

**Comments regarding the proposed Charlottesville
Comprehensive Plan Land Use Chapter
and Future Land Use Map**

Peter Krebs (*emailed June 4, 2021*)



For nearly fifty years the Piedmont Environmental Council has promoted compact, highly livable communities surrounded by distinctively rural areas where farms, forests, and natural systems thrive. Our work to halt sprawl, prevent and mitigate climate change and create healthy vibrant communities depends on smart land use planning. Although not a perfect document, the current draft of the Charlottesville Comprehensive Plan largely reflects and supports those goals.

Broadly speaking, our thoughts and concerns are as follows:

- **Analysis of Impact of Potential Growth on Public Services and Infrastructure is Needed:** The draft Land Use Map envisions significant increases in density that have not been analyzed. When actual rezoning takes place, it will be crucial to understand population trends and the potential new demands on transportation, schools and other infrastructure.
- **More Mixed Use is Appropriate:** We support the increased mixed use and those mixed-use opportunities should be dispersed throughout the city to make neighborhoods more livable for all residents.
- **More Housing Options are also Appropriate:** We also support the inclusion of more housing types and options throughout the city--particularly in traditionally exclusionary areas.
- **Map Past Injustices:** Our city's built environment reflects deep historic injustices to the detriment of all. Those need to be understood, acknowledged and actively reversed.
- **Identify How Supportive Infrastructure will Get Built:** The city is already behind in delivery of basic infrastructure like sidewalks and connective open space. This will be made worse without a sustained commitment and follow through *prior to or in tandem with* new development. Basic infrastructure cannot be a mere recommendation.
- **Prioritize Quality of Life:** Cities are made of people and their stories. Quality of life requires that cultural, historic, natural, and scenic resources must be protected.
- **Public Process and Engagement Matters:** This work is important and it is good that the recent public response has been passionate. The next stage needs to build upon that interest and provide further opportunities for public reflection, discussion and refinement. We wish that the next stage had been better defined prior to requesting comment.

We applaud the draft plan's **focus on affordable housing, walkability, explicit embrace of Climate Action** and focus on smart policies. Throughout the multi-year process, PEC has submitted multiple suggestions, many of which were quite specific and are reflected in the current draft. Residents and others who care passionately about Charlottesville have done the same and we encourage them to continue doing so.

It is no sleight on the part of the team preparing the Plan that there remain fundamental questions to be resolved. These are issues that the community as a whole ought to fully own and sort out before moving forward. While there will certainly be differences, it would be irresponsible to default on them entirely.

What rate of growth is appropriate and how will that impact public services?

PEC believes passionately that development should be focused in the city and in Albemarle's designated growth areas, and we have been dedicated to that cause for decades. While many have argued that the future Land Use Map goes too far and that it could lead to negative side effects, it is impossible to know for certain because there is no population target and no analysis of how much development would be possible in the proposed scenario. Typically, localities consider demographic trends and plan accordingly--and our current (2013) Comprehensive Plan does that. Unfortunately, this proposed plan does not take this approach.

The global, national, and statewide population trends are dramatically slowing.¹ Yet the Land Use Map seems intended to maximize development opportunities. It demonstrates an unwarranted level of faith in the free market even though we know that more or bigger buildings will not necessarily yield desired results such as affordability.² The new units might not even serve local residents at all, as local need is only one factor that drives development. And, more development often brings significant downsides. So we need to make sure what is built serves community needs and is affordable to current residents and future generations.

A better approach would be to identify what needs exist (the Affordable Housing Plan makes a good start) and authorize appropriate inventories in a targeted way. We understand that a future land use map is vague by nature, perhaps incompatible with a build-out analysis. But we request that at least the coming zoning revision (which is far more precise and binding) be paired with the population and buildout analyses that are currently lacking. Such an analysis would need to consider the University's, Albemarle County's and other regional actors' plans and strategies. We know that more infill and redevelopment are needed, but the question of *how much* new capacity beyond the existing is an essential one.

We also caution that although the Zoning Code is what really matters, if the Future Land Use Map does turn out to be overly expansive, it will still be used by developers as a lever for development that is not needed or warranted. Having some wiggle room for additional growth built into the Future Land Use map is necessary, but having too much included could create unintentional impacts (e.g., overtaxed infrastructure and overcrowded schools, higher taxes, unfinished public projects, inconsistent development patterns, fractured neighborhoods) and acrimony that could be avoided if the Land Use map were more directly connected to need.

¹ 2020 growth rates for Virginia: 0.4% ([Macro Trends](#)), for the U.S.: 0.5% (World Bank), for the World: 1.1% (World Bank). Per [Weldon Cooper](#), Charlottesville is expected to add 2,638 residents in the next twenty years. This is unlikely to merit explosive development. We should instead focus on projects that meet socio-economic needs.

