

## **Extended analysis and objections to the Plano Tomorrow Plan**

We have read the Draft Plano Tomorrow Plan and attended the P&Z open house in November 2014. We have also read the Survey, the Survey results included in the Phase II Public Outreach Campaign Summary Report and minutes of discussions at joint Planning and Zoning and City Council meetings. While we recognize a lot of time, effort and money have been put into this Plan, we have a number of concerns about the conclusions reached in the Draft of the Plano Tomorrow Plan and we believe substantial revisions are necessary to reflect thoughts and wishes of the citizens of Plano.

We believe the fundamental misdirection of the draft Plan is its emphasis on population growth and the “Urbanization” of Plano. We do not believe that “Urbanization” is seen as virtuous by the majority of Plano citizens. That does not mean we object to some urban development, but the authors of the draft Plan seem to believe that significant population growth and urbanization is a goal the city should strive to achieve. The majority of the residents of Plano do not believe population growth is a worthy objective, especially if the only means to get to this let is to fundamentally change the character of Plano. Our citizens have long understood that that the population of Plano was expected to max-out at around 270,000 to 280,000. For instance a 2007 report by the City of Plano projected Plano’s population would be 270,000 in 2015 and 271,100 on 2020 and the 2011 Comprehensive Annual Financial Report reported similar projections with the population in 2030 projected to be 276,000. Now as we approach that 270,000 level in our city, the forces behind the Plano Tomorrow Plano appear to be desperately striving to find ways to increase our population to 320,000 to 330,000 by looking for every nook and cranny to squeeze in more multi-family development, using terms like “urban mixed use” and “mid-rise residential” as if they were some new-found gold standard far different and better than apartments.

Unfortunately, this aspect of the draft Plano Tomorrow Plan reads like a pre-determined answer looking for justification. As explained below, the survey itself was flawed because it used very general questions and respondents had no concept of how their responses might be used to justify certain policies or actions. In spite of its flaws, the desires of our citizens can be discerned but somehow they were misinterpreted to support a result that is very different from the message the citizens of Plano wished to send.

Based on 2014 actions, it appears that the Planning & Zoning Commission and the City Council are already demonstrated how they intend to use the Plano Tomorrow Plan to radically change the face of Plano. In spite of residents’ concerns as shown in the Plano Tomorrow Survey and at various planning and zoning meetings, the Commission and Council have already approved construction of over 7,500 multifamily units during 2014 alone, which will result in 10,000 additional residents. It appears that the intent is to use a misguided interpretation of the Survey to support policies in the Plano Tomorrow Plan that will continue down this path of high density development and especially high density residential development that is not the desire of the Plano citizens at large.

Although we could go on at great length about the number of points and areas we disagree with, in the interest of keeping this short, we are going to hit on some direct points.

### **Population Growth**

Draft Plano Tomorrow Policy:

*Regionalism: Population Growth: Plano should develop a policy on new growth, which would identify where it should occur.*

The draft Plano Tomorrow Plan makes some broad statements about protecting the quality of development, not placing housing in areas that are unsuitable for residential development that are supported by citizens at large. The draft Plan also states that residential development should not take place where there are better commercial

opportunities consistent with existing adjacent development; however, every time this statement is made there is a carve-out for midrise residential or high density residential, typically as part of a “compact center” or an “urban mixed use development.” Underlying these statements is a desire by the Plan’s authors to significantly increase the amount of multi-family housing units and therefore the population of Plano. The citizens of Plano and the survey respondents do not share the view that the population of Plano needs to significantly increase. According to Question 6 of the Survey, attracting more employment to the city should be its highest priority, followed by improving the appearance of the overall built environment and enhancing open space. Increasing the variety of higher density housing was rated the “least important” and this highly negative score should be taken as the respondent saying they do not want significantly more high density housing.

Question 9 of the survey asked residents about the use of the remaining undeveloped land in Plano. General office space easily received the highest rating followed by retail and entertainment and then other commercial uses. Residential uses ranked last even after industrial uses. Clearly this is a message that our citizens do not see any reasons to significantly grow the population of Plano given the limited remaining available land.

In spite of these responses to survey and other objections expressed by neighborhood groups. P&Z and the City Council increased the number of multi-family units by 7,500 or more than 20% in just one year (2014) and it is apparent from the draft Plano Tomorrow plan that this is just the beginning. Are we to believe that by the time this is done, the city leaders want to double the number of multi-family units in Plano?

