doesn't address such inequities by redrawing attendance boundaries (and they haven't done so since the 1990s), our schools will only be as inclusive as the neighborhoods they serve. And one way to make our neighborhoods more inclusive is to allow modest multifamily units throughout the city so that lower-income families have more options and a better chance at moving to opportunity.</p> <p>Third, the new UDO will clearly be a net environmental benefit for our city and region. One of the most important aspects of sustainability is using scarce land as efficiently as possible. The more we can capture growth closer to the core of our city, the less development pressure there will be further away at the edge of the city and in the county. Growing more compactly makes everything else easier. It improves the feasibility and economics of public transit. It allows more people to walk and/or bike to work. It increases foot traffic in our vibrant downtown business community. It reduces the amount of carbon emissions going into the atmosphere. It reduces the amount of land eaten up by new development further into the Lake Monroe watershed. Allowing more types of housing within the city will help push back against our historically sprawling ways.</p> <p>Finally, the new UDO will make it easier for us to broaden our property tax base. Any new construction means new owners are added to the property tax rolls. That means--all else equal--existing owners pay marginally less, as the amount of total property tax revenue collected by the county is capped every year by the state. In short, the new UDO makes it easier to marginally lower everyone's property tax rate.</p> <p>Cities in Indiana are prevented by the state from doing lots of things to address housing affordability, exclusion, and sprawl. But one tool we have full authority to use is zoning. And the new zoning rules in the proposed UDO do a much better job than the existing ones of allowing more types of housing throughout the city, which will lead to a more affordable, equitable, and sustainable community.</p> |
| 8/26/2019 13:20:44 | I'm strongly opposed to the plan to increase density in any way in core neighborhoods. Please do not wreck our neighborhoods in the name of some theoretical notion of "affordable housing." Bloomington's charm is in its neighborhoods; turn them over to rapacious developers (a tautology, I realize), and you will have done irreparable damage with precious little to show for it. Find other ways to create your "affordable housing" and leave our neighborhoods alone. Real peoples' lives are affected by your decisions--please stop playing games with us. |
| 8/26/2019 13:22:15 | I do NOT support this UDO. I bought a house in a single family neighborhood because that is what I prefer. If I wanted to live in a neighborhood with duplexes/triplexes, etc on the corners I would have purchased property in such a neighborhood. |
| 8/26/2019 14:06:59 | <p>I'm generally in favor of the UDO changes. I support the updates to improve density in single family neighborhoods (And I'm a home owner in one-Park Ridge).</p> <p>I think the UDO could be improved if it could avoiding shifting the balance of owning vs renting as part of the changes by requiring or encouraging ownership as part of increasing density. For example, owner-occupied duplexes, twin homes and condos all improve density but involve ownership.</p> <p>I don't see how the front-facing garage setback requirement furthers the City's Comprehensive Plan goals. It seems like unnecessary bureaucratic burden and I recommend striking it.</p> |

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| 8/26/2019 14:22:57 | <p>It should be noted that the UDO changes allowing new building in some Bloomington residential neighborhoods is a segregationist policy-economic segregation in this case--but in reality no different from policies that allowed 'redlining' of neighborhoods to exclude racial and religious minorities historically.</p> <p>Lack of sufficient affordable housing is an issue belonging to the entire city, and not merely a few 'core' neighborhoods. Wealthy neighborhoods with existing covenants, and which often have the most available space for expansion, have been allowed to 'opt out' of participating in the common solution proposed by the UDO changes. This separation of wealth and privilege will only be exacerbated by the neighborhood changes initiated by the proposed UDO, as increased density with it's associated urban issues dramatically alter older, established areas which have thus far managed a melding of single family, retiree, and young professionals in vital and livable arrangements.</p> |
| 8/26/2019 14:24:51 | <p>I strongly support ADUs being allowed as a by-right accessory use in all residential-zoned areas. A diversity of housing types is one key element of market rate housing affordability, as the Comprehensive Plan and Adopted Draft UDO correctly note. Moreover, permitting people of diverse backgrounds and means to live in our neighborhoods is an element of a socially equitable city, and we should seek to encourage it.</p> <p>However, I believe there are two unnecessary restrictions related to ADUs, and I am requesting that the Plan Commission amend the UDO to remove these restrictions.</p> <p>(1) I believe the permitted square footage of ADUs is unnecessarily restrictive. In the Adoption Draft, square footage is limited to 600 sq. ft. for an attached ADU and 440 sq. ft. for a detached ADU (p. 87). Other accessory units (such as a detached garage) are allowed to be larger based on the context of the zoning district and lot size. Specifically, Table 3-4: Number and Size of Accessory Structures Permitted (p. 85), allows accessory structures to be 580 square feet in R3, 840 square feet in R2, and 1,000 square feet in R1. I believe the size of an ADU's footprint should be governed by Section 20.03.030(g), matching the maximum footprint size of other permitted accessory uses. There doesn't seem to be any legitimate reason for limiting the square footage of ADUs, and the Draft clearly anticipates allowing larger structures, per Table 3-4. The permitted use involved – i.e., the number of families allowed to occupy the ADU (one) – would not change with a slightly larger footprint. Why force the unit to be unnecessarily small or uncomfortable for whomever lives there?</p> <p>(2) I also believe the one-bedroom maximum for ADUs is unnecessary. It is easy to imagine many situations where two bedrooms would be very useful/attractive if not essential to make an ADU viable. Imagine a disabled or elderly loved one living in an ADU who requires a part- or full-time live-in caretaker. Imagine a single mother or father with a young child, each of whom would like a modicum of privacy. Imagine a graduate student who would like a small room to function as an office and/or guest room. Or elderly parents who don't sleep in the same bed for comfort reasons. As with my proposed square footage change, the permitted use – for a single family in our community to live in the unit – does not change whether or not there is one bedroom or two. Why unnecessarily restrict this use?</p> <p>Both of these restrictions unnecessarily and significantly limit who can take advantage of the relatively more affordable ADU housing type. Due to the restrictions we've had in place for ADUs so far, we have seen fewer than 10 of these units in almost two years. In contrast, Bend, OR (a town of 96,000) has seen 298 ADUs in three years, after they removed unnecessary restrictions like these in 2016.</p> |
| 8/26/2019 14:30:46 | <p>I strongly support allowing duplexes and triplexes in the R1, R2, R3, and R4 zones (and quadplexes in R4) for reasons of housing affordability, social equity, and sustainability, all of which are supported by our adopted Comprehensive Plan.</p> <p>When it comes to housing policy, our goals should be to enhance environmental and social sustainability. This means avoiding undue environmental degradation via sprawl and limiting greenhouse gas emissions. It means working to improve housing affordability and enhancing the diversity and inclusion of our neighborhoods.</p> <p>Regarding environmental and climate considerations, we should certainly fight to prevent sprawl. Thus, this means a denser city as Bloomington continues to grow.</p> <p>The most socially equitable way to densify is to include a wide diversity of housing types, and specifically "missing middle" housing, as the Comprehensive Plan calls for. Some people may never be able to purchase a home or rent an entire house, but that doesn't mean they should be excluded from our neighborhoods and segregated in certain areas of town (often with poorer access to jobs and amenities, and with greater exposure to air pollution). If we believe in social equity, we should enact policies that allow diversity of housing types throughout Bloomington, including throughout all neighborhoods.</p> <p>Missing middle housing, such as the duplexes, triplexes, and accessory dwelling units anticipated in the Adoption Draft, would mark an end to exclusionary, single-family zoning, which we should welcome. Exclusionary zoning has always been about keeping people out, which has been documented extensively by many academics, housing policy researchers, and practitioners. Moreover, it is well-researched and proven with empirical studies that exclusionary zoning creates artificial scarcity, helping to drive the housing affordability crisis that we are experiencing in Bloomington.</p> <p>Moreover, exclusionary zoning exacerbates climate change in at least three ways:</p> <p>(1) Exclusionary zoning enables and perpetuates sprawl by preventing more diverse housing types. It leads to the development of green space and increased driving times and congestion. It also makes sustainable transportation modes like walking, biking, and transit less viable due to low population density, overbuilt roads, and automobile dependence.</p> <p>(2) Exclusionary zoning exacerbates housing affordability challenges by creating artificial scarcity, driving up prices. This in turn prices out from our community an increasing number of low- and moderate-income individuals (the "drive 'til you qualify" phenomenon). This, too, increases commute times, vehicle emissions, and congestion. It also reinforces cycles of poverty by forcing lower-income individuals to spend a large portion of their income on vehicle ownership, maintenance, and fuel.</p> <p>(3) As a rule, detached single-family have the largest carbon footprint among housing types. This is because they are, typically, larger than other housing types and also don't share walls, floors, or ceilings with other units, leading to greater energy use. Exclusionary zoning that only allows this least-efficient housing type, when considered at a systems level, can have a significant climate impact.</p> |

