



Lake Champlain Regional Chamber of Commerce

September 27, 2012

Mr. David White, Director
Planning and Zoning Department
City of Burlington
149 Church Street
Burlington, VT 05401

Dear Mr. White:

We appreciate the opportunity to comment on Plan BTV Downtown and Waterfront Plan and wish to thank Sandrine Thibault for presenting an overview of the plan to our Board of Directors last week.

These comments from the Lake Champlain Regional Chamber of Commerce and GBIC are meant to be constructive and to provide the beginnings of the business perspective regarding its contents in the hopes that we can all work collaboratively to attain the best possible plan for the City's numerous and diverse stakeholders. In general, the City is to be commended for an extensive and innovative public outreach process and the creative use of a magazine format for the plan makes it inviting and easy to read for the average person. However, we also believe some of the plan's recommendations lack a business and real world perspective.

We are of the opinion that more outreach, specifically with the business community and key property owners is recommended before finalizing the plan. We offer the following comments as a start, and they should not be considered all of the comments that we have on the more specific elements of the plan. We would like the opportunity to flesh out more of our input in a series of meetings between city officials and the stakeholders who are most likely to develop key properties in the study area.

Plan Overview

The plan has a heavy focus on:

Increasing opportunities for walking and biking;
Living downtown and increasing housing opportunities and types of housing;
Promoting civic pride, tolerance, diversity and community;
Bringing agriculture from the Intervale to the city center and schools; and
Promoting a locally based creative economy.

We believe that the plan should also acknowledge the importance of the economic drivers for the downtown and waterfront and address the concerns and barriers to future expansion that our employers and the development community have about the area. Therefore, we have suggested some other issues for the city to consider as areas to focus upon per the section below.

Top Five Issues for the City??

On Page 41, a top 5 list of subject areas to be addressed by the plan is summarized from 250 survey participants (a fairly small number of responses). The number one issue – “promote a local economy (how is a “local” economy defined?) that is sustained by a diverse mixture of business opportunities” is a laudable goal but is a local economy sustainable? Does this mean that the City intends to discourage major national retailers or businesses? In these economic times, it is critical that our businesses have as broad and diverse a customer base as possible. Local is critical, but an obsessive focus on local leaves us very exposed to more significant downturns. Evidence that diversity helps has been very clear as we have seen from the strong export business we’ve enjoyed during this recent regional and U.S. recession.

The number two issue – “Strengthen Burlington’s role as a regional population and economic center” is too limiting as Burlington is not only a statewide center, but it has become a magnet for international travelers and especially, Canadian visitors.

We especially appreciate the fifth bullet which is to “Promote new and infill urban development.” However, we suggest that **more creative approaches to parking requirements for development** is the single most important issue for future development infill to occur and that zoning requirements for inclusionary affordable housing must also be changed to allow projects to go forward.

Proposed Top issues for consideration:

We submit that other top issues for the City are:

Financial Stability & Sustainability especially with respect to Address Existing Maintenance and Repair Needs

Parking Availability and Traffic Congestion mitigation

Burden of Homeless Population and the resulting demand for social services and police presence, especially in the downtown area

Barriers to Infill Development including permitting process, architectural and design/historic preservation requirements, lack of parking, NIMBYism and zoning requirements

Creative Economy Promoted and Mentioned to the Exclusion of other Economic Development and Economic Drivers?

One overarching concern is a lack of focus on economic development other than the creative or arts/culture sectors of the economy. In fact, on page 6, it states: *“While some plans include an economic development section, we see the economy as inextricably linked to everything else, and as such don’t give it a separate section.”* David White’s letter on page four acknowledges that a stable and healthy economy is the greatest barrier to achieving the vision of a sustainable community, yet ironically, Burlington’s economic drivers are absent from the plan. There are extensive sections in this plan that talk about the creative economy and agriculture yet, the financial services sector, the spinoff companies generated by the areas’ colleges, our medical center, research and technology sectors as well as manufacturers and retailers are important contributors to Burlington’s economy. They should also be acknowledged and issues that would contribute to their success discussed, as the City has recently lost a significant amount of jobs from companies such as Gallagher Flynn and People’s United to surrounding communities. The plan’s choice of limiting the study area so as not to include important waterfront and economically vital parcels such as Dealer.com, Blodgett’s, the former General Dynamics site,

(now known as Innovation Center), and Maltex building among others gives one the impression that the only economic development the City is interested in is the creative arts and tourism. We recommend expanding the scope of the study area as these areas are vital to the City's future and linkages from these areas to the downtown and waterfront are critical to encourage a symbiotic and thriving economy. Satellite parking and transportation linkages from these areas are crucial to reducing congestion in the downtown areas and therefore, the omission of these areas from the study scope is noteworthy.

