APPENDIX II

Plan A Appendix II includes:

A. Public Engagement and Outreach
   • Atlanta City Design Engagement
   • CD/HS Public Hearings
     • CD/HS Public Hearing #4 Q3 2021: October 25, 2021
     • CD/HS Public Hearing #3 Q2 2021: June 28, 2021
   • Stakeholder Meetings
   • CD/HS Committee Meetings
   • Incorporating Public Review and Comment
     • Public Review and Comment on Draft III
     • Public Review and Comment on Draft II
     • Public Review and Comment on Draft I
     • Feedback from Stakeholder Meetings (Fall-Winter 2020)
   • Public Outreach

B. Land Use/Zoning Compatibility Table and I-Mix Ordinances

C. Consideration of the Regional Water Plan and Environmental Planning Criteria

D. Other Documentation
   • City of Atlanta Transmittal Letter
   • ARC and DCA Communications
   • Staff Report
   • Plan A Adopted Ordinance
A. Public Engagement and Outreach
PUBLIC ENGAGEMENT

Plan A is the result of years of public engagement and outreach by the City of Atlanta Department of City Planning and others over the elements to this comprehensive development plan. The following pages summarize public engagement milestones from this CDP update including public hearing agendas, meeting minutes, attendance logs, and presentations.

1. Atlanta City Design Engagement
2. CD/HS Public Hearings
3. Stakeholder Meetings
4. CD/HS Committee Meetings
5. Incorporating Public Review and Comment
   • Public Review and Comment on Draft III
   • Public Review and Comment on Draft II
   • Public Review and Comment on Draft I
   • Feedback from Stakeholder Meetings (Fall-Winter 2020)
1. Building from Atlanta City Design

As the 2016 Comprehensive Development Plan process was wrapping up, the City was taking on the effort to create Atlanta City Design. Under the leadership of the Department of City Planning, a broad and inclusive group of people representing local government, the community, and topic experts prepared the Atlanta City Design to reflect Atlanta’s values, history and culture, and future growth and development. By adopting Atlanta City Design into City’s Charters in December 2017 and continuing broad engagement, the efforts behind Atlanta City Design immediately influenced the work to prepare and adopt Atlanta’s Transportation Plan in 2018, which largely informs the Transportation Planning Element in Plan A and the transportation actions found in the 2022-2026 Community Work Program.

For the past three years, the Department of City Planning has generated a ground swell of interest culminating in Atlanta’s first urban ecology framework, Atlanta City Design: Nature. Atlanta City Design has also left its impression on the Department of Parks and Recreation years-long master planning efforts with Atlantans, ActivateATL. Together, these two initiatives have reached thousands of people and directly inform a large part of the Natural Systems and Resiliency Planning Element.

For nearly two years, the Department of City Planning has been engaging advocates, experts, residents, and businesses in Atlanta City Design: Future Places Project. Much of this engagement work is reflected in the contents of the Historic Preservation Element.

Atlanta City Studio is a physical space, with open hours for public visitation, in which the Department of City Planning embeds itself in neighborhoods to celebrate and build momentum for design excellence in Atlanta. Atlanta City Studio was in Ponce City Market (2016-2017) and Cascade Heights (2017-2019). Since late 2019, the Studio has called South Downtown its home. The studio is staffed by urban designers and urban planners who engage the public daily over the values, concepts, and big ideas of Atlanta City Design. Early on, the studio partnered with Atlanta Public Schools to design a social studies curriculum inspired by Atlanta City Design for middle school students; the department hopes to pursue this partnership further to incorporate new planning initiatives since 2017. This symbiotic relationship between our professional designers and planners and the public have generated new initiatives and understanding of Atlanta’s built environment—the outcomes of which are described in the Urban Design Element of Plan A.

In 2019, we also started NPU-University to provide training and education to Atlantans to increase contributions to civic decision-making in neighborhoods. Our courses are designed to inform and empower members to use the tools available for greater community impact. In 2020, we produced 15 virtual classes and 3 in-person classes for nearly 6,000 students (on Zoom and via social media streams). People who register for our classes are usually Atlanta residents, neighborhood leaders or stakeholders. Approximately half are actively involved in their NPU. We learned a lot from these new interactions and this is reflected in our Neighborhood Planning Element.
FROM DESIGNING TO BUILDING THE BELOVED COMMUNITY

VISIONING

Atlanta City Design sets the framework for how the city will grow and develop

PLANNING

Plans, studies, and policies guide this growth and development across the city and in neighborhoods

Zoning, Permitting, Financing

Regulations, programs, projects, and initiatives implement the vision and plans

Building Our City

Over the next generation, we will operationalize these ideas and actions to build the Beloved Community
Atlanta City Design is also influencing the ongoing revisions to the City’s Zoning Ordinance. After a diagnostic identified needed, near-term improvements to the Ordinance—precursors to future changes from the Zoning Code rewrite—the City adopted amendments to the Zoning Ordinance in 2018 and 2019. The Department continues to communicate the changes to zoning, and correspondingly changes to Future Land Use Planning, through public forums such as community meetings, NPU monthly meetings, and City Council meetings. There will be many more opportunities to engage the public over the relationships between comprehensive development planning and zoning as the Zoning Code Rewrite proceeds over the next few years and the next phase to Plan A starts.

Atlanta City Design: Housing is our latest work translating Atlanta City Design into policies and actions. In the summer of 2018, the Department of City Planning facilitated four community workshops attended by nearly 300 people. Participants learned about current and future housing needs, identified priorities, and selected preferences for the range of tools available to meet priorities and needs. Feedback from these sessions informed the Equitable Housing Needs Assessment and laid the groundwork for policies and tools for the City to consider. In 2019 and early 2020, the Department started to convene the Housing Innovation Lab while also reaching the broader public through a 5-week long book club (concluding with a panel presentation) to discuss Richard Rothstein’s book, The Color of Law. Both activities shed new perspectives on the laws, policies, and practices in place that enable segregation as well as the ways to address equity Atlanta’s housing market. Following these efforts up in in the fall and winter of 2020 and 2021, the Department conducted a series of NPU-University courses and virtual webinars as well as present at NPU monthly meetings. This direct engagement followed the December 2020 release of Atlanta City Design: Housing Storymap, an interactive platform for the public to learn about the history of residential land use and zoning in Atlanta and published recommendations for addressing Atlanta’s housing challenges. Plan A’s Housing and Community Development Planning Element is greatly informed by the engagement and work of Atlanta City Design: Housing.

Atlanta City Design is creating immense momentum to change Atlanta’s comprehensive development planning. Since 2017, the Department of City Planning has been in ongoing dialogue with the public and elected officials over this once-in-a-generation chance to change how Atlanta plans. The course of this dialogue and the evolution of ideas informing Plan A may best be illustrated by the frequent Department updates at Atlanta City Council Community Development and Humans Services (CD/HS) Committee public hearings throughout the years. Several examples of these presentations archived on the CD/HS website are included in this Appendix.
2. CD/HS Quarterly Public Hearings for Plan A

The Department of City Planning provided progress updates regarding Plan A at four quarterly public hearings to CD/HS Committee.

- CD/HS Public Hearing #4 2021 Q3: October 25, 2021 (Legislation for Adoption, Rescheduled from 9/27)
- CD/HS Public Hearing #3 2021 Q2: June 28, 2021 (Transmittal Draft to DCA/ARC)
- CD/HS Public Hearing #2 2021 Q1: March 22, 2021 (Administrative Update Overview)
- CD/HS Public Hearing #1 2020 Q3: September 28, 2020 (Kick-off)

The agendas, minutes, and presentations for these hearings are included in this Appendix. The Department’s staff report submitted to CD/HS at Public Hearing #4 is also in this Appendix.

During these updates, City Council members asked questions or provided input on preparing the comprehensive plan. The hearings also included public comment opportunities for which residents could leave voice messages prior to the meeting.

The Department received voicemail comments on drafts during Public Hearings #4 and #3.

Public Hearing #4:
City Council Community Development/Human Services (CD/HS) Committee rescheduled the 2021 Q3 public hearing for the Comprehensive Development Plan for Monday, October 25, at 6pm. City Council will host a special session on October 28 to adopt the CDP by October 31, 2021. The Department released Draft 3 for public review and comment from October 1 to 8. The Department releases the Final Draft at CD/HS Committee Meeting on October 12.

There were 871 public comments (10 hours, 37 minutes of voicemails) for the September 27 CD/HS CDP Quarterly Hearing. Due to the rescheduled hearing, these voicemails were made available on City Council website for people to listen on demand. The Department listened to all of them. In total, 712 voicemails were related to Plan A. Most of these comments followed similar themes expressed in email comments over Drafts II and III.

There were approximately 600 public comments (about 7 hours and 35 minutes of voicemails) for the rescheduled CD/HS CDP Quarterly Hearing on October 25th.

Public Hearing #3:
City Council received 1,050 messages, totaling 16+ hours of public comment, related to the CDP draft at the public hearing on June 28, 2021. Similar to what the Department heard at Public Hearing #4, most of the comments were from Northwest Atlanta or Midtown residents. The majority of Public Hearing #3 comments related proposed changes to City’s Zoning Ordinance listed in the June 2021 draft and below:

- HC 4.1: Amend the zoning ordinance to allow attached and detached ADUs citywide.
- HC 6.1: Amend the zoning ordinance to reduce residential parking requirements.
- HC 6.2: Amend the zoning ordinance to reduce minimum lot size requirements.
• HC 7.1: Create fee simple subdivision for accessory dwelling units to promote affordable homeownership options.

Following this feedback, the Department of City Planning revised Plan A by removing proposed policy actions HC 6.2 (minimum lot size) and HC 7.1 (fee simple subdivisions). The Department also revised HC 4.1 to state “Amend the zoning ordinance to allow attached and detached ADUs in more areas.” The Department left HC 6.1 as is. These changes reflect legislation (21-O-0456) submitted to City Council to amend the Zoning Ordinance during the June to July 2021 public comment period over the draft of Plan A. More discussion over these revisions is in the public review and comment section later in this Appendix.
The Community Development/Human Services Committee of the Atlanta City Council will hold its third quarter Comprehensive Development Plan (CDP) Amendments Public Hearing on **Monday, October 25, 2021, at 6:00 p.m. remotely on** the following proposed CDP amendments.

Members of the public may dial into the hearing at (877) 499-2930, Conference ID: 3995242. Materials for this hearing will be posted on the Community Development/Human Services Committee presentation page at: [https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations](https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations).

Public comments associated with the proposed CDP amendments may be made by dialing the following numbers: for comments related to agenda item (1) CDP-21-049/21-O-0671 please dial (404) 330-6068; for comments related to all other agenda items please dial (404) 330-6042 and indicate the agenda item number you will be speaking to at the beginning of the message. Messages are not to exceed 3 minutes and will be accepted between the hours of 4:00 pm and 7:00 pm on the day before the scheduled meeting (Sunday, October 24).

<table>
<thead>
<tr>
<th></th>
<th>CDP-21-049 21-O-0671</th>
<th>An Ordinance adopting the 2021 City of Atlanta Comprehensive Development Plan (&quot;Plan A&quot;) as the Official Comprehensive Development Plan for the City of Atlanta, Georgia, in Compliance with the Requirements of the Georgia Planning Act of 1989; and for other purposes.</th>
</tr>
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<tbody>
<tr>
<td>(1)</td>
<td>CDP-21-022 21-O-0344</td>
<td>An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate a portion of the property located at 1295 Marietta Boulevard NW (tax ID 17 0190007234) from the Transportation Communications and Utilities (TCU) Land Use Designation to the Mixed Use (MU) Land Use Designation; and for other purposes. (Z-21-029)</td>
</tr>
<tr>
<td>(2)</td>
<td>CDP-21-031 21-O-0683</td>
<td>An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 1818 Lakewood Avenue SE from the Single Family Residential (SFR) Land Use Designation to the Low Density Residential (LDR) Land Use Designation; and for other purposes. (Z-21-047)</td>
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<tr>
<td>(3)</td>
<td></td>
<td>NPU-D Council District 9</td>
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<td></td>
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<td>NPU-Y Council District 1</td>
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</tbody>
</table>
PUBLIC NOTICE COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE

October 25, 2021 6:00 P.M. The Community Development/Human Services Committee of the Atlanta City Council will hold its third quarter Comprehensive Development Plan (CDP) Amendments Public Hearing on Monday, October 25, 2021, at 6:00 p.m. remotely on the following proposed CDP amendments. Members of the public may dial into the hearing at (877) 499-2930, Conference ID: 3995242. Materials for this hearing will be posted on the Community Development/Human Services Committee presentation page at: https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations. Public comments associated with the proposed CDP amendments may be made by dialing the following numbers: for comments related to agenda item (1) CDP-21-049/21-O-0671 please dial (404) 330-6071; for comments related to all other agenda items please dial (404) 330-6042 and indicate the agenda item number you will be speaking to at the beginning of the message. Messages are not to exceed 3 minutes and will be accepted between the hours of 4:00 pm and 7:00 pm on the day before the scheduled meeting (Sunday, October 24). (1) CDP-21-049 (21-O-0671) An Ordinance adopting the 2021 City of Atlanta Comprehensive Development Plan ("Plan A") as the Official Comprehensive Development Plan for the City of Atlanta, Georgia, in Compliance with the Requirements of the Georgia Planning Act of 1989; and for other purposes. (2) CDP-21-022 (21-O-0344) An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate a portion of the property located at 1295 Marietta Boulevard NW (tax ID 170190007234) from the Transportation Communications and Utilities (TCU) Land Use Designation to the Mixed Use (MU) Land Use Designation; and for other purposes. (Z-21-029) NPU-D Council District 9 (3) CDP-21-031 (21-O-0683) An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 1818 Lakewood Avenue SE from the Single Family Residential (SFR) Land Use Designation to the Low Density Residential (LDR) Land Use Designation; and for other purposes. (Z-21-047) NPU-Y Council District 1 (4) CDP-21-034 (21-O-0684) An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 3393 Jonesboro Road SE from the Single Family Residential (SFR) Land Use Designation to the Industrial (I) Land Use Designation; and for other purposes. (Z-21-039) NPU-Z Council District 12 (5) CDP-21-035 (21-O-0685) A Substitute ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 3626 Peachtree Road NE from the Low Density Residential (LDR) Land Use Designation to the High Density Commercial (HDC) Land Use Designation; 3693 Wieuca Road NE and a Portion of 3706 Peachtree Dunwoody Road from the Single
WHAT IS A COMPREHENSIVE DEVELOPMENT PLAN (CDP)?

- The CDP is Atlanta’s guide for growth and development.
- The Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) require Atlanta to adopt and implement a CDP and update within 5 years — next update by October 2021.
- The City uses the CDP to prioritize programs, projects, and initiatives, and changes to development policies for individual neighborhoods and the entire city.
- Per Atlanta’s Charter, Atlanta City Design (adopted in 2017) sets the framework for updating Atlanta’s CDP.
- Plan A is the 2021 CDP and next update.

COMPREHENSIVE PLANNING IS A CONTINUOUS PROCESS...

ПHASE 1 OF PLAN A IN 2021 IS AN “ADMINISTRATIVE UPDATE”

Purpose of the 2021 CDP Administrative Update

- Allow the City to maintain its Qualified Local Government (QLG) status so Atlanta can continue accessing federal and state funds for economic development, affordable housing, and infrastructure
- Meet the Minimum Standards and Procedures for Local Comprehensive Development Planning
- Refresh CDP Goals, Needs and Opportunities, and Policies from the 2016 CDP
- Provide a revised Community Work Program (CWP) and Report of Accomplishments
- Document revised MPU policies and adopted small area/neighborhood plans since 2016
- Include the Future Land Use Map and Descriptions as of the June 2021 quarterly update
- Reflect recent and ongoing planning across Atlanta
- Lay a foundation for a more robust update in 2022

FROM DESIGNING TO BUILDING THE BELOVED COMMUNITY

Atlanta City Design sets the framework for how the city will grow and develop

Plans, studies, and policies guide this growth and development across the city and in neighborhoods

Regulations, programs, projects, and initiatives implement the vision and plans

Over the next generation, we will operationalize these ideas and actions to build the Beloved Community
PHASE 2 OF PLAN A STARTING IN 2022 IS A “FULL UPDATE”

Purpose of the 2022 CDP Full Update

- Further align Plan A with Atlanta City Design
- Allow for an iterative process between the CDP update and Zoning Code Rewrite
- Engage the community in an even more participatory and inclusive planning process over 18 or more months
- Combine educational courses, workshops, and other traditional and non-traditional meeting forums at the city, NPU, and neighborhood levels
- Conduct both virtual and in-person engagement

- Major update to the Land Use Element — potentially different Future Land Use maps and policies, and compatibility table with new Zoning Code
- Greater integration of Atlanta City Design values, context, and relationships throughout all the elements
- Prepare a CDP for a growing Atlanta

PLAN A ELEMENTS

Planning Elements

- Community Vision and Goals
- Land Use Planning
- Transportation Planning
- Housing and Community Development Planning
- Local Economic Development Planning
- Broadband Internet Planning
- Natural Systems and Resiliency Planning
- Urban Design
- Historic Preservation
- Public Safety Facilities Planning
- Neighborhood Planning

Plan Elements

- Community Vision and Goals are carried through all Elements Summaries of Major Plans/Policies, Needs and Opportunities, and Proposed Policies and Actions

Implementing Elements

- Community Work Program (CWP) — specific activities the community will undertake during the next five (5) years to address priority Needs and Opportunities
- Capital Improvements Element (CIE) — development impact fee funded projects for construction, maintenance, and renovation of public facilities and infrastructure over the next five (5) years. The element is prepared and adopted each year
- Report of Accomplishments — brief status update on progress implementing actions listed in the previous Community Work Program

PLAN A DRAFTS AND PUBLIC REVIEW AND COMMENT PERIODS

Public Review and Comment Periods

- June 8 to July 27 — Public Review and Comment Period for Draft #1
- July 27 to September 28 — Public Review and Comment Period for Draft #2
- October 1 to 8 — Public Review and Comment Period for Draft #3

Summary of Draft Revisions to Date

- Incorporates nearly 1000 written comments from the public, NPUs, and other stakeholders
- Also incorporates comments received at community, APAB, NPU, and CD/HS meetings
- Documents line-by-line changes between working drafts

Outreach During Public Review and Comment Periods

- Hardcopies at 15 libraries and community centers
- Frequently Asked Questions on website
- Routine social media posts, website updates, and NPU Planner updates
- Department staff met with individual NPUs on request

HIGHLIGHTS OF PUBLIC COMMENTS AND REVISIONS

Main Topics

- Balancing growth and development priorities with what truly makes Atlanta great
- Aligning public infrastructure plans with growth and development
- Limiting the scope of this CDP update and ensuring meaningful engagement with residents

Plan Elements

- Land Use Planning
- Housing and Community Development Planning

CDP LEGISLATION DATES

City Council Meetings for Plan A Adoption by October 31, 2021

- August 24 — Legislation Introduced at CD/HS Committee Meeting
- September 7 — City Council Full Meeting Legislation Reading #1
- September 14 — CD/HS Committee Meeting #2
- September 20 — City Council Full Meeting Legislation Reading #2
- September 27/October 25 at 6:00pm — Final CD/HS Public Hearing for Plan A
- October 12 — CD/HS Committee Meeting #3
- October 26 — CD/HS Committee Meeting #4
- October 28 — Final City Council Full Meeting Reading #3 for Adoption

Website atlcitydesign.com/2021-cdp
Suggestions & Comments to cdp2021@AtlantaGo.Gov
RECAP OF PUBLIC OUTREACH AND ENGAGEMENT SCHEDULE

NEXT STEPS TO PLAN A

- Final Draft considered at October 26 CD/HS committee meeting and October 28 Full City Council meeting
- Notification of Plan A adoption to DCA/ARC, NPU, and the public in November 2021
- Department will provide CD/HS committee and NPU update on Phase 2 of Plan A first quarter 2022
- Anticipate aligning CDP and Zoning Rewrite technical analysis as early as November 2021
- Anticipate aligning CDP and Zoning Rewrite public engagement and outreach by second quarter 2022

THANK YOU

Janide Sidifall
jsidifall@AtlantaGa.Gov

Stay informed &
provide input on Plan A

Email the CDP team
cdp2021@AtlantaGa.Gov
Follow us on social media
@atlplanning
Browse the CDP website
atlcitydesign.com/2021-cdp
CD/HS Committee Amendment Forms for Plan A

Following the CD/HS CDP Public Hearing on October 25, the CD/HS committee submitted two amendment forms for 21-O-0671 (the ordinance to adopt Plan A). The specific revisions to Plan A the amendment forms requested are outlined on the next few pages.

Amendment Form #1:

COMMITTEE AMENDMENT FORM

Date: Tuesday, October 26, 2021

Committee: Community Development/Human Services PAGE #S: _____________

Ordinance # 21-O-0671 (smith) SECTION(S): _____________

Resolution # _____________ PARAGRAPH _____________

This legislation is amended to remove the dedication page, ii of Plan A.

Amendment Form #2:

COMMITTEE AMENDMENT FORM

Date: Tuesday, October 26, 2021

Committee: Community Development/Human Services PAGE #S: _____________

Ordinance # 21-O-0671 (Westmoreland) SECTION(S): _____________

Resolution # _____________ PARAGRAPH _____________

Amends the legislation to revise Exhibit A as follows:

Page 31: Delete the following:

Atlanta City Design challenges us to be exceptional in our design of the physical growth and development of Atlanta. It also introduces a different framework to Land Use Planning in this comprehensive development plan, one that, for now, doesn’t replace existing Future Land Use and Character Area Planning, but rather suggests additional design considerations.

Page 32: Delete the following:

Atlanta City Design proposes the share of the city’s regional population to be much larger and suggests that the city of Atlanta could more than double its population to 1.2 million residents in a generation.

Atlanta City Design introduces a different framework to Land Use Planning in this comprehensive development plan, one that, for now, doesn’t replace existing Future Land Use and Character Area Planning, but rather suggests additional design considerations.
Page 33: Update the definition of “Growth Areas” and “Conservation Areas”:

**Growth Areas:** These areas of the city have a built environment that is most conducive to dense, urban development. Atlanta’s Growth Areas are already places where many of the city’s densest residential neighborhoods and commercial districts are, but there is significant room for additional density. Growth will be organized into already-developed areas that are suitable to taking on growth. This includes the historic core of the city, the corridors that flow outward in every direction, and outlying clusters like Buckhead and Greenbriar. These growth areas represent an enormous capacity that, if properly designed, can easily accommodate Atlanta’s expanding population.

**Conservation Areas:** Much of Atlanta is comprised of residential areas that are currently dominated by low-density residential areas. Adding density in these areas looks very different from the Growth Areas. The key is to add subtle density that maintains the character and form of the neighborhoods. The rest of the city will be protected from overwhelming growth. The intown neighborhoods and lush suburban territories will grow in ways that retain and improve their charm and their leafy tree canopy. These Conservation Areas represent ecological value, historic character, and housing options that, if properly designed, can make living with all those new neighbors a pleasure.

Page 36: Delete the following:

*Zoning changes in Atlanta must be consistent with the comprehensive development plan. While the City considers both the Future Land Uses and the Character Area Map when recommending changes to a property’s zoning, ultimately, consistency with the comprehensive development plan is determined solely by reference to the Future Land Use Map.*

Page 48: Delete the following:

*Zoning changes in Atlanta must be consistent with the comprehensive development plan. While Character Area Planning can inform zoning changes, ultimately, consistency with the comprehensive development plan is determined solely by reference to the Future Land Use Map.*

Page 96-97: Update the “Housing Density & Variety” section:

**HOUSING DENSITY & VARIETY**

**Needs & Opportunities**

Housing variety means diverse types of home design, size, tenure, age, and ownership models. This contrasts with the large area of Atlanta where we see one type of home designed to house one nuclear family. Nearly 60% of the land in the City is zoned exclusively for single family development. This housing monoculture simply does not meet the needs of Atlanta’s diverse families—young singles, aging seniors, couples, and parents who benefit from having multigenerational family and caregivers nearby. The areas of the city with the least housing variety are also the least racially diverse. Improving housing variety may lead to increased racial diversity in neighborhoods. Atlanta developers, homeowners, nonprofit organizations, and financial institutions are experimenting with housing types that are available in other cities across the country but are novel to the
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Zoning changes in Atlanta must be consistent with the comprehensive development plan. While Character Area Planning can inform zoning changes, ultimately, consistency with the comprehensive development plan is determined solely by reference to the Future Land Use Map.

