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Subject: Rochester 2034 Plan
Date: Monday, August 26, 2019 1:36:37 PM

Hello:

On August 16 the South Wedge Planning Committee submitted a letter of comments and recommendations to the City of Rochester in response to the proposed **Rochester 2034 Comprehensive Plan**. In the allotted time period, SWPC Community Engagement Committee members attended community meetings, visited libraries to read and study the plan, discussed neighborhood priorities and Plan impacts at committee meetings and a work session, met with Dorraine Kirkmire to find out more about Plan language and implications, and communicated through dozens of emails in assembling this document.

We are sending a copy of the letter (pasted below) to you--one of our City representatives--so you are aware of some concerns that may also affect or be echoed by other neighborhoods in the city. If you have any comments or questions, please feel free to contact me.

We appreciate the time and work that the City has obviously put into this project and appreciate the City's openly soliciting feedback from the community. We look forward to staying informed and involved as the process of approval and implementation progresses.

Best regards,
Glynis Valenti and the SWPC Community Engagement Committee

Glynis Valenti

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Dorraine Kirkmire
Manager of Planning/Office of the Mayor
City Hall
30 Church St.
Rochester, NY 14614

Dear Dorraine:

On behalf of the SWPC Community Engagement Committee and the South Wedge Planning

Committee, I'm presenting points for your review and consideration regarding the *Rochester 2034 Comprehensive Plan*.

My wife and I bought our house on Comfort Street in the South Wedge more than 30 years ago and raised our two sons here. We've seen what was once a marginal neighborhood evolve into one of the most desirable in the city. As a neighborhood advocate, I can appreciate wanting to make the most of assets like main corridors and the Genesee River. However, we're cautious of overdevelopment at the expense of invested, stabilizing residents and businesses in a neighborhood rich with historical significance.

To that effect, we would like to focus on Placemaking and Historic Preservation: 1. Updating zoning and land use regulations; 2. Valuing historic properties and areas to safeguard and enhance the city's heritage.

Our first priority is protecting and preserving the historic designation of the South Wedge, both along and in between the main arteries of Mount Hope Ave., South Ave., and S. Clinton Ave. Thoughtful planning here will echo key Rochester 2034 Placemaking tenets such as preserving community assets (walkability, historic character, cohesiveness, and access to the river.)

As part of partnering with the City to achieve the goals of the Plan we submit these comments after long hours of hard work, analysis and thought. We would like Neighborhood Planning Committees and groups to be included in the partnership areas of the Plan for all Strategies, as we have valuable experience and detailed knowledge of considerations and history unique to our neighborhoods.

Support and concerns on Future Land Use:

- **Mount Hope Ave.:** We recommend **setting the southern boundary of the proposed Downtown Mixed-Use zoning designation** (with no height limitations) **north to use I-490 as its southern boundary**. The South Wedge is currently effectively cut off from Downtown, and pedestrians cannot currently walk downtown to MLK Jr. Park or the Strong Museum of Play, particularly seniors and children. When the infrastructure is connected, there might be justification for extending Downtown Mixed Use to the South Wedge. But it is premature to allow these uses without the connectivity. We do support changing the currently proposed Downtown Mixed-Use and Flexible Mixed-Use areas on Mount Hope to **Neighborhood Mixed-Use** to support the Initiative of Reinforcing Strong Neighborhoods and maintaining the neighborhood's historic character, encouraging walkability, and enhancing a neighborhood environment. However, we want to discourage the incentives for developers, who have already bought up portions of Mount Hope Ave., to demolish the two-story former industrial buildings the Plan intends for adaptive reuse and build more intrusive buildings that are allowed as of right. These arterials directly border single family, two story homes, where allowing building higher than the current three stories would significantly impact the neighboring residential homes.
- **South Ave.:** We support the proposed designation of **Neighborhood Mixed-Use**, except

south of Caroline Street, where the houses are primarily owner-occupied single-family houses, up to Highland Hospital for the reasons above.