### **Urbanization of Plano and increasing the density of housing.**

Draft Plano Tomorrow Policy:

*Plano will encourage reinvestment, redevelopment, and urbanization of identified high intensity corridors to create mixed use developments that incorporate higher density housing, commercial, and retail opportunities.*

With respect to housing choices, the Plano Tomorrow Plan keeps coming back to allowing high density developments that include multi-family housing and includes the following:

- Requiring a minimum 40 dwelling units per acre for new multifamily zoning. Prior to 2012, the City of Plano zoning focused on a maximum concentration in multi-family units not a minimum. This change was adopted to maximize the value of remaining undeveloped land; however, the everyday citizen does not understand the significance of this change, as it is only starting to take effect. Most multi-family housing in Plano has a density far less than 40 units per acre and the implications of greater than 40 dwelling units is shocking. For instance, most people we talk to believe that Austin Ranch development on Windhaven Parkway in The Colony is very dense. Yet in a response to a question posed at a Plano Planning and Zoning meeting, Lucy Billingsley informed the P&Z that the density at Austin Ranch is 32 units per acre.
- Although adopting the minimum of 40 dwellings per unit, Plano zoning has continued to maintain limitations on multi-family housing, primarily limiting apartment complexes to a maximum of 500 units and required spacing of 1500 feet between groupings of 500 units. It appears that these limitations are rendered toothless by instead making wide use of exceptions for mid-rise residential and mixed use developments below.
- Establishing Mid-Rise Residential housing that can be extremely dense. Although defined as 5 to 12 stories, Mid-Rise Residential has already been allowed as high as 20 stories. Mid-rise residential projects have been approved with a density in excess of 100 units per acre and 1,000 or more units.
- Establishing two new zoning districts: Urban Mixed-Use and Neighborhood Mixed-Use. For instance mixed use projects recently approved included well in excess of 1000 residential units

The draft Plan states, “The consensus from the Plano Tomorrow Survey, joint work session survey, and map exercise is that undeveloped land should be reserved for economic development purposes. However, based on the map exercise results, staff has interpreted that the city is open to the development of residential and retail uses on remaining undeveloped land as long as it is incorporated into a mixed-use environment and is integrated with the employment centers. Based on this analysis, staff has drafted a proposed policy statement for the Commission’s review.” When the staff states that the city is open the development of (high density) residential they appear to be referring to the city council rather than the citizens of Plano.

Draft Plano Tomorrow Policy:

*Plano will reserve its remaining undeveloped land for high quality development with distinctive character, emphasizing businesses offering highly skilled employment and limiting housing and retail uses except when integrated into compact complete centers to ensure adequate land for projected employment growth.*

The exception regarding “compact complete centers” does not reflect the thinking of the citizens of Plano or the responses to the Plano Tomorrow Survey. Question 8 of the survey asked respondent to rank the “order of choices for new housing products you would prefer to see built in Plano today.” The survey clearly shows on page 17 that respondents rated single family homes the most desirable for Plano development while high density apartments in urban centers and mid-rise residential were rated the LEAST Desirable. Yet at every opportunity, the Plano Tomorrow Plan seems to advocate midrise and other high density multi-family housing.

The fundamental problem we have with this recommendation is that it seeks to place urban living and mixed use developments all over the city. In Plano, we have the benefit of probably one of the most successful urban mixed developments in the country, in Legacy Town Center. It is exceptional because it has a number of things going for it. First and foremost, it is in the middle of a very high quality employment center that has attracted several large corporate campuses. It was only after these companies were attracted to Plano and built a large base of employment, however that the need arose for hotels, restaurants and entertainment, which then made this a desirable area for mixed use housing development. We are now see urban mixed use developments popping up all over DFW and it feels like the draft Plan is proposing to put a UMU on every corner in Plano. The concern should be what happens when these UMU developments are not successful. Leading a project with residential development should be viewed as a big red flag. That is the incorrect way to build a successful mixed use development and many are destined to never be anything but dense multi-family housing with a Subway, a nail salon, dry cleaners, postal store and, if the developer went high end, a fitness center with lots of windows that professes to be open to the public but in reality only serves the residents. The problem will then become having a high density residential development with no caché and as it eventually fades, it is a monstrosity that is impossible to get rid of and close to impossible to fix.

Although the policy states that the remaining land should be reserved for “*high quality development with distinctive character*” some of the recent planned / urban mixed use residential development recently approved by P&Z and city council lacks this character and we note the several exceptions were made to the UMU guidelines that shows they will not be upheld. These include allowing multi-family to take place in a planned development with almost no other uses, allowing a UMU to count adjoining single story retail strip shopping center as part of the UMU development and allowing UMU to count the first floor of multi-story rental residential units as office / retail based upon the lower level designation as an in-home office / studio, even though there is no requirement that it be used to receive the public.

## **Neighborhood Centers**

Draft Plano Tomorrow Policy:

*The introduction of residential uses within Neighborhood Centers is recommended where it can be accomplished in a context-sensitive manner and should be integrated into the center. Neighborhood centers will be based on the concepts of mixed-use, urban design and transit-oriented design, where possible.*

The Neighborhood Center is defined as corner retail sites along major arterials. So here is another place the draft Plano Tomorrow Plan recommends mixed use housing be added. We find this deeply concerning to say apartments are going to be put on top of neighborhood strip shopping centers, particularly because it is listed as a “recommendation.” Our residents are not asking to have more people packed into their neighborhoods, nor do they want to fight congestion and at their neighborhood grocery store. While we understand that some strip shopping centers in the city are underperforming, the addition of multi-family housing is not the cure-all and would be a poor outcome in most situations. We find it hard to accept that this should be a recommendation. We do understand that there may be some unique possibilities to add such a development to a strip shopping center if it is done in a very restricted and high quality manner, but we believe those opportunities will be far and few between and so this should not be a recommendation. If this concept is acknowledged at all, it should be that the city would be willing to listen to proposals that meet a high standard of development.