Page 96-97: Update the “Housing Density & Variety” section:

HOUSING DENSITY & VARIETY

Needs & Opportunities

Housing variety means diverse types of home design, size, tenure, age, and ownership models. This contrasts with the large area of Atlanta where we see one type of home designed to house one nuclear family. Nearly 60% of the land in the City is zoned exclusively for single family development. This housing monoculture simply does not meet the needs of Atlanta’s diverse families—young singles, aging seniors, couples, and parents who benefit from having multigenerational family and caregivers nearby. The areas of the city with the least housing variety are also the least racially diverse. Improving housing variety may lead to increased racial diversity in neighborhoods. Atlanta developers, homeowners, nonprofit organizations, and financial institutions are experimenting with housing types that are available in other cities across the country but are novel to the Atlanta market. Accessory dwelling units, cottage courts, modular and offsite construction, new mortgage products—we need to signal that we want and support this innovation. The best way to do that is through changes to our zoning code. Easing restrictions to support increased supply makes sense throughout the city. If just 15% of parcels added an accessory dwelling unit, over 11,000 units could be supplied while maintaining the low-density character of neighborhoods in Atlanta City Design Conservation Areas. We can locate high-density housing in Growth Areas near transit and other supportive infrastructure. While the City’s zoning ordinance is getting a much-needed overhaul, we will exercise a sense of urgency to fast-track simple changes to encourage housing density and variety.

Policies

HC 4 — Enable the market’s ability to provide missing middle housing.

HC 5 — Leverage transit and other infrastructure to maximize housing density in Atlanta’s Growth Areas.

HC 6 — Maintain the low-density character of neighborhoods in Atlanta’s Conservation Areas by permitting housing types that gently increase density.

HC 7 — Advance affordable homeownership opportunities.

HC 5.1 Amend the zoning ordinance to allow small apartment buildings near transit.

HC 5.2 Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.

HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.

HC 7.1 Increase the use of community land trusts to expand options for homeownership.

Policy Action

HC4.1 Amend the zoning ordinance to allow attached and detached ADUs in more areas.

HC 4.2 Amend the zoning ordinance to support missing middle housing.

HC 4.3 Amend the zoning and building codes to allow offsite construction models.

HC 4.4 Amend the zoning ordinance to update or remove the definition of family in favor of maximum occupancy regulated by the building code.

HC 5.1 Amend the zoning ordinance to allow small apartment buildings near transit.
**HC 5.2** Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.

**HC 6.1** Amend the zoning ordinance to reduce residential parking requirements.

**HC 7.1** Increase the use of community land trusts to expand options for homeownership.

The City feels these particular action steps need considerably more public engagement. Accordingly, this individual subsection will be removed from this update to the Comprehensive Development Plan.
HOUSING DENSITY & VARIETY

Needs & Opportunities

Housing variety means diverse types of home design, size, tenure, age, and ownership models. This contrasts with the large area of Atlanta where we see one type of home designed to house one nuclear family. Nearly 60% of the land in the City is zoned exclusively for single family development. This housing monoculture simply does not meet the needs of Atlanta’s diverse families—young singles, aging seniors, couples, and parents who benefit from having multigenerational family and caregivers nearby. The areas of the city with the least housing variety are also the least racially diverse. Improving housing variety may lead to increased racial diversity in neighborhoods. Atlanta developers, homeowners, nonprofit organizations, and financial institutions are experimenting with housing types that are available in other cities across the country but are novel to the Atlanta market. Accessory dwelling units, cottage courts, modular and offsite construction, new mortgage products—we need to signal that we want and support this innovation. The best way to do that is through changes to our zoning code. Easing restrictions to support increased supply makes sense throughout the city. If just 15% of parcels added an accessory dwelling unit, over 11,000 units could be supplied while maintaining the low-density character of neighborhoods in Atlanta City Design Conservation Areas. We can locate high-density housing in Growth Areas near transit and other supportive infrastructure. While the City’s zoning ordinance is getting a much-needed overhaul, we will exercise a sense of urgency to fast-track simple changes to encourage housing density and variety.

Policies

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HC 5 Leverage transit and other infrastructure to maximize housing density in Atlanta’s Growth Areas.

HC 6 Maintain the low-density character of neighborhoods in Atlanta’s Conservation Areas by permitting housing types that gently increase density.

HC 7 Advance affordable homeownership opportunities.
Policy Actions

HC 4.1  Amend the zoning ordinance to allow attached and detached ADUs in more areas.

HC 4.2  Amend the zoning ordinance to support missing middle housing.

HC 4.3  Amend the zoning and building codes to allow offsite construction models.

HC 4.4  Amend the zoning ordinance to update or remove the definition of family in favor of maximum occupancy regulated by the building code.

HC 5.1  Amend the zoning ordinance to allow small apartment buildings near transit.

HC 5.2  Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.

HC 6.1  Amend the zoning ordinance to reduce residential parking requirements.

HC 7.1  Increase the use of community land trusts to expand options for homeownership.
The Community Development/Human Services Committee of the Atlanta City Council will hold its second quarter Comprehensive Development Plan (CDP) Amendments Public Hearing on Monday, June 28, 2021 at 6:00 p.m. remotely on the following proposed CDP amendments. Please note that this is an updated notice which adds additional parcels to Item #10 (21-O-0341/CDP-21-019.)

Members of the public may dial into the hearing at (877) 499-2930, Conference ID: 3995242. Materials for this hearing will be posted on the Community Development/Human Services Committee presentation page at: https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations.

Public comments associated with the proposed CDP amendments may be made by dialing (404) 330-6021; please ensure to indicate the item number you will be speaking to at the beginning of the message. Messages are not to exceed 3 minutes and will be accepted between the hours of 4:00 pm and 7:00 pm on the day before the scheduled meeting (Sunday, June 27th.)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Plan A – Atlanta’s 2021 Comprehensive Development Plan</td>
<td><strong>Plan A</strong> is Atlanta’s guide to growth and development. The Department of City Planning (DCP) has been leading a public planning process to keep it up to date every 5 years. As part of this effort, DCP will host three (3) virtual Community Meetings in June: Thursday, June 10th at 6pm; Saturday, June 12th at 1pm; and, Thursday, June 17th at 1pm. The City Council Community Development/Human Services Public Hearing will be held on September 27th at 6pm. The City Council will adopt the CDP by October 31, 2021.</td>
</tr>
<tr>
<td>(2) 21-R-3551 CDP-21-033</td>
<td>A Resolution to Transmit the Capital Improvements Element (“CIE”), which Includes Capital Improvements that the City Intends to Fund, in Whole or in Part, with Development Impact Fees, to the Georgia Department of Community Affairs and the Atlanta Regional Commission in Compliance with the Requirements of the Georgia Development Impact Fee Act (“DIFA”); and for other purposes.</td>
</tr>
<tr>
<td>(3) 21-O-0127 CDP-21-006</td>
<td>An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 1046 and 1104 Avondale Avenue SE from the Single Family Residential (SFR) Land Use Designation to the High Density Residential (HDR) Land Use Designation; and for other purposes. (Z-20-088)</td>
</tr>
</tbody>
</table>

NPU-W       Council District 1
CD/HS Public Hearing #3 Public Notice

PUBLIC NOTICE (Updated June 15, 2021) COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE June 28, 2021 6:00 P.M. The Community Development/Human Services Committee of the Atlanta City Council will hold its second quarter Comprehensive Development Plan (CDP) Amendments Public Hearing on Monday, June 28, 2021 at 6:00 p.m. remotely on the following proposed CDP amendments. Please note that this is an updated notice which adds additional parcels to Item #10 (21-O-0341/CDP-21-019.) Members of the public may dial into the hearing at (877) 499-2930, Conference ID: 3995242. Materials for this hearing will be posted on the Community Development/Human Services Committee presentation page at: https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations. Public comments associated with the proposed CDP amendments may be made by dialing (404) 330-6021; please ensure to indicate the item number you will be speaking to at the beginning of the message. Messages are not to exceed 3 minutes and will be accepted between the hours of 4:00 pm and 7:00 pm on the day before the scheduled meeting (Sunday, June 27th.) (1) Plan A Atlanta's 2021 Comprehensive Development Plan Plan A is Atlanta's guide to growth and development. The Department of City Planning (DCP) has been leading a public planning process to keep it up to date every 5 years. As part of this effort, DCP will host three (3) virtual Community Meetings in June: Thursday, June 10th at 6pm; Saturday, June 12th at 1pm; and, Thursday, June 17th at 1pm. The City Council Community Development/Human Services Public Hearing will be held on September 27th at 6pm. The City Council will adopt the CDP by October 31, 2021. (2) 21-R-3551 CDP-21-033 A Resolution to Transmit the Capital Improvements Element (“CIE”), which Includes Capital Improvements that the City Intends to Fund, in Whole or in Part, with Development Impact Fees, to the Georgia Department of Community Affairs and the Atlanta Regional Commission in Compliance with the Requirements of the Georgia Development Impact Fee Act (“DIFA”); and for other purposes. (3) 21-O-0127 CDP-21-006 An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property located at 1046 and 1104 Avondale Avenue SE from the Single Family Residential (SFR) Land Use Designation to the High Density Residential (HDR) Land Use Designation; and for other purposes. (Z-20-088) NPU-W Council District 1 (4) 21-O-0109 CDP-21-012 An ordinance by Councilmember Marci Collier Overstreet to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property known as 3430 Cascade Road from the Single Family Residential (SFR) Land Use category to the Low Density Commercial (LDC) category; and for other purposes. (Z-21-014) NPU-I Council District 11 (5) 21-O-0179 CDP-21-014 An ordinance by Councilmember Smith to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to redesignate property at
CD/HS Public Hearing #2

2021 COMPREHENSIVE DEVELOPMENT PLAN (CDP)

- The CDP is Atlanta’s guide for growth and development.
- Engagement to Date...
  - We met with over 200 people and organizations in fall and winter stakeholder meetings.
  - Planning during COVID-19 and relying on virtual meetings cannot result in a CDP Atlanta demands.
- Upcoming Engagement...
  - CD/HS Quarterly Public Hearings in March, June, and September.
  - Neighborhood Planning Unit (NPU) meetings and request for NPU Policy revisions April through June.
  - Atlanta Planning Advisory Board (APAB) presentation in April.
  - Draft plan for public review and comments starting in late-May.
  - Virtual community conversation in early-June.
  - Plan review by Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) in July and August.
  - Plan adoption by City Council in October.

THE 2021 CDP IS AN ADMINISTRATIVE UPDATE

- DCA and ARC require Atlanta to adopt and implement a CDP and update it every 5 years.

THIS ADMINISTRATIVE UPDATE WILL...

- Begin translating Atlanta City Design Vision to CDP Goals, Needs and Opportunities, and Policies.
- Provide a revised Community Work Program (CWP) and a 2016 CWP Report of Accomplishments.
- Reflect other planning work and administrative updates to the CDP since 2016.
- Lay a foundation for a more robust update in 2022 which will align the CDP with ongoing initiatives.

THIS ADMINISTRATIVE UPDATE WILL NOT...

- Involve extensive public engagement.
- Change Future Land Use Map, Descriptions, or Policies beyond the quarterly updates.

FOR QUESTIONS OR MORE INFORMATION:
Website: atlcitydesign.com/comprehensive-development-plan
Email: cdp2021@AtlantaGa.Gov
COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE
REGULAR COMMITTEE MEETING

--Agenda--

CITY OF ATLANTA

Chairperson
The Honorable Matt Westmoreland

Tuesday, September 29, 2020
1:30 PM

Public Conference Bridge
(877) 579-6743
Code: 8315991256

A. CALL TO ORDER

B. INTRODUCTION OF MEMBERS

C. REMOTE MEETING STATEMENT

D. ADOPTION OF AGENDA

E. APPROVAL OF MINUTES

F. PUBLIC COMMENT
   The Public may leave comments related to this committee or for legislation on this agenda by dialing (404) 318-6089 and leaving a message not to exceed three (3) minutes. Public comment will be accepted between the hours of 4:00 p.m. and 7:00 p.m. on the day before the scheduled meeting.

G. PRESENTATION(S)/REPORT(S)/UPDATE(S)
   1. Department of Parks and Recreation Quarterly Update
   2. 2021 Comprehensive Development Plan Launch

REGULAR AGENDA

H. ORDINANCE(S) FOR SECOND READING:
   20-0-1566 (1) CDP-20-025 AN ORDINANCE BY COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE TO AMEND THE ZONING CODE OF THE CITY
A. CALL TO ORDER

The regularly scheduled meeting of the Community Development/Human Services Committee was held on Tuesday, September 29, 2020, at 1:30 PM Remotely via Public Conference Bridge.

B. INTRODUCTION OF MEMBERS

<table>
<thead>
<tr>
<th>Attendee Name</th>
<th>Position/District/Post</th>
<th>Status</th>
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</thead>
<tbody>
<tr>
<td>Matt Westmoreland</td>
<td>Chair, Post 3 At-Large</td>
<td>Present</td>
<td>1:20 PM</td>
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<tr>
<td>Michael Julian Bond</td>
<td>Post 1 At-Large</td>
<td>Present</td>
<td>1:37 PM</td>
</tr>
<tr>
<td>Carla Smith</td>
<td>District 1</td>
<td>Present</td>
<td>1:40 PM</td>
</tr>
<tr>
<td>Amir R Farokhi</td>
<td>District 2</td>
<td>Present</td>
<td>1:37 PM</td>
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<tr>
<td>Antonio Brown</td>
<td>Vice-Chair, District 3</td>
<td>Present</td>
<td>1:33 PM</td>
</tr>
<tr>
<td>Natalyn Mosby Archibong</td>
<td>District 5</td>
<td>Present</td>
<td>1:24 PM</td>
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<tr>
<td>Joyce M Sheperd</td>
<td>District 12</td>
<td>Present</td>
<td>1:11 PM</td>
</tr>
<tr>
<td>Wasonna Hammonds-Griffin</td>
<td>Council Legislative Assistant</td>
<td>Present</td>
<td>12:00 PM</td>
</tr>
<tr>
<td>Julia R Pulidindi</td>
<td>Legislative Research and Policy Analyst</td>
<td>Present</td>
<td>12:00 PM</td>
</tr>
</tbody>
</table>

Others in Attendance:

Council: Felicia A. Moore, Council President; DCP: Tim Keane, Commissioner, Kim Tallon, Jessica Lavandier, Leah LaRue and Jenidie Sidifall; DPR: LaChandra Butler Burks, Interim Commissioner; WorkSource Atl: Katerina Taylor, Executive Director; Mayor's Office: Jon Keen, COO; Law: Nina Hickson, City Attorney and Elisia Frazier; Invest Atlanta: Dr. Eloisa Klementich, President/CEO; Audit: Amanda Noble, City Auditor and Michael Jones; Other: Council Staff, Councilmember Staff, the media and members of the public.

C. REMOTE MEETING STATEMENT

A remote meeting statement was read, in accordance with O.C.G.A. 50-14-1, by Ms. Julia R. Pulidindi, the Research and Policy Analyst for the Community Development/Human Services Committee.

D. ADOPTION OF AGENDA

RESULT: ADOPTED [UNANIMOUS]
MOVER: Matt Westmoreland, Chair, Post 3 At-Large
SECONDER: Antonio Brown, Vice-Chair, District 3
AYES: Westmoreland, Smith, Farokhi, Brown, Archibong, Sheperd
ABSENT: Michael Julian Bond

E. APPROVAL OF MINUTES
RESULT: APPROVED [UNANIMOUS]
MOVER: Matt Westmoreland, Chair, Post 3 At-Large
SECONDER: Antonio Brown, Vice-Chair, District 3
AYES: Westmoreland, Smith, Farokhi, Brown, Archibong, Sheperd
ABSENT: Michael Julian Bond

F. PUBLIC COMMENT

The Public left comments related to this committee or for legislation on this agenda by dialing (404) 330-6089 and leaving a message that did not exceed three (3) minutes. Public comments were accepted on the day before this scheduled meeting between 4:00 pm and 7:00 pm.

There were 34 Public comments received. The voice recorded messages were heard during this portion of the agenda.

Public comments can be heard by visiting the City of Atlanta’s website at https://www.atlantaga.gov/ and selecting “GOVERNMENT”, “Channel 26”, “Archived Meetings” and searching under Committee Meetings for a video of this meeting. A recording of the meeting is also available by visiting the Atlanta City Council website http://citycouncil.atlantaga.gov/ and selecting “Council Divisions”, “Council Communications”, “Meeting Videos” and searching under Committee Meetings for a video of this meeting.

G. PRESENTATION(S)/REPORT(S)/UPDATE(S)

1. Department of Parks and Recreation Quarterly Update – LaChandra Butler Burks, Interim Commissioner, Department of Parks and Recreation

LaChandra Butler Burks, Interim Commissioner of the Department of Parks and Recreation, attended the meeting remotely to give a quarterly update. An electronic copy of this presentation will be available on the Committee Presentations Page, https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations/ within 24 hours of the meeting. This presentation may be viewed by visiting the City of Atlanta’s website at https://www.atlantaga.gov/ and accessing the Atlanta City Council’s website http://citycouncil.atlantaga.gov/ and watching the video of this meeting. It may also be viewed by visiting http://atlantacityga.iqm2.com/Citizens/Default.aspx and selecting the Community Development/Human Services Committee meeting link for September 29, 2020 and watching the video.

2. 2021 Comprehensive Development Plan Launch – Tim Keane, Commissioner, Department of City Planning

Tim Keane, Commissioner of the Department of City Planning, joined the meeting remotely to give an update on the authority. An electronic copy of this presentation will be available on the Committee Presentations Page, https://citycouncil.atlantaga.gov/standing-committees/community-development-human-services/presentations/ within 24 hours of the meeting. This presentation may be viewed by visiting the City of Atlanta’s website at https://www.atlantaga.gov/ and accessing the Atlanta City Council’s website http://citycouncil.atlantaga.gov/ and watching the video of this meeting. It may also be viewed by visiting http://atlantacityga.iqm2.com/Citizens/Default.aspx and selecting the Community Development/Human Services Committee meeting link for September 29, 2020 and watching the video.
**WHAT IS A COMPREHENSIVE DEVELOPMENT PLAN (CDP)?**

- The CDP is Atlanta’s guide for growth and development.
- Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) require Atlanta to adopt and implement a CDP and update it every 5 years.
- Atlanta’s current CDP must be updated by October 2021.
- The City uses the CDP to prioritize infrastructure investments and changes to development policies for individual neighborhoods and the entire city.
- Updates involve extensive analyses and public engagement.
- Per Atlanta’s Charter, The Atlanta City Design (adopted in 2017) sets the framework for updating Atlanta’s CDP.

**CONTEXT FOR ATLANTA’S CDP PROCESS**

<table>
<thead>
<tr>
<th>Georgia Planning Act of 1989</th>
<th>The Atlanta Region’s Plan (10 Counties)</th>
<th>Atlanta’s Comprehensive Development Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administered by Georgia Department of Community Affairs (DCA)</td>
<td>Sets statewide policies and standards for CDPs</td>
<td>Prepared by Atlanta Regional Commission (ARC)</td>
</tr>
<tr>
<td>Sets objectives and standards for CDPs</td>
<td>Provides guidance for Atlanta’s CDP</td>
<td>Guides the city’s growth and development</td>
</tr>
<tr>
<td>Prepares Atlanta’s CDP</td>
<td></td>
<td>Prepares Atlanta’s CDP</td>
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<tr>
<td></td>
<td></td>
<td>Adopted every 5 years by City Council</td>
</tr>
</tbody>
</table>

**APPLYING CITY DESIGN APPROACH TO GROWTH AND DEVELOPMENT**

- Growth Areas will be designed to connect people and accommodate growth.
- Conservation Areas will be designed to connect nature and protect other things that we value.
REQUIRED ELEMENTS OF THE CDP

COMMUNITY GOALS
Institutionalize Atlanta City Design vision, goals, and values for growth and development.

NEEDS & OPPORTUNITIES
Identify issues to address based on socioeconomic and demographic trends, development patterns, public engagement, and community goals.

COMMUNITY WORK PROGRAM
Prioritize specific actions that can be taken in the next 5 years to address Needs and Opportunities.

CAPITAL IMPROVEMENTS*
Prepare an implementation plan to construct, maintain, and renovate public facilities and infrastructure over the next 5 years.

ECONOMIC DEVELOPMENT
Design for density by aligning the future land use map, zoning ordinance, character areas, and previously adopted plans with Atlanta City Design Growth and Conservation Areas.

LAND USE
Design a transportation system that supports density by prioritizing transit, walking, and bicycling and providing better accessibility to the Urban Core, Clusters and Corridors.

TRANSPORTATION
Support affordable housing initiatives while drawing connections to other CDP elements, particularly Land Use and Transportation.

HOUSING
Develop strategies to expand and improve broadband access in the city - a disparity issue that has become apparent during the current pandemic.

BROADBAND
*Section is prepared and adopted every year

BECOMING THE BELOVED COMMUNITY
As we face these challenges, we draw upon The Atlanta City Design and its core values. The 2021 CDP update is our chance to embrace an Atlanta designed for everyone and become the beloved community. For our part, the Department of City Planning will work hard to accomplish the following tasks.

Embed The Atlanta City Design Equity Value into the CDP process and our Department’s practices and policies.

Operationalize The Atlanta City Design and Anticipate Zoning Ordinance Rewrite changes that will shape future CDPs and Atlanta’s growth and development, more broadly.

Strengthen Connections Between Land Use and Transportation elements based on The Atlanta City Design Growth and Conservation Areas.

Build Collaboration across City departments, offices and partner agencies especially when Prioritizing Infrastructure investments.

Engage the Public in New Meaningful Ways through the NPUs, online, and in small group discussions led by staff from across the Department of City Planning.

Incorporate the Department’s Planning for Change efforts and hold the Department Accountable to ensure these changes are institutionalized.

PUBLIC ENGAGEMENT APPROACH
Department of City Planning staff will engage the public with opportunities to learn about The Atlanta City Design and to voice ideas and perspective to shape the CDP.

Steering Committee:
Public leadership group chaired by CD/HS chair who guides preparing the update.

Stakeholder Advisory Committee:
Community leadership group who facilitates inclusive, diverse, and meaningful public engagement.

Technical Advisory Committee:
Staff from City departments who provide insight, support, and recommendations.
3. Stakeholder Meetings

Virtual Stakeholder Kick-Off Meeting | October 28, 2020

The Department of City Planning convened the Public Leadership Group (PLG), Stakeholder Advisory Committee (SAC), and Technical Advisory Committee (TAC) at a virtual kick-off event for the CDP update process. The virtual meeting had 145 attendees and represented 99 community groups. The presentation discussed how Atlanta City Design is the foundation for Plan A. An overview of the required elements of the CDP was given in addition to possible engagement methods throughout the process.

People asked several questions about how this comprehensive development plan will address the needs and opportunities of neighborhoods. How will this update incorporate adopted neighborhood plans? How can people with specific neighborhood concerns and ideas be part of the planning process? And, in what ways will this planning process help build capacity among the NPUs to secure resources to implement the comprehensive development plan in their neighborhoods?

Further, stakeholders identified specific topics that Plan A must address, including Atlanta’s adaptation to climate change, Atlanta’s tree canopy and other natural resources, the challenges of homelessness and affordable housing, and the opportunities and considerations for a denser Atlanta. These insights early-on directly influenced updates to the elements in this draft.
## Attendance Log for Kick-off Meeting

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>McNeal, Tony</td>
<td>City of Atlanta Department of City Planning</td>
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<td>Keane, Tim</td>
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<td>Drury, Blake</td>
<td>GAI Consultants</td>
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<td>Westmoreland, Matt</td>
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<td>Shaffer, Wes</td>
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<td>Sequeira, Sonia</td>
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<td>Hoelzel, Nate</td>
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<td>Sidifall, Janide</td>
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<td>Peek, Eric</td>
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<td>Glover, Eunice</td>
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<td>Klementich, Eloisa</td>
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<td>Dimmick, Paul</td>
<td>Ansley Park Civic Assoc</td>
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Virtual Kick-Off Presentation

THIS IS A ZOOM WEBINAR
- This presentation will be recorded and shared
- Audience is muted and cameras are turned off
- Use "Q&A" button at the bottom of your screen to submit a question
- Callers can email questions to cdp2021@atlantaga.gov
- We are not using the "Raise Hand" button
- Our social media is @atiplanning

ATLANTA IS GROWING
HOW IT GROWS IS UP TO US

ATLANTA IS GROWING

ATLANTA POPULATION (2010-2019)


1.2M Residents

Plan A: Atlanta's 2021 Comprehensive Development Plan
BECOMING THE BELOVED COMMUNITY

Applying to the Beloved Community
Adopted into the City Charter in 2017, Atlanta City Design provides a guiding framework to address the challenges of growth in a way that values equity, progress, ambition, access, and nature.