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|--------------------|---|
| 8/26/2019 15:10:59 | <p>The Greater Bloomington Chamber of Commerce has been tracking the drafts of this UDO update and providing input for over a year. We'd like to thank the consultants and planning staff for their hard and thorough work on the draft, and for incorporating changes submitted by the Chamber.</p> <p>In particular, we'd like to highlight our support for changes that encourage building more housing in the city and for incentives related to affordable housing. As local businesses attempt to recruit and retain staff, one common challenge is a lack of housing that's affordable for their workforce. Adding to the housing stock at all price points is crucial for the economic resilience of our community. The UDO draft takes importance steps toward achieving this goal.</p> <p>While pleased with many of the changes incorporated into the new draft, we are concerned with Section 20.04.0110(c)(7) that provides for a payment-in-lieu process related to affordable housing. The draft currently states: "The provisions of this Section 20.04.0110(c)(7) shall not become effective until the City adopts administrative procedures for calculating, collecting, accounting for, and spending payments-in-lieu in compliance with all applicable law."</p> <p>A previous version indicated that the City Council – not "the City" – would be charged with adopting these administrative procedures. We support the Council's role in this process.</p> <p>Further, the section does not specify that the procedures be included in the final UDO. The Chamber therefore recommends amending this section to:</p> <p>"The provisions of this Section 20.04.0110(c)(7) shall not become effective until such time as the City Council approves administrative procedures, which procedures are adopted as a part of this ordinance and specifically set forth the methodology for calculating, collecting, accounting for, and spending payments-in-lieu in compliance with all applicable law."</p> <p>The Chamber wants to ensure that the procedures are included in the UDO update so that the process as outlined in this section will be consistent and standardized. We are especially concerned that the administrative procedures are not yet available to the public. That means the public is not able to provide feedback before the payment-in-lieu process is codified in the UDO. At the least, that information should be released before the Plan Commission and Council vote to adopt the UDO.</p> <p>Again, we would like to thank the consultants, the City Administration, and the Planning Department for their excellent work on this updated UDO. We look forward to these new rules being incorporated and stress the importance of the City to abide by this document as it allows for predictability in the development process.</p> <p>Erin Predmore, President & CEO The Greater Bloomington Chamber of Commerce</p> |
| 8/26/2019 15:16:52 | <p>I think it's important for the UDO to make specific reference to sub-area planning for the hospital site, as called for in the Comp. Plan. The Comp Plan also calls for the use of the lifetime community framework for the redevelopment of the site. Therefore, both concepts should be surfaced in the UDO. The proposed maintenance of the current zoning regs for the district (though the term medical becomes health) actually can provide an important blueprint for its development as a zone that supports health-related activities of all kinds. This won't detract from the interest that IU-Health has in keeping a presence there.</p> |
| 8/26/2019 15:28:46 | <p>When I moved to Bloomington, like so many others in my age range, I was a renter. My partner and I struggled to find a home in our price range to buy in a neighborhood that had access to downtown, resources, and amenities. Call us crazy, but we are eager to do our part to protect our climate, and we try to prioritize walking and biking to places we need to go, such as work, the grocery store, and to the park. Homes either required a substantial amount of work to be move-in ready, or were out of our price range. We rented for months longer than we had planned, further putting a strain on our finances. It is clear that Bloomington's housing supply isn't keeping up with the city's housing demand. When a city's housing supply is too low, we need more housing units to stabilize home prices and rents, or else the market will dictate and home prices will rise. Here in Bloomington, our city has a choice to maintain the status quo—and continue our policies that exclude many renters and potential buyers from our neighborhoods—or we can make changes to add to and diversify our housing stock in our neighborhoods.</p> <p>For the reasons I mentioned above, I support allowing ADUs by right in our neighborhoods, and I support allowing duplexes and triplexes by right in our neighborhoods. I do believe ADUs should be allowed to be two bedrooms (instead of one), and be the size of an allowable accessory structure (right now they are required to be much smaller). I also believe duplexes and triplexes should be allowed by right, as we need to diversify our housing stock, increase our housing supply, and increase opportunities for people with diverse backgrounds and income levels to live alongside one another. Making these changes in our housing policy are small steps in the right direction, but by no means an ending point. We have a lot of work to do.</p> |
| 8/26/2019 15:29:29 | <ol style="list-style-type: none"> 1. Height limit: Please reduce the height limit in R2 and R3 zones to 25 or 30 feet. Homes in these areas are single-story or two-story. If a triplex is built on the small lots in these zones, there is a good chance it will take full advantage of the height allowed. A 40-foot triplex building near a single story home will be overwhelming and distressing. The height limit could be raised in the future, once the neighborhoods have started to transition into increased density. In other words, make the transition less shocking by ensuring that building height increases gradually. 2. Rental vs Owner-occupied: With the current plan, all structures in the R2 and R3 neighborhoods could eventually become duplexes and triplexes, with the units in those plexes only for rent. Wouldn't it be better to encourage home ownership of duplex or triplex units? If there are more stringent building requirements to allow the plex units to become homes for sale, it would be good to encourage those extra measures, and encourage developers to sell the units, so residents can own, not just rent. 3. Parking: Some of the narrow streets of the R2 and R3 neighborhoods cannot handle more than a few parked cars. Increasing housing density will add to the problem. Please require duplex and triplex buildings to have at least 1 on-property space per DU (not just 0.5 spaces). 4. Geothermal: There is no mention of geothermal energy systems in the Allowed Use Table under Utilities and Communication. Geothermal should not only be allowed, but encouraged. Besides being energy wise and eco-friendly, geothermal systems eliminate noise from air-conditioners. Noise is a real concern when the number of housing units is increased and are close together, as they would be in plex structures. |
| 8/26/2019 15:56:34 | <p>I'd always felt so good, even proud, of the fact that Bloomington valued its core neighborhoods, unlike so much of Indiana. "The Land of No Zoning" is what I would think to myself while passing through places like Spencer, Seymour (where I'm from), and Scottsburg, among so many others. Now, we can get ready to add Bloomington to the list of places where unscrupulous developers and slumlords can truly get their game on. How fast can we knock that 1920s bungalow down? Bring on the aluminum siding!! How many people can we pack in? How much rent can we charge? How cheaply can we build it? And, most of all, who cares what it looks like? If anyone needs a visual aid for the type of construction to which I'm referring, take a gander at the.... duplex? triplex? whatever it is located at the end of Hunter Avenue. Lovely, isn't it?</p> |
| 8/26/2019 15:57:08 | <p>Dear City of Bloomington Plan Commission: Please put great weight and value on each unique neighborhood, and its identity and the wants and preferences of its residents. Each neighborhood is, after all, the home of the neighbors, who understandably have a sense of pride and ownership for their place in Bloomington. Please make every effort to accommodate the reasonable views and expectations of those neighborhoods' residents, individually and a voiced by neighborhood associations and representatives. The residents of each neighborhood should be able to enjoy the inherent benefits of the neighborhood in which they (often long ago) decided to move to and invest in financially, socially, and otherwise -- and not have that benefit impaired by city-wide/blanket ordinances that substantially alter the nature of any single neighborhood. Preserve the nature and integrity of each neighborhood, the charms and good qualities--the attributes that led many residents to select and establish roots in their given neighborhoods.</p> |