- **South Clinton Ave.:** The Plan proposes Flexible Mixed-Use from Byron St. to Meigs St. We urge **limiting Flexible Mixed-Use** to the areas between Byron St. and Alexander St. and from Gregory St. to Meigs St. because of the larger-scaled buildings in those areas. Due to the character of the surrounding properties and streets, we recommend changing the area between Alexander St. and Gregory St. to **Neighborhood Mixed-Use** along with the Plan-proposed 780 S. Clinton to Beaufort St. Making this adjustment will help preserve the urban village character in the mix of smaller buildings and homes.
- **Residential areas:** The Plan proposes Medium Density Residential for nearly all of the South Wedge and notes on page 45, “The City should explore strategies for encouraging more four-family buildings...” The City may be surprised to learn that a survey by members of the Community Engagement Committee (using the City Property Information site) found that South Wedge homes are predominately single-family and owner-occupied. The housing stock is old, homes are close together, and many do not have driveways, which creates a higher level of density. There are duplexes and some multi-family homes throughout the neighborhood, but they are not the norm and many of those were built-as doubles. To preserve stability and homeownership, we recommend that areas currently designated R-2 and R-1 be designated **Low Density Residential**. This neighborhood is already suffering the impacts of its proximity to the University of Rochester and other colleges, where absentee landlords purchase homes, rent them to students, and they have become de-facto illegal boarding houses. Development along the corridors encourages multi-family units, but the quiet, residential character of the side streets should be maintained.
- **Parks and other amenities:** We support the Plan initiatives to enhance parks and other amenities. We note that the **Gateway Park, north and south, have been omitted from the initiative to enhance parks**. Several of our members continue to work with City staff to upgrade this park and would like this oversight corrected. We also hope to have the **South Avenue R Center**, our only recreation center, **included in the initiative to enhance centers that combine multiple services**, such as our South Ave. R Center, Frederick Douglas Library and Anna Murray Douglas School combination.

Recommendations on Design Considerations:

- **Height Guidelines:** SWPC’s Community Engagement Committee recently submitted a proposal to the Zoning Department for a three-story Limited Height Overlay on an important portion of Mount Hope Ave next to areas with historic designation. It was denied. We are adamant about maintaining a **three-story height limit** for Neighborhood Mixed-Use buildings adjacent to residential properties. Not only are higher structures out of character in the general South Wedge neighborhood, but they loom over surrounding two-story houses blocking light and visibility. The five-story Gold St. Lofts building is an example of this. This will assist the Plan Principles of preserving Historic Character and valuable assets and

infrastructure, and design at pedestrian scale. To that end, we do not support conversion of the currently R-1 building at the corner of Mount Hope Ave. and Cypress St. to Boutique Mixed use, as it is nestled in a residential area, bordering two-story R-1 homes and a Preservation District.

- **Parking:** As noted above, the South Wedge is comprised of housing stock that is historic and predates the automobile, so many structures do not have driveways. Conversions of large single-family homes into apartments has created a shortage of parking spaces on many of the residential streets. While the City is promoting walking, biking, and public transit, it is unrealistic to think that all the new people moving in along the main arteries will get rid of their cars. Parking shortages are already an issue with student housing. We believe that **smart development includes parking restrictions and/or guidelines** that protect the character of the neighborhood and all of the stakeholders. We strongly object to the current trend where Planning Commission decisions have allowed the paving over of back yards in residential areas for parking. Should the transit situation change to significantly affect this in the future, the plan can then be revised to address this.
- **Entertainment:** Out of concern for the lack of information about how permitted entertainment works with the Plan proposals, our ability to comment on the uses allowed in certain Character Areas is limited by our fear of the impacts for residences and other businesses next to areas where entertainment is allowed. There has been change from long-time enforcing and the process of permitting entertainment through Zoning to solely enforcing and permitting by Rochester Police Department. We have no clarity on the Plan entertainment uses and restrictions. For example, **would entertainment of any type be allowed inside or outside for a building/property in Boutique Mixed Use or Neighborhood Mixed Use?** If a property is already allowed to have entertainment as a special permit, it will now be allowed to have entertainment as a permitted use as of right without regard to indoor or outdoor, proximity to neighboring homes, etc. We understand that limitations are unlikely to be put on a new RPD entertainment license applicant, because it is generally not until after a use has begun that problems are apparent.
- **Accessory Dwelling Units:** We **support permitting these only as long as the owner continues to live at the primary residence.** To do otherwise incentivizes investors to purchase properties and live there only so long as to convert garages for student, Air B&B or other rentals and then move away, leaving the neighborhood to the consequences of non-traditional uses of an ancillary structure. Such a structure is generally in the back of a property, closer to a neighbor's private yard/space and more intrusive. For this reason, as well, we do not support the conversion of the two-story second story.
- **Affordable Housing:** Because of its popularity, the South Wedge housing prices have increased exponentially over the last 20 years, while the population remains largely a diverse mix and working-class. We also have a significant number of homelessness services and shelters, such as St. Joseph's Neighborhood Center, the VOC Richards House, Otto House and Priscilla's House. The Plan mentions "work[ing] together to diversify housing choices, affordability, and income across all neighborhoods." We support maintaining what we have

and making sure there is a mix of affordable and market rate housing available here.

Affordability should include keeping long-time residents in their homes to age in place and making new housing options available to an aging population that wants to downsize and remain in the South Wedge.