BECOMING the Beloved Community
The 2021 Comprehensive Development Plan will implement the aspirations of Atlanta City Design into tangible and actionable policies that will guide our city to become the Beloved Community.

IMPLEMENTING ATLANTA CITY DESIGN

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<th>Design</th>
<th>Implementation</th>
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<td>Strategic Actions</td>
<td>Design Proposals</td>
<td>Detailed Plans</td>
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APPLYING CITY DESIGN APPROACH TO GROWTH AND DEVELOPMENT

Equity  Progress  Ambition  Access  Nature

Growth Areas will be designed to connect people and accommodate growth.
Conservation Areas will be designed to connect nature and protect other things that we value.
### Comprehensive Development Plan (CDP) and Its Elements

<table>
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<th>Community Goals</th>
<th>Needs &amp; Opportunities</th>
<th>Community Work Program</th>
<th>Capital Improvements</th>
<th>Economic Development</th>
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<td>Institutionalize, goals, and values for growth and development.</td>
<td>Identify needs to address based on environmental and demographic trends, development patterns, public engagement, and community goals.</td>
<td>Prioritize specific actions that can be taken in the next 5 years to address Needs and Opportunities.</td>
<td>Prepare an implementation plan to construct, maintain, and improve public facilities and infrastructure over the next 5 years.</td>
<td>Address the challenges and opportunities for reducing the income and wealth gap, and supporting businesses.</td>
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### Land Use
- Design for density by aligning the future land use map, zoning ordinance, character areas, and adopted plans with Atlanta City Design Growth and Conservation areas.

### Transportation
- Design a transportation system that supports density by prioritizing transit, walking, and bicycling and improving accessibility to the urban core, clusters, and corridors.

### Housing
- Support affordable housing initiatives while drawing connections to other CDP elements, particularly Land Use and Transportation.

### Broadband
- Develop strategies to expand and improve broadband access in the city, a disparity issue that has become apparent during the current pandemic.

### Additional elements:
- Nature
- History
- Urban Design
- NPU Policies

### Responding to the Moment by Planning for Change

- **Embed The Atlanta City Design Equity Value** into the CDP process and our Department’s practices and policies.
- **Operationalize The Atlanta City Design** and **Anticipate Zoning Ordinance Rewrite** changes that will shape future CDPs and Atlanta’s growth and development, more broadly.
- **Build Collaboration** across City departments, offices and partner agencies especially when prioritizing infrastructure investments.
- **Strengthen Connections Between Land Use and Transportation** elements based on The Atlanta City Design Growth and Conservation Areas.
- **Engage the Public in New Meaningful Ways** through the NPUs, online, and in small group discussions led by staff from across the Department of City Planning.
- **Incorporate the Department’s “Planning for Change” efforts and hold the Department Accountable** to ensure these changes are institutionalized.

### Atlanta is Growing
- **Beloved Community** is up to us.

### Public Engagement Approach

- **Learn** where, what, how, and why our city is growing.
- **Voice** where, what, how, and why our city should grow.
**ENGAGEMENT METHODS**
Online and “at-home” opportunities for people to learn and voice about ideas and perspectives.

- **Project Website**
  Hub containing all material, data, documents, and engagement tools for public access.
- **Community Conversations (online)**
  Six virtual sessions, based on five ACD values, “what we heard,” via Zoom between November and February.
- **Meeting Kit**
  Online or at-home for small group discussions so neighbors, families, friends, co-workers, and strangers can meet at a convenient time and location.
- **Citizen Planning Tools**
  Web-based applications that allow anyone to share their perspectives via audio, video, text, and other interactive activities.
- **NPU University & Meetings (online)**
  Special NPU University on comprehensive development planning workshops and meetings with NPUs in March.
- **On-Going Surveys**
  On-going surveys will assess the efficacy and progress of our engagement process.

**LEADERSHIP & ADVISORY STRUCTURE**
We are convening broad and inclusive groups of government leaders, community leaders, and technical experts.

- **Public Leadership Group (PLG)**
  - Accountable for the CDP
  - Approximately 20 people
  - Meets State requirements for comprehensive planning
  - Includes elected officials and leadership from City departments and economic development agencies
  - Provides high-level direction and decision-making at particular points in the process

- **Technical Advisory Committee (TAC)**
  - Responsible for the CDP
  - Made up of City and agency staff
  - Provides expertise to Project Management Team and Stakeholder Advisory Committee members through Working Groups on specific CDP elements
  - Meetings will be scheduled monthly to ensure close coordination between disciplines

- **Stakeholder Advisory Committee (SAC)**
  - Lives with the CDP
  - Approximately 200 people
  - Includes community members, groups, NPUs, and institutions with interest in Atlanta’s future
  - Engages at particular points in the process as a source of input and feedback for key concepts and ideas in the CDP

**MILESTONES**

**ATLANTA IS GROWING**
**THIS IS A CALL TO ACTION**

For questions or more information, please contact:
cdp2021@atlantaga.gov
atlcitydesign.com
@atlplanning
Stakeholder Meetings

Public Leadership Group Meeting | December 17, 2020

The Department held a virtual meeting for the PLG to discuss the roles and responsibilities as well as the schedule for developing and adopting the comprehensive development plan update. Stakeholders at this meeting discussed challenges of engaging people during the pandemic and relying on virtual methods. Strong emphasis was given to providing opportunities for small, in-person discussions when able to safely do so as well as facilitating creative online discussions, such as “meetings in a box.”

Attendance Log

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<tr>
<th>Name</th>
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<tr>
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Total: 16
Public Leadership Group Presentation

2021 Comprehensive Development Plan Update
Public Leadership Group Meeting
December 17, 2020

Why are we here today?
What is our role?
Expectations

10 minutes

How will public engagement influence the update?
Atlanta City Design?
How do we build off ACD?

Structure

15 minutes

What is our approach to realigning Land Use?

25 minutes

Today’s Agenda

PLG Roles & Expectations
‘Plan A’ Structure
Aligning ACD Land Use

Why are we here today?
What is our role?
How do we build off Atlanta City Design?
How will public engagement influence the update?

What is our approach to realigning Land Use?

Leadership & Advisory Structure

We are convening broad and inclusive groups of government leaders, community leaders, and technical experts

PLG Roles and Expectations

Public Leadership Group (PLG)

- Accountable for the CDP
- Steer the process
- Responsible for the CDP
- Support the final plan
- Stakeholder Advisory Committee (SAC)
- Facilitate cross-jurisdictional partnerships and data sharing agreements
- Lives with the CDP
- Engage with thoughtful leadership

CDP Kickoff (October 28)

Department of City Planning convened stakeholders to kickoff the CDP update process.

145 Attendees
99 Community Groups

Watch the recording at www.atlcitydesign.com/cdp-kickoff

Appendix II Released November 2021
Plan A: Atlanta’s 2021 Comprehensive Development Plan

COMP PLANNING 101

LESSON #1

What is the Comprehensive Development Plan?

- Policy document recognized by the State of Georgia
- Sets policy and infrastructure investment priorities
- Reflects the public’s stated Needs and Opportunities

Building the Beloved Community

Aspiring to the Beloved Community
Adopted into the City Charter in 2013, Atlanta City Design provides a guiding framework to address the challenges of growth in a way that values equity, progress, ambition, access, and nature.

Building the Beloved Community
The 2021 Comprehensive Development Plan (Plan A) will implement the aspirations of Atlanta City Design into tangible and actionable policies that will guide our city to become the Beloved Community.
Ongoing Planning Effort

**The Atlanta City Design**

- Defines vision, values, design approach

**Translations**

- Translates The Atlanta City Design and subsequent plans into the CDP elements

---

**Community Involvement (Approach)**

**LEARN**

WHERE, WHAT, HOW, AND WHY OUR CITY IS GROWING

**VOICE**

WHERE, WHAT, HOW, AND WHY OUR CITY SHOULD GROW

---

**Our Goal**

Put Atlanta City Design in use through the CDP as the City’s official policy for the recommended future use and development of land.

**Approach to Land Use in Plan A**

- Design for people
  - Public life
  - Legibility
  - Density
  - Everyone

- Design for nature
  - Wildness
  - Retreat & adventure
  - Comfort

- Design for people in nature
  - Connections
  - Lifestyles

---

**Appendix II**

Released November 2021
Three Primary Opportunities For Improvement

Alignment
Plans and policies should sync with each other

Clarity
The policy purpose and intent should be clear and concise

Usefulness
City staff should find this document useful in guiding their work

Character Areas
• Character Area Descriptions
• Character Area Map

Future Land Use
• FLU Categories
• FLU Map

Zoning
• Zoning Districts
• Zoning Map

Our Tools For Regulating The Built Environment

Updating the Land Use Element

1. Redefine Character Areas
2. Realign Future Land Use to the Updated Character Areas
   • Modify FLU Categories
   • Propose Recommended FLU Map
1. Redefine Character Areas

Growth Areas will be designed to connect people and accommodate growth.

Conservation Areas will be designed to connect nature and protect other things that we value.

Modifying FLU Categories: Examples

- The addition of "accessory dwelling units" reflects policy recommendations from ACO Housing.
- Specifying the appropriate character areas, "Urban" and "Suburban" helps communicate where it is appropriate to locate this FLU designation.
- References to TOD Opportunity Areas reflects policy recommendations from the Atlanta Transportation Plan, however further analysis may determine that "Corridor" Character Areas will encompass the intent and purpose of TOD areas.
- Character Areas will define appropriate building heights.

Modifying FLU Categories: Examples

- Some modifications help standardize and provide clarity between FLU Categories.
- Some FLU Categories may be appropriate in both Conservation and Growth character areas.
- Specifying target density/intensities helps communicate which Zoning Districts are compatible with this FLU Category.
- Target density/intensities will require further calibration via "Inputs and Analysis".
Stakeholder Meetings

Virtual PLG, SAC, and TAC Meeting
January 27, 2021

On January 27, 2021, the Department brought together nearly 190 people, representing several organizations, neighborhood associations, and NPUs, in a virtual discussion about the comprehensive development elements, particularly its Land Use Element, and opportunities and the challenges of public outreach and engagement during the pandemic.

After consulting with the PLG, SAC, and TAC members at the December and January meetings, the Department of City Planning decided to reset the comprehensive development planning process by only focusing on the required updates this year and begin a more robust process in 2022. The Department explained the decision and discussed opportunities for public participation and input at the CD/HS quarterly CDP public hearing on March 22, 2021.

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January 27 SAC CDP Session

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**Total: 177**
TODAY’S OBJECTIVE

1. Are we asking the right questions?
2. Are there other outreach channels we should engage?
3. What tweaks and refinements should we make to our engagement techniques?

Plan A: Atlanta’s 2021 Comprehensive Development Plan

Deepen understanding of the CDP process (key ideas, terms, and concepts)

Outline engagement outreach and activities (our strategy for engaging a broad community)

Get your feedback and answers to questions (we need your thoughts and feedback on our engagement approach)

Atlanta’s comprehensive plan for addressing growth and development with a vision for building the Beloved Community where everyone thrives.
PLAN A STRUCTURE

LEADERSHIP & ADVISORY STRUCTURE: THE ‘SAC’

- **PUBLIC LEADERSHIP GROUP**
  - Accountable for the CDP

- **TECHNICAL ADVISORY COMMITTEE**
  - Responsible for the CDP

- **STAKEHOLDER ADVISORY COMMITTEE**
  - Lives with the CDP

WHAT ARE THE TRENDS & ISSUES?

**ACCOMMODATING DENSITY**

**LIMITED HOUSING TYPES**

**RISING COST OF HOUSING**

**CONTINUED EXPANSION OF MOBILITY OPTIONS**

LEADERSHIP & ADVISORY STRUCTURE: THE ‘SAC’

**Role**
1. Advise community involvement process
2. Champion inclusive public input

**Expectations**
1. Attend SAC meetings in each project phase
2. Engage with thoughtful leadership and guidance

Lives with the CDP
LEARN & VOICE: OUR ENGAGEMENT APPROACH

COMMUNITY AMENITIES
TO SUPPORT GROWTH

MAKING TRANSIT
WORK FOR PEOPLE

LEARN
about the issues and
elements of Plan A

VOICE
about how we build the
Beloved Community

LEARN & VOICE: OUTREACH RESOURCES

PROTECTING NATURE
AS WE GROW

ACCESS TO PARKS
& FOOD

LEARN & VOICE: QUESTIONS WE ARE ASKING

1. How does Atlanta design for people, design for nature, and design for people in nature to become the Beloved Community?
2. How might the values guide our design approach; for people, for nature, for people in nature?
3. What are the things we want to change or remain?
4. What community infrastructure do we need to support growth or conservation?
5. What are the most urgent and important Needs & Opportunities the City must address?
6. Are there other Needs & Opportunities the City must address?

INCOME INEQUALITY

PROVIDING ACCESS
TO OPPORTUNITY

LEARN & VOICE: QUESTIONS WE ARE ASKING

1. How does Atlanta design for people, design for nature, and design for people in nature to become the Beloved Community?
2. How might the values guide our design approach; for people, for nature, for people in nature?
3. What are the things we want to change or remain?
4. What community infrastructure do we need to support growth or conservation?
5. What are the most urgent and important Needs & Opportunities the City must address?
6. Are there other Needs & Opportunities the City must address?
LEARN & VOICE: ENGAGEMENT ACTIVITIES

MEETING IN A BOX

- Online and in-person toolkit for facilitating individual responses and/or small-group workshops
- Affirm the community goals (vision & character); and needs & opportunities
- Participants return completed exercise sheets

AT-HOME EXERCISES

Activity 1: Building the Beloved Community

Activity 2: The Vision for Atlanta

Activity 3: The Character of our City

Activity 4: Needs & Opportunities

LEARN & VOICE: COMMUNITY CONVERSATIONS

- Virtual public meetings about Community Goals and Needs & Opportunities
- Rotating panelists selected from the audience
- Poll and choice questions

COMMUNITY CONVERSATIONS

DISCUSSION

WRAP UP: THANK YOU FOR YOUR PARTICIPATION

For questions or more information, please contact:
cdp2021@atlantaga.gov
atplana.com
@atplanning
Community Meetings

APAB and NPU Meetings

The Department of City Planning presented at the Atlanta Planning Advisory Board (APAB) on April 17, 2021, to give an overview of Plan A and the process of updating the comprehensive development plan over the next several years. Prior to this meeting, the Department emailed all 25 NPU chairs and zoning contacts of the process to revise NPU policies and provided examples of how these policies are used by the Department. Revised NPU policies can be found in Appendix III. City planners also met with a dozen NPUs individually in small group discussions between April and July 2021 to provide further guidance on the changes to the comprehensive development plan and listen to specific ideas and proposals to updating NPU policies. The Department kept APAB updated during this time as NPUs submitted their policy revisions.

Several comments from NPUs to improve the draft plan are reflected in the latest draft to Plan A, including NPU maps and clearer, more approachable text and graphics to communicate the connections between Future Land Use Planning, Character Area Planning, and Zoning. The Department of City Planning engaged NPUs early on in October 2020 with planners giving regular updates at monthly meetings, and the Department will continue to do so as the adoption process continues this fall and Phase 2 to Plan A begins next year.

APAB Presentation - April 17, 2021
**Plan A in 2021 is an Administrative Update**
Planning during COVID-19 and relying on virtual meetings cannot result in a CDP Atlanta demands.

**THIS CDP ADMINISTRATIVE UPDATE WILL:**
- Allow the City to maintain its Qualified Local Government status so Atlanta can continue accessing federal and state funds for economic development, affordable housing, and infrastructure.
- Begin translating Atlanta City Design Vision to CDP Goals, Needs and Opportunities, and Policies.
- Provide a revised Community Work Program (CWP) and a 2016 CWP Report of Accomplishments.
- Document revised NPU Policies and adopted small area/neighborhood plans since 2016.
- Include the Future Land Use Map and Descriptions as of the June 2021 quarterly update.
- Reflect recent and ongoing planning initiatives across Atlanta.
- Lay a foundation for a more robust update in 2022 which will align the CDP with ongoing initiatives.

**APAB Presentation - August 21, 2021**
The Department of City Planning presented at the August APAB meeting to go over revisions from the first draft of Plan A to the second, the schedule for adoption and to answer any questions from the group. The conversation focused on the idea of planning being continuous - this 2021 update as a minimum requirement incorporates all the plans, neighborhood and citywide, that have been completed since the 2016 CDP. Each sections’ recommendations within Plan A comes from a citywide plan that was either approved by City Council or an initiative of the administration (Mayor’s office). The state minimum requirements for comprehensive planning were discussed in relation to this administrative update as well as a reminder that Phase 2 will be a 18+ months process and in line with the Zoning Rewrite happening for the next 4 to 5 years. The team also asked for clarification on the community engagement resolution APAB put forward at this meeting.

**WHAT IS A COMPREHENSIVE DEVELOPMENT PLAN (CDP)?**
- The CDP is Atlanta's guide for growth and development.
- Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) require Atlanta to adopt and implement a CDP and update within 5 years — next update by October 2021.
- The CDP uses the CDP to prioritize programs, projects, and initiatives, and changes to development policies for individual neighborhoods and the entire city.
- Per Atlanta’s Charter, Atlanta City Design (adopted in 2017) sets the framework for updating Atlanta’s CDP.
- **Plan A** is the 2021 CDP and next update.

**FROM DESIGNING TO BUILDING THE BELOVED COMMUNITY**

**Visioning**
- Atlanta City Design sets the framework for how the city will grow and develop

**Planning**
- Plans, studies, and policies guide this growth and development across the city and in neighborhoods

**Zoning, Permitting, Financing**
- Regulations, programs, projects, and initiatives implement the vision and plans

**Building Our City**
- Over the next generation, we will operationalize these ideas and actions to build the Beloved Community
**Plan A: Atlanta’s 2021 Comprehensive Development Plan**

**Plan A Elements**

**Planning Elements**
- Community Vision and Goals
- Land Use Planning
- Transportation Planning
- Housing and Community Development Planning
- Local Economic Development Planning
- Broadband Internet Planning
- Natural Systems and Resiliency Planning
- Urban Design
- Historic Preservation
- Public Safety Facilities Planning
- Neighborhood Planning

Community Vision and Goals are carried through all elements/summaries of major plans/policies, needs and opportunities, and proposed policies and actions.

**Implementing Elements**
- Community Work Program (CWP) – specific activities the community will undertake during the next five (5) years to address priority needs and opportunities.
- Capital Improvements Element (CE) – development impact fees funded projects for construction, maintenance, and renovation of public facilities and infrastructure over the next five (5) years. The element is prepared and adopted each year.
- Report of Accomplishments – brief status update on progress implementing actions listed in the previous Community Work Program.

**Purpose of Plan A**

**Purpose of the 2022 CDP Update**
- Further align Plan A with Atlanta City Design
- Allow for an iterative process between the CDP update and Zoning Code Revisions
- Engage the community in a meaningful planning process over 18 to 36+ months
- Combine educational courses, workshops, and other traditional and non-traditional meeting forums at the city, NPU, and neighborhood levels
- Conduct both virtual and in-person engagement

**Purpose of the 2021 CDP Administrative Update**
- Allow the City to maintain its Qualified Local Government (QLG) status so Atlanta can continue accessing federal and state funds for economic development, affordable housing, and infrastructure
- Meet the Minimum Standards and Procedures for Local Comprehensive Development Planning
- Align CDP Goals, Needs and Opportunities, and Policies to Atlanta City Design
- Provide a revised Community Work Program (CWP) and Report of Accomplishments
- Document NPU policies and adopted small area/neighborhood plans since 2016
- Include the Future Land Use Map and Descriptions as of the June 2021 quarterly update
- Reflect recent and ongoing planning across Atlanta
- Lay a foundation for a more robust update in 2022

**Plan A “Phase I” in 2021 is an “Administrative Update”**

**Plan A “Phase II” Starting in 2022 is a “Full Update”**

**Public Review and Comment and CDP Legislation Dates**

**Public Review and Comment Periods** (online and hardcopy)
- June 6 to July 27 – Public Review and Comment Period for Draft #1 of Plan A
- July 27 to August 27 – Public Review and Comment Period for Draft #2
- September 13 to 27 – Public Review and Comment Period for Draft #3

**Upcoming City Council Meetings for Plan A Adoption in October**
- August 24 – Adoption Legislation Introduction at City Development/Human Services (CD/HS) Committee Meeting
- September 7 – City Council Full Meeting Legislation Reading #1
- September 14 – CD/HS Committee Meeting #2
- September 20 – City Council Full Meeting Legislation Reading #2
- September 27 at 6pm – Final Virtual CD/HS Public Hearing for Plan A
- October 4 or 18 – Final City Council Full Meeting Reading #3 for Adoption

**Suggested Comments to cdp2021@atlantaga.gov**

**Plan A Draft #2**

Draft #2 published on June 27th
- Revised Draft #1 plan text and added the 4 appendices
- Documented line-by-line revisions from Draft #1 to #2 in the font matter and provided more discussion in Appendix II
- Adding to Frequently Asked Questions
- Routine social media posts and NPU Planner updates
- Continuing meeting with individual NPUs on request

**Highlights of Comments, Questions, and Revisions**

Discuss the following CDP Elements
- Land Use Planning
- Housing and Community Development Planning
- Transportation Planning
- Natural Systems and Resiliency Planning
- Neighborhood Planning

**City Limit at East Lake (NPU-O)**
PLANNING AND DEVELOPMENT PLANNING

• Current Atlanta City Design: Housing Legislation
• Ongoing Zoning Reform Project

ACD: HOUSING CURRENT LEGISLATION SCHEDULE

NPU Presentations and Discussions — Through September
NPU Vote — October*
CD/HS Quarterly CDP Public Hearing — November 29th
Zoning Review Board Meeting — November 4th or 18th
City Council Zoning Committee — November 29th
City Council CD/HS Committee — November 30th
Final City Council Vote — December 6th
*City Council To Adopt the 2021 CDP by October 31st

TRANSPORTATION PLANNING

• Aligning transportation infrastructure with density
• Prioritizing transportation infrastructure maintenance, improvements, and expansions (and, other infrastructure) in Implementing Elements

NATURAL SYSTEMS AND RESILIENCY PLANNING

• Tree canopy
• Watershed management and health
• Climate change

NEIGHBORHOOD PLANNING

• NPU policy revisions in Appendix III
• NPU Character Area and Future Land Use Maps also in Appendix III
• Neighborhood and Small Area Plans
• Policy actions to improve the NPU system
• Public Engagement and Outreach

THANK YOU

Nate Hoelzel, nhoelzel@atlantaga.gov
Stay informed and provide input on Plan A
Email the CDP team, cdp2021@atlantaga.gov
Follow on social media @atlplanning
Browse the CDP website atlcitydesign.com/2021-cdp
NPU Chairs and NPU Zoning Contacts,

As you know, the comprehensive development plan (CDP) is Atlanta’s guide to growth and development. The Department of City Planning leads a public planning process to keep it up to date every 5 years.

In the fall of 2020, we officially started the CDP update. We presented at City Council’s September CD/HS Quarterly Public Hearing, and we met with over 200 people representing the NPUs and many other organizations at virtual stakeholder meetings in October, December, and January. We intended to have a range of engagement activities in the spring leading to a full revision of the CDP that aligns it with Atlanta City Design. However, it has become clear that conducting a major planning effort during COVID-19 and relying on virtual meetings cannot result in a CDP Atlanta demands.

As a result, Department of City Planning is working with the State of Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) to prepare an administrative update to the 2016 CDP. By adopting an administrative CDP update by October 2021, we will maintain the City’s Qualified Local Government status so Atlanta can continue having access to specific federal and state funds for economic development, affordable housing, and infrastructure. The administrative update also supports a more robust CDP update in 2022.

This administrative update will...

- Begin translating Atlanta City Design Vision into the goals, needs and opportunities, and policies of Atlanta’s comprehensive development plan.
- Provide a Community Work Program (CWP) and a 2016 CWP Report of Accomplishments.
- Reflect other planning work and administrative updates to the CDP since 2016 that have been vetted by the NPUs and public.
- Involve additional opportunities for public review and comment, as mentioned below.
- Lay a foundation for a more robust update in 2022 which will align the CDP with ongoing initiatives.

This administrative update will not...

- Change Future Land Use map, descriptions, or policies beyond the quarterly updates.

What can the NPUs expect between now and October?