Public Review #6 - UDO Adoption Draft (Responses)

| Timestamp | Please provide any comments or information to consider for the UDO Adoption Draft. |
|--------------------|--|
| 8/26/2019 16:02:27 | |
| 8/26/2019 16:33:59 | <p>By changing the zoning policies it would move our neighborhood into the opposite direction that we want it there. It would cause noise and space issues and make the neighborhood undesirable to live in for home owners. Not to mention it will not provide affordable housing</p> <p>The proposal has a fatally flawed assumption. It will not provide a significant change after 5 years in the availability of low-rent housing - landlords will bring the rents up to market rates as rapidly as they can get away with it, leaving the core residential neighborhoods blighted by student housing like many others, with no net gain to anyone at all.</p> <p>Other alternatives, such as subsidized low cost apartments in the existing apartment neighborhoods near Atwater might work, but blighting the core neighborhoods will accomplish nothing but reduce quality of life (the consultants actually believe a triplex with 3 bedrooms and no parking will have a max of six residents ?).</p> <p>Baloney. Here is what will happen instead of what the planners are falsely assuming: Within a year or a few years at most, all three bedrooms of every triplex will be full of high-rent-paying students , and each will include a partner- there will be EIGHTEEN people and 18 cars for a single parcel, and if you think this won't happen , you haven't been watching. From various statements that city officials have made, it almost sounds like the rezoning is designed simply to punish residents for living where they have lived peacefully for decades. And the actual number of affordable residences that would result, compared to those being created by the many currently planned new apartments complexes (eg, KMart property) will be negligible- only 6 more units were built so far under the similarly motivated ADU plan!</p> <p>I saw this happen in Urbana Illinois, where when they changed the zoning, my childhood home was replaced by a multi unit building, filling the lot, taking down all the trees, and leaving the two neighboring single-family houses looking straight into a wall of apartment windows- making their properties very unattractive to families and drastically affecting property values. I didn't check on taxes, but I would bet they did not go down in tandem with that. I have disturbing photos of this if you don't believe it.</p> <p>In closing, I note with astonishment that there is no limit to the triplex- buildings per block! That may not be easily abused in, say, Elm Heights, but in a neighborhood like Near West Side what's to keep a big developer from buying up an entire block of existing single-family affordable houses and razing the whole block to build two dozen triplexes? No protection of any kind for that is apparent in this many-flawed ungrounded hyper-idealistic fantasy of a proposal.</p> |
| 8/26/2019 16:48:16 | |

Dear Madam/Sir

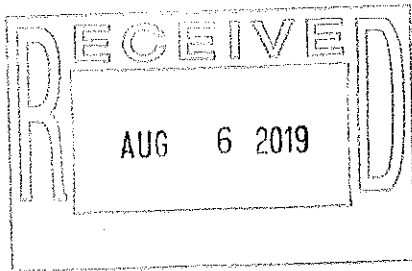
We have recently bought a house in Green Acres, at 421 N. Clark Street, counting on our daughter leaving there while studying at IU, but that plan didn't work out. So, instead we ended up renting out the house to 3 students. The house can easily support 5 tenants, as it has 5 bedrooms, 2 bathrooms, and 5 parking spots, however it is zoned for 3 adults only.

We hereby motion to adjust the UDO such that homes in single family residential areas are allowed to accommodate up to 5 (or at least 4) unrelated adults, as long as there is a separate bedroom and a separate parking spot available for each tenant.

Please let us know if you have any questions.

Thank you!

Aleksey Yezerets



1711 E. Hunter Avenue
Bloomington, IN 47401
August 2, 2019

Secretary
City of Bloomington Plan Commission
401 N. Morton St.
Suite 130
Bloomington, IN 47401

Dear members of the commission:

I write to restate my opposition to the repeal of the current UDO and the adoption of a new zoning ordinance. Despite the many claims made in the proposal that encouraging "missing middle" housing will lower rents and create more affordable housing, there is no real evidence that the proposed rules will have that effect. Cities that have adopted "missing middle" policies have not experienced a decline in rents. Bloomington's own experience bears this out. Despite a massive expansion in the number of apartments, housing affordability continues to decline, and housing prices and rents continue to rise. Increasing supply does not lead to a decrease in price.

Rather than following the latest policy fashion, I urge the commission to build more purpose-built low-cost housing instead.

Sincerely,



Nick Cullather

VOTES ON THE ISSUES PRESENTED
At the
25 August 2019
ELM HEIGHTS NEIGHBORHOOD ASSOCIATION MEETING

Accessory Dwelling Unit (ADU)

| | |
|--|----|
| Support the change to a Permitted Use (no public meeting): | 1 |
| Press for continuing as a Conditional Use | 55 |
| Abstaining | 1 |

Small scale multi-family uses in single-family zones

| | |
|--|----|
| Object to introduction of the multi-family uses in single family zones | 56 |
| Support the introduction of the multi-family uses in single family zones as proposed | 1 |

[The third option, Support as above but make "Single family attached" conditional use like the others, was deleted before the final vote.]