Importance of Financial Sector as One Example

As a specific example, and with respect to the financial services sector:

- This industry employs many hundreds of individuals in the city core
- It provides socially responsible jobs and good wages and benefits to all employees.
- The sector has key buildings that generate real estate tax revenues and contribute to the aesthetics and parking of the downtown area.
- These employees shop and dine regularly in downtown, generating consistent sales taxes and revenues.
- They provide the financing to companies such as Dealer.com and Seventh Generation, as well as all of the local restaurants and retailers, which have allowed them to grow here.
- This sector provides significant financial support for our not for profit organizations who serve the broad needs of the community, from economic development efforts and human services to the arts.
- Recently, large employers in the financial sector have relocated to the suburbs due to parking and cost issues that need to be addressed by this plan.

Need for Prioritization

The City has critical basic infrastructure repair and maintenance needs. This plan must recognize the limited capacity of the taxpayers to incur additional tax increases and therefore, the prioritization of the improvements called for in this plan must be done and match the City's financial capability to pay for these improvements.

Waterfront

We conceptually support most of the elements that the plan calls for:

- improvements to be made to enhance the streetscape and urbanism along the corridors, safe pedestrian and vehicular access and minimizing use of the automobile around the waterfront through new linkages, shared parking structures and innovative public transportation.
- expanding marina operations with a goal of adding 300 more slips and support services.
- securing status of a Vermont Clean Marina to improve water quality.
- redesign and relocation of ferry boat landing as the gateway to the city by moving the ferry terminal further south to Perkins Pier to free up space for mixed use waterfront redevelopment. (Who will pay for this?)
- a number of proposals to balance event demands on the waterfront with residential needs including requiring soundproof windows and doors (no such things exist) on new residences, a band shell and constructing a parking garage below Battery Street (who will pay for this?) is included.

Housing

The lack of housing for middle income people is acknowledged and described as the “hole in the donut.” We concur with this area of concern. The cost of land, infrastructure and the permitting process make developing this price range impossible and therefore, strategies are needed in this plan to address these issues.

P. 52 and 53 includes a number of recommendations to encourage housing. We support the statements, “the current zoning actually prohibits new development from being more than 50 % housing in the downtown area core. This has got to go if Burlington’s economic potential is ever to be realized.” **It is our opinion that inclusionary zoning has been the biggest barrier to the creation of new housing and must be eliminated.** Other statements including the cost of parking and an uncertain approval process are appreciated.

We need to understand more about form based codes for context appropriate infill development and how it has worked in other cities, before we can support this change to the zoning. We want the process to become more predictable, not less predictable and it would seem form based codes would leave a lot of subjective design decisions to the staff and regulatory bodies.

We concur that the city’s superblock site (Midtown Motel) is a location to experiment with new construction and adaptive reuse and concur with all of the proposed zoning amendments on .p. 52. Since we would like to see inclusionary zoning eliminated altogether, the suggestion about reducing thresholds is welcome.

Parking

We are particularly concerned about the Plan’s comments addressing parking, specifically new parking. The greatest single impact on developing parcels within this urban environment and the feasibility of infill development is the parking requirements. Parking affects every proposed development. If we improve commuter rail, sidewalks and paths and increase bus service, we will only address part of the problem with mobility in the community. People still use cars to access the City.

Long term, as projects are proposed for development we need to be more creative in our approach. The plan should identify pockets of small locations that might be available throughout the City, versus large parcels for large scale (ie: proposal for Edmunds School to be a large parking facility) parking. We should be looking at developing “pocket” parking areas; there are a few ways to address this, short term we need to look at existing lots to determine if they can be redeveloped with more efficient use. An example would be Browns Court, which could become a two level parking structure (it is already at least 10 feet above the St Paul Street grade) with housing above. The parking lot on Main and South Winooski could be a two level with a multi-story building above; if you combine the existing auditorium and the fire station you should have over 1.5 acres of land mass for development. There are a few other parcels where public parking could be added; commercial office development is ideal because of the shared use component for off- hours residential use.