- The Department of City Planning will provide each NPU Chair and Zoning Contact their 2016 CDP NPU policies for review and discussion during their April/May meetings.
- Each NPU must email their policy revisions back to the Department of City Planning at cdp2021@AtlantaGa.Gov by June 1st.
- The Department of City Planning will attend the April APAB meeting to discuss the 2021 CDP update and answer questions.
- In mid-May, we will have a draft plan for public review and comment online at https://www.atcitydesign.com/2021-cdp.
- We will host a virtual public meeting in early June to highlight this year’s update and promote the broader update that will start in 2022.
- NPUs and the public can submit questions and comments to their NPU planner or to cdp2021@AtlantaGa.Gov.
- We will present at the June 28th CD/HS Quarterly Public Hearing and then submit the 2021 CDP update to DCA and ARC for their review.
- We anticipate City Council adopting the 2021 CDP at their October 4th Council Meeting.

We appreciate your input and continued commitment to your NPUs. This administrative CDP update is just a first step to the work we will be doing together over the next few years to prepare a comprehensive development plan that can guide Atlanta’s future growth and development.
Example of email to NPUs to update their policies:

Action Required: NPU-J Policies 2021

Vasquez, Daniel

To: jenmelia@bellsouth.net; gkfalimore@gmail.com

Baker, Childochashe; McNeal, Marquis; Hoelzel, Nathanael

Comprehensive Development Plan 2021

Good afternoon, Ms. Thompson and Mr. Latimore,

Per my previous email, the NPU-J policies for inclusion in the 2021 Comprehensive Development Plan (CDP) must be submitted to the Department of City Planning at cdp2021@AtlantGa.Gov by end of business day, June 1st.

To assist you in this task, I have attached the NPU-J Policies from the 2016 CDP document for review and discussion during your April/May meetings. Feel free to keep/update these policies to fit your needs. I have also attached an example of how the Office of Zoning and Development utilizes your NPU policies document when reviewing applications.

Please note that the Department of City Planning will default to the 2016 policies document if revisions have not been submitted to cdp2021@AtlantGa.Gov by the June 1st deadline.

To better provide assistance through this process, please direct your questions to cdp2021@AtlantGa.Gov.
Community Meetings

June 2021 Virtual Public Meetings

The same presentation was given at each of the three meetings in June 2021. The presentation can be found after this summary section. Deputy Commissioner, Janide Sidifall, presented an overview of the draft document for about 30 minutes followed by an equal amount of time for questions and answers with meeting attendees. We received both substantive and process-related questions.

Presentation #1: June 10, 2021, 6 pm, 54 Attendees
Presentation #2: June 12, 2021, 1 pm, 27 Attendees
Presentation #3: June 17, 2021, 1 pm, 68 Attendees

A recording of each meeting can be viewed on the Department of City Planning’s facebook page.

Attendance Logs

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### June 17 CDP Community Engagement Webinar

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**Total: 68**
WHAT IS A COMPREHENSIVE DEVELOPMENT PLAN (CDP)?

- The CDP is Atlanta’s guide for growth and development.
- Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) require Atlanta to adopt and implement a CDP and update it within 5 years.
- Atlanta’s current CDP must be updated by October 2021.
- The City uses the CDP to prioritize infrastructure investments and changes to development policies for individual neighborhoods and the entire city.
- Per Atlanta’s Charter, The Atlanta City Design (adopted in 2017) sets the framework for updating Atlanta’s CDP.
APPLYING CITY DESIGN APPROACH TO GROWTH AND DEVELOPMENT

PLAN A

Atlanta’s comprehensive plan for addressing growth and development, with a vision for becoming the Beloved Community where everyone thrives.

APPLYING CITY DESIGN APPROACH TO GROWTH AND DEVELOPMENT

PLAN A IN 2021 AN ADMINISTRATIVE UPDATE

The 2021 CDP Administrative Update objectives
• Allow the City to maintain its Qualified Local Government (QLG) status so Atlanta can continue accessing federal and state funds for economic development, affordable housing, and infrastructure
• Meet the Minimum Standards and Procedures for Local Comprehensive Development Planning
• Begin aligning CDP Goals, Needs and Opportunities, and Policies to Atlanta City Design Vision
• Provide a revised Community Work Program (CWP) and a 2016 CWP Report of Accomplishments
• Document revised NPU policies and adopted small area/neighborhood plans since 2016
• Include the Future Land Use Map and Descriptions as of the June 2021 quarterly update
• Reflect recent and ongoing planning initiatives across Atlanta
• Lay a foundation for a more robust update in 2022 which will align the CDP with ongoing initiatives

PLAN A ELEMENTS

Community Vision and Goals
• Institutionalize Atlanta City Design Vision, Goals and Values for growth and development and sets the Challenges motivating our work ahead

Our Vision
• At our best, Atlanta is both a vibrant city and a verdant forest. Our core values — equity, progress, ambition, access, and nature — will guide our growth and change to create a future city that is designed for people, designed for nature, and designed for people in nature.

PLAN A ELEMENTS

Land Use Planning Approach
• Uses both Character Areas Future Land Use Categories
• Outlines the descriptions, policies, and maps that serve as the City’s official guide to future growth and development
• Features routine amendments to the Future Land Use map made quarterly since 2016—no changes are made to Character Area geographies

PLAN A ELEMENTS

Other Planning Elements
Includes the following nine (9) planning elements:
• Transportation Planning
• Housing and Community Development Planning
• Local Economic Development Planning
• Broadband Internet Planning
• Natural Systems and Resilience Planning
• Urban Design
• Historic Preservation
• Public Safety Facilities Planning
• Neighborhood Planning

Like the Land Use Planning element, each organized around a Vision and Goals, Summaries of Major Plans/Policy Documents, Needs and Opportunities, Policies, and Actions
PLAN A ELEMENTS

Implementing Elements and Accomplishments

- Community Work Program (CWP) - specific activities the community will undertake during the next five (5) years to address the priority Needs and Opportunities

- Capital Improvements Element (CIE) - an implementation plan for the construction, maintenance, and renovation of public facilities and infrastructure over the next five (5) years. The element is prepared and adopted each year.

- Report of Accomplishments gives a brief status update on progress implementing actions listed in the previous Community Work Program.

PUBLIC ENGAGEMENT APPROACH

TIMELINE FOR PLAN A OUTREACH AND ENGAGEMENT

THANK YOU

- Email us cdp2021@atlantaga.gov
- Follow on social media @atlplanning
- Browse the CDP website atlcitydesign.com/2021-cdp

Plan A: Atlanta’s 2021 Comprehensive Development Plan
4. CD/HS Committee Updates by the Department of City Planning 2017-2021 (these are excerpts related to Plan A and Atlanta City Design, not the full presentation)

September 28 2021

POPULATION GROWTH & ATLANTA CITY DESIGN

ATLANTA POPULATION CHANGE, 2010-2020

ATLANTA POPULATION CHANGE, 1970-2020

CITY OF ATLANTA’S POPULATION AS A PERCENTAGE OF THE TOTAL METRO REGION POPULATION, 1970-2020

CONSTRUCTION VALUATION FY11-FY21 (in Billions)
Plan A: Atlanta’s 2021 Comprehensive Development Plan

OPTIMAL SCENARIO FOR GROWTH

AFFORDABILITY, MOBILITY, AND SUSTAINABILITY

THE NEED FOR GREATER HOUSING VARIETY

NUMBER OF UNITS IN HOUSING STRUCTURE

GWINNETT COUNTY POPULATION CHANGE, 1970-2020

Data derived from U.S. Census Bureau Decennial Census. 1990 data is an adjusted figure due to undercount. COVID-19 likely produced an undercount for 2020 due to student populations.
PHASES OF IMPLEMENTATION

1. Design Concept
   - Atlases City Design is the framework for guiding the City's long-term growth and development.

2. Design Development
   - Projects that operationalize Atlases City Design into policy, regulations, and other regulatory actions at multiple scales.

3. Design for Construction
   - Projects specific designs that translate plans, recommendations and Atlases City Design into communities.

4. Our City
   - Combining projects and investments in the services and transformation.

5. Beloved Communities
   - Combining projects and investments in the Beloved Communities.
CD/HS Committee Updates by the Department of City Planning 2017-2021

July 2021

PERMITS AND CODE ENFORCEMENT FOR FISCAL YEAR 2021

TOTAL NUMBER OF INSPECTIONS
July-tune FY2020 vs. July-tune FY2021

TOTAL INSPECTIONS BY INSPECTION TYPE
July-tune FY2021

STANDARD PERMITS VS. EXPRESS PERMITS
July-tune FY2020 & July-tune FY2021

PERMIT VOLUME PER WORKSTREAM
July-tune FY2020 & July-tune FY2021

TOTAL INSPECTIONS BY INSPECTION TYPE
July-tune FY2021

Standard: 5824 | Express: 1540

Plan A: Atlanta’s 2021 Comprehensive Development Plan
SHORT-TERM RENTALS

• Preparations are underway for Short-Term Rental Licenses within the City

PLAN A - PUBLIC INPUT AND NEXT STEPS

• Atlanta’s current Comprehensive Development Plan (CDP) must be updated by October 2021
• The CDP is the City’s plan to address growth and development over the next five years
• Plan A is the first update of the City’s CDP since the adoption of Atlanta City Design into the City Charter in 2017
• Since October 2020, worked with stakeholders, including NPUs and APAB, throughout the process to get their input
• A draft document has been released for public review and comment until mid-August 2021
• Held three virtual community meetings in June
• Received over 1,000 comments at the June CDHS public hearing

NEXT STEPS

• Draft will be submitted for a 45-day review by state and regional agencies
• Plan A will be updated to incorporate state, regional, and community input
• Final draft available for the CDHS quarterly public hearing on September 27th
• Adoption at October 4th City Council Meeting

TIMELINE FOR PLAN A OUTREACH AND ENGAGEMENT

ATLANTA CITY DESIGN HOUSING LEGISLATION
Plan A: Atlanta’s 2021 Comprehensive Development Plan

ATLANTA CITY DESIGN HOUSING

- Legislation introduced on 07/06
- Ordinances would:
  - Expand ADU opportunities (including attached ADUs) in R4+ zoning districts
  - Remove minimum parking requirements for residential uses in primary zoning districts (except R1-R3)
  - Update MR-MU to require affordability for buildings w/ 4+ units
  - Rezone R4+ lots within 1/2 mile of MARTA to MR-MU

ZONING REWRITE

ZONING REWRITE OBJECTIVES

The City of Atlanta is rewriting the Zoning Ordinance. This effort will take place over the next 3-5 years with a consultant team led by TSW.

Goals of the Rewrite:
1. Update Atlanta’s zoning regulations to bring them into alignment with, and make it easier to achieve, the planning objectives of the Atlanta City Design project;
2. Implement the “Five Core Values” of the Atlanta City Design project through the creation of design regulations and develop an Ordinance that reinforces the strength and distinctive character of Atlanta’s neighborhoods that would reflect equity, progress, ambition, access and nature throughout Atlanta;
3. Simplify the format of the Zoning Ordinance to make it user-friendly and web-interactive;
4. Increase the predictability of the application of the Ordinance through the creation of language that is clear, concise and provides a basis for consistent interpretation;
5. Create regulations and processes that will facilitate a shift from the existing primarily use-based Ordinance towards a more balanced approach that addresses building form in conjunction with land uses and transportation networks; and
6. Streamline permitting processes by simplifying the Zoning Ordinance procedures

NEXT STEPS

- Finalize the regulatory approach memo — late July/early August
- Will include Zoning Ordinance alternatives for public consideration.
- Finalize the public outreach plan — mid-July
- Conduct Round #1 Public Plenary — Videos to be released in early August and supplemented by online Q&A
- Conduct Round #2 Public Meeting: Alternatives (virtual) Review of process, schedule, and outreach opportunities
  - Review of consultant team findings to-date
  - Informational plenaries on various planning and zoning concepts
  - A call for test sites that will be used for the duration of the process to explore different zoning concepts (the consultant team includes local architects who will test different concepts as they are considered)
  - Public input exercises to share reactions and other ideas

FRESH FOOD ACCESS REPORT AND LEGISLATION
Other CD/HS Updates by the Department of City Planning
2017-2021
March 2021

PERMITS AND CODE ENFORCEMENT FOR FISCAL YEAR 2021 THROUGH FEBRUARY

PERMIT VOLUME PER WORKSTREAM
July-February FY2021 & FY21

TOTAL NUMBER OF INSPECTIONS
July-February FY2021 vs. July-February FY2021

TOTAL INSPECTIONS BY INSPECTION TYPE
July-February FY2021

PLAN REVIEW CYCLES
FY20 & July-February FY20

CONSTRUCTION VALUATION
FY20 & July-February FY20

CONSTRUCTION VALUATION
FY20 & July-February FY20 (in Billion)

Appendix II

Released November 2021
CODE ENFORCEMENT: COMPLAINT SUMMARY
March 2020-March 2021

Other Complaints: 705

Stop Work Orders By Quadrant
Northwest 85
Southwest 98
Northeast 39
Southeast 32
Total 266

IMPACT FEE UPDATE

2020 DEVELOPMENT IMPACT FEE PROGRAM UPDATE

Single-Family Home Phase In Approach by Rate Change

*Rate differences of $3,000 ($3,944-$4,944) phased into next rate incrementally each year.

ELEMENTS & CHANGES IN THE PROPOSED ORDINANCE

Tree Valuation
Tree Replacement and Recompense
Tree Preservation Standards
Early Tree Plan Review
Posting and Appeals
Affordability and Community Assistance

Public and Private Trees
Enforcement
Parking Lots
Stormwater Management
Tree Trust Fund
Periodic Removal of Healthy Trees
Site Examples

SCHEDULE AND NEXT STEPS

January 19th: Legislation introduced
January 26th: Legislation held at CDHS
February 17th: Council Work Session
February 17th – End of April: Public Notice and Comment and listed on NPU agendas
February – End of April: Continued stakeholder meetings and discussions with the citizen’s group
Early May: Anticipated adoption date

ATLANTA CITY DESIGN: HOUSING
PUBLIC ENGAGEMENT TO DATE

- Over 2,000 residents engaged
- Presented to all 25 NPU's and NPU University
- 7+ additional public meetings
- 5-week book club series on The Color of Law

NEIGHBORHOOD CHANGE IN ATLANTA

- Presenting to all 25 NPU's and NPU University
- Over 2,000 residents engaged
- 5-week book club series
- 7+ additional public meetings

PLACEMAKING PARKLETS

The Placemaking Program is an initiative by the Department of City Planning aimed at reimagining Atlanta's public realm for people. We believe that our public spaces should be accessible, comfortable, aesthetically pleasing, and sociable. These interventions are a tool for residents and community organizations to lead the changes they want to see in their own neighborhoods.

Understand the City's Processes & Programs

Transportation

City Planning

Affordable Housing

RECENT HOUSING REPORTS

Recent Released Reports

RECENT HOUSING REPORTS

RECENT HOUSING REPORTS

RECENT HOUSING REPORTS

RECENT HOUSING REPORTS

RECENT HOUSING REPORTS

COMPLETED PROJECTS

2021: PLACEMAKING PARKLETS

2021: PLACEMAKING PARKLETS

2021: PLACEMAKING PARKLETS

2021: PLACEMAKING PARKLETS

Appendix II

Appendix II

Appendix II

Appendix II

Released November 2021
Plan A: Atlanta’s 2021 Comprehensive Development Plan

**PHASE 1: DEMO PARKLET**

- The Department of City Planning will lend materials for demonstration (short-term) parklets. This allows for quick implementation of a temporary parklet while fully compliant materials are procured.
- Materials provided by DCP:
  - Jersey barriers
  - Ramp
- Materials provided by business owner:
  - Tables and chairs

**PHASE 2: BASIC PARKLET**

- The Department of City Planning will also procure and install a basic parklet that is fully compliant with the City’s requirements. These parklets will be lent to food and beverage establishments for the duration of the Outdoor Dining legislation (end of 2021).
- Additional materials provided by DCP:
  - ADA compliant platform structure
  - Posts and wheel stops
  - Tactical curb extension (as applicable)

**PHASED APPROACH**

- 20 CONDITIONAL AWARDS OUT OF 25 APPLICATIONS
- SPRING 2021 INSTALL
- www.atlcitydesign.com/placemaking

**DEMONSTRATION PROJECT**

- Example of demonstration project from Atlanta Streets Alive 2018

**ECONOMIC DEVELOPMENT RECENT ORDINANCES**

- On-Street Dining Ordinance passed in late 2020
- Kiosk trust fund and program update ordinances passed
- Food truck ROW Program Expansion Ordinance - Work Session on 3/11 with PSLA

**ECONOMIC DEVELOPMENT IN THE PUBLIC REALM**

- Downtown Kiosks, Pre-COVID

**DESIGN CONCEPTS IN PROGRESS**

- These concepts along with others were presented to the public at the Design Workshop in late January 2021.

**CURRENT SCHEDULE**

- PROJECTs at the beginning of 2021
- PHASED APPROACH
- 20 CONDITIONAL AWARDS OUT OF 25 APPLICATIONS
- SPRING 2021 INSTALL
About NPU University

NPU University was established in 2019 to provide training and education residents need to make valuable contributions at civic decision-making tables and produce more equitable strategies for neighborhoods. Our courses are designed to inform and empower members to use the tools available for greater community impact.

2020 SNAPSHOT

In 2020, we produced 18 virtual classes and 3 in-person classes for nearly 6000 students (via Zoom and via social media streamed). People who register for our classes are usually Atlanta residents, neighborhood leaders or stakeholders. Approximately half are actively involved in their NPU.

FEEDBACK: WHAT WE LEARNED

"I am so glad I attic the individualized format you provided...it was a great learning experience..."-a satisfied student in our NPU 101 class.

"I am learning so much. I think the individualized format, the individualized format, the individualized format, the individualized format..."-a satisfied student in our NPU 101 class.

"The presenter spoke directly to the topics, was clear, informative and knowledgeable and willing to share their knowledge."-a satisfied student in our NPU 101 class.

"I learned a lot. I think the individualized format, the individualized format, the individualized format, the individualized format..."-a satisfied student in our NPU 101 class.

"The course was extremely beneficial and I recommend this course to anyone interested in understanding the history and importance of NPU."-a satisfied student in our NPU 101 class.

"It was an excellent course and I am glad I participated! Thanks!"-a satisfied student in our NPU 101 class.

"My experience was extremely beneficial and I recommend this course to anyone interested in understanding the history and importance of NPU."-a satisfied student in our NPU 101 class.

"It was an excellent course and I am glad I participated! Thanks!"-a satisfied student in our NPU 101 class.

"It would be helpful to have a real-life example and the real-world example would help demonstrate how the information used to support the final decision. - Then through the information provided on the application actual variance application is shown, we are walked through the information provided for each topic discussed. Meaning: - An example of the types of variance and how to solve their issues during the "Hold the individualized zoning issues that come up in residential neighborhoods. Specifically, how neighbors can interface with developers and builders on these applications and tips for coming to mutually agreeable outcomes."

"The presenter was knowledgeable and willing to share their knowledge."-a satisfied student in our NPU 101 class.

"It was an excellent course and I am glad I participated! Thanks!"-a satisfied student in our NPU 101 class.

"The presenter was knowledgeable and willing to share their knowledge."-a satisfied student in our NPU 101 class.

"It was an excellent course and I am glad I participated! Thanks!"-a satisfied student in our NPU 101 class.

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"The presenter was knowledgeable and willing to share their knowledge."-a satisfied student in our NPU 101 class.
Other CD/HS Updates by the Department of City Planning 2017-2021

May 2020, see the full presentation here.
PROJECTS WE’RE WRAPPING UP

As we begin to design our future, the intrinsic value of Progress will be realized only when we stand up for people and places that have meaning...

- Atlanta City Design

PROJECTS WE’RE WORKING ON

CHATTAHOOCHEE RIVERLANDS STUDY

CHATTAHOOCHEE RIVERLANDS STUDY

PROCTOR CREEK EXTENSION

FIVE POINTS MARTA STATION TRANSFORMATION

HISTORY, IDENTITY AND COMMUNITY

- Atlanta’s historic buildings and places:
  - define the City’s authentic identity
  - provide a sense of place
  - have cultural and community meaning
  - generate economic value
- Address myths vs. facts
- Respond to minimal presence in civic dialogue, but increasing expectations by the public
- Increasing expectations by the public
- Change and/or add to the conversation/approach
- Determine the role of historic buildings and places
**ANTICIPATED PROJECT SCHEDULE - PEACHTREE STREET REDESIGN**

- **May 2020**: Data Collection & Analysis
- **June 2020**: First Stakeholder Workshop: virtual & potentially small group sessions
- **Summer 2020**: Demonstration Project & Street Activation Strategies
- **Fall 2020**: Stakeholder & Community Engagement for Concept Development
- **Early 2021**: Finalize Concepts & Prepare Recommendations
- **Spring 2021**: Final Presentations to Neighborhoods, NPUs, Key Stakeholders & City Council; Finalize GDOT Concept Report

**LINDBERGH-ARMOUR AREA MASTER PLAN**

Nature and people will flow together in these vibrant hands and awesome new public meeting grounds.

**ANTECIPATED PROJECT SCHEDULE - LINDBERGH**

- **June 2020**: First Stakeholder Workshop: virtual & potentially small group sessions
- **Fall 2020**: Second Stakeholder Workshop: charrette-style & small group meetings
- **Early 2021**: Final Workshop & Public Open House for Plan Recommendations
- **Late Spring 2021**: Final Presentations to Neighborhoods, NPUs, Key Stakeholders & City Council
Growth Areas will be designed to connect people and accommodate growth.

Conservation Areas will be designed to connect nature and protect other things that we value.

UPCOMING PHASE 2 IMPLEMENTATION

Beginning Summer 2020

- Comprehensive Development Plan Update
- Zoning Ordinance Re-write

ATLANTA CITY DESIGN
Other CD/HS Updates by the Department of City Planning
2017-2021
October 2019, see full presentation here.
WE’VE ALSO BEEN REFORMING OUR ZONING CODE...

- Accessory Dwellings
- Definitions Update
- Historic Lot Patterns
- Industrial Districts Uses
- I-Mix District
- Loading Requirements
- MRC (Mixed-Residential Commercial)
- Residential Density Increase
- Missing Middle Zoning District
- Parking (on-street, shared, old buildings)
- Neighborhood Design Standards
- Telecommunications Updates
- Transitional Height Plane Updates
- Quality of Life Districts

Phase 1 and 2 passes, RFP for rewrite in progress
Other CD/HS Updates by the Department of City Planning 2017-2021

March 2019, see full presentation here.
URBAN ECOLOGY FRAMEWORK

ORGANIZING INPUT

DATA ANALYSIS AND FINDINGS

FINDINGS

Carnot Grasslands
- Biological Features
  - Interior grassland, old-growth forest, wetland buffer
  - Elevations with 40% tree coverage in 70% buffer area, 12% impervious surface
- Ecological Challenges
  - Besserer's and poverty thistle
  - Impacted stream (0.06 mi)
  - 1,000-foot corridor to buffer

DESIGN FOR WILDERNESS

DESIGN FOR RETREAT & ADVENTURE

DESIGN FOR COMFORT

DESIGN FOR CONNECTIONS

DESIGN FOR LIFESTYLES
TIMELINE

URBAN ECOLOGY FRAMEWORK SCHEDULE

MARCH–SEPT. 2018
UEF Data Collection and Analysis

MAY–SEPT. 2018
UEF Visioning and Needs Assessment

MARCH 2019
TPO Outreach Process
• Atlanta Planning and Advisory Board
• Council CDHS Presentation
• Stakeholder and Technical Advisory Committees

APRIL 2019
UEF Recommendations and TPO Launch
• City-wide Public Forums
• Green Infrastructure Task Force Presentation

JUNE 2019
• Council TPO Work Session
• Green Infrastructure Task Force Presentation

JULY/AUG. 2019
TPO Draft Ordinance
• City-wide Public Forums
• Stakeholder and Technical Advisory Committees

OCT.–DEC. 2018
UEF Final Data Analysis

MAY 2019
TPO Work Sessions
• City-wide Public Forums
• Stakeholder and Technical Advisory Committees

PEACHTREE SHARED STREET

HOUSING CASCADE HEIGHTS
Plan A: Atlanta’s 2021 Comprehensive Development Plan

**Concept**

**ILLUSTRATIVE PLAN**

**West End Storefront Re-Design Program**

**Preservation Strategy**

Historic Preservation Strategy will consist of five main components:

1. Public outreach, guidance & education initiatives
2. Comparative analysis of peer cities
3. “The View of Atlanta”
4. A survey of existing plans and documents
5. A survey of targeted individual resources and general classes of properties

The HRS is needed for two reasons:

1. Speed of development and growth in the city and decisions made by City’s policy, planning, and permitting.
2. Correlation with the DCP initiatives on strategic planning (City Design, UEF, ATP)

**Affordable Housing Impact Statements**

In FY2018, 27 impact statements were attached to legislation that was adopted by Council.