## **Urban Mixed Use Justification**

The Draft Plano Tomorrow Survey results appears to use the “Map Exercise” outreach where at certain “outreach” public events, residents were asked to place a dot on places they liked and Legacy Town Center received the most number of dots. We note that residents could place multiple dots on the map and the total number of dots received by Legacy Town Center was 23. This is can hardly be seen as a ringing endorsement in a city of 270,000 people. The fact that the total dots collected for all sites were 128 says this “outreach” did not reach the public and so should be discounted. Additionally, we note that the picture of Legacy Town Center showing the primary two blocks of restaurants and bright lights at night looks very appealing and was intended to elicit a reaction. Many people visit there to enjoy one of the restaurants, but this does not mean that they want to live there or want such a development in their back yard or think Plano should try to have 10 more just like it. Many Plano residents also like to go to Greenville Avenue and to the Texas State Fair, but that does not mean they want to live in those neighborhoods or believe they are the right attractions for their neighborhood or even the city of Plano.

The Survey in Question 4 asked respondents to list their favorite places in Plano, and the “Shops at Legacy” received the most votes (15.8% of the votes cast) just ahead of “bike trails and greenbelts” also at 15.8%. This result is flawed, however since the survey only listed 8 suggestions four of which were parks and bike trails and skipping over areas like “restaurants and shopping along Highway 75,” “retail and restaurants at Preston and Highway 121” or “John Clark Field.”

## **What the Draft Plano Tomorrow report is missing.**

The Plano Tomorrow report does not spend enough time focusing on what is important to the citizens of Plano and how zoning should support those priorities.

Maybe because it was already apparent, the survey never asked the obvious question – what is the most important factor for living in Plano. Without doubt, our school system would have blown any way any other choice. Question 2 did ask, “How would you rate the following opportunities in Plano?” to which “education” was the top response. This question does not do justice to the point of education and our school system which always has been and always will be the number one reason people choose to live in Plano. Question 1

responses ranked the city as a place to live and raise our children as being key to the quality of life in Plano. Our citizens are very concerned that we protect the quality of our schools and know that the quality of life will follow by protecting our neighborhoods. We are most concerned that increasing our population beyond its designed capacity and particularly doing it by increasing the number of people residing in multi-family residential will lead to deterioration in the quality of our schools and neighborhoods. We know that some on the P&Z Commission and the city council try to argue that children do not live in these developments. That is a red herring. The reality is that children do in fact live in these developments and while initially the number of children may be small, we assert that if you did a study of multi-family housing you would find that as each year passes, the number of school age children in these developments increases. We do not believe that our schools can absorb this additional population and we note that these urban designs are so popular with developers because they do not have to set aside any acreage or funding for future school development. Finally, multi-family residents are much more transient in nature and less willing and less able to invest in the public schools through taxes and personal commitment.

We believe schools are our most important asset and the Plano Tomorrow Plan should address how its policies promote the advancement of our schools.

**Please don't try to fix what is not broken.**

Question 5 of the Survey asked the respondents what areas of Plano they would like to see change. West Plano got the fewest votes by far, receiving 55 votes out of 3,855 votes cast or less than one-half of 1%. We think that is a pretty resounding message that things are just fine in West Plano and don't need to change. Yet the changes proposed in draft Plano Tomorrow Plan would dramatically change the character of West Plano. Already since the survey was taken, dramatic changes have been announced and approved by P&Z. Some of these, such as Legacy West and the Toyota headquarters could be viewed as consistent with current development and not necessarily a concern to the residents of Plano. Others, such as designating the whole area between Parkwood Boulevard and Communications Parkway south of Tennyson as "high intensity development" is a very major change, is not consistent with the historical development in this corridor and is a major concern to the residents of West Plano. We have understood this it is valuable land and will be developed as employment centers and retail consistent with the development that has already taken place. We do not find it appropriate for it to be labelled "high intensity" development and seek to add several 20 story buildings with a 4 to 1 floor to area ratio or higher and to insert midrise, high rise and urban mixed use residential throughout this corridor. We also find it very troubling to extend these concepts, including compact centers and high density housing outside of the Parkwood to Communications boundaries as we believe is about to happen east of Parkwood at Haggard Farm West. This constitutes a major change to the existing zoning and nature of this area we do not like it. Growth for growth's sake is not a deserving justification, so why try to fix what is not broken?

We are available to discuss any of these matters with you at any time.