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Position Letter on the Proposed Open Space Amendment
Board of Directors
Coalition of Asheville Neighborhoods
March 24, 2022

The Coalition of Asheville Neighborhoods (CAN) is an organization that has strived to protect the integrity and livability of the city's diverse communities for more than 30 years.

CAN has taken a stance on behalf of its member neighborhood associations on a multitude of issues, including the development proposals for the Charlotte Street corridor, the proposed low-barrier homeless shelter and preserving the Oakley Public Library; and worked with City staff on a number of initiatives, such as the Urban Center Form Code, a new Noise Ordinance and improvements to the Asheville App and *SimpliCity*.

The current issue drawing CAN's attention is the proposed amendment to the Open Space Standards in the Unified Development Ordinance, Sec. 7-11-4.

The stated goals of the proposed Open Space revision are to use open space to tie together the Living Asheville Comprehensive Plan strategies of, 1. Eliminating barriers to infill housing, thus increasing the availability of affordable dwellings, and 2. Improving environmental regulations, particularly by offering an incentive for developers to follow stronger stormwater management regulations.

There are several elements of the proposed Open Space Amendment that are improvements over the existing open space standards. These include:

- For residential subdivisions, providing an option to either meet the open space requirements, or increasing the required tree canopy preservation standard by 10 percent.
- Adding industrial sites to the list of zoning districts requiring open space.
- Including tree-save areas as an appropriate use for open space.

CAN finds the overall goals of the revised Open Space Standards laudable and supports some of the elemental changes in the proposed code language.

However, CAN strongly feels that the proposed Open Space Amendment could go farther in bringing a better balance between achieving its goals, while trying to avoid the amendment's overall negative impact to the city's existing and long-standing neighborhoods.

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Specifically, adding to the density of residential neighborhoods by increased infill development should not occur without a commensurate form code language for multifamily housing that could create residential-friendly designs with height restrictions, as well as avoid setback-to-setback construction.

Also, CAN staunchly believes that the proposed OSA does not go far enough to promote and protect open space as green space, thus preserving and supporting a livable city by providing more environmental-friendly, comfortable, welcoming, and accessible spaces.

For these reasons, the Coalition of Asheville Neighborhoods cannot support the Open Space Amendment as currently proposed.

Since CAN did not have a seat on the Open Space Task Force and is not bound by the task forces' recommended ordinance language or the process by which task force reached its conclusions, and in its primary mission of protecting the integrity of all city neighborhoods, CAN offers the following recommendations:

1. Postpone action on a revision of Sec. 7-11-4 until the City creates a form code for multi-unit Missing Middle Housing, which would establish design requirements better suited for single-family zoned neighborhoods, and that also would include height and setback restrictions to help mitigate the added density that infill development would bring.
2. Compliment new land use technology, such as revised open space standards, that creates more sensible density conducive to walking, biking and other recreational and sociability forms with more sustainable green areas as cited in the Strong Town Study

<https://www.strongtowns.org/jour%20r%20%20%20al/2021/10/18/where-did-all-the-small-developers-go?lapcid=0060f5c55db5b5bba5585001&utm%20campaign=102021-wednesday-ema&utm%20content=&utm%20medium=email&utm%20source=autopilot>

3. Limit the use of non-green space as open space to high density zoning districts, such as the Urban Centers, and require that a minimum of 50 percent of open space in other zoning districts be green space.
4. Rather than the current language limiting impervious surfaces to 50% in an open space area, require that all non-green surfaces in open space be pervious to better mitigate stormwater runoff and the heat-island effect.
5. Limit to 25 percent the reduction for open space required for parcels one acre or

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more that voluntarily meet the affordable housing standard, unless the affordable housing index is measured at 60 %t of AMI.

6. Reduce the percentage of open space reduction by meetings design elements conditions as set for in the proposed Sec. 7-11-4 (f) 2. from "by 5 % " to "by 3%" .
7. Increase from 10 percent to 15 percent the amount of open space required for non-residential and mixed use developments.

Finally, although the Coalition of Asheville Neighborhoods recognizes the effort made by City Staff and the Open Space Task Force in working on an Open Space Amendment, city neighborhoods, as a key stakeholders, were left out of the process.

As our recommendations indicate, CAN urges the City to take another look and approach to revising Sec. 7-11-4. In doing so, we strongly urge the City to expand the stakeholders involved in the process to include representatives from city neighborhoods, especially of its Legacy Neighborhoods.

The Coalition of Asheville Neighborhoods stands ready to assist the City in reaching this objective.

With regards,

Board of Directors
Coalition of Asheville Neighborhoods
Rick Freeman, President

The Coalition of Asheville Neighborhoods has been representing Asheville communities for nearly 30 years.

VISION

Vibrant neighborhoods united in purpose, strong in voice, dedicated to equality and justice