- 7 impact statements were created for legislation that authorized public funding for affordable housing.
- 30 impact statements were created for Land Use ordinances.

**Impact by Legislation Type and AMI Level**

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<th>Type of Legislation</th>
<th>Number of Impact Statements</th>
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<td>Public Funding</td>
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<tr>
<td>Land Use Amendments</td>
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<table>
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<tr>
<th>AMI Level</th>
<th>Adding Units</th>
<th>Preserving Units</th>
<th>Decreasing Units</th>
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<td>30% or Below</td>
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<tr>
<td>50.01 to 80%</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Above 80%</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Other CD/HS Updates by the Department of City Planning 2017-2021
December 2018, see full presentation here.
Enduring Housing Diversity: Accessory Dwellings

The Problem

- Accessory Dwelling Units: An accessory structure that allows to build a home or allow someone to live in a home.
- Currently, only allowed in the R-4 district.
- ADUs—only income for the homeowner; new housing options and more affordable myriad than are found in large apartments/buildings

Proposed Solution

- Allow accessory dwellings in R-1 and R-2 districts.
- Require that accessory dwellings conform with all existing zoning and development regulations.
- More importantly, they also offer additional housing options for the City.
- Single-family non-conforming in R-1, R-2, R-4, and MR.

Enduring Housing Diversity: Multi-Unit Dwellings

The Problem

- Existing zoning does not properly support existing and future "missing middle" housing.

Proposed Solution

- Create a new R-DW zoning district similar to R-1 and R-2 with:
  - Minimum lot size: 1,500 sq ft
  - Minimum floor area: 800 sq ft
  - Minimum height: 24 ft
  - Allow only in Low-Density Land Use

Urban Ecology Framework

Transportation: Mode Shift Targets

Current Mode Share

Future Targets

Housing Needs Assessment

Five Year Action Plan (2018-2023)

Placemaking

Preservation Strategy

Plan A: Atlanta's 2021 Comprehensive Development Plan
GREENBRIAR LCI

At this community meeting, we will review draft concept plans and project recommendations and talk about next steps toward implementation. Please join us and share your thoughts!

For more information, visit: atlantaga.gov/greenbriarlci

Councilmember Marci Collier Overstreet invites you to the final community meeting for the Greenbriar LCI Plan.
Plan A: Atlanta's 2021 Comprehensive Development Plan

445 Marietta Hotel

524 West Peachtree / Baltimore Row

Initial Design Concept

Revised Design Proposal
Other CD/HS Updates by the Department of City Planning 2017-2021

September 2018, see full presentation here.
**ZONING ORDINANCE AMENDMENTS**
- Accessory Dwelling Units
- Definitions Update
- Historic Landmark districts
- Industrial District Changes
- Infill Districts
- Loading Requirements
- MRC (Mixed-Residential Commercial)
- Residential Density Increase
- Missing Middle Zoning District
- Parking (on-street, shared, old buildings)
- Neighborhood Design Standards
- Telecommunications Updates
- Transition Indian River Updates
- Quality of Life Districts

**PRESERVATION STRATEGY**

**TRANSPORTATION MODE SHIFT TARGETS**

**CITY DESIGN**

**DESIGN FOR CONSTRUCTION**

**MOBILITY**

**AFFORDABILITY**

**SIX-T YEAR ACTION PLAN (2018-2023)**

**PREVIOUSLY**

**PLACEMAKING**

**CHATTahoochee PLAN**

**HOUSING INNOVATION**

**DESIGN AND ARCHITECTURE**
Other CD/HS Updates by the Department of City Planning 2017-2021

November 2017, see full presentation [here](#).

The mission of the Department of City Planning is to enable high quality, sustainable and equitable growth and development of Atlanta by facilitating more options for travel, abundant housing for all people, thriving neighborhoods, exceptional design in architecture and public spaces, preservation of historic resources, innovative regulatory practices, safe and durable buildings, attentive customer service, and resident involvement in all our work.
In March 2017, OOB established the 'second review' metric. The goal is to complete critical plan review comments within two cycles through closer coordination with the customer.

Plan Review Cycles - March - October 2017

- One Review Cycle
- Two Review Cycles
- Three or More Reviews

Zoning Reform

Zoning Diagnostics

Signage
5. Incorporating Public Review and Comment

Public Review and Comment on Draft III | October 1st - October 8th, 2021

The Department of City Planning published Draft III online on October 1, 2021. The Department also placed factsheets (see below) and a memo noting revisions in libraries (and, one open community center).

City Council Community Development Human Services Committee rescheduled the 3rd Quarter CDP public hearing from September 27 to October 25. To accommodate this change in schedule, there was one week of public review and comment for Draft III. The Department submitted a final draft for adoption at the City Council CD/HS Committee meeting on October 12. CD/HS voted on this final draft on October 26, and Full Council voted on October 28.

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**WHAT IS A COMPREHENSIVE DEVELOPMENT PLAN (CDP)?**

Plan A: Atlanta’s 2021 Comprehensive Development Plan (CDP) is the city’s guide for growth and development. This is the first update of the CDP since the adoption of Atlanta City Design into the City Charter in 2017. The CDP shows important relationships between land use, transportation, housing, economic development, nature, historic preservation, and other aspects of city building. Plan A is about being more intentional about how we grow, which means prioritizing people and places and putting infrastructure in service to our lives. Plan A starts to align several plans and initiatives using Atlanta City Design as a framework to design a future Atlanta with greater density and diversity while conserving the unique character and scale of our neighborhoods.

**PLAN A IS EVOLVING**

Plan A is being prepared in two phases over several years. This year’s update is a snapshot of planning across the city over the past five years, and it makes the minimum updates to keep the plan relevant.

We will continue the comprehensive planning process by building off this work and starting the second phase to Plan A in 2022. The Department has learned from this year’s experience of relying on virtual engagement during the pandemic and will carry those lessons forward. The comments received during the public review and comment period since June 2021 are all beneficial to the Department as it strives for more participatory and inclusive planning.

For the past several months, we hosted 3 virtual citywide community meetings; presented at 2 City Council public hearings; and, met with stakeholder and neighborhood groups across the city. We routinely used our website and social media and provided hardcopy drafts at libraries and community centers to expand our outreach.

The Department received thousands of comments and incorporated this feedback in the latest draft. For example, we revised Housing and Community Development policy actions to propose zoning reform supporting accessory dwelling units (ADUs) in some parts of the city rather than citywide, and we removed recommendations for zoning reform reducing minimum residential lot sizes and allowing fee simple subdivisions for ADUs. In responding to comments about aligning public infrastructure with growth and development, we worked with stakeholder partners implementing infrastructure projects across the city, including City of Atlanta Departments of Watershed Management and Transportation, and prioritized actions in the 2022-2026 Community Work Program based on existing capital programs.

**Important Dates and Next Steps**

- October 1 - 8: Review and Comment Period for Draft III of Plan A
- October 12: Final Draft of Plan A published and submitted to City Council Community Development and Human Services Committee (CD/HS)
- October 25: CD/HS 3Q CDP Public Hearing (rescheduled from Sept. 27th)
- October 26: CD/HS vote on the Final Draft of Plan A
- October 28: Special 3Q CDP Full City Council Meeting to adopt Plan A

For more information about Plan A or to leave a comment, please email cdp2021@AtlantaGa.Gov.
To whom it may concern,

As a non-profit that advocates for the urbanism of the City of Atlanta, ThreadATL is fully supportive of these good Housing and Community Development policies included in the latest draft of the 2021 Comprehensive Development Plan, Plan A, listed below:

-- HC 4 Enable the market’s ability to provide missing middle housing.

-- HC 5 Leverage transit and other infrastructure to maximize housing density in Atlanta’s Growth Areas.

-- HC 6 Maintain the low-density character of neighborhoods in Atlanta’s Conservation Areas by permitting housing types that gently increase density.

We also support the associated policy actions:

-- HC 4.1 Amend the zoning ordinance to allow attached and detached ADUs in more areas.

-- HC 4.2 Amend the zoning ordinance to support missing middle housing.

-- HC 4.4 Amend the zoning ordinance to update or remove the definition of family in favor of maximum occupancy regulated by the building code.

-- HC 5.1 Amend the zoning ordinance to allow small apartment buildings near transit.

-- HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.

Please leave these policies in the document when it is submitted to the City Council Community Development/Human Services Committee, as we find them to be excellent ways to foster improved urbanism in Atlanta.

Darin Givens  
Board President  
ThreadATL  
threadatl.org  
darin@threadatl.org

Co-signing:  
Neighbors for More Neighbors - Metro Atlanta n4mnatlanta.org n4mnatlanta@gmail.com
A few resident comments raised concerns over the population projection as discussed in *Atlanta City Design* and used in the 2021 comprehensive development plan update. In response to these and other comments received on Draft II, the Department’s Commissioner addressed the topic at the CD/HS Committee Meeting on September 28 and in an October 6 blog entry on atlcitydesign.com (see below). The demographer report from Dr. Nelson can be found [here](#).
From: Gloria Cheatham <gjccheath@icloud.com>
Date: October 24, 2021 at 10:19:06 PM EDT
To: fmoore@atlantaga.gov, csmith@atlantaga.gov, Amir Farokhi <arfarokhi@atlantaga.gov>, aobrown@atlantaga.gov, csmith@atlantaga.gov, narchibong@atlantaga.gov, jnide@atlantaga.gov, Howard Shook <hshook@atlantaga.gov>, JP Matzigkeit <jpmatzigkeit@atlantaga.gov>, drhllis@atlantaga.gov, aboone@atlantaga.gov, mcoverstreet@atlantaga.gov, jmsheperd@atlantaga.gov, mbond@atlantaga.gov, Matt Westmoreland <mwestmoreland@atlantaga.gov>, adickens@atlantaga.gov
Cc: Brink Dickerson <wbdnatl@gmail.com>, Nancy Bliwise <bliwise@bellsouth.net>, Zack Gober <zgober@lavista.com>, James S Martin <james.martin@me.gatech.edu>, Nabil Hammam <nabilhammam@yahoo.com>, Debbie Skopczynski <chair@npufatlanta.org>, Ola Reynolds <npug74mhj@gmail.com>, Eunice Glover <chair.npui@gmail.com>, Daniel Rice <chair@atlanpuo.org>, Reginald Rushin <rushin58@gmail.com>, Angela Clyde <aclyde1@yahoo.com>, Stephanie Flowers <stephanieflowers@bellsouth.net>, Troy Nunnally <secretarynpuy@gmail.com>, Anne Phillips <anne.phillips@bellsouth.net>, Tim Keane <tkeane@atlantaga.gov>, Christopher Nunn <christopher.nunn@dca.ga.gov>, Andrew Smith <asmith@atlantaregional.org>, Jon West <jon.west@dca.ga.gov>, Jared Lombard <JLombard@atlantaregional.org>, Donald Shockey <dshockey@atlantaregional.org>

Madam President and Honorable Council Members—

On October 8, an alliance of ten NPUs wrote to you opposing the Department of City Planning’s comprehensive development plan and asking you to adopt a CDP that was what DCP had promised stakeholders and the public.

Since that time, our NPU alliance has grown from ten to fifteen—a group that represents some 175 neighborhoods all over Atlanta. Our fifteen-member alliance now asks again: In the interest of the future of Atlanta and the restoration of the public trust, please adopt a CDP that is what DCP promised—one that aligns with Atlanta City Design and that is otherwise limited to the legally required updates.

We appreciate your consideration of our request.

Sincerely,
Gloria Cheatham

Plan A: Atlanta’s 2021 Comprehensive Development Plan
Dear Madam President and Honorable City Council Members:

On October 8, 2021, a group of ten neighborhood planning units (NPUs) wrote to you and to Commissioner Tim Keane to oppose the Department of City Planning’s Plan A 2021 update to Atlanta’s Comprehensive Development Plan (CDP). Since that time our alliance has grown from ten NPUs to fifteen—a group that collectively represents 175 neighborhoods all over Atlanta. We write to you now as an alliance of those fifteen NPUs to reiterate our
opposition to DCP’s proposed CDP and our request that you adopt a 2021 CDP that reflects what DCP promised—a comprehensive development plan that aligns with Atlanta City Design and that is otherwise confined to the updates required by law.

I.

PLAN A IS CONTRARY TO THE WILL OF THE COMMUNITY

Comprehensive development planning is supposed to be a very public process in Georgia, actively involving the local community to ensure local comprehensive development plans “embody the community’s articulated will” and “reflect the full range of the community’s needs and values.” In fact, the late Mayor Maynard Jackson expressly established the Neighborhood Planning Unit (NPU) system for this very purpose—to assure that Atlanta residents had a way “to actively participate in the development of the Comprehensive Development Plan.”

Despite these requirements, DCP conducted no significant public engagement on the elements of Plan A as the City’s 2021 CDP update, and its communications leading up to Plan A’s release in June were misleading as to its scope and content. But the community’s voice on Plan A has nonetheless been loud and clear: The NPUs, neighborhood associations and residents who have commented on Plan A have almost universally opposed it. And for its part, DCP has failed to address the community’s concerns in any meaningful way.

A. Essentially 100 percent of community comment has opposed Plan A.

As the “official avenues” for resident participation in this process, multiple NPUs submitted letters, either individually or in concert, detailing major concerns with Plan A. To a one, these

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1 “Each element of the comprehensive plan must be prepared with opportunity for involvement and input from stakeholders and the general public, in order to ensure that the plan reflects the full range of community needs and values.” DCA regulations Section 110-121-1.02(2) (emphasis added). See also the Georgia Department of Community Affairs website, which notes that its regulations are designed to “ensure that comprehensive development plans embody the community’s articulated will.”

2 According to DCP’s public engagement report, it held only three small meetings on Plan A in mid-June, soon after its initial release in early June. At that time few Atlanta residents were aware of Plan A’s existence and fewer still were aware of its contents, especially given its volume and the compressed timeframe. DCP’s prior meetings were more general in nature and described its forthcoming CDP update very differently from what it released in June. Its initial presentations in 2020 indicated that the update would institutionalize the Atlanta City Design’s values and approach to growth. See, e.g., 2021 Comprehensive Development Plan Update, CD/HS Committee Meeting, September 29, 2020, included in Appendix II at page II-21 et seq.; 2021 Comprehensive Development Plan Update, Public Leadership Group Meeting, December 17, 2020, included in Appendix I at page II-34 et seq. Then at the March CDHS public hearing, DCP announced it would “focus only on the required updates.” See also DCP letter to NPU Chairs and NPU Zoning Contacts at included at page II-51. The document released in June did neither. It went far beyond the required updates, but it failed to “institutionalize” either Atlanta City Design’s values or its approach to growth. To our knowledge, DCP conducted no community engagement on any of the plan elements, policies or policy action items of the CDP update it proposed in June. Based on the DCP’s response to an open records request, DCP has no studies or other analytical support for what it proposed. See email from Patricia Walden to Brinkley Dickerson dated October 1, 2021.
letters opposed DCP’s proposed 2021 CDP update as written. Almost all these letters also requested that this year’s update be cut it back to “only the required updates,” as DCP announced it would do at the CDHS public hearing in March.

In addition, Atlanta residents and individual neighborhood associations left hundreds of emails and recorded messages of opposition:

- Over 1000 recorded messages on the public comment line for the June CDHS public hearing in opposition to Draft I;
- Some 1100 emails in opposition to Draft II; and
- Some 900 recorded messages on the public comment line for the September CDHS public hearing in opposition to Draft II.

We understand and believe that the overwhelming majority of the community emails submitted to the CDP comment address also asked that the 2021 be cut back to “only the required updates,” as DCP publicly announced in March.

To our knowledge, no neighborhood or resident comment approved of the 2021 CDP as written. (We understand that the handful of residents who did not oppose it merely indicated approval for the Farokhi legislation, not the CDP update.)

That means that essentially 100 percent of the community comments DCP received were in opposition to its Plan A update to the CDP, with no neighborhood or resident arguing in its favor.

B. DCP failed to address the community’s primary concerns in any meaningful way.

The community comments opposing Plan A raised many concerns, but there were three major ones: 1) Plan A’s failure to provide for the balancing of development with the preservation of our iconic tree canopy, our stable single-family neighborhoods and other things that, in DCP’s words, “make Atlanta great;” 2) Plan A’s failure to address infrastructure needs before actively seeking to more-than-double the city’s population; and 3) Plan A’s expansive, policy-changing scope—going well beyond DCP’s promise to limit it to “only the required updates” and without the community engagement changes of its scope require and deserve.

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4 Because of the compressed timeline for responding to Draft I (and the inability to digest the huge quantity of information necessary for complete comment), the community comment on Draft I tended to focus on individual line items. In response, DCP did remove or amend some line items of concern, but those changes turned out to be largely ephemeral. For example, DCP deleted a provision in Plan A allowing ADU subdivisions, but literally days later it proposed legislation that included provisions for ADU subdivisions. Similarly, it removed a provision for citywide reductions in minimum lot size, but it said in a previous iteration of Appendix II that it would pursue that and other removed provisions in Phase 2 of Plan A and in the zoning code rewrite.
DCP failed to address any of these major concerns in any meaningful way:

1) **Failing to balance growth with what we value.**

This concern was discussed at length in the joint NPU A, B, C, G, and I letter dated August 26, as well as in the separate letters by NPU-B, NPU-E and NPU-Y and in the comments of many residents. Addressing this concern should have been easy. All DCP had to do was two things: a) institutionalize Atlanta City Design’s five core values into the CDP (including its Progress “with Integrity” value—one that expressly requires the balancing of growth “with what we value” that NPUs and residents have demanded), and b) incorporate the Atlanta City Design’s “growth area/conservation area” approach to development (an approach that graphically requires the “protection of people, places and other things we value” in development planning).

Indeed, DCP led stakeholders to believe that institutionalizing the values and growth approach of Atlanta City Design was exactly what they planned to do from the outset of this process. In its very first presentation on the 2021 CDP update on September 29, 2020, DCP announced it would “Institutionalize Atlanta City Design’s vision, goals, and values for growth and development” in the 2021 CDP, along with its growth area/conservation area approach to development. DCP’s presentation to the Public Leadership Group on December 17, 2020 went even further and included graphics depicting the translation of the 2016 CDP’s “Character Areas” into “Growth Areas” and “Conservation Areas,” as well as examples of how those redesignations would change decision-making.

On top of all that, multiple presentations, from September 20, 2020 through June 2021, included slides depicting the Atlanta City Design’s “Growth Areas” with the legend, “Growth Areas will be designed to connect people and accommodate growth,” and depicting Atlanta City Design’s “Conservation Areas” with the legend, “Conservation Areas will be designed to connect nature and protect other things we value.”

The version of Plan A released in June, however, turned out to be very different. DCP used a different description for “Growth Areas” (one that did not reference their growth accommodation purpose) and a different description for “Conservation Areas” (one that did not reference their preservation purpose). Plan A at page 33. And more importantly, DCP expressly

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5 See, e.g., 2021 Comprehensive Development Plan Update, CD/HS Committee Meeting, September 29, 2020, at Appendix II, page II-21 et seq., and especially slide entitled “Required elements of the CDP” (“Community Goals” and “Land Use”).

6 This presentation is included at Plan A’s Appendix II at page II-34 et seq. The presentation included two examples:
  - “Example: The ACD categories help communicate where it is appropriate to locate ADUs” (adding a graphic showing that by applying Atlanta City Design’s growth/conservation approach to development, ADUs would be allowed in “Urban” and “Suburban” Conservation Areas, but not in “Rural” ones).
  - “Example: References to TOD opportunity areas reflect policy/recommendations from the Atlanta Transportation Plan; however, further analysis may suggest that ACD ‘Corridor’ Areas will encompass the intent and purpose of TOD areas.”

Appendix II at page II-38. Note that these examples indicate that adopting the Atlanta City Design’s approach to growth not only would have disallowed DCP’s “citywide” allowance of ADUs, but also would have required DCP to rethink both its new Plan A transit-oriented development policy—which would increase density within a half-mile of transit, regardless whether the impacted property was in a “Growth” area or a “Conservation” one.

7 See, e.g., Appendix II at page II-38.
declined to adopt the Atlanta City Design’s growth framework into Plan A—a framework that is fundamental to that design plan—saying dismissively that it merely “suggests additional design considerations.” Plan A at 31.

Whatever its motivation for these eleventh-hour changes, DCP has advanced no rational justification for them, nor has it advanced any justification for not addressing the NPUs’ and residents’ “failure-to-balance” concerns. Indeed, instead of simply doing what it said it was going to do at the outset of this process, it proceeded with a CDP update that not only directly conflicts with Atlanta City Design but is also directly contrary to the manifest will of the community.

2) Putting the densification cart before the infrastructure horse.

Prioritizing major density increases without addressing current infrastructure needs and planning for future ones was a major concern discussed at length in the July 16, 2021, letter by NPU-A, as well as in other NPU letters and many resident comments. In response, DCP said it “worked with stakeholder partners . . . to prioritize actions in the 2022-2026 Community Work Program.” However, as best we can tell, DCP made no changes to its Community Work Program, and more importantly, it made no effort to build infrastructure planning into its “densification strategy.”

In this regard, it is important to note—as Commissioner Keane explained at the September 28 meeting of City Council’s CDHS committee—that DCP’s “densification strategy” is not one of “accommodating” Atlanta’s projected growth, as the words of Plan A would lead one to believe. On the contrary, it is an affirmative plan to attract and build the City’s population to 1.2 million people—some 240 percent of Atlanta’s current population. This “densification strategy” is also apparently an effort to attain that population level without any articulated plan to meet the infrastructure needs of the city’s current population of 498,700, much less those of the 700,000 people DCP wants to add.

When the City developed its current 2016 Comprehensive Development Plan, the Atlanta community agreed that addressing traffic congestion and flooding were two of the highest ranked needs among all the community needs identified in that plan. And the community vociferously repeated those concerns in its comments on Plan A. Yet DCP nonetheless plans to proceed with Plan A as is—despite the express “will of the community” that the City address and fund Atlanta’s already dire infrastructure needs for our current 498,700 inhabitants before drawing in a population increase of over 700,000 more.

3) Failing to abide by its promise to confine the 2021 CDP to “only the required updates.”

Commissioner Keane made this explanation at the Community Development/Human Resources Committee meeting on September 28, 2021. Before that time DCP representatives and surrogates had said that its “densification strategy” was “urgently” needed to address Atlanta’s supposedly “exploding” population. After neighborhood representatives pointed out that neither the Atlanta Regional Commission’s population projections nor those based on the 2020 census supported DCP’s claims, Commissioner Keane appeared before Council’s CD/HS committee to explain that DCP’s 1.2 million figure was not a projected population figure but was rather the “optimum population” DCP was seeking to attain.
This concern was discussed at length in the joint letter by NPUs A, B, C, G, and I dated August 26, 2021. And we understand it was echoed by a thousand Atlanta residents in the comments submitted on Draft II as well as in letters by NPUs E and Y. DCP responded by saying that it did in fact do what it said it was going to do, that Plan A is merely an “administrative” update and that it is consistent with both Atlanta City Design and the vision and values of the 2016 CDP.

Those assertions are manifestly untrue:

a) DCP announced at the March CDHS public hearing it would “focus only on the required updates this year.”

In the text of Plan A itself, DCP says that, after consulting with the Public Leadership Group, the Stakeholder Advisory Committee and the Technical Advisory Committee, it “decided to reset the comprehensive development planning process by only focusing on the required updates this year and beginning a more robust process in 2022.” DCP goes on to say that it announced that decision at the March 22, 2021, CDHS public hearing. See Plan A at page 22. At that same hearing, DCP announced that “This administrative update will NOT . . . change future land use map, descriptions or policies beyond the quarterly updates.” See Appendix A at page II-17. According to multiple NPU leaders, the limited scope of the 2021 update (“focused only on the required updates”) was also announced to APAB and in other communications.9

As we all now know, however, when Plan A was introduced just over two months later, it went far beyond the required updates. It included new citywide policies for land use development and hundreds of new character area, housing and other policies, policy action items and priority changes—all plainly directed at the future land uses of many areas of the city and especially residential ones, many obviously driven by DCP’s “densification strategy” for building Atlanta’s population to 1.2 million.