Parking should be the first thing we address in the ordinance, but, to do that we need a plan to replace parking shortages and to better guide people with signage to existing parking (ie. Courthouse Plaza parking garage, Union Station, etc.). There are other approaches we should consider, for example, if a developer cannot provide parking on the lot he is developing, he should be able to contribute to a municipal fund that creates parking within the City. More senior housing is needed downtown, however it should have a more relaxed parking standard since most seniors do not own two vehicles, and many do not own any vehicles.

The Mall

1. In the interior area between Peoples United Bank, the Hilton and the Courtyard Burlington Harbor, we should consider building a Civic Center/Convention Center. This facility could be built on top of the existing parking garages. Years ago, CEDO officials had mentioned this idea and now if feasible, it seems more logical than ever. Soon there will be 544 hotel rooms and over 2000 parking spaces all with access to the marketplace, Burlington Town Center and the lake.
2. The Cherry Street corridor (once the bus station gets moved to Pearl Street) needs some attention. Perhaps the street should be narrowed making it one way and having restaurants/cafes spill out onto the Cherry street sidewalk. Pierre Hardy, the muralist who did the Church Street Mural is very interested in putting a mural on the facade of the ugly garage on Cherry Street which is owned by General Growth Properties.

Church Street

Burlington has increasingly become a destination of choice for people needing robust social services. We applaud the quality of social services that our public sector provides and we are proud of the philanthropy of their private sector benefactors. The fact is, however, that the core business district has reached its saturation point in terms of the percentage of social service organizations to for-profit businesses. Church Street has become a magnet for unacceptable behavior and language used by individuals who congregate around benches and who pan-handle. This issue is a significant problem and results in people who do not want to visit Church Street as they fear for their safety. We are concerned about putting in more benches if the transient population and their behavior are not addressed. We also suggest that the city work with other communities to host their fair share of services and that zoning regulations be put into effect that curtails the growth of additional social services in the core downtown.

Main Street

We are concerned about the proposal for back in parking spaces and the inevitable pedestrian/bicycle conflicts with a separated bike lane. We question whether there is adequate right of way or funding to accommodate these improvements.

Editorial Content Comments

On page 43, there should be some type of value relating to business and the economy – ie. “encouragement of prosperity and jobs for all.”

Page 44-45, in Vibrant Economy, again Burlington is an economic engine for the state not just the region. Under Creativity and Innovation- there are many references sprinkled throughout the plan to locally produced products and the economy; it is naïve to believe that we will have a sustainable community or lifestyle with just local goods and services. Furthermore, legacy manufacturers such as Blodgett, Edlund or Burton and other newer employers such as Seventh Generation should be acknowledged.

In the Sense of Place section, the statement, “putting the needs of City residents above the desires of visitors” is a troubling declaration if we are trying to promote a tourism economy.

p. 46 The plan recognizes that higher rents, smaller floor plates (typo?) and parking issues have resulted in the relocation of large office users. We appreciate the statement that Burlington must comprehensively address parking and that an increase in the supply of low cost incubator spaces is needed to stay competitive.

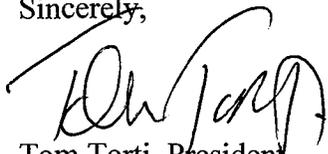
p. 47 The Plan recommends expanding the Downtown Improvement District paid for by a commercial property tax for businesses within the district to provide services that are unique from municipal services such as downtown recruitment services and infrastructure.

It also recommends a downtown development revolving loan fund using CDBG funding and leveraging from private investments, banks and foundations. Is another fund needed or can existing ones be used?

A reference is made to assure appropriate design and materials standards are met for downtown historic districts. The development community and non profit housing sector has expressed concerns with the stringent requirements for building materials and we recommend a relaxing of these requirements especially with new and better materials available on the market. Property owners need more flexibility with respect to building materials and requirements so that they can better afford and have more incentive to maintain and upgrade their properties.

Again, we appreciate the opportunity to submit these comments, we would like a chance to have key property owners and developers meet with City officials prior to finalizing the plan, and look forward to working in a collaborative, positive manner to improve this draft vision for Burlington.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Torti', written over a white background.

Tom Torti, President

Lake Champlain Regional Chamber of Commerce