² See for example, *Why Building More Market-Rate Housing Will Not Solve Charlottesville's Housing Crisis* ([Charlottesville Low-Income Housing Coalition](#), 2021)

Where should that growth be located and how should various uses be mixed?

We enthusiastically support the emphasis on walkability, transit and neighborhood mixed use that will increase options for residents, improve health and reduce the food-and-service deserts that exist throughout the city. It is not the role for PEC to speak on behalf of neighborhoods or residents about where this or that resource ought to be located. We urge the city's leadership to listen to residents while sticking to the broad goal of complete communities, in which necessary services are easily accessible to people with the most challenges and the greatest need.

Furthermore, we support the addition of more diverse housing options by introducing "soft density" throughout the city. Allowing more units on existing lots makes a lot of sense in a city with limited buildable area. Communities with diverse housing options are among the most vibrant and desirable around the country and that is the case here in Charlottesville too. Yet, new projects could also exacerbate deep historic injustices that need to be well understood, spelled out and mapped in the Plan to avoid future repetition and focus on reversing these mistakes. Broadly speaking that requires actively working *with* communities not *at* them.

What infrastructure is needed to support this development and how will it get built?

Although density of homes and businesses is a precondition for transit, walk-and-bikeability, neighborhood parks and the like, the one does not guarantee the other. It is entirely possible to add density without creating these positive attributes. Unfortunately, that has been a standard historic miscalculation in our region. For example, the city is currently struggling to pay for needed West Main Street upgrades while also bringing the Middle School into the Twenty First Century.

If we maintain the proposed expansive (and open-ended) approach to development, there can be no evaluation of the carrying capacity of schools, sewer and water lines, parks and other infrastructure, or necessary energy-efficiency retrofits. We know that all of these are under-resourced in the current condition. Although the Plan offers great suggestions (such as a Vision Zero Policy), they are aspirational and not requirements. Infrastructure should arrive in advance or in tandem with new development and the Plan needs to be more prescriptive and less faith-based.

That means making actual commitments with measurable outcomes. We shouldn't just say "we should continue implementation of the Bicycle and Pedestrian Plan," for example. Instead, a more useful alternative would be to say "we should complete specific recommendations of the Bicycle and Pedestrian Plan by certain dates."

Beyond supportive infrastructure, how do we maximize opportunity and high quality of life for residents?

Communities are made of people, not buildings, but the built environment is important too. The physical integrity of a neighborhood over time has an important influence on residents' quality of life and ultimate willingness to stay. No one likes to lose their trees, views of the sky and surrounding landscapes, local landmarks and the like. Losing these touchstones create disorientation and trauma that needs to be considered as we manage necessary change.

The future land use map is a general recommendation that is open to interpretation, whereas the zoning code is prescriptive. The latter will need to actively protect the fabric of the community, while making the development process more predictable. In order to provide this clarity, the code will need to include overlays and other planning instruments that prioritize affordability while protecting cultural, historic, environmental, and scenic resources.

“Respect the community and its history,” is a refrain we hear over and over; it underlines our original premise: a neighborhood is its people and their knowledge should be valued and actively sought.

What kind of process leads to something like consensus around these issues?

A Comprehensive Plan requires asking the community to ponder difficult, important issues. One month was not sufficient time for the public to fully digest the chapters and the Land Use map that will influence their lives for decades to come. The additional two weeks are helpful and have provided stakeholders including PEC with more time to discuss the proposed plan with members of the community and provide more thoughtful feedback. While we would not wish to see the process drag on infinitely, PEC’s approach through all these years is built upon the conviction that lasting positive change happens when the public shows up to speak. Not only is it the right way, it is the only way for the community to really own its future.

This is a town full of smart, passionate people who derive wisdom from many sources. However, many of them have not been paying attention or have been historically ignored. More people are paying attention now because the issues are more specific and the Planning Commission and consultant have done a much better job of being more present in the community as we work our way out of a pandemic.

Given that the deadline for public comment is unlikely to be extended a second time, it is essential that the next phase accomplish two things. First, it must demonstrate that people have truly been heard and accounted for via actual changes in the plan and map. Second, there must be more opportunities for the public to validate or correct those changes. While it is natural to get a few things wrong initially, a successful engagement process includes listening, learning and following up with check-backs along the way.

Unanimity is rare and difficult to achieve, but something approaching *consensus* is attainable. *Consensus* will make the Plan more successful for years to come and make it easier to marshal the resources needed to implement its ambitious goals.

Conclusion

The current draft of the Charlottesville Comprehensive Plan is the fruit of countless hours of very evident and high quality work. We commend the passion and hard work of those involved, and we are encouraged by the continuous progress made as a community. But there’s more work to be done and we must rely on humility and caution--and faith in the community to chart its future--to finalize the Comprehensive Plan.