DCP submits that the policies, policy action items and related provisions in Plan A are all somehow “required updates.” But that is plainly not the case. DCA regulations clearly spell out which CDP elements are required to be updated (see Section 110-12-1-.03), and the following updates are the only ones required: 1) A locally agreed upon list of Needs and Opportunities;10 2) Community Work Program;11 3) Capital Improvements Element;12 4) Land Use Element.13 An update of the Community Goals element (which

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9See, e.g., email from Chair of NPU-O to the CDP comment address, dated August 27, 2021. See also DCP letter to NPU Chairs and NPU Zoning Contacts at included at page II-51 (announcing the limited scope of the upcoming CDP update).

10DCA regulations Section 110-12-1-.03(2). An update of this element may be met by drawing “needs and opportunities” provisions from the 2016 CDP. See Section 110-12-1-.03. For the 2021 update, it will be legally necessary to use this option, since none of the “Needs and Opportunities” in Plan A have been “locally agreed upon”—which is a required part of this element.

11Section 110-12-1-.03(3). An update of this element is included in Plan A’s Appendix I.

12Section 110-12-1-.03(5). An update of this element is included in Plan A’s Appendix I.

13Section 110-12-1-.03(7).
includes vision, goals, policies, and/or character areas and defining narrative) is expressly not required, nor are updates of the Broadband Services Element, the Transportation Element or the Housing Element.\textsuperscript{14} The various other elements and narratives included in the text of Plan A are not required even for 15-years plans, so updates are not required by definition.

b) Plan A is obviously not an “administrative” update.

From the beginning, DCP promised that the 2021 update would be an “administrative” one, which—despite DCP’s eleventh-hour efforts to define the word differently on its website—means “relating to the running of a business, organization, etc.” See Oxford English Dictionary. An “administrative” update would thus not convey expectation of new substantive policies, priority changes, policy directives mandating zoning amendments, or other significant substantive changes—and certainly not ones relating to planning initiatives and strategies that have never been approved by City Council (such as DCP’s controversial Housing Initiative and its even more controversial “densification strategy”). Plan A is filled with such substantive policies and changes—leading one NPU to observe: “It became evident that an ‘administrative update’ was neither clearly defined for the public nor truthful. We believe City Planning misled the public by downplaying the scale of the impact in the 2021 CDP update while simultaneously drafting aggressive residential planning changes.”\textsuperscript{15}

c) Plan A did not “institutionalize” Atlanta City Design’s values and expressly declined to adopt its approach to growth.

From the outset, DCP promised that it would “institutionalize Atlanta City Design’s vision, goals and values for growth and development” and that it would “align” the CDP with “Atlanta City Design’s Growth and Conservation Areas.” Plan A plainly does not do that, and indeed, it expressly \textit{declined} to adopt Atlanta City Design’s Growth Areas/Conservation Areas development framework.

Moreover, Plan A proposes new policies for character area development, transit-oriented development and residential land use that are \textit{directly contrary} to the values of Atlanta City Design and/or to its framework for development.\textsuperscript{16} And what is worse, Plan A’s many new policies and priority changes for both character area development and character areas themselves give every impression that DCP intends to keep the current FLU/character area development approach indefinitely—or at least for the next five years. Given that City Council incorporated Atlanta City Design into the City

\textsuperscript{14} See sections 110-12-1-.03(1), 110-12-1-.03(4), 110-12-1-.03(8), and 110-12-1-.03(9) (each allowing updates “at local discretion” but not requiring them).
\textsuperscript{15} Letter from NPU-E on Draft II, included in Appendix II at page II-115 et \textit{seq.} (quoted passage at page II-117).
\textsuperscript{16} See Mike Dobbins, “Atlanta’s proposal offers false hopes for housing affordability, breaks with Atlanta City Design,” SaportaReport (September 26, 2021). Professor Dobbins, now a professor or urban design for the Georgia Institute of Technology, was formerly Commissioner for City Planning for the City of Atlanta.
Charter in 2017, we submit that adoption of a CDP update that would thus institutionalize the current development approach would be unlawful. And given that DCP has had almost four years to translate the current character areas designations into the Growth Areas and Conservation Areas, we also cannot help but wonder whether Plan A’s retention of the current development scheme is a deliberate effort to avoid the strictures Atlanta City Design would put on DCP’s “densification strategy.”

DCP’s various responses to the community’s concerns simply do not change the facts here. And the plain facts are these: DCP led the NPUs to believe that the 2021 CDP update would “institutionalize” the values and growth approach of Atlanta City Design and that it would otherwise be limited to the “required updates”—but the 2021 update it released in June did neither one. And now DCP is simply ignoring the community’s concerns and has presented City Council with a CDP update that not only goes vastly beyond the “required updates” but is also contrary to Atlanta City Design.

Considering those facts and the virtually universal opposition of the NPUs, neighborhood associations and residents who have weighed in with their letters, emails and recorded messages, adoption of DCP’s Plan A would be manifestly contrary to the will of the community.

II.

ADOPTION OF PLAN A WOULD BE UNLAWFUL AND A BREACH OF GOOD GOVERNANCE AND THE PUBLIC TRUST

Considering its misleading communications about the scope and content of this year’s CDP update, we believe DCP’s continued effort to push Plan A forward as this year’s CDP—especially in light of overwhelming neighborhood opposition—is a breach of the most basic considerations of good governance, public trust and fair play. We also believe that the Honorable Council Members who make up Atlanta’s City Council understand and appreciate that their adoption of Plan A as the 2021 CDP update would compound that breach.

We would further submit that there are issues of law at play here as well. DCA regulations require that “Each element of the comprehensive plan must be prepared with opportunity for involvement and input from stakeholders and the general public, in order to ensure that the plan reflects the full range of community needs and values.” Section 110-12-1.02(2) (emphasis added). Despite this requirement, DCP has put forward a CDP update on which it has conducted essentially no public engagement on the plan elements, raising serious questions as to its legality. Similarly, DCP has put forward a CDP update that has essentially no community support and thus could not possibly be said to “embody the articulated will of the community” or to “reflect [its] needs and values” as DCA regulations require—raising yet more questions as to the plan’s legal viability. And DCP has put forward a CDP update that also directly conflicts with Atlanta City Design, even though the Department has had almost four years to conform its development planning to the design plan incorporated in the City Charter in 2017—raising further questions not only as to the legality of the update but also as to the bona fides of DCP’s intentions.
We are at a pivotal point in Atlanta’s evolution. City Council is faced with a decision whether to adopt a CDP update that is broadly opposed and likely unlawful, one with a “densification strategy” that would—as a matter of choice—more than double our city’s population, a strategy that would precipitate development in neighborhoods that neither want nor need it, pushing prices up and legacy residents out, exacerbating wealth inequality, destabilizing neighborhoods and further destroying the tree canopy that uniquely positions us to weather climate change, while weakening the NPU system and leaving declining neighborhoods still wanting.

We submit that good governance, the rule of law and the restoration of the public trust demand instead that City Council adopt a CDP update that reflects what DCP promised and the public has demanded—and that the future of Atlanta depends on it.

Sincerely,

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The Department of City Planning submitted Draft II to DCA and ARC for their review and approval on July 27th. The Department also posted the draft online and placed hardcopies at 15 libraries and community centers around the city. The Department requested public comments on Draft II through September 27th as DCA and ARC conducted their 45-day review. On September 13th, the Department received DCA and ARC’s approval that Plan A conforms to the Minimum Standards and Procedures for Local Comprehensive Planning. DCA and ARC provided only a few advisory comments with their approval. Documentation of the approval and the Department’s response to DCA and ARC comments are later in Appendix II, Part E.

The Department received over 900 emails from residents and stakeholders during this period.

Approximately 700 emails from residents using the Buckhead Council of Neighborhoods script urged City Council and the Department to revise Draft II of the 2021 CDP to “conform to the general goals, objectives, policies, and format of the current 2016 CDP and only include updates to the existing 2016 CDP that are legally required and/or mandated by the Atlanta City Charter or DCA (Appendix I and III).”

Similarly, another 138 emails from residents using an Ansley Park Civic Association script asked City Council and the Department to revise the 2021 CDP update to only include updates to the 2016 CDP that are legally required and/or mandated with no new policies or actions.

A few emails from Peachtree Park, Candler Park, and Springlake residents stated opposition to the CDP Housing and Community Development Element policies for increased density in residential neighborhoods as well as the ACD: Housing zoning legislation proposed in City Council in July (i.e., 21-O-0455/CDP-21-043 FLU changes associated with pro-active rezoning case Z-21-073 for MR-MU zoning changes near existing high-capacity transit stations and residential parking minimums, ADU, and MR-MU zoning text reform case Z-21-074).

The Department received a letter from NPU- A, B, C, G, and I chairs opposing the 2021 update as currently drafted and asking to pare it back to only what is legally required for a five-year update. NPU-B Chair also sent a separate letter to the Department’s Office of Housing and Community Development expressing similar comments. NPU-Y Zoning Committee sent a letter sharing similar feedback as these the other NPUs.

The Department also met with and discussed with NPU-E a few times during the review period to discuss the NPU’s comments and suggestions on Draft II. In a follow-up letter, NPU-E documented their concerns with the 2021 CDP update and recommendations for specific revisions to several elements.

Atlanta Housing, Atlanta BeltLine, and MARTA as well as groups such as Midtown Alliance, Atlanta Bicycle Coalition, Housing Justice League, and Sierra Club GA Chapter offered specific suggestions and clarifying questions about Draft II. The Department, with assistance by ATLDOT and others, made several revisions to Draft II reflecting these substantive comments. The themes from their feedback built on ideas and concepts brought up during the fall and winter stakeholder holders—just with greater detail on recommended Policies and Policy Actions in several Elements. When appropriate, the Department incorporated changes in Draft III and followed-up with individual groups to discuss which comments led to revisions and which comments will be better addressed in Phase 2 to Plan A starting next year.
In response to this feedback, the Department made several revisions to the introduction, and in the elements. These line-by-line changes are documented in a new memo in the front matter.

**Summary of Incorporating Stakeholder and Public Comments:**

The following are the most salient topics from *Plan A*’s public review and comment period(s) and the Department’s response.

**Topic 1: Balancing Growth and Development with What Makes Atlanta Great** — The most discussed topic by far is the approach to balancing Atlanta’s growing residential population and unprecedented development while protecting and enhancing the things that make Atlanta great—its people, diversity, residential neighborhoods, historic and cultural places, walkable urban core, tree canopy, streams and rivers, parks and trails, transit, and schools. Prefaced on *Atlanta City Design*’s recognition that change is coming and with it is the prospect for Atlanta to account for a larger share of the region’s population, the Department purposely drafted a comprehensive plan for a population that is at least double the city’s current size. And, this means planning for a future Atlanta with greater density and diversity while conserving the unique character and scale of neighborhoods.

*Plan A* in 2021 starts to align several plans and initiatives already implementing *Atlanta City Design*. Extensive technical analysis and public engagement will be needed in the next phase of *Plan A* to draw more connections across plan elements and overhaul the land use planning element, itself. While preparing *Plan A*, a series of legislation (ordinances 21-O-0454, 21-O-0455, and 21-O-0456) proposing future land uses and zoning changes to support missing middle housing around MARTA transit stations and text amendments to the zoning ordinance for parking minimums and accessory dwelling units was introduced to City Council. This proposed legislation implements recommendations of *Altana City Design: Housing*, and it spurred most of the comments received during the public review and comment period for *Plan A*. In recognizing the need for further analysis and engagement, the Department revised policies supporting aspects to *Atlanta City Design: Housing* in *Plan A*’s Housing Element.

These included making the following revisions to Draft I:

- **HC 4.1**: Amend the zoning ordinance to allow attached and detached ADUs citywide. “Amend the zoning ordinance to allow attached and detached ADUs in more areas.”
- **HC 6.1**: Amend the zoning ordinance to reduce residential parking requirements (no change)
- **HC 6.2**: Amend the zoning ordinance to reduce minimum lot size requirements (removed)
- **HC 7.1**: Create fee simple subdivision for accessory dwelling units to promote affordable ownership options (removed)

Public discussion over the legislation continues, and the legislation will be considered for adoption after City Council adopts *Plan A*. 
The proposed legislation prompted public discussion and comments, particularly among several NPUs, during the review period for Draft II. Most of these comments focused on the Land Use Planning element and how Growth and Conservation Areas, Future Land Use Categories, Character Areas relate to each other and guide zoning decisions, especially near transit stations and in residential neighborhoods. Acknowledging these comments, the Department responded by reiterating that Character Area geographies, policies, and preferred future land uses in the 2021 Plan A are substantively the same as they were recommended in the 2016 CDP. For example, transit-oriented development (TOD) character area policies continue to be considered along with overlapping character area policies when making zoning decisions. Additionally, the city-wide character area policy to protect existing single-family, low-density, and medium-density residential from incompatible higher densities and non-residential uses remains (see CW-2). But, the thrust of the comments reinforces the first Land Use Planning Element policy proposed in Plan A:

LU 1: Revisit the purpose of Character Area Planning and Future Land Use Planning.

“It will take this and the next update to Atlanta’s comprehensive development plan to properly translate the Atlanta City Design vision and goals for the physical growth and development of the city. For this update, we are working with the existing policies and practices of Character Area Planning and Future Land Use Planning. We also recognize the need to revisit these policies and practices within the context of the ongoing rewrite of Atlanta’s Zoning Ordinance during the next update.”

**Topic 2: Aligning Public Infrastructure with Growth and Development** — A related topic to balancing growth and development is the need to invest in public infrastructure in places Atlanta City Design and Plan A direct new growth and development. The Department received comments regarding increased burden on stormwater infrastructure in growing residential neighborhoods and car traffic in corridors experiencing new mixed-use development—indicating a lack of public infrastructure investments to support the intensity of growth and development. The Department worked with stakeholder partners implementing infrastructure projects across the city, including City of Atlanta Departments of Watershed Management and Transportation, to prioritize actions in the 2022-2026 Community Work Program based on existing capital programs. The Department will carry this focus on implementation in Phase 2 of Plan A as it increases engagement with both the public and implementing partners to further align infrastructure with growth and development.
Topic 3: Limiting the 2021 CDP Update to a Minimal Administrative Update and Ensuring Meaningful Engagement — During the review period for Draft II, the scope of the administrative update and public engagement emerged as a third salient topic.

The Department received many comments requesting that Plan A conform to the general goals, objectives, policies, and format of the 2016 CDP and only include updates that are legally required and/or mandated by the Atlanta City Charter or the State. The 2016 CDP together with Atlanta City Design is the basis for the 2021 CDP update. The Department decided to use a different format and report template than the 2016 CDP for Plan A to produce a more legible and streamlined document of recommendations. However, the substance of Plan A’s policies and actions still reflect and draw from those in the 2016 CDP. Below are examples of Plan A reflecting the 2016 CDP and Atlanta City Design.

Example 1: 2021 CDP Policy Actions
HC 4.1 Amend the zoning ordinance to allow attached and detached ADUs in more areas.
HC 4.2 Amend the zoning ordinance to support missing middle housing.

2017 Atlanta City Design Policy Actions
• 2.1d Missing Middle. Eliminate barriers to the development of small or attached housing, including accessory dwelling units, two- and three-family homes, small-scale multifamily buildings, tiny houses, micro-units, co-housing, shared housing and other models. Encourage the design of family-friendly multi-family units (p. 162).
• 2.1e Rethink Parking. Unbuckle the cost of parking from the cost of housing so people can choose to pay for parking or not. Eliminate parking requirements and set parking maximums where transit, walking and bicycles are real options (p. 162).

2016 CDP Policy Actions
• Encourage a range of housing types, and promote mid-size development compatible in scale with single-family homes (“Missing Middle”), including duplexes, triplexes, fourplexes, bungalows courts, townhouses, multiplexes, and live-work (p. 58).
• Allow accessory units to provide for housing diversity and affordability (p. 228).

Example 2: 2021 CDP Policy Actions
HC 5.1 Amend the zoning ordinance to allow small apartment buildings near transit.
HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.

2017 Atlanta City Design Policy Actions
• 2.1e Rethink Parking. Unbuckle the cost of parking from the cost of housing so people can choose to pay for parking or not. Eliminate parking requirements and set parking maximums where transit, walking and bicycles are real options (p. 162).

2016 CDP Policy Actions
• Encourage transit-oriented development to encourage mixed-income housing near job centers (p. 58).
• Create more dense, transit-oriented development (p. 82).
• Establish maximum parking requirements, encourage shared parking and alternative modes of transportation (p. 218).
• Maximize opportunities for on-street parking (p. 218).
The Department communicated the scope of the administrative update several ways over the past six months. The Department presented specifics about the administrative update with the CD/HS committee in March and at the June CDP quarterly public hearing. The Department discussed the scope at the April and August APAB meetings and at the June community meetings. The Department met with several NPU leadership groups, when requested, since April to discuss the scope of the update. The Department also posted details about the administrative update on its FAQs at www.atlcitydesign.com/2021-cdp. The Department followed the guidance of both DCA and ARC to ensure that the scope discussed with the public and stakeholders meets the Minimum Standards for Local Comprehensive Planning. ARC and DCA instructed the Department that re-adopting the 2016 CDP 5-year update was not an option.

Drafting Plan A while relying on virtual engagement during the pandemic has been challenging. The Department has learned from this year’s experiences and will carry those lessons forward as Phase 2 public engagement and outreach strategies are developed and presented in early 2022 to City Council, NPUs, other stakeholders, and the public. The comments received during the public review and comment period for Plan A are all beneficial to the Department as it strives for more participatory and inclusive comprehensive planning.

The following emails are attached after this section:

**Resident Email Script:**

1. Buckhead Council of Neighborhoods script
2. Ansley Park Civic Association script

**Stakeholder/Technical Advisory Committee Emails:**

3. Letter from NPU- A, B, C, G, and I Chairs
4. Letter from NPU-E
5. Letter from NPU-B
6. Letter from NPU-Y
7. Comments from Midtown Alliance
8. Comments from Atlanta Housing
9. Comments from MARTA
10. Comment from Atlanta BeltLine
11. Comments from Atlanta Bicycle Coalition
12. Letter from Sierra Club Georgia Chapter
13. Comments from Housing Justice League
14. Letter from Council for Quality Growth
1. Buckhead Council of Neighborhoods script

TO: ATLANTA NEIGHBORS
FROM: Nina Schwartz and Mary Norwood

We have been communicating with you about the City’s Zoning Plans and how they can affect YOUR NEIGHBORHOOD. We need your help once again.

Your calls helped TREMENDOUSLY, when on June 27 you called asking the City to remove certain Policy Statements from the CDP (Comprehensive Development Plan). But despite our best efforts, this plan STILL negatively affects our Single Family Residential Zoning policies and practices!

The City needs to hear from us again before August 27. This time, please ask the Planning Commissioner and all members of the Atlanta City Council to make the following changes to the 2021 CDP Draft II-Plan A:

- The 2021 CDP update - Plan A should conform to the general goals, objectives, policies, and format of the current 2016 CDP and ONLY include updates to the existing 2016 CDP that are legally required and/or mandated by the Atlanta City Charter or DCA (Appendix I and III).

- The 2021 CDP update - Plan A should NOT include ANY new policies, policy changes or policy action items (EXCEPT those with legislative approval that are necessary to bring current zoning legislative land uses, character area maps and future land use maps up to date.)

E-MAIL either the BULLET POINTS (above) or the LETTER (below) to the following:

1) CDP feedback address
2) Commissioner Tim Keane
3) City Council President and Members

(YOU CAN CUT AND PASTE THESE E-MAIL ADDRESSES:)

cdp2021@atlantaga.gov; tkeane@atlantaga.gov; fmoores@atlantaga.gov; csmith@atlantaga.gov; arfarokhi@atlantaga.gov; cwinslow@atlantaga.gov; narchibong@atlantaga.gov; jnide@atlantaga.gov; hshook@atlantaga.gov; jpmatzigkeit@atlantaga.gov; drhills@atlantaga.gov; aboone@atlantaga.gov; mcoverstreet@atlantaga.gov; jmsheperd@atlantaga.gov; mbond@atlantaga.gov; mswestmoreland@atlantaga.gov; adickens@atlantaga.gov

SAMPLE LETTER:

Dear City Council Members and Commissioner Keane:

I am writing about the revised CDP 2021 (Draft II, Plan A, July 21) and request that you approve only what is needed to meet the ARC requirements for a five year update. All other sections should be tabled.

The City Administration promised repeatedly in many different public forums that the CDP Draft II would be "bare bones," "administrative," and the "minimum CDP that the law requires." Instead, what we have received is a CDP that dramatically impacts city design, limits neighborhood input and removes neighbors’ ability to vote or speak up about their neighborhoods. This is a breach of public trust.

This lengthy (660 pages), rushed, and complex document changes our City’s CDP processes, our single-family zoning policies and practices, and departs from the authorized Atlanta City Design plan (which the City Council adopted) in significant ways.
Appendix II Released November 2021

Legislation recently introduced by Councilman Amir Farokhi demonstrates how broad CDP statements will be linked to zoning ordinances to the detriment of tree canopy/green space, infrastructure, and neighborhood identity.

As a citizen, I feel misled. Our City’s Administration claims an open, transparent process. If this had occurred, there would have been an open and lengthy dialogue from the beginning, and citizens and City Council members would have known about the significant changes to the 2016 CDP and what could happen to their neighborhoods. Instead, it seems the City Administration has been working over a year on an extremely broad CDP.

Planners came to our NPUs multiple times to discuss the CDP, but they were either unprepared (e.g., “I don’t know, I was hired a month ago”), had little information (e.g., “I don’t know, it is above my pay grade”) or read from a script prepared by the City Administration and could not answer questions. This has not been the type of discussion promised or needed for full citizen engagement.

The revised CDP has caused much concern and upset across the city. Many NPUs already have voted adamantly against it.

Please pare the revised CDP 2021 (Draft II, Plan A, July 21) back to the basics and submit only what is needed to meet the ARC requirements for five year update. Save the rest for when the City Administration is prepared to fully engage its citizens.

Respectfully submitted,

HERE’S THE BACKGROUND:

The Comprehensive Development Plan (CDP) is an important document that affects YOUR NEIGHBORHOOD. It is a mandated document that is re-written every 5 years and is submitted to the Atlanta Regional Commission and the State of Georgia. It affects future development allowed in EVERY NEIGHBORHOOD throughout the City of Atlanta. The last CDP was written in 2016, so 2021 is the year to submit another one.

Early in 2021, the Planning Department advised us that due to COVID-19, they would produce an update which would be updated ONLY with policies from the Atlanta City Design, a document which was created in 2017 and officially adopted by the Atlanta City Council.

Here is what the Planning Department said they would do:

This administrative update (of the 2016 CDP) will...

- Begin translating Atlanta City Design Vision into the goals, needs and opportunities, and policies of Atlanta’s comprehensive development plan.
- Provide a Community Work Program (CWP) and a 2016 CWP Report of Accomplishments.
- Reflect other planning work and administrative updates to the CDP since 2016 that have been vetted by the NPUs and public.
- Involve additional opportunities for public review and comment, as mentioned below.
- Change Future Land Use map, descriptions, or policies beyond the quarterly updates.

We have been misled.

Instead:

They gave us 600 pages of policy changes and policy action items!
1. …that are dramatically different from the 2016 CDP;
2. …that purport to conform to the Atlanta City Design Plan in the Atlanta City Charter, but actually depart from it in significant ways; and
3. …that include many policies the City Council never approved.

Please help us protect your neighborhood! Please send either the two BULLETS or the LETTER to:

1. CDP Feedback Address email.
2. The Commissioner of City Planning Tim Keane
3. The President and all Members of the Atlanta City Council

THANK YOU!
2. Ansley Park Civic Association Script

A CALL TO ACTION

MAKE YOUR OPINION ABOUT THE PROPOSED COMPREHENSIVE DEVELOPMENT PLAN KNOWN TO THE CITY OFFICIALS

Dear Ansley Park Neighbor: Ansley Park urgently needs your help and immediate outreach to City of Atlanta officials. Briefly, between now and August 27, you as a member of the public have the opportunity to comment on the City’s proposed Comprehensive Development Plan, an essential legal process in how the City plans land use in our neighborhoods and rezones them. Your comments carry weight.

The APCA asks that you write to the City immediately, by August 27, with the following comments (please copy and paste) and subject line “Comments on 2021 CDP”. You are welcome to make additional comments if you wish.

To the Mayor, City Council and Dept. of City Planning:
I am a resident of Ansley Park in Atlanta and I have the following comments on the proposed Comprehensive Development Plan updates and the proposed legislation that has been introduced to support them.