Fraternities and Sororities

Agree with above suggestions (firm up the definition of fraternities/sororities and "listing of frats in MS and MI should NOT BE ALLOWED (changed from SHOULD BE CAREFULLY CONSIDERED)"

unanimous

Group care home, FHHA small and Opioid rehabilitation home, small

Request additional language to ensure that these are bona-fide residences where ongoing treatment and/or supervision is rendered.

unanimous

Multi-family zones

Request changes to the neighborhood parking zones so as to establish separate neighborhood parking zones for the single-family areas and nearby multi-family areas

| | |
|-----|----|
| YES | 56 |
| NO | 1 |

Step back on the changes to RM in the UDO now, then when the new zoning maps are drafted, perform a careful inventory of the uses, character, and adjacency to single-family zoned areas, and based on that, apply different zones as warranted.

| | |
|-----|----|
| YES | 56 |
| NO | 1 |

Ask the planners for a summary of how "student housing or dormitory" differs from other apartment uses, who it benefits, and how its regulations differ.

| | |
|-----|-----------|
| YES | unanimous |
|-----|-----------|

Enforcement

Do you have confidence in the city's enforcement of zoning issues in the neighborhood?

NO unanimous

If you have made a complaint to the city, was it resolved?

YES 5

NO 18

Should the city improve its enforcement capability to address the new uses and to avoid violations that cut against affordability and harm the neighborhood?

YES unanimous

Should an affidavit of occupancy as in West Lafayette be considered here to help with the new enforcement demands that would come with the newly permitted multi-family uses?

YES unanimous

Good Evening. My name is Jon Lawrence and I'm an Executive Committee Member of the Council of Neighborhood Associations. I also live in Bryan Park.

I'm here to discuss proposed changes in the UDO regarding density in neighborhoods. I could, and often do, argue this issue on the merits of adding multi-family housing forms in existing neighborhoods. There are a number of reasons why I don't think this makes sense. Price-points won't be affordable. It takes away a dwindling stock of already affordable housing. Etc... Other people are here tonight to argue the merits. But I'm here tonight to argue against this from a more basic point of view. The Comprehensive Plan says don't do it....

The city spent thousands of dollars and thousands of community hours to craft and then pass the Comprehensive Plan. You, as a body, passed this important document as well as City Council. And the sole intent of the Comp Plan is to guide in the drafting of the UDO before us tonight.

On the screen are 6 paragraphs I pulled from the Comp Plan. I'm not going to read them all to you because it would take too much time. But I will read the bold portions that make my point:

1. **Existing core neighborhoods should not be the focus of the city's increasing density.**
2. **Bloomington's older urban, small scale, compact, single-family housing stock located primarily around the city center and university provide some of the city's more affordable housing stock and must be protected.**
3. **More market opportunities may exist to convert single-family homes from student-rental to owner occupied.**
4. **Avoid placing these high density forms in single family neighborhoods.**
5. **Continue to support and promote affordable home ownership**
6. **The conversion of dwellings to multifamily or commercial uses should be discouraged.**

Those are pretty straightforward statements. Not a lot of interpretation necessary. So I'm a bit confused why we're even having this conversation. Why did we spend all that time and money on the Comprehensive Master Plan if we're not following it?

Please remove multi-family forms from our already dense and affordable neighborhoods.

Thank you.

Comprehensive Plan

(pg 60)

Housing Trends and Issues

Some of Bloomington's neighborhoods are relatively diverse, both economically and by housing type, whereas others are comprised almost entirely of single-family homes and limited in development by covenants. Most core neighborhoods are stable but are trending towards a lower percentage of new single-family homes. With greater density in the city comes the challenge to preserve neighborhood character and the opportunity to strengthen neighborhoods by developing small commercial nodes as community gathering places. **Existing core neighborhoods should not be the focus of the city's increasing density.**

(pg 61)

Bloomington's older urban, small scale, compact, single-family housing stock located primarily around the city center and university provide some of the city's more affordable housing stock and must be protected.

(pg 61)

Now that 1,900 new housing units have been constructed Downtown within the past decade (almost all of them apartments) the market dynamic is shifting. **More market opportunities may exist to convert single-family homes from student-rental to owner occupied.** This can allow more people to have a chance to live in urban neighborhoods, which are often closer to employment, shopping, and other amenities. This may also have the added benefit of reducing automobile traffic and the negative environmental impacts of traffic congestion.

(pg 64)

Policy 5.3.1: Encourage opportunities for infill and redevelopment across Bloomington with consideration for increased residential densities, complementary design, and underutilized housing types such as accessory dwelling units, duplex, triplex, and fourplex buildings, courtyard apartments, bungalow courts, townhouses, row houses, and live/work spaces. **Avoid placing these high density forms in single family neighborhoods.**

(pg 65)

Continue to support and promote affordable home ownership as another method of permanent affordability that can help to raise and keep residents from poverty while they build equity and security in the local community.

(pg 84)

A few locations may support increases in density and multifamily residential uses when adjacent to higher volume roads, or near major destinations, or located along neighborhood edges that may support small-scale neighborhood mixed uses. It is important to protect the existing single-family housing stock within this district. **The conversion of dwellings to multifamily or commercial uses should be discouraged.**

Average Sales Price of Single-family Units (2015)

Bryan Park.....\$146,141.

Perry Township \$222,667.

Monroe County \$202,763.

State-wide Average..... \$159,702.

Property Sales 2015
Bryan Park Neighborhood
 Single Family Houses

| Address: Single-family Sales | Price | owner/rental |
|------------------------------|-----------|--------------|
| 1207 S Fess | \$137,000 | Owner |
| 1205 S Henderson | 132,500 | Rental |
| 1104 S Park | 122,000 | Rental |
| 1402 S Grant | 158,000 | Owner |
| 1314 S Grant | 189,900 | Owner |
| 1206 S Grant | 135,000 | Owner |
| 1200 S Grant | 149,900 | Owner |
| 1218 S Washington | 127,000 | Rental |
| 1112 S Washington | 175,000 | Rental |
| 1101 S Washington | 157,500 | Owner |
| 1104 S Washington | 136,000 | Rental |
| 1423 S Washington | 151,000 | Owner |
| 1411 S Washington | 127,500 | Owner |
| 1428 S Washington | 156,500 | Rental |
| 1004 S Washington | 140,500 | Owner |
| 608 S Washington | 143,000 | Owner |
| 415 E Dodds | 127,750 | Rental |
| 1005 S Lincoln | 159,900 | Owner |
| 1005 S Palmer | 135,000 | Owner |
| 1100 S Dunn | 208,000 | Owner |
| 1023 S Palmer | 150,151 | Owner |
| 1402 S Stull | \$96,000 | Rental |

All Single-family Houses

| | |
|-------------|--------------|
| Total Sales | \$3,215,101 |
| Count | 22 |
| Avg Price | \$146,140.95 |

Rental Houses

| | |
|-------------|-------------|
| Total Sales | \$1,072,750 |
| Count | 8 |
| Avg Price | \$134,094 |

Owner Occupied Houses

| | |
|-------------|-------------|
| Total Sales | \$2,142,351 |
| Count | 14 |
| Avg Price | \$153,025 |

Property Sales 2015
Bryan Park Neighborhood
Non Single-family Residential

| Address | Price | Description | |
|------------------|-----------|-------------------------------|------------------------|
| 609 S Washington | \$235,000 | Multi-unite: duplex (RM Zone) | no unit owner-occupied |
| 707 S Washington | \$155,000 | Multi-unite: duplex (RC Zone) | no unit owner-occupied |
| 703 S Washington | \$132,000 | Multi-unite: duplex (RC Zone) | no unit owner-occupied |
| 1021 S Wanut | \$275,000 | Office building (CG Zone) | |
| 1100 S Woodlawn | \$875,000 | Apartment Complex (RC Zone) | |
| 1326 S Dunn | \$5,000 | Pocket Park (PUD Zone) | |
| 1400 S Dunn | \$450,000 | (PUD Zoning) | |

Other

They are not just not bad; they are good!

