Mr. Mayor and Village Board Members:

To expand and clarify my comments at the public meeting last week, I am submitting the following suggestions on the proposed Bulkeley School Overlay zoning.

The disappearance of affordable housing in the Village is a primary concern identified in the 1993 Comprehensive Plan, as well as the current Comprehensive Plan public outreach process. This critical issue needs to begin being addressed as soon as possible, not waiting for eventual adoption of a new Plan and the substantial extra time needed for the Village-wide rezoning process. Conversion of the school building to rental housing is an opportunity that should not be missed. I support the proposal to permit multi-family housing in the former school building, but it would be more consistent with recommended zoning principles to allow the overlay to be applied to more than the specific request of one development group for a single parcel.

1. Instead of the one-parcel Bulkeley School Overlay (BSO), I suggest the Village adopt an Affordable Housing Overlay (AHO) zoning option tied to the creation of below-market-rate multi-family, attached units, or houses. An AHO would act as a floating zone that could provide an incentive for affordable housing proposals in multiple locations and districts.

2. To ensure that the Bulkeley School proposal is not unduly delayed by this change, the Village could provide that the general application requirements for being placed in this more flexible AHO zone are ones already satisfied by the school proposal, including a detailed narrative describing the proposal, a SEQRA assessment of the subject parcel(s) weighing neighborhood and other environmental impacts, and an analysis to confirmed by the Village Engineer that the proposal can meet Department of Health standards. The adoption of the enabling AHO text should not require an extensive environmental review, since the rezoning of any particular parcel into the AHO would require a more detailed and site-specific SEQRA process. A public hearing for adoption of the AHO and Bulkeley School rezoning can be held on the same night.

3. The AHO should permit a full range of housing types. Currently, new multi-family buildings are prohibited in the Residential, Medical/Professional, and Gateway districts and other attached housing types require special permits. Since the application of the AHO would require a site-specific rezoning and public hearing process, no additional special permits should be required.

4. Any project for the construction of affordable housing could be considered by the Village Board for the overlay, not just larger-scale projects. A proposal with 10 or more new dwellings should be expected to provide at least 10% below-market-rate units, perhaps with a bonus unit provision to make the cost of inclusionary housing more economically feasible. Higher percentages can be encouraged.

5. To act as an incentive and allow more flexibility, no minimum or maximum number of acres, units per acre, or bedrooms should be included in the AHO zone. The Village Board has the authority to reject any unreasonable rezoning proposal before or after the environmental review and public hearing process.

6. The site plan standards should include stronger terms. Instead of "reduce" adverse impacts, the standards should "avoid or minimize" adverse impacts.

7. The Planning Board should be given the authority to reduce minimum lot sizes and approve shared driveways. Otherwise, the current bulk standards in the Dimensional Table for each underlying district should be applied, although I support additional provisions for rooftop features.

8. To reduce unnecessary pavement, promote walkability, and further reinforce affordability, the minimum parking standard for the AHO should be 1 space per unit. If the applicant provides a reasonable analysis for more parking, the Planning Board can always approve a larger number.

9. All the historic protection provisions and standards in Article VIII should be applied in the AHO, without an exception statement.

Finally, as a member of the Planning Board and Comprehensive Plan Committee, I have tried to avoid any comments on the specific Bulkeley School development proposal submitted to the Village. I have discussed other planning options for the Bulkeley School parcel and even prepared concept plan alternatives for the Committee to consider in the draft plan, as part of a broader approach to affordable housing on a variety of parcels. However, the suggestions in this email on the draft BSO zoning amendment are my own personal opinions and have not been discussed in advance with other Board or Committee members.

John Clarke