* **TOP PRIORITY:** City Council should reject and withdraw proposed zoning ordinances 21-O-0454, 21-O-0455, and 21-O-0456. They are being rushed through without fully analyzing how they could negatively impact traditional neighborhoods like historic Ansley Park.

**Comments on the Comprehensive Development Plan:**

* The 2021 CDP update - Plan A should conform to the goals, objectives, policies, and format of the current 2016 CDP and **ONLY** include updates to the existing 2016 CDP that are legally required and/or mandated (Appendices I and III), as promised.

* The 2021 CDP update - Plan A should **NOT** include any new policies, policy changes, or policy action items, except those already legislatively approved AND necessary to update current zoning land uses, character area maps, and future land use maps.
3. Letter from NPU- A, B, C, G, and I Chairs

NEIGHBORHOOD PLANNING UNIT A
NEIGHBORHOOD PLANNING UNIT B
NEIGHBORHOOD PLANNING UNIT C
NEIGHBORHOOD PLANNING UNIT G
NEIGHBORHOOD PLANNING UNIT I

August 26, 2021

The Honorable Felicia A. Moore - fmoore@atlantaga.com
The Honorable Carla Smith - csmith@atlantaga.com
The Honorable Amir R. Farokhi - arfarokhi@atlantaga.com
The Honorable Antonio Brown - aobrown@atlantaga.gov
The Honorable Cleta Winslow - cwinslow@atlantaga.gov
The Honorable Natalyn Mosby Archibong - narchibong@atlantaga.gov
The Honorable Jennifer N. Ide - jnide@atlantaga.gov
The Honorable Howard Shook - hshook@atlantaga.gov
The Honorable J.P. Matzigkeit - jpmatzigkeit@atlantaga.gov
The Honorable Dustin R. Hillis - drhillis@atlantaga.gov
The Honorable Andrea L. Boone - aboone@atlantaga.gov
The Honorable Marci Collier Overstreet - mcoverstreet@atlantaga.gov
The Honorable Joyce Sheperd - jmsheperd@atlantaga.gov
The Honorable Michael Julian Bond - mbond@atlantaga.gov
The Honorable Matt Westmoreland - mwestmoreland@atlantaga.gov
The Honorable Andre Dickens - adickens@atlantaga.gov
Commissioner Tim Keane - tkeane@atlantaga.gov
Joshua Humphries – jhumphries@atlantaga.gov
2021 CDP Public Comment Box – cdp2021@atlantaga.gov

Re: 2021 CDP Update

Dear Honorable City Council Members, Commissioner Keane and Mr. Humphries:

We write to oppose the 2021 CDP update as currently drafted and to ask that you pare it back to only what is legally required for a five-year update.¹

¹See Georgia Planning Act, O.C.G.A. 50-8-1 et seq. and Rules of the Georgia Department of Community Affairs—Minimum Standards and Procedures for Local Comprehensive Planning, Section 110-12-1.01 et seq.
Here is why:

I. We were misled.

In numerous communications leading up to the release of the 2021 update in June, we were advised that this year’s required update would be “bare bones,” “purely administrative” and “only the minimum the law requires.” Indeed, Draft II of the proposed update itself recites, “After consulting with the PLG, SAC and TAC . . ., the Department of City Planning [DCP] decided to reset the comprehensive development planning process by only focusing on the required updates this year and beginning a more robust process in 2022.” Draft II at p. 28 (emphasis added).

However, instead of confining the proposed 2021 CDP update to “the required updates,” what the City actually proposed was some 600 pages of narratives, new policies, significant changes in policies and objectives (especially with respect to single-family neighborhoods), “policy action” items seeking specific zoning changes, and incorporation of numerous planning initiatives and other documents that have never previously been approved by City Council. Only small portions of this sprawling, internally inconsistent document—Appendices I and III—are legally required.

What is worse, Draft II added new language that provides, “Zoning changes in Atlanta must be consistent with the comprehensive development plan.” Draft II at p. 48 (emphasis added). This language would appear to lock in the future zoning changes contemplated (or, in some places, specifically directed) by the new policies and policy action items—thus weakening the public’s ability to influence subsequent zoning legislation and indeed, weakening the zoning power of City Council itself.

We venture to say that few Council members—and even fewer neighborhood leaders and Atlanta residents—have read this 600-page document that by its own

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2 Georgia law requires that the City adopt a comprehensive CDP every fifteen years, with updates on the intervening 5-year anniversaries. The 2016 CDP was a comprehensive 15-year plan, and only an update is required in 2021.

3 The current draft of the 2021 CDP update was published on July 10, 2021, and is called “Draft II” on the DCP’s website.

4 We would submit that such deferral is also legally required. While the Atlanta City Charter provides for policies to be included in 15-year plans such as the 2016 CDP that is currently in effect (see City Charter at Section 6-302), there is no provision for policies or policy changes in 5-year updates (see City Charter at Section 6-303). We would thus submit that any policy additions or changes must be done via amendment to the 2016 plan, rather than as some sort of rider on the 2021 5-year update.
terms “will influence decisions impacting lives all over the city.” Draft II at p. 35. We also suspect that many residents and neighborhood leaders may have even forgone review of this document in reliance on the City’s repeated assurances that this update would be “bare bones,” “administrative” (in the ordinary sense of the word) and confined to “the required updates.”

Under the circumstances (and especially given the compressed timeframe for reviewing such a significant document), good governance and simple fairness demands that the 2021 CDP update be pared back to what the DCP originally promised—the minimum that is legally required, i.e., Appendices I and III. Anything more would be a breach of the public trust.

II. The proposed update departs from The Atlanta City Design in fundamental ways.

In multiple forums, including the 2021 CDP update itself, DCP officials have stated that one of the primary purposes of the 2021 update is to “conform the CDP to The Atlanta City Design”—a visionary and broadly agreed-upon plan that sets out the values and design for our city’s growth and that was incorporated into the Atlanta City Charter in 2017. As set out more fully below, we believe the “conforming” exercise is both unnecessary and legally confusing (see Section III(a) below), but even if that were not the case, the proposed 2021 CDP update not only does not conform to the Atlanta City Design, it departs from both its values and its directives in very fundamental ways:

a. It fails to balance growth with “things that need protection.”

The Atlanta City Design identifies five core values—Equity, Progress, Ambition, Access and Nature—and it specifically provides that “the intrinsic value of Progress” must be tempered “with Integrity,” which it defines as “strik[ing] the right balance between things that need protection and others that the market can change.” Atlanta City Design at p. 160. “By balancing our priorities so that we also support things with meaning, we’ll make sure Progress . . . will become a shared commitment to the hard work of protecting the values, character and people that make this city worth living in.” Atlanta City Design at 160.

The Atlanta City Design goes on to specifically identify our city’s historic heritage, its existing, tree-covered neighborhoods, and our urban forest and tree canopy as “things we value,” things that that must be “celebrated and preserved”
and things that are often put at risk by unfettered growth (Atlanta City Design at pp.166, 192, 199, 202), and thus, by definition, as things that must be balanced against growth if the Progress with Integrity value is to be honored. But the 2021 update fails even to acknowledge this value, much less to provide a framework for the balancing it requires. More importantly, as more specifically shown below, it fails to apply this value in its formulation of the policies and policy actions it proposes.

b. It fails to incorporate The Atlanta City Design’s basic framework for growth.

Consistent with its Progress with Integrity value and its express recognition that “[d]enser development . . . [comes] at the expense of our natural assets” and specifically “our iconic urban forest,” the Atlanta City Design sets out a very specific framework for Atlanta’s growth: It calls for the City to identify “areas for growth” and “areas for conservation” and to “draw lines” between them and “between subareas for each.” And it goes on to direct the City to “[d]efine the intention of each area, rules to shape them, and a public process for vetting and changing these lines over time.” Atlanta City Design at 190-91.

The proposed 2021 CDP update includes the Atlanta City Design’s maps of Growth Areas and Conservation Areas and in passing mentions two of the four subareas of the Conservation category, but it otherwise makes no effort whatsoever to provide a framework for Atlanta’s growth along the lines the design plan demands, much less for defining the “intentions” and “rules” for the various subareas. In fact, the proposed update expressly declined to incorporate the Atlanta City Design’s growth framework “for now,” saying that it merely “suggests additional design considerations.” Draft II at page 38. Given how central—indeed fundamental—the growth/conservation distinction is to the Atlanta City Design (which is now part of the City Charter5), one cannot help but wonder if this deferral was intended to avoid the limitations this framework would impose on the DCP’s efforts to increase density in Atlanta’s single-family neighborhoods.

c. It totally ignores the Atlanta City Design’s approach and directives for managing growth.

The Atlanta City Design is extraordinarily clear on its approach to growth—an approach it defines “at core” as “the careful juxtaposition of a vibrant city and a

5 The Atlanta City Design was incorporated into the City Charter in 2017 by Section 1 of Ordinance 17-O-1706.
verdant forest.” That “careful juxtaposition” and the directives that come with it are worth quoting in their entirety:

**Growth Areas**
Growth will be organized into already-developed areas that are suitable to taking on growth. This includes the historic core of the city, the corridors that flow outward in every direction, and the outlying clusters like Buckhead and Greenbriar. *These Growth Areas represent an enormous capacity that, if properly designed, can easily accommodate Atlanta’s expanding population.*

**Conservation Areas**
The rest of the city will be protected from overwhelming growth. The intown neighborhoods and lush suburban territories will grow in ways that retain and improve their charm and their leafy tree canopy. Strategic production areas will also be protected from growth. These Conservation Areas represent ecological value, historic character, and housing options that, if properly designed, can make living with all those new neighbors a pleasure.

Atlanta City Design at p. 244 (emphasis added). The Atlanta City Design makes this concept clear elsewhere as well—for example, “By organizing growth in already-dense zones like [the] Downtown, Midtown and Buckhead [business/commercial districts] and along strategic corridors like the Atlanta Beltline, *we can accommodate our anticipated growth ‘without encroaching on existing neighborhoods.’*” Atlanta City Design at p. 120 (emphasis added). **Just as it did with the Atlanta City Design’s growth framework, the 2021 CDP update totally ignores both its directive to focus growth in Growth Areas and designated corridors.**

What is worse, many of the update’s specific policies and policy actions are directly at odds with the Atlanta City Design’s carefully laid out approach to growth. For example, Draft I\(^6\) contained a policy action item (which the DCP has indicated it will continue to seek)\(^7\) to “[a]mend the zoning ordinance to reduce

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\(^6\) The initial draft of the 2021 CDP update was published in June 2021. We refer to it as Draft I.

\(^7\) Draft I included multiple provisions for spurring increased density in Atlanta’s single-family neighborhoods, including, among others, provisions for reducing minimum lot sizes, allowing accessory dwelling units (ADUs) on all single-family properties citywide, and allowing ADUs to be subdivided off and sold. After receiving 1050 calls in opposition to those provisions, DCP promised to delete the first two and to delete the third to the extent that it would allow ADUs in zones R-1, R-2 and R-3. And DCP did in fact delete precise language in those respects in Draft II. However, it indicated in an appendix that it nonetheless intends to continue to campaign for all of these
minimum lot sizes [of residential properties].” Such a provision was specifically aimed at spurring growth in Atlanta’s single-family neighborhoods (which the Atlanta City Design designates as Conservation Areas) and would have spawned dramatic increases in density in neighborhoods subject to gentrification and those with high land values, **with a commensurate destruction of tree canopy.** We understand that was in fact the purpose of the specified zoning change—the creation of “density for density’s sake” in Atlanta’s single-family neighborhoods—a stated goal of the City’s Office of Housing and Community Development. 8 No effort was made to balance those density goals with the dramatic loss of tree canopy such density would entail, and in fact the certain destruction of tree canopy was not even acknowledged.

Similarly, Draft II contains a provision for the rezoning of all properties within a half-mile of transit stations, regardless whether the properties are in Growth Areas or Conservation Areas. 9 Recently filed legislation seeking to enact this provision proposes to rezone some 2200 single-family properties across the city to “Multifamily/mixed use,” a classification that would allow at least 52,800 dwelling units to be built on those properties—and likely many more, depending on the actual sizes and configurations of the current lots. As with the properties slated for reduction of minimum lot size, these 2200 properties are all in Conservation Areas, according to The Atlanta City Design. And if the current legislation is passed, the number of dwelling units could be built on them—almost half the total number of current dwelling units in all of Atlanta—would increase allowable density on those properties **at least 24-fold,** with a **total loss of tree canopy in a combined area well over half the size of New York’s Central Park—and very likely considerably larger.**

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8 DCP initially said the purpose of this provision was to create affordable housing. When we pointed out that the land values in the areas most likely to be subdivided were already so high the creation of affordable housing would be impossible, City officials ultimately acknowledged that the purpose was simply to increase density.]

9 Note that the 2016 CDP policies would **disallow** this proposed rezoning of single-family properties. Although supportive of transit-oriented development in corridors and commercial/business areas near transit, it specifically provides that single-family neighborhoods must nonetheless “be protected from encroachment of nonresidential uses and incompatibly scaled residential development.” 2016 CDP at p. 194.
We should also point out that the re-zonings contemplated by this legislation and the 2021 CDP update would entail the loss of significant amounts of Atlanta’s historic neighborhood character—including significant portions of Victorian-era Inman Park, some 65 percent of the diverse neighborhood of Candler Park (which is on the National Register of Historic Places) and 118 properties in Ansley Park (a neighborhood eligible for National Register listing and that would thus be protected under 2016 CDP). See 2016 CDP at p. 90.

We submit that each of these examples flies in the face of the Atlanta City Design’s clearly defined balanced approach to our city’s growth and, even more importantly, of Progress with Integrity, one of the five values on which that approach to growth was expressly based. More to the point, they are merely illustrative of the DCP’s general approach to growth in the 2021 CDP update—an approach that prioritizes growth in the Atlanta City Design’s Conservation Areas without consideration of other things we value—and despite the capacity of Growth Areas to accommodate the city’s population needs.

III. The bulk of the proposed 2021 CDP update is confusing and unnecessary, and it undermines critical objectives in the 2016 CDP—a 15-year plan.

As the 2016 CDP rightly notes, the City’s comprehensive development plan is—and should be—a “fact-based resource” that “creates an environment of predictability for business and industry, investors, property owners, taxpayers and the general public.” 2016 CDP at p. 2. We submit that the proposed 2021 update’s long narratives, its inconsistent and reworded policies, its policy changes and policy reversals, and its incorporation of multiple planning initiatives that have not been Council-approved would quite literally layer 600 pages of confusion over Atlanta’s comprehensive development planning. And what is worse, it would not only do so unnecessarily, but also undermine the vision and objectives of the current 15-year plan in the process.

In that regard, we would urge you to consider the following:

a. The policies set out in the Atlanta City Design already apply to the CDP.

After careful consideration and a thoughtful and inclusive process, the Atlanta City Design was incorporated into the City Charter in 2017. Accordingly, the policies it contains already apply to City’s planning activities, and, as lawyers
would say, the actual document “speaks for itself.” The proposed 2021 CDP update includes some of the Atlanta City Design’s policies and provisions, but not nearly all, and it rewords and/or significantly limits or otherwise changes many of the ones it does include—very likely setting the City up for litigation by those Atlanta residents negatively impacted by those omissions and changes.

We submit that the Update’s restatement of some of the Atlanta City Design is not only unnecessary but actually hurtful to the City. We further suggest that if the City believes those policies and provisions should be included in the CDP (despite their inclusion in the City Charter), it should incorporate them by reference and confine any other “conforming” provisions to the implementation of the document’s express policies and directives.

b. Many of the policies in the proposed 2021 CDP update are dramatically inconsistent with the 2016 CDP.

The vision of the 2016 CDP is laid out in its opening pages and includes the following imperatives:

- “Atlanta will . . . [r]espect and maintain the character of the City’s residential neighborhoods and preserve single-family residential neighborhoods.” 2016 CDP at p. 8.
- “Atlanta will . . . [b]rand the City’s identity by preserving the unique character of established neighborhoods and supporting revitalization efforts that will increase housing opportunities and neighborhood stability.” 2016 CDP at p. 8.

The 2016 CDP goes on to identify the following as the “Highest Ranked Needs and Opportunities Among All Needs and Opportunities” laid out in its some 300 pages:

- “Preserve existing neighborhoods.” 2016 CDP. at p. 9.10

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10 See also 2016 CDP at pp. 215-16 (reiterating this designated “need” as an Urban Design policy directive); 2016 CDP at pp. 227-28 (reiterating this designated “need” as a Land Use policy directive); 2016 CDP at 269 (reiterating this designated “need” as a “Traditional Neighborhood Existing” policy directive). The 2016 CDP also expressly notes, “Maintaining the existing character and preserving the housing stock of [Existing Traditional] neighborhoods and preventing the encroachment of incompatible uses are very important. The development pattern should be supported by infill housing construction that is compatible with the existing scale and character of the neighborhood. There should be emphasis on reinforcing the stability of the neighborhood by . . . creating and maintaining neighborhood identity.” 2016 CDP at p. 269.
“Create plans to encourage and promote growth in areas with slow growth/declining population.” 2016 CDP at p. 10.

“The size of flooded areas has grown due to increased volume and velocity of stormwater from impervious surfaces in watersheds throughout the City. Frequent flooding is a consistent issue in some areas.” 2016 CDP at p. 78.

“Urban forest land and the city’s tree canopy are disappearing.” 2016 CDP at p. 80.

By major contrast, the 2021 CDP update—which, despite assertions to the contrary, has received virtually no significant airing among the City’s NPUs, much less its residents—would turn these well-vetted and agreed-upon priorities on their head. As set out throughout Draft II’s many, many pages—and as dramatically illustrated by the recently filed legislation—the 2021 update does the following:

- It prioritizes increased residential density in Atlanta’s single-family neighborhoods over any considerations of neighborhood stability or “the unique character of established neighborhoods.”
- It prioritizes increased residential density in Atlanta’s single-family neighborhoods over the impact of that density on Atlanta’s iconic tree canopy.
- It prioritizes increased density in Atlanta’s single-family neighborhoods over the impact of that density on the flooding many Atlanta neighborhoods already suffer.
- It prioritizes density-producing development in established, stable neighborhoods over efforts to promote growth in areas that need and want it.
- And it prioritizes elimination of off-street parking requirements over any considerations of the traffic congestion such elimination would invariably entail.11

Coming a mere five years after the considered and well-aired policies, goals and objectives set out in the 2016 CDP—which was supposed to be a 15-year plan

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11 Witness the recently filed legislation, which would allow some 2830 dwelling units on the Ansley Park properties where 118 single-family homes now sit—with no provision whatsoever for anything but on-street parking for the thousands of additional vehicles such increased density would entail—or the rezoning of several times that many homes in the Lake Claire neighborhood with the concomitant increase of that many more thousands of vehicles parking on that neighborhood’s narrow streets.
these dramatic changes in priorities erase any semblance of the “predictability” the comprehensive development process requires.\textsuperscript{12}

We cannot help but add that none of the sweeping new policies or priority changes included in this update are necessary to address the affordable housing objectives or issues of wealth inequality set out in the City’s Housing Initiative—issues that we understand are driving this 2021 CDP update. Indeed, the 2016 CDP has a well-considered Housing plan (see 2016 CDP at pp. 39-58), with an exceptional affordable housing strategy that is not only more robust but far more calculated actually to create affordable housing and housing-based wealth than the provisions included in this update. It even includes specific goals for the creation of workplace-oriented affordable along the Beltline. And its economic strategies identify the necessity to invest in education and job training, to create more low-skilled jobs and to direct more growth to low-growth areas of the city—all of which could significantly impact income inequality.\textsuperscript{13}

We also cannot help but note that the 2021 CDP update’s shift in development priorities to one of increasing density in stable, well-established neighborhoods throughout the city—neighborhoods where there is already a relatively high percentage of home ownership (and thus of housing-based wealth)—not only cuts against all four of the highest ranked needs identified in the 2016 CDP but is also the strategy least calculated to achieve the Housing Initiative’s twin goals of increasing affordable housing and reducing wealth inequality. By and large, the single-family neighborhoods targeted for such density (and where developers would assuredly target such density) do not need that growth. And they do not want that growth. And they know that when such growth does come, it almost invariably results in larger-scale and/or more expensive homes, pushing prices up and legacy residents out, while reducing tree canopy and increasing impervious surfaces in the process—all issues specifically recognized as “highest ranked needs” by the 2016 CDP.

\textsuperscript{12} The City appears to justify its inclusion of the major new policies and policy changes in this update by quoting the City Charter provision (Section 3-602) governing Atlanta’s comprehensive development plan—a provision that calls for the inclusion of the City’s development policies. See Draft II at p. 20. But the City fails to acknowledge that the quoted provision applies to 15-year plans—which is what the 2016 CDP is—not to 5-year updates such as this, which are governed by a separate City Charter provision (Section 3-603). The latter calls merely for “a recommended generalized land use development pattern to guide the growth of the City over the succeeding five-year period” and related “development goals and objections,” but makes no provision for major policy changes such as those included in the proposed 2021 CDP update.

\textsuperscript{13} It is worth noting that Draft II does not in any meaningful way address the City’s affordable housing crisis. Clearly, the first rule of affordable housing is to preserve the affordable housing the City currently has. But there is no a single provision in Draft II that does that—although it is specifically addressed in the 2016 CDP]
We understand and appreciate that there are indeed some neighborhoods that in fact do want growth and that in fact do need growth—but it goes without saying that those are not the ones developers would target. Given that, would the aims of the Housing Initiative (as translated into the 2021 CDP update) not be far better served by addressing one of the highest ranked needs identified in the 2016 CDP—creation of policies to encourage and promote growth in areas with slow growth and/or declining population—rather than by spurring growth in areas that neither want it nor need it and where it would do far more harm than good?

Finally, and most importantly, we cannot help but note that allowing the 2021 CDP update to override the 2016 CDP undermines not only the vision, but a number of critical objectives of that 15-year plan:

First, as mentioned several places above, Draft II completely ignores the impact of its priorities on the tree canopy. No one should overlook the fact that it is our tree canopy that provides much of Atlanta’s iconic character, that moderates the flow of water during storms, and that helps keep Atlanta from becoming just another “heat sink.” Were Draft II implemented as proposed, our tree canopy would be irreparably damaged, as would the City.

Second, Draft II completely ignores the impact of its priorities on the flooding many Atlanta neighborhoods already endure. The dramatic increase in density it envisions—especially in single-family neighborhoods near transit—would be a double whammy—not only greatly increasing impervious surfaces and thus the flows of stormwater runoff, but also significantly reducing the tree canopy that helps stem that flow. One associated risk that cannot be overlooked is that if flooding worsens, the City may be required to purchase the damaged properties on the north side of Atlanta, just as it has elsewhere.

Third, Draft II equally ignores the City’s infamous traffic congestion. Its implied expectation that improved transportation will magically appear to support the intended development is fantastical—and disproven by the growth of the traffic problems all over the City over the last 15 years. Growth without a credible solution for the increased transportation demands will diminish the quality of life for all Atlantans.

Last, Draft II ignores education. While education in Atlanta largely is the purview of the Atlanta Public Schools, the wild-west approach to growth in the 2021 CDP update cannot ignore the fact that Atlanta’s schools are FULL. Again, the DCP’s quest for greater residential growth is putting the cart before the horse.
While at least the first three of these issues are addressed in the 2016 CDP, we are deeply concerned that the DCP’s intent is to proceed with growth in our city’s residential neighborhoods without regard to the ancillary consequences. Not only would it irreparably damage our city, it is a great way to convince businesses considering relocation or expansion in Atlanta to select Birmingham, Charlotte, Nashville or Chattanooga instead.

IV. Conclusion

Given the City’s repeated misleading statements regarding the nature of the 2021 CPD update, not to mention the fact that it does not in fact conform to the Atlanta City Design, that it is overwhelmingly confusing and unnecessary, and that it significantly undermines current comprehensive development objectives, we respectfully request that the 2021 CDP update be confined to the legally required and customarily included provisions—a requirement we understand would be met with the submission of Appendices I and III that currently accompany Draft II of the 2021 update.

Sincerely yours,

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Gloria Cheatham, NPU-A Board
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NPU-E RESPONSE:
2021 COMPREHENSIVE DEVELOPMENT PLAN UPDATE: PLAN A

Plan A is Atlanta’s 2021 Comprehensive Development Plan (CDP). The CDP is a citywide plan that shows the important relationships between land use, transportation, housing, economic development, nature, historic preservation, and other aspects of thoughtful city building. It is planning done at the city scale with an emphasis on implementing change.

