

To: City Council  
From: John Clarke, City Planning Consultant  
Date: February 7, 2017  
Re: Draft Comprehensive Plan Update and Proposed Zoning Changes

I submitted detailed comments to the committee and consultants on the proposed plan and zoning in December, but the zoning comments were received too late to be incorporated into the current draft. I fully support the adoption of the Comprehensive Plan Update and the overall intent of the zoning changes, but I have listed my specific suggested edits below:

### **223-41.3 WP Zone**

- C(2) Restaurants not exceeding ~~4,000~~ 2,500 square feet. (more café than full-scale restaurant)
- C(4) Delete Chandlery, which has multiple meanings, and just include marine-related retail establishments not exceeding 2,500 square feet.

### **223-41.4 WD Zone**

- B(2) Residential multifamily and/or attached dwelling units (townhouses not defined in the code).
- B(4) Restaurant; add bar, or brew pub.
- B(7) At the public hearing we received several comments urging more openness to office uses in the WD. The 20% requirement should be deleted. Allow professional and business offices as permitted uses, but perhaps add that the Planning Board may restrict office uses from the first floor, depending on the building location in the overall development.
- B(10) Add Public square, plaza, promenade, or pocket park.
- C(a) Add museums.
- D Accessory Uses. Add public garages and off-street parking. Add rooftop gardens, greenhouses, and solar collectors. Delete boat facilities and lighthouses.
- E(1)(a) Consistent with subsections B and C above, as well as the newer CMS and L districts, the Planning Board should have jurisdiction over Special Permits. This coordinates the process under one board with one set of public hearings and makes the process much more efficient.
- J(3) ...preserve important public views from upland locations, in particular view corridors identified in the LWRP.
- J(4)(d) Delete the un-excessive difference sentence.
- J(4)(i) Delete rustication. ...employ texture or additional detailing to accentuate the base of buildings and provide human scale.
- J(5) Delete last sentence. LEED process is too expensive to be required. Updated building codes and transit-based, walkable location provide for high energy efficiency.
- J(12) Parking standards should be significantly reduced in this transit-friendly WD district (to at least as low as the L district) to limit the cost of structured parking and to allow for shared commuter spaces at off-peak times.

Suggested Standards: (By Comparison, Poughkeepsie Waterfront-TOD District)

Residential	0.75/unit	0.5/unit
Retail/Service	1/333 sf	1/400 sf
Office	1/350 sf	1/350 sf
Restaurant	1/300 sf	1/250 sf
Hotel	0.75/guest room	0.75/guest room

Should also include additional parking provisions from the Linkage District to give the Planning Board more flexibility to reduce these standards under certain conditions, given the size and varied use of the commuter parking lots. Because of the exorbitant cost of new structured parking, requiring too much parking for each use will just make any development around the Train Station far less feasible. Since Metro-North has already taken all the available space for its lots, getting the WD parking right is critically important to the success of the district.

**223-41.7 WD Bulk Regulations:**

- B(1) Average of ~~no more than~~ four stories...
- B(2) Average of ~~no more than~~ three stories...
- B(3) ...so that the public views to the east are adequately protected.
- C Like the CMS and L districts, do not need Floor Area Ratios. They are abstract and very confusing to most people, especially in multi-building sites. Form-based codes usually avoid numerical FAR limits in favor of more visual and design-oriented standards. Height limits provide sufficient limits on development, while providing flexibility within the site.

In the WD North Section drawing should change ~~total~~ height to average height in all illustrations.

**223-41.21 Linkage District Regulations**

- D(9) Do not need FAR (see above explanation).
- F(d) Leave as is. Gives Planning Board more flexibility for walkable development near the Train Station and Main Street. The walkable, transit-oriented districts should not have the same parking requirements as the rest of the City.
- H(2) I am not sure why projects over 10,000 sf footprint are listed as needing a special permit. Just an extra step in the process for buildings that meet the purposes of the district. They are not included in the special permit subsection B. Eliminate or maybe raise to 20,000 sf footprint (same for CMS District).
- L Leave the sketch in, although it could be relabeled as an illustrative plan. Form-based codes most often have an attached overall plan. The street sections, Beekman Street frontages and Route 9D corner parcel are still useful. Could be updated rather than eliminated.

**Comprehensive Plan Update**

- P. 59 Figure 4.1 shows 1/4-mile walking radii, not 1/2-mile. Also, should add a trolley stop/pocket park at the Train Station.
- P. 153 Figure 10.3. Should not show specific pocket parks along Beekman Street. These are potential development sites owned by the City, so it should retain some flexibility.
- P. 155 Map should again be labeled as 1/4-mile walking radii.
- P. 158 Figure 10.4 should change ~~total~~ height to average height in all section illustrations.