Rochester 2034 Plan Implementation

- **Action Plans:** While reviewing the Action Plans for the Initiatives, our group discovered an alarming number of Strategies that do not include mention of “Neighborhood Groups” or “Community Groups/Partners” (such as SWPC, NBN6, etc.) The language presented throughout the community meetings and *Guidebook* noted **the importance of “collaboration** among government, residents, businesses, neighborhood groups and community partners,” for example “the entire community must work together,” “neighborhood and community organizations are critical partners to implement *Rochester 2034*,” “boosted through collaborations among the City, community partners, homeowners, property owners and developers.” However, in the Placemaking Plan (PMP) there are 57 Strategies. Only TWO (2) include “Community Partners” (PMP-2h) and “Community Groups” (PMP7a.) Since “Placemaking” is the centerpiece to the *Rochester 2034 Plan*, we believe that the people who live in the places should have a greater voice in what happens there, i.e. **“...it is a community wide plan, not just a City plan.”** To that end, we request to be notified of what proposed changes are incorporated into the Plan well prior to any next steps in consideration and approval, to enable our continued participation. For the immediate purposes of commenting, we have focused on “Placemaking,” “Housing,” and “Parks, Recreation & Open Spaces” and are attaching a list to this letter of Goals and Strategies from the Plan in which we could provide valuable—and crucial—input and participation.

We’re encouraged by the City’s community meetings and discussions about *Rochester 2034* and hope that as this process moves forward, the City will continue its open dialogue with all neighborhoods. In fact, we request to have a representative on all working groups tasked with implementing parts of the Plan that affect neighborhoods.

While our comments are relevant for the South Wedge, (especially regarding smart development along Mount Hope Avenue and including 151 Mount Hope; zoning changes impacting residential blocks, i.e. height guidelines, parking, entertainment as of right; and making sure that both market rate and affordable housing are available in the South Wedge) we believe that the suggestions and considerations apply to neighborhoods throughout the city. Thank you for your efforts on the Plan.

Best regards,
Frank Logan

Board Chair, SWPC

Action Plan Recommendations for Including Neighborhood Groups/Community Groups

#	Goal	#	Strategy
PMP-2	Foster growth in the City's population and business community in order to restore the critical mass needed to support local businesses, deconcentrate poverty, grow the tax base, and address housing affordability	PMP-2e	In the future zoning district reflective of the Low-Density Character Area, re-legalize existing two-family homes (as built or converted) as of right
		PMP-2k	Allow entertainment uses as of right accessory to permitted uses....
PMP-4	Protect the existing character of neighborhoods while allowing room for evolution into more vibrantly urban, inclusive, and resilient design character	PMP-4a	Consider expanding use of form-based code outside of downtown into mixed-use areas identified in the Placemaking Plan, allowing for some variation among the districts to recognize desired differences in scale & neighborhood impacts
		PMP-4f	Continue to work with the architecture & development community to raise the design standards for mixed-use & multi-family building projects
		PMP-4g	Revise RFP processes for development of City-owned land to reflect evolving parking demand...
		PMP-4j	Account for & encourage emerging & as of yet untapped housing types...
		PMP-4k	Consider regulating commercial activity according to occupancy rather than by use type
PMP-6	Improve public parks, open spaces, public facilities, and waterfront access	PMP-6d	Work with developers & property owners in downtown & major mixed-use corridors to incorporate small-scale public spaces
		PMP-6e	Identify opportunities throughout the river corridor, parks system, & streetscape to proliferate public art, educational opportunities, historic interpretation, etc.
		PMP-6f	Identify obstacles to live music, plays, outdoor uses, sidewalk entertainment, & other performances in the entertainment licensing process and

			zoning code...
HSG-2	Improve understanding & monitoring of local housing & community development issues, needs, opportunities, impacts	HSG-2c	Conduct research to inform new strategies & initiatives...
HSG-3	Improve collaborative planning & coordination to promote more holistic housing policy & community development	HSG-3c	Proactively connect housing initiatives, policy & development with economic development & employment initiatives, parks/rec programming, commercial corridor strategies...
HSG-5	Pursue additional housing strategies that support innovative & equitable housing & community development	HSG-5a	Increase the effectiveness, impact, & reach of the Rochester Land Bank ... Expand the network of pre-qualified development partners the Land Bank can work with
PR-1	Reclaim the Genesee River & City parks & rec system as foundational assets that help achieve crosscutting community goals	PR-1d	Explore additional categories of community benefits that could be negotiated with developers such as public art, public amenities, bike/pedestrian enhancements,... .particularly along the City's waterfronts to improve public access
PR-4	Increase community awareness, pride, & engagement with our parks & rec system	PR-4b	Increase visibility & welcome near parks & rec facilities through...public art,...signage, ...traffic calming