Besides just not having the same elements of concern as larger breeds of goats and other livestock defined as “large” or “medium” by the UDO, these animals would very positively contribute to households, our neighborhood, and the town.

Part of community joy and identity: my back yard, with two Nigerian dwarf goats, is a regular stop for family walks around our neighborhood, with kids of all ages and with dogs. When they saw a sign about a zoning variance hearing last week, many have asked what they can do to support keeping the goats, and quite a few have written letters, emailed, or called in support. Even neighbors that I didn’t know before have stopped to ask how they can support. At the hearing, several speakers brought up how the goats bring a delightful and bonding character to the neighborhood.

Part of plan for reducing waste: in addition to their regular special goat food and alfalfa hay, the goats (like chickens and some dogs) may eat food scraps as treats. Furthermore, their waste can go to gardens for fertilizing.

Part of affordable food plan for a household: especially those who are lactose intolerant know that goat milk is very expensive, especially when guaranteed that the animals have been treated well. One kidding will have the doe in milk for at least a year. Personally, this past year I was also able to trade the kids from a kidding for a year’s worth of a CSA, which also helped significantly with costs associated with obtaining healthy, local food.

These are just a few reasons that the goats are actively good and appropriate for an urban environment.

Recognizing that as a city we do care deeply about being good neighbors and about being good stewards of land and animals, I propose these as a starting point for a conversation about good goat care inside city limits (and out):

1. Must have two (Storey p. 31 insert box) or else they get depressed and do not thrive.
Beyond that, could use goat/space ratios proposed by Storey as a starting place to decide how many animals per lot.
2. No intact bucks.
3. Bucklings banded or castrated by 2 months of age.
4. 4-foot fence, made of goat or horse fence and/or panels.
5. Functional waste management plan.
6. Feed, forage, water, and salt/mineral blocks.
7. Shelter (again, can start with ratios proposed by Storey).

I believe that it is in our best interests as community members to count dwarf and pygmy goats under different rubrics than standard size goats and other livestock defined as “medium” in the proposed UDO, much as we do chickens and other smaller breeds of animals that are under a human provided nutrition program (not exclusively pasture fed). That is why I am requesting that you include language in the UDO that allows and regulates the keeping of Nigerian dwarf goats within city limits.

Story's Guide to Raising Dairy Goats is the industry standard reference book. It can help to address some of the concerns that might come up about keeping Nigerian Dwarf goats in town.

Why should they be considered different than standard size goats and others in the “medium livestock” category?

Size:

Burros: 180 to 1,060 lb (with loud bray lasting around 20 seconds and heard for about 2 miles)
Standard size breed goats: Boer breeders are 80-100lb, La Manchas are 130-165 lb, Nubians are 135-175 lb. There are many more, but those are averages.
Sheep: according to breed and gender, 220-350 lb
Swine: many different breeds, but full size full grown can reach well above 750 lb
Pygmy or pygora goats: around 75 lb
Nigerian dwarf goats: 25-45 lb

Space per goat. According to Storey p. 3 insert box), standard goats need 10 sq ft per goat covered plus some outdoors (particularly if they are pasture fed). Also according to Storey (p. 9 paragraph 2), three dwarves thrive in the space of one standard. The most important feature of the outdoors space for goats is that they have a way to jump up, both to feel safe and for exercise. This can be accomplished with various kinds of indoor or outdoor platforms, cable spools, decommissioned water barrels, etc.

Smell. Neutering (wethering) a male vastly cuts down on or eliminates typical goat smell (Storey p. 2, paragraph 1). Females don't have the same glands that produce that recognizable smell in non-wethered males.

Waste. These goats poop and pee in very specific areas. Where they do, one can keep wood chips (outdoors) and straw (indoors) laid out, which catches the waste and begins the compost process. The wood chips and straw can then be used as fertilizer in gardens, for the homeowner as well as friends and neighbors. It's actually in high demand, because goat poop is not as hot as other new waste, and they're like little time release pellets. So, if managed like chicken straw, cat litter, or hamster wood shavings, there should not be a pile up of waste or used bedding at all. (And it's much more urban agriculture friendly than most cat litter.)

Sounds. These goats basically do not make noise unless they are in strong distress. Even when dogs or people walk by or stop to greet them, they do not bleat or “cry.” The most they might do is snort in glee just a little bit if you give them a mango peel.

| Section Number | Section Title | Comment on Section | Changed? | |
|-------------------|-------------------------------------|---|----------|---|
| 20.01.010 (a) | Ordinance | Need to better introduce what UDO is, define what UDO stands for. | No | |
| 20.01.010 (a) (1) | Ordinance | Would like more explicit mention of other plans, like in the original UDO. Should include mention of other plans like the Bloomington Habitat Connectivity Plan, Sustainability Action Plan, etc. To show that environmental plans are important. | Yes | Now mentions the Sustainability Action Plan by name in section 20.01.010 (b) (1) |
| 20.01.010 (b) | Foundation, Title | Add an additional purpose line that explicitly addresses climate change | No | |
| 20.01.020 (b) (1) | General Applicability | Why does this exclude capital improvement projects? Why are these held to different standards? Would like clarification on this. | Yes | Nothing about capital improvements is listed in this section. |
| 20.02 Commentary | Maximum impervious surface coverage | The last line of this paragraph states "impervious surface coverage maximums are important for aesthetics and water quality reasons." Neglecting to also include the importance of impervious surfaces for storm water management and flood control, which prevents property damage, downplays the benefit of a lower maximum impervious surface coverage standard. | Yes | Line added "The City may consider reevaluating stormwater runoff allowances and on-site detention/retention requirements for new developments to ensure that anticipated rainfall volumes are accommodated to reduce the risk of flooding and overwhelming a City existing A definition for "missing middle" appears later, in commentary for section 20.03 Missing Middle Housing & Affordable |
| 20.02 Commentary | Zoning districts | Please define what "missing middle" means when discussing minimum lot area and minimum lot width | Partial | |
| 20.02.020 | Zoning districts | Front Building Setbacks should include a maximum of 25 feet from the front property line. Sustainability best practices for a compact and complete development for single-family residential blocks use a max 25 feet front setback from the property line (See STAR Communities Credit BE-3). Proposed UDO standards set a minimum, and do not specify a maximum. They should specify a maximum. | No | |
| 20.02.020 (a) (1) | RE: Residential Estate | Would like inclusion of language from old UDO RE district intent to include the purpose to "promote compactness in city structure". It seems like we should encourage compactness all around. | No | |
| 20.02.020 (a) (2) | RE: Residential | This UDO increases impervious surface from 15% to 20%, would like a reduction. | No | |
| 20.02.020 (b) (2) | R1: Residential Large Lot | Unsure how to judge this newly proposed zoning district. Allows for more compact lot, but also has a very high maximum impervious surface coverage 40%. Perhaps there can be a trade off that allows increased vertical density on this type of lot while allowing a lower maximum impervious surface?? | No | |
| 20.02.020 (b) (2) | R1: Residential Large Lot | R1 is 20,000 sqft and allows for 40% impervious surface coverage, meaning 8,000 sqft could be impervious surfaces. This is almost the entire lot size of R2, which is 8,400 sqft (and also 40% impervious surfaces), and much larger than R3 altogether which is only 5,500 sqft (45% impervious surfaces). 40% of a 20,000 sqft lot size seems high. | No | |

