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**Sent:** Wednesday, May 04, 2022 2:31 PM  
**To:** Planning <[Planning@a2gov.org](mailto:Planning@a2gov.org)>  
**Subject:** Work Plan

Hello members of the planning commission.

Thank you for all your great work, including the creation of the TC1 district and your ongoing efforts to remove the city's parking minimums. That second change alone could make this commission the most effective in recent history.

I encourage you to build on your success by taking a principled approach to the issues now facing you.

### **1. Downtown Premiums and Height Limits**

The city's new affordable housing premiums (combined with tighter baseline rules about height and FAR) see to be preventing the construction of new market-rate housing. I encourage you to propose removing the premiums and loosening the baseline rules.

If you remove the premiums, you will be confronted with the question of what the baseline rules should be. I encourage you to not just put in place the rules that happened to exist before the new premiums were created, but to instead consider what baseline rules would best serve the interests of the city.

In my opinion, the rules that would best serve the city are those that most allow the supply of housing and retail space to increase, which would be having no height limit and no FARs. This change might seem radical, but many cities have districts without height limits, and the whole idea of an FAR is arbitrary and silly. No one is hurt by too much floor area in a building.

Please don't trade away critical benefits (like more housing and retail space) just to avoid being controversial. If city council wants to compromise politically, they can, but the planning commission should be trying to achieve the city's stated goals (like carbon neutrality and lower housing prices), by whatever methods are most effective, not least controversial.

### **2. Minimum lot sizes**

If you are going to consider reducing or eliminating minimum lot sizes in single family neighborhoods, then you should consider eliminating them city-wide. The C1 and downtown districts already [don't have minimum lot sizes](#), and there's no good reason to keep them around in other districts.

Single family areas are the places where zoning changes tend to be most controversial, so there's no sense in going through all the drama of removing minimum lot sizes there, while leaving them untouched in other districts.

### **3. TC1 Rezoning**

I encourage you to combine the TC1 rezonings scheduled for the next three years into a single rezoning process over a month or two. Spreading out these rezonings over three years is extremely slow, but the

problems the district is designed to mitigate, like the housing crisis, are urgent. Slowly responding to urgent problems is not cautious or prudent, but irresponsible. I know city staff picked these timelines initially, but it is your job to direct city staff, not the other way around.

A three year process actually makes it harder for the planning commission to receive public input, because feedback on one district is going to be valuable when making decisions about the others. For example, if a property owner on Plymouth is going to be unexpectedly burdened by rules in the new district, a similarly situated property owner on Stadium might be burdened in the same way, and it would be good to hear the Plymouth owner's feedback before rezoning Stadium. A combined process lets you get feedback from lots of residents in the same position, and is less likely to result in spot-zoning or unfairly unequal treatment of property owners in similar positions.

#### **4 The relation between zoning changes and the Master Plan**

In years past, planning commission members have sometimes assumed that every zoning change should be prefaced by a master plan change that specifically calls for the zoning change in question. This assumption is not reasonable or legally correct. Legally, zoning changes must be *consistent* with the city's master plan, but there are many different sets of zoning rules that are consistent with any given master plan.

For example, the master plan does not set a particular minimum lot size for R1A districts. The particular lot size that happened to be in place at the time the last master plan was passed is not some sort of privileged rule that only a master plan revision can undo. To assume that the old rules are consistent with the master plan, but that new ones are not, would be baseless, especially in light of the city's new commitments to carbon neutrality and housing affordability.

Please don't wait for the new master planning process to make zoning changes that are already consistent with the master plan's high level goals. If you are waiting for specific instructions in the master plan to pass zoning changes, you may never get them, because master plans set high level goals, not implementation details.

Thank you for your consideration, and good luck!

Will Leaf