| | | | | |
|--|--|--|----|----------------------|
| 20.02.020 (d) (2) | R3: Residential Small Lot | Reduces min lot area from 7200 sqft to 5500 sqft and lot width from 50ft to 55ft. No issue with this, makes sense when placed with other lot types and stepwise decrease in lot size and width. | No | |
| 20.02.020 (e) (2) | R4: Residential Urban | Unsure how to judge this newly proposed zoning district. Allows for more compact lot, but also has a very high maximum impervious surface coverage 50%. With this being the smallest residential lot offered, why does it also have a decreasing trend in vertical height. | No | |
| 20.02.020 (f) (1) | RM: Residential Multifamily | Would like inclusion of language from old UDO RM district intent to include the purpose to "facilitate compact development patterns..." | No | |
| 20.02.020 (f) (2) | RM: Residential Multifamily | Would like some more explanation/clarification for the calculations for the lot area and change in lot width. Would like a reduced impervious surface coverage, changed from 40% to 60%. | No | |
| 20.02.020 (g) (2) | RH: Residential High Density | Would like some more explanation/clarification for the calculations for the lot area and change in lot width. Would like a reduced impervious surface coverage, changed from 50% to 65%. | No | |
| 20.02.020 (f) (2), 20.02.020 (g) (2), & 20.02.020 (g) (2) & 20.02.030 (a) Commentary & (2) | RM, RH, & MS RH & MS Mixed Use Student Housing | Can parking be converted to be a level within the building footprint? This could reduce impervious surface. If the stated goal of the newly proposed zoning district MS is to "reduce housing pressures on other areas" by encouraging student housing to locate in areas of the City that will "help realize the goals and intent of the Comprehensive Plan", why are the requirements different between student housing and RH: Residential High Density, if they are to be different only in their locations in Bloomington? Differences include 70% impervious surface cover in MS vs 65% in RH and maximum structure height of 6 stories for MS and 5 stories for RH. I understand MS includes commercial but it seems like it would be ultimately mostly for housing. | No | |
| 20.02.030 (b) (1) | MN: Mixed-use Neighborhood Scale | Should reincorporate some language from UDO CL district intent so that "development should incorporate pedestrian oriented design (scale and massing) and accommodate alternative means of transportation." | No | |
| 20.02.030 (b) (1) | MN: Mixed-use Neighborhood Scale | What is the reason to go up to 75% impervious surface coverage, standing out as higher than any allowance except downtown zones, and also only allow a max structure height of 3 stories? | No | |
| 20.02.030 (b) (2) | MN: Mixed-use Neighborhood Scale | Increased impervious surface coverage from 50% to 75%. Would like to see this max coverage reduced. Would like more explanation about what "build-to range" is. | No | |
| 20.02.030 (b) (2) | MN: Mixed-use Neighborhood Scale | What does "building facade at build-to range (minimum)" mean? | No | |
| 20.02.030 (c) (2) | MN: Mixed-use Neighborhood Scale | Large increase in max impervious surface coverage, changed from 50% to 75% coverage. | No | |
| 20.02.030 (e) (2) | MM: Mixed-use Medium Scale | Inclusion of Landscape area minimum, would like to see this included in the other zones dimensional standards as well | No | Exists in MN as well |

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| 20.02.030 (e) (2), 20.02.030 (d) (2), 20.02.030 (c) (2), 20.02.030 (b) (2), 20.02.030 (a) (2) | ME: Mixed-use Employment | Increase in max impervious surface coverage, changed from 60% to 70% coverage. | No | |
| 20.02.030 (f) (2) 20.02.030 (g) (4) | Multiple MI: Mixed-use | Reduced lot width from 130ft to 50ft Greatly reduced minimum lot area from 21780 sq ft to 5000 sq ft. This seems to | No No | |
| (A) 20.02.030 (g) (6) (A) | Institutional MD-CS: Mixed-use Downtown - Courthouse Square | support increases density of development. Removes language involving preservation of historic structure or compatibility with structures within the Survey of Historic Sites and Structures | No No | |
| 20.02.030 (g) (6) (C) | MD-UV: Mixed-use Downtown - University Village | Removes language promoting the Kirkwood Corridor as a "strong pedestrian-friendly route" | No | |
| 20.02.050 (a) | Planned Unit Development (PUD) | Removed language emphasizing environmental protection and enhancement purposes as outlined in the original PUD District Intent | No | |
| 20.02.050 (b) | Planned Unit Development (PUD) | Improves upon the qualifying standards, and specifically calls out the necessary design features included in a PUD, many of which are environmental in nature. | No | |
| 20.02.060 (a) (4) | Primary Building Roof Design | Could something be included here about green roofs/putting gardens or small trees on roof spaces to help catch water and keep buildings cooler? Or solar panels? | No | |
| 20.03.020 Table of Allowed Uses (Table 3-1) | Residential Uses | It stands out to me that there are no residential zoning districts that are P rather than P* for attached housing, or triplex or fourplex housing. Why is this? The UDO mentions growing the "missing middle" housing, so I expected more definitive Permitted status. Would also like the distinction between attached and detached to be made clear. Also stands out that "Supportive Housing" only has conditional use permit status. it is permitted use nowhere. | Partial | These actually went in the opposite direction, they changed from P* (permitted with use-specific standard) to C (conditional). |
| 20.03.020 Table of Allowed Uses (Table 3-1) | Public, Institutional, and Civic Uses Utilities and | Glad to see that "urban agriculture, non-commercial" (previously called community gardens) is permitted in all zoning districts, as well as the addition of the solar and wind categories in utilities. | No | |
| 20.03.030 (g) (2) (A) | Accessory Uses and Structures - Solar Collector, Ground- or | Does this prevent locating solar collectors being located in side yards? | No | No clarification added. |
| 20.04.030 | Title | The chapter should be titled "Environment" | No | |
| 20.04.030 | Environment | Mixed use development sustainability best practices for compact and complete communities include having a front setback that is not more than 10 feet from the property line. (See STAR Communities Credit BE-3). Proposed UDO setbacks are listed as a minimum instead of a maximum, and are too deep as written. | No | |
| 20.04.030.(c) (1) | Steep Slopes | Steep slope: If these slopes are non-natural but have trees and habitat on them, they should also be considered for preservation | No | |

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| 20.04.030.(c) (5) | Steep Slopes | Add (E) Presence of substantial tree cover on the slope, which would help to reduce erosion. | No |
| 20.04.030.(c) (9) | Steep Slopes | Too vague - work with Planning & Transportation for more detailed language | No |
| 20.04.030 (d) (3) | Siltation & Erosion | Removed standards regarding sedimentation basins construction | No |
| 20.04.030.(d) (3) | Siltation & Erosion | Environmental constraints should specify erosion control measures | No |
| 20.04.030.(d) (3) (B) | Siltation & Erosion Prevention | "Toxic materials or hazardous materials shall be properly disposed of" should specify disposal requirements | No |
| 20.04.030.(d) (3) (F) | Siltation & Erosion Prevention | "Sediment shall be controlled and contained on-site and control measures shall prevent damage to existing vegetation or pavement" should specify control measures | No |
| 20.04.030.(d) (3) | Siltation & Erosion | There is no scale | No |
| 20.04.030.(e) (2) | Drainage - Exemption | Add that "Exemption may only occur if full drainage infrastructure is provided to Planning & Transportation or Plan Commission prior at time of review of development. If not provided then exemption is not acceptable." | No |
| 20.04.030.(e) (4) | Drainage - Stormwater Mitigation Requirements | This call for 100% on-site water management; Stormwater Mitigation Requirements "to a location adequate to receive such runoff" should be defined; What are the "city utility department standards" and do those standards account for the increasing number of heavy downpours we are experiencing? | No |
| 20.04.030.(e) (5) | Drainage - Poorly Drained Sites | Development should not be permitted on "poorly drained sites." Flooding is only going to increase in these areas. | No |
| 20.04.030 (e) (5) | Drainage - Poorly Drained Sites | Standard is building finished floor elevations 2ft above 100 flood level, should this be increased? 2ft above 200 floodplain elevation? There seem to only be a few areas highlighted as within a 200-year floodplain so I'm not sure how much of a difference this would make. | No |
| 20.04.030.(f) | Riparian Buffers | No fertilizer and pesticides/herbicides application should be allowed in buffer zones | No |
| 20.04.030.(f) | Riparian Buffers | It would be great to have a chart and a graphic about what you can do within each section | No |
| 20.04.030 (f) | Riparian Buffers | May want to consider varying buffer sizes depending on drainage basin or stream order. | No |
| 20.04.030.(f) | Riparian Buffers | There should be some discretion for people asking for a variance to have a smaller buffer | No |
| 20.04.030.(f) (1) | Riparian Buffers | Platted lots less than one acre should be subject to riparian buffer requirements as they may still have riparian features | No |
| 20.04.030.(f) (1) | Riparian Buffers | Add ephemeral streams | No |
| 20.04.030.(f) (1) | Riparian Buffers | Add to "reduce the threat of downstream flooding and conserve important wildlife habitat". | No |

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| 20.04.030.(f) (4) | Drainage | This should include ephemeral streams, but with smaller buffers. Ephemeral streams can be significant conveyors of polluted runoff and heavy flows contributing to stream erosion; suggest a minimum lot size of half an acre, not a full acre | No |
| 20.04.030.(f) (4) (B) | Riparian Buffers | "protected with double silt fencing and/or..." - Rationale - one silt fence, even when done properly does not protect the flow of sediment run off in heavy rain storms. A second silt fence will act as an additional check, one that is set at a minimum five feet but no more than 10 feet from the first fence. If additional are required that may be subject to the Planning & Transportation Department enforcement measures. Widen riparian buffer zones beyond what is stated in Module 2 text. | No |
| 20.04.030.(f) (5) (B), (f) (6) (B), and 20.04.030.(f) (5) (C) | Riparian Buffers, Buffer Widths | | No |
| 20.04.030.(f) (5) (C) | Riparian Buffers, Vegetation | Change "may remove invasive species" to "shall remove invasive species" and "natives should not be removed" | No |
| 20.04.030 (f) (5) (C), 20.04.030 (f) (5)(D) | Riparian Buffers - Vegetation | Need to capitalize Natural Resources Conservation Service (NRCS) | No |
| 20.04.030.(f) (5)(D) | Riparian Buffers, Disturbance Activities | Would like more mitigation efforts for these four exceptions | No |
| 20.04.030.(f) (5) | Riparian Buffers | "within 100 feet of a Karst Conservancy Easement." - Rationale: Setbacks for Karst Conservancy Easements should be 100 feet. 10 is not sufficient due to the identified sensitivity and the KCE would not be recognized unless it there were potential negative environmental impacts if disturbed. | No |
| 20.04.030.(f)(7)(d)(i) | Riparian Buffers | "Streets, as needed to achieve connectivity" is too low a bar to pass to put more impermeable pavement in floodplains. Please add "where no other alternatives outside floodplains can be found and where need for new streets has been established" | No |
| 20.04.030.(f) (8) | Riparian Buffers, | This section should include requirements for minimum survival of number of trees or area of plantings; minimum diversity of surviving species; and type and extent of volunteer plants allowed. | No |
| 20.04.030 (f) (9) | Riparian Buffer | Removed rain gardens as a BMP option | No |
| 20.04.030.(g) | Karst Geology | Should have stronger requirements and stronger language | No |
| 20.04.030.(h) | Wetlands | Require a "2 for 1 tree replacement by planting trees within ½ mile of site development. Tree plantings must be at least 2 caliper trees or at least add requirement for trees planted near impervious surfaces. | No |
| 20.04.030.(h) (4) | Wetlands | We should consider reducing this threshold to 1 acre. | No |
| 20.04.030 (h) (2) | Wetlands | References that the "buffer zone required by this subsection (f) shall be established", but the subsection is h. Needs correction unless it is making reference to use buffers corresponding with subsection f - Riparian Buffers, if so needs to be clarified. | Yes |

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| 20.04.030 (i) (3) | Tree and Forest Preservation | References "areas as defined in this subsection (g)", unsure what subsection they are referencing. | Yes | Clarified and changed "subsection (g)" to "subsection (i)" |
| 20.04.030 (i) (3) | Tree and Forest | What is a heritage tree in this context? | No | |
| 20.04.040. (c) (3) (b) | Floodplain, General Standards, Conflicting Provisions | The designation FIRM should be defined. | No | |
| 20.04.040.(a) | Floodplain Purpose | Add to (3) to require planting or replanting undergrowth. | | The last sentence is new: Except as specified elsewhere in this UDO, tree plots may not be less than five feet and shall be planted with grass. <i>The Planning and Transportation Director may allow tree grates, tree boxes, or other appropriate streetscape treatments in areas that anticipate increased pedestrian</i> |
| 20.04.050.(d) (8) | Pedestrian and Bicycle Circulation Minimum Tree Plot Width | Do we have to plant grass in a tree plot? What about native groundcover and trees? | Yes | |
| 20.04.060.(d) | Parking Lot and Loading Minimum Vehicle Parking Requirement | Minimum Vehicle Parking Requirements are too high; "Fraternity or sorority house" and "student housing or dormitory" parking maximums are too high should be reduced. All Maximum Parking lines - The UDO should never say "no requirement" for marking maximums. Retail Sales – the proposed parking maximums are too high, and some of them are increasing since last time. We strongly disagree with this increase, and we advocate for a decrease. | No | |
| 20.04.080.(g) (2) | Buffer Yards, | Reference native groundcover | No | |
| 20.04.080.(g) (3) | Buffer Yards, Buffer Yard Types | Buffer yards cannot overlap | No | |
| 20.04.080.(c) (1) (A) | General Landscaping, Rights-of-way and Easements | Replace Second Sentence = "Plant types shall be utilized from the native species list." - Rationale: There should not have to be an approval from the easement holder or the city. | No | |
| 20.04.080.(c)(2) (B) | General Landscaping, Plant Materials Standards, Species Diversity | "any given genus of trees shall be limited to a maximum of 25 percent.."; - Rationale: One genus should not exceed 25% of the total amount and we propose a change from "species" to "genus" to add to higher diversity. | No | |
| 20.04.080.(e) Table 4-18 | Table 4-18: Prohibited Plant Species | Add poison hemlock to list of invasives and Bradford pear should be listed as invasive | No | |
| 20.04.080.(f) | Street Trees | Create a subsection (5) to include mulching standards; many trees are mulched incorrectly and subsequently die off | No | |

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| 20.04.080.(f) (2) | Street Trees, Type | "A variety of street tree genus shall be..." (replace beginning of second sentence = See 20.04.080(c)(2)(B) for percentage of genus per city block.) - Rationale: A mix of street tree varieties should be required within a block. Planting the same type of tree four or five times in a row is not sustainable. If that type of tree is hit by a pest (which are predicted to become more common with climate change), we lose trees for an entire block. otherwise. | No | |
| 20.04.080.(f) (3) (D) | Street Trees, Location, Tree Grates | Replace Tree Grates with Permeable Pavers. "covered with permeable pavers, with associated maintenance plan, to maintain a flush grade with adjacent sidewalks." - Rationale: Tree grates strangle trees and should not be permitted. Instead, the UDO should require permeable paving around street trees, where needed. This is a standard practice in many cities. | No | |
| 20.04.080.(f) (4) (A) | Street Trees, MD district | Replace ADA compliant cast iron grate with "permeable pavers, with associated maintenance plan," - Rationale: maintain consistency with change proposed in (f)(3)(D) | No | |
| 20.04.080.(h)(1) (B) (i) | Parking Lot Landscaping, Trees, Number | Add a second sentence = Parking lot landscaping shall require tree plantings within the parking lot every 6 parking spaces. - Rationale: There is a way to plant trees without losing parking. This practice was implemented in downtown Louisville, KY. | No | |
| 20.04.080.(n) (3) (A) (ii) | Fences and Walls, Fence and Wall Height, Interior Lots | Change to "...fences and walls shall not exceed eight feet in height; however, eight foot fencing must maintain line of sight and receive approval from the Planning & Transportation Department. If fencing does not maintain line of sight or was not approved by the Planning & Transportation Department, then fencing shall not exceed four feet in height." - Rationale: Allow higher see through fences up to 8 feet tall in front of houses for deer with permission from the Planning & Transportation Department | No | |
| 20.04.110.(a) | Incentives, Applicability | Remove student housing and dormitories as exemptions to the incentives list. By exempting student housing dormitories, we exempt student housing and dormitory projects from positive exemptions which we want to be more sustainable. | Partial | Now specifies that it is within the MD zoning district that Student Housing & Dormitories do not get exemptions: "These affordable housing and sustainable development incentives are available to all development. except for Student Housing |
| 20.05.040.(c) | Easements, Environmental | No pesticides or herbicides should be allowed in conservation/environmental easements | No | |
| 20.06.050.(b) (3) (E) (ii) | Development Permits and Procedures | Replace the regulations developed referencing 100-year flood plain rating with 500-year flood plain area ratings, at a minimum. | No | |

The draft shows an increase in the percentage of impervious surface coverage for several zoning districts. This seems inconsistent with the Master Plan. I think we should encourage the Plan Commission and Council to reduce these, at least for the larger lot districts.

Common Areas are defined as managed by the development association. All common areas with good quality natural features should be preserved by a Conservancy Easement.

Push for restoring the environmental protection language.

Either the UDO or the variance process should have provisions to allow decreased buffer widths in situations where a 75' buffer is not feasible or would create a legitimate hardship.

Trails in Zone 1 should be at least 10' from the top of the stream bank.

We should continue to request a stream classification system and inventory.

Both of these sections should include ephemeral streams (see comments under Definitions). Although ephemeral streams convey water only during a rain event, they can carry large quantities of soil and other pollutants downstream to intermittent and perennial streams.

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| 20.02.020&030 | |
| 20.02.050 | |
| 20.04.030(f) | Riparian Buffers |
| 20.04.030(f)(1) & (4) | Riparian Buffers |

It is important to include a minimum survival rate and number of planted tree species, otherwise the planted area can end up with a dominance or even a monoculture of opportunistic volunteer species. We suggest an addition be made to this section to address this issue, with the following guidelines based on IDNR and Corps habitat restoration guidelines for example:

1. Must include a mix of species from each category below, as suitable to the region and appropriate for the specific site
 - a. Category 1 – soft maples, hackberry, sycamore, elms
 - b. Category 2 – oaks, hickories, beech, walnut
 - c. Category 3 – cottonwood
2. Minimum stocking rate of 435 bare root stems per acre (10'x10' spacing) or 302 containerized stems per acre (typically 3- and 5-gallon stock; 12'x12' spacing)
3. Success criteria
 - a. at least 75% survival of planted stock
 - i. including no more than 10% native volunteers
 - b. at least 2/3 of planted species are represented with at least 20% from each of the groups in #1
 - c. no single species comprises more than 20% of the diversity
 - d. no more than 20% presence of nonnative species

The CI Subdivision is not required to have any open space, and the TD subdivision is only required to have 5%. I think these should be increased, especially for larger subdivisions.

The Adoption Draft defines 'riparian buffer' as follows: "Wooded or vegetated areas along creeks, streams, rivers, or designated regulated drains. The area on each bank designated as a riparian area shall be no wider than the average width of the creek, stream or river at normal flow elevation, but be no less than ten feet in width from the top of banks."

This is inconsistent with the Development Standards, which require a 75 foot wide buffer.

20.04.030(f)(8)
Table 5.2 & Table
5.3 (Subdivision
Standards)

Definitions

The Adoption Draft defines 'intermittent stream' as follows: "A surface watercourse that flows typically only after significant precipitation events or during a particular season; and that evidences a discernible stream bed". This definition is inconsistent with federal and state agency definitions of stream types. The US Army Corps of Engineers definition is below. Also the Draft does not provide a definition of 'perennial stream'.

Year-round streams (perennial) typically have water flowing in them year-round. Most of the water comes from smaller upstream waters or groundwater while runoff from rainfall or other precipitation is supplemental.

Seasonal streams (intermittent) flow during certain times of the year when smaller upstream waters are flowing and when groundwater provides enough water for stream flow. Runoff from rainfall or other precipitation supplements the flow of seasonal stream. During dry periods, seasonal streams may not have flowing surface water. Larger seasonal streams are more common in dry areas.

Rain-dependent streams (ephemeral) flow only after precipitation. Runoff from rainfall is the primary source of water for these streams. Like seasonal streams, they can be

Definitions