The CDP is the legal foundation of zoning. All zoning classifications are based on the land uses for every parcel in the city, as designated in the CDP. When a party appeals a zoning decision, the city’s main line of defense is the intended or future land use for that parcel as designated in the CDP. The CDP is submitted to, and approved by, the Georgia Department of Community Affairs and adopted via a legislative process by Atlanta City Council. While this document is often referred to as a “guide,” in actual practice, it is far more powerful than simply a “guide” and therefore must be carefully reviewed by and supported by our citizens. To quote City Planning’s website, the CDP is “where we lay the foundation to turn ideas into action and the vision into reality to become the beloved community.”

NPU-E reviewed both Draft I and II of 2021 CDP Plan A.

NPU-E acknowledges that since 2016, the various governing bodies of our City have developed and adopted numerous policies for future thoughtful city planning that are not currently reflected in the 2016 CDP. We understand the need for and requirement of a 2021 CDP update. We applaud the hard work of the City Planning office in tackling this complex project and embracing innovation so that Atlanta can grow in a healthy and prosperous way.

And because we understand the importance and complexity of the CDP update, we have serious concerns about the content and process for the 2021 update.

DECISION

NPU-E does not support the Atlanta Comprehensive Development Plan A Draft II.

NPU-E will reconsider its position if all recommendations detailed below are adopted into Plan A Draft III.
PROCESS COMMENTS

NPU-E believes the public engagement process as designed by the City Planning Office has been insufficient for the extent of change being sought.

Beginning with a city-wide launch in October 2020 and a subsequent presentation to APAB in January 2021, Plan A was initially presented as a major update. It devolved quietly and unceremoniously into “an administrative update.” No clear definition of “administrative update” was ever offered to NPUs as we awaited the first draft. Understanding the importance of the CDP and its impact on city design, we made numerous follow-up requests for a document to review from April to June and for clarification on the swirling chatter that warned of sizable change to residential land uses. NPUs were not able to begin a detailed review of the first draft until June 2021. Following this initial review, the significant changes to residential land uses were clear. Trusting the timeline of the City Planning Department left us working against the clock to inform our communities, gather feedback and prepare comments. NPU-E leadership called two special NPU-E meetings in July and August to discuss and understand Plan A with City Planning and City Council Members. This forum of discussion and engagement was created by us, not City Planning. There is a serious imbalance between the extensive impact of Plan A and the level of community engagement and allocated review time. We contend that City Planning did not fulfill their obligation to execute an engagement process whereby NPUs:

- are transparently and intentionally presented with the significant changes from 2016 to 2021; and
- are provided a fair and balanced review timeline to articulate this impact to their communities and provide thoughtful and collaborative feedback to City Planning.

In Appendix II, Plan A Draft II, the flaws in the process are acknowledged by City Planning:

“Many attendees of the stakeholder meetings were NPU chairs or residents involved in their NPU. They voiced concern about how often the NPUs were engaged or updated about the CDP process. This point is well taken, when a reset strategy was established to do an administrative update rather than a full comprehensive plan we began to communicate with the NPUs more frequently. But this open communication channel should have been well established at the beginning of the process…”

We do not deny the real need for these conversations about affordable housing, density, and transit. However, the timeline we are facing for the level of change attempted in Plan A Draft I and II unfairly forces decisions that have a significant impact on a citizen’s primary real estate investment and the character of our neighborhoods.

City Planning announced the CDP update in October 2020 and provided the first draft nine months later. Communities were asked to review, digest, communicate, respond, and review subsequent drafts in two months. This process is not designed for the citizens.
NPU-E believes Atlanta City Planning misrepresented Plan A Drafts I and II as an “administrative update.”

Upon review of the Plan A Draft I in June 2021, NPU-E became aware of City Planning’s intended changes to residential land use including among other changes:

- drastic reductions to minimum lot size;
- zero lot line subdivisions for ADUs;
- and the expansion of MR-MU.

It became evident that an “administrative update” was neither clearly defined for the public nor truthful. This misrepresentation introduced suspicion and distrust into the process and has resulted in a defensive posture from both City Planning staff and Atlanta citizens. This is not the way to healthy, positive change where all stakeholders feel heard and everyone works toward a common shared goal. Our city’s residents want to see Atlanta prosper more than any stakeholder group. This is our home. This is where we raise our families. This is where many have made their biggest financial investment. As the highest density NPU in the city, we understand well that density and variety in housing stock is critical to our city’s success. This change can happen collaboratively. NPU-E feels City Planning misled the public by downplaying the scale of impact in the 2021 CDP Update while simultaneously drafting aggressive residential planning changes.
CONFLICTS BETWEEN TRADITIONAL NEIGHBORHOOD EXISTING (TNE) AND TRANSIT-ORIENTED DEVELOPMENT (TOD) WITHIN THE CDP

PAGE 37 / 55: Map
There is not a clear separation between the Traditional Neighborhood Existing & the Transit Oriented Development areas. The two zones have very different characteristics especially regarding density requirements but intentionally overlap without an indication of priority. The CDP should provide intentional separation of the two areas on the map and/or establish the order of priority.

PAGE 56: “CW 2. Protect existing single-family, low-density, and medium-density residential from incompatible higher densities and non-residential uses.”
We believe that CW 2 and the TNE statements regarding protecting existing lower density residential from incompatible higher densities appear to be losing out to a relentless focus on remaking all land proximate to transit stations (TOD policies), even though significant tracts of land previously zoned for intensive development remain undeveloped or underdeveloped. Prior to considering amending future land use or rezoning in TNEs for the purposes of transit oriented development, the City should maximize the development (or redevelopment) of parcels currently indicated for higher density in existing future land uses. Furthermore, the CDP should clarify that existing single family residential land uses be protected from medium and high density residential indication and seek to expand density through R-zones with the implementation of low density uses which are compatible with single family residential. Where medium or high density uses are strongly desired by City Planning, NPU support for each intended parcel should be required.

PAGE 69 / 87: “TOD 5: Discourage single-family and low-density residential development as well as low-density commercial and industrial development.”
The TOD overlays parts of the Historic Midtown Garden District and Ansley Park – Traditional Neighborhood Existing areas. Per page 42 / 60, TNE 2 and TNE 4, we should “Prioritize maintaining and rehabilitating existing housing” and “Support local historic designation of potentially eligible Landmark, Historic, and Conservation Districts within these areas.” The CDP presents a serious conflict between the intention of the TODs and the protections of TNEs. This conflict has a significant impact on both the Historic Midtown Garden District and Ansley Park. While we understand that TOD 5 has been removed from the Draft II of the CDP, there still remains a missing clarification for the two overlapping areas and lacking protections for the existing housing mix in a TNE. The CDP should be revised to indicate that a TNE district requirement has priority over a TOD district requirement where there is overlapping conflict to maintain and protect the character of TNE neighborhoods like the Midtown Historic Garden District and Ansley Park. We strongly oppose any implication that the mere proximity of a TNE to a transit station implies that the goals of TOD 1, TOD 2 and TOD 3 should supersede the goals and zoning of TNEs when significant high and medium density residential exists within (Midtown) or adjacent to (Ansley Park) already.
PAGE 69 / 87: “Transit-oriented development emphasizes increased densities within ½ mile of transit stations so people can easily access work, home, and other places using transit—not cars.”

It is important to note that even if the intent is to have easy pedestrian access to transit stations, unfortunately the Atlanta street grid with large blocks should be taken into consideration. Just because a property is within ½ mile from a transit station, the actual distance walking to the transit station can be more than ½ mile. The blanket usage of a ½ mile radius for any discussion of development near transit is to some extent arbitrary. It is a flawed approach that is not considering the existing context of each transit station and this broad policy will lead to unintended and unwanted results in already dense neighborhoods that prioritize historic character. In addition, the CDP should specifically define the intended transit centers as “existing” transit stations. This should not be based on future planned stations, but only existing stations.

The CDP language should be revised from “½ mile from a transit station” to “walking distance of ½ mile of existing MARTA rail transit stations”. The “walking distance of ½ mile of existing MARTA rail transit stations” should be reduced where requested by neighborhoods.

PAGE 102: “HC.5 Leverage transit and other infrastructure to maximize housing density in Atlanta’s Growth Areas.”

The non-specific use and reference to “transit” throughout the CDP leaves the implementation of any TOD policy open to a wide range of subjective interpretations. It seems the intention of the CDP is to focus on high capacity transit stations.

The definition for this in the current zoning code is provided below:

High capacity transit: A local or regional public transportation facility: (i) using rail; or (ii) using a fixed overhead wire system; or (iii) in the case of bus rapid transit, using and occupying an exclusive right-of-way for at least 75 percent of the route’s length. High capacity transit includes, but is not limited to, heavy rail, light rail, streetcars, commuter rail, and bus rapid transit. Long distance passenger facilities providing service beyond the State of Georgia shall not be considered “high capacity transit.”

The non-specific use of “transit” in the CDP and its intended impact on Historic Neighborhoods and TNEs should be carefully considered and explicitly described given the expansion of the Beltline Rail and Atlanta Streetcar and possible introduction of BRT lines. Consider focusing this priority only on existing high capacity fully dedicated routes / ROW Transit lines only.

The potential to declare BeltLine or Atlanta Streetcar a future version of “transit” to then apply for broader interpretation of these goals is dangerous, as that would open up even more TNE exposure for the Historic Midtown Garden District and Ansley Park and expressly violates the promises made when the BeltLine TAD was formed in the mid-2000s which indicated that single family zoning near the BeltLine would not be impacted.
FLAWED STRATEGY OF TARGETING AREAS OF EXISTING DENSITY

PAGE 57: “CW 12. Encourage a variety of housing types, including “missing middle” housing, that are compatible with nearby buildings.”

CW 12 is an admirable goal across the entire city. It should begin with acknowledging the inventory of multi-family units in neighborhoods that have existing “middle housing” today. Often, “middle housing” is not in fact “missing” in many TNEs. Neighborhoods like Midtown already reflect over 54% of the R-5 zone in non-conforming, low density “middle housing.” We ask the City to recognize that in the pursuit of this goal, that they not destroy existing TNEs, especially those with historic relevance, to simply replace existing multi-family with new "middle" housing.

The CDP assumes every neighborhood with transit has the same need for “missing middle” housing. Prior to considering amending future land use or rezoning for the purposes of transit oriented development or the “missing middle”, the City should conduct a study of whether there is indeed a “missing middle” in each TNE. The City of Atlanta should establish a “missing middle” inventory of each TNE to be adopted and approved by the host neighborhood and NPU. Using this inventory, the City of Atlanta should partner with the neighborhood and NPU to establish a density target goal which considers existing units as well as available development opportunities that do not erode the character and fabric of the existing neighborhood. Together, NPUs and the City of Atlanta can identify logical, strategic parcels for growth that make sense for the context and fabric of that neighborhood.

PAGE 44 / 44: Table

The Single-Family indication seems inaccurate. We suspect that the inventory does not account for a recent study of duplex and non-conforming multi-family uses within R-zones. For example, the Historic Midtown Garden District, zoned R-5, had more than 54% of properties with non-confirming multi-family use in 2017 but that percentage has grown. A new survey should be completed to inventory and acknowledge the duplex and multi-family non-conforming properties in each of Atlanta’s Single-Family zones.

PAGE 97 / 103: “HC 4.2 Implement the missing middle housing ordinance.”

The Historic Midtown Garden District is known for the beautiful eclectic and historic buildings (from craftsman, mid-century to modern), walkability, and density. More than 54% of the properties are multi-units with the majority at more than 4 units per lot. Existing housing diversity similarly exists today in Ansley Park. Contributing homes to both neighborhoods’ National Register Listing include single family homes as well as complementing ADUs, duplexes, triplexes, garden court apartments and traditional condominiums. We do not have a "missing middle.”

Of significant concern is the City’s desire to expand the use of an insufficient and dangerously vague definition of MR-MU in existing zoning code. MR-MU (as admitted even by Commissioner Tim Keane) was written quickly to address a specific zoning need in the City. It was not carefully studied nor has it been revisited for improvements to the language since it was adopted. MR-MU impacts each existing neighborhood differently and needs to be re-written to comply and complement the underlying zoning area it is replacing. City Planning and City Council seem to be singularly focused on limiting the number of units which only addresses one aspect of density and in reality is subject to a vast range of scale. The concern is not only the increased number of units but the lack of building controls. For instance minimum lot sizes, FAR, lot coverage, and building coverage should be used to further define MR-MU. These will impact the character of the original neighborhood substantially.
We understand that this language has been amended to read “Amend the zoning ordinance to support missing middle housing.” The CDP should be further revised to clearly indicate that the MR-MU ordinance must be re-written to complement the underlying existing zoning district it replaces, including but not limited to similar minimum lot sizes, comparable requirements for FAR & lot coverage. The MR-MU rewrite must be completed as a first step before the expansion of its application in the CDP.

NPU-E adamantly opposes the forced imposition of CDP land use changes to Medium Density Residential or the rezoning to MR-MU without explicit neighborhood consent for each parcel.

CHANGING RESIDENTIAL DENSITY WITHOUT SUFFICIENT PREPAREDNESS FOR RIPPLE EFFECTS

PAGE 95 / 101: “Atlanta has a housing supply problem.”
As we discuss our city’s housing needs, we should also address and discuss the "facts on the ground" items which scale exponentially with increased density:

1. Infrastructure Failure. Streets are in bad repair and the water, sewer, wastewater systems are under severe stress. Density expansion should be predicated upon the prioritized repair and expansion of these utility systems prior to adding population stress.

2. Maintenance and Expansion of Green Space. An expanded populace will require and demand parks and recreation areas which the City of Atlanta struggles to afford today. The City is heavily dependent upon the private sector for the creation and maintenance of these areas today. A prioritized strategy for the expansion of public-private partnerships should be specifically indicated in the CDP.

3. Education. An expanded populace will coincide with increased demand on available public schools. The CDP should specifically reference APS long-term plan for student population growth.

4. City Budget. The CDP cites an expanded tax base but fails to address the possible short-term property value decreases in certain neighborhoods.

On page 26 of Plan A Draft II, the CDP references the strategic plans of other city departments and organizations. We understand the complexity of these topics and the need for the dedicated subject-matter expertise of these integrated departmental plans. In order to highlight the importance of certain growth concerns, we encourage the City to take the CDP a step further. We recommend this section pair the most fundamental concerns (listed above) with intentional links/reference to sections of the integrated plans where strategies and studies are identified.

The CDP should also state a city policy priority for funding specific critical programs.
ADDRESSING MUCH NEEDED ENFORCEMENT IN THE FACE OF MORE REQUIRED OVERSIGHT

PAGE 97 / 103: “HC 5.2 Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.”

City of Atlanta Inspection & Enforcement departments are currently behind on zoning complaints that impact the City from building without permits to building not consistent with submitted plans. If they cannot review, inspect, and properly hold accountable an illegal and not permitted 6’ opaque fence in the front yard, how will they verify and manage the oversight of the affordability commitment? This program would rely heavily on the City’s ability to implement effective oversight. The CDP makes no specific qualifications for how this would be successful.

The CDP should address how additional funds will be raised and allocated to a separate City of Atlanta department that can and will be able to verify and inspect compliance with affordability.

ZONING CHANGES THAT CAN ERODE THE HISTORIC FABRIC AND CHARACTER OF ATLANTA’S NEIGHBORHOODS WITHOUT COMPATIBILITY PROTECTIONS

PAGE 97 / 103: “HC 6.2 Amend the zoning ordinance to reduce minimum lot size requirements.”

This has been removed from Draft II. We support this removal.

We would like to note that the removal of this language from the CDP should initiate amendments to 21-O-0456.

PAGE 97 / 103: “HC 7.1 Create fee simple subdivision for accessory dwelling units to promote affordable ownership options.”

This has been removed from Draft II. We support this removal.

We would like to note that the removal of this language from the CDP should initiate amendments to 21-O-0456.

PAGE 97 / 103: “HC 7.2 Increase use of community land trusts to expand options for home ownership.”

We understand this has been updated in Draft II to read “Increase use of community land trusts to better match existing patterns, including reducing lot size and setback standards.”

Amend this language to read “Increase the use of community land trusts to encourage affordable housing development.” Strike any reference to reducing lot size and setback standards.
REBALANCING THE POWER OF THE COMMUNITY

PAGE 155: “04. Legislative Updates: Correct outdated legislation to improve engagement process.”
Since there are multiple interpretations of “engagement process,” further clarification is needed. Does the language intend to focus on NPU member engagement with their respective NPU or the city’s engagement with the NPU? This is not clear.
We disagree with the characterization of NPU code being “incorrect.” The CDP language should be amended to read “Update legislation to improve engagement process.”

PAGE 156: “Policies: NPU 1: Ensure NPU boundaries and processes are updated regularly” and “Policy Actions: NPU 1.2: Examine NPU boundaries and demographics to include population size and determine whether it is necessary to recommend boundary changes.”
Any alteration to one NPU has a ripple effect on other NPUs. While NPUs may benefit from these adjustments in some ways, it must be acknowledged that a change in the neighborhood mix of a NPU can cause its own erosion to well established community partnerships.
This need has not been presented to NPU-E to date. NPU-E would like to understand the demographic metrics used today to review NPU boundaries and the date of the last review. NPUs should also be informed of the legislative process for amending any boundary. This should include a transparent demographic study provided to each NPU during regularly scheduled monthly meetings. Boundary changes should require unanimous NPU support.

PAGE 156: “Policies: NPU 2: Instill the Department of City Planning’s Planning for Change commitment in its support of the NPU system.”
NPUs should be provided with City Planning’s Planning for Change commitment for immediate review.

PAGE 156: “Policy Actions: NPU 1.1: Amend legislation to allow affected residents to make recommendations, even if the event is not in the boundaries of their NPU.”
No application placed on a NPU agenda is restricted from review or comment by any other NPU. The much needed improvement to this process is the requirement of a formal NPU vote in each affected NPU. This policy action language should be amended to “amend legislation to require all affected NPUs to review and vote on any application whose property, parcel, place of business or event borders more than one NPU.” This should apply to all applications that require NPU review and presentation today (LRB, MOSE, and ZRB/BZA applications).

PAGE 156: “Policy Actions”: New Action
NPUs, a function of City Planning, have been given additional legislative rights for review of applications outside of zoning initiatives. The review of these applications include liquor licenses and special event permits. While these are not zoning initiatives, the NPU process for this review is housed within City Planning.
Because the NPU process is managed through City Planning, we believe that additional Policy Actions should be added to the CDP to address these additional NPU responsibilities. A new Policy Action should be added to:
● “amend legislation to expressly guarantee the right for NPUs to present, with equivalent time allocation between the applicant or defendant and NPU representative, at both License Review Board application hearings and License Review Board Due Cause hearings.”

● “amend legislation to require the License Review Board to accept NPU application responses in writing and provide these submissions to each member of the LRB at least one week in advance of the LRB hearing for which the application will be heard.”

PAGE 156: “Policy Actions: NPU.1.3: Support NPUs post-pandemic and well into the future by maintaining an active NPU website and implementing NPU initiatives such as Participate!, NPU-U, and hybrid meeting models.”

Each of the City of Atlanta’s twenty-five NPUs have unique needs. All of those needs should be supported by the City Planning NPU Department. Expanded resources and funding should be allocated to the NPU Department to assist NPUs in creating a framework that works best for their needs. Virtual meetings have significantly advanced the efficiency and engagement of NPU-E meetings. NPU-E feels strongly that the success of the NPU system hinges on:

● maximized engagement;
● access to resources as needed; and
● the autonomy to structure meetings (virtual or in-person) per the unique guidelines of individual NPU bylaws.

The definition of “hybrid meeting model” has not been shared with NPU-E to date and should be provided to NPUs and supported before CDP adoption.
August 25, 2021

Joshua Humphries
Director, Office of Housing & Community Development
Atlanta City Hall Annex

Via: e-mail

RE: CDP Plan A - II

Dear Mr. Humphries:

I am writing to comment on behalf of NPU-B on Draft II of Plan A: Atlanta’s 2021 Comprehensive Development Plan. I collaborated with other NPU leaders on a longer, more technical letter. I will highlight key points here and emphasize the reactions of NPU-B residents to the latest draft of Plan A.

1. Plan A - Draft II preserved ADUs for Zones R-1, R-2 and R-3 as part of its ‘future’ section. While these ADUs may have been taken out of the main narrative and the pending legislation, they are there in the appendix. It is the stated intention of Atlanta City Design-Housing/Department of Planning to continue to work toward ADUs in all zoning categories and to say otherwise, as has been done in recent statements, misleads the public.

2. Plan A (Drafts I and II) do NOT conform the CDP to Atlanta City Design’s Growth Area/Conservation Area approach of drawing lines between the two types of areas and concentrating growth in Growth Areas while protecting Conservation Areas. Atlanta City Design states that this approach can accommodate the projected housing need. Plan A – Draft II does not even acknowledge the fact that this “juxtaposition of a vibrant city and a verdant forest” (Quote from Atlanta City Design) is necessary in order to preserve our tree canopy and other natural assets. Many of the proposals within the CDP Plan A directly contradict the Growth Area/Conservation Area approach.

3. The current 2016 CDP adopted by City Council calls for the City to preserve the unique character and stability of single-family neighborhoods. CDP Plan A – Draft II contains proposals that would allow rezoning of hundreds of acres of single-family properties near transit stations. Plan A prioritizes density in single-family neighborhoods over neighborhood stability and over preservation of urban forest or unique or historic neighborhood character. This is in direct opposition to what was previously adopted by City Council.

4. Many residents who live in R-1, R-2 and R-3 zoned neighborhoods care deeply about our friends and colleagues who live in R-4 neighborhoods. The proposed changes to the single-family neighborhoods that are outlined in Plan A – Draft II would have extremely negative impacts on tree canopy and the consequent health and safety of all Atlanta residents. We are bombarded every day with pictures of devastating fires, flooding that has claimed too many lives, and heat-related deaths. This plan would destroy the trees that help with carbon uptake and cooling. Our tree loss has already heated up the City; we don’t need more.

As important as residents’ response to the specific proposals in CDP Plan – Draft II are the emotional reactions of residents. ‘Betrayed’ is a typical statement as a promise was made in multiple NPU-B meetings that this would be a ‘minor, administrative update’, a ‘minimal’ response to a regulatory requirement; what is in the CDP Plan A – Draft II is anything but a minimal response. As partners in the Department of Planning process, NPUs need to be able to count on those who present for accurate, timely, and honest statements. The Department of Planning has been disingenuous at least and dishonest at worst.
Most important, though, is the impact of these proposals on the movement to de-annex Buckhead from the City of Atlanta. I cannot even begin to count the number of people who have sought me out to tell me that they were ambivalent about the City of Buckhead movement until they read what was happening with the CDP. “First crime, now this”; “they must want us to go”, “I was committed to the city for years, why do they want me to go now,” “they annexed us long ago for our tax base, maybe it is time to de-annex for our autonomy”. These are just a small sample of what is being said.

There is an easy response to all of this. Live up to your promise and remove all but Appendix II from the CDP submission. Then, after the first of the year, engage the community in a true dialogue about building the beloved community. You might be surprised at the good ideas that residents will bring to the discussion. You just have to let them talk and then truly listen.

Sincerely,

Nancy Bliwise
Chair, NPU-B

Cc: Tim Keane
6. Letter from NPU-Y

Neighborhood Planning Unit Y
September 26, 2021

Mr. Tim Keane
Department of City Planning
City of Atlanta
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

Dear Honorable City Council Members, Commissioner Keane and Mr. Humphries:

The NPU-Y Zoning Committee opposes the 2021 Comprehensive Development Plan (CDP) due to the following reasons:

1. CDP should focus on increasing density of adaptive reuse of Growth Areas rather than density in Atlanta Conservation Areas. Also, CDP fails to discuss solutions of areas with high concentrations of Industrial properties in the Growth Areas, which endanger the health of nearby residents (i.e., primarily minority communities and southern NPUs). Furthermore, this high concentration of Industrial properties in Growth Areas hinders economic and business growth in southern NPUs. We suggest that the city modify the CDP to discuss incentives to equitable distribution of Industrial uses (auto repair shops, tow trucking, recycling plants).

2. Atlanta City Design Plan lacks to enforce equitable and affordable Single Family Zoning in housing across all parts of Atlanta. We suggest that the city modify the CDP to prevent the high concentrations of affordable housing and trend toward equality of both market rate and affordable housing in all quadrants of the city.

3. The city growth projections may be outdated. The city growth projections and model should be re-evaluated due to unforeseen events such as pandemic. We suggest that the city perform another evaluation of growth before performing swift zoning policy reform.

4. Atlanta City Design Plan should strongly review existing transportation and infrastructural changes before introducing zoning policy reform.

5. The current CDP should remove any policy action items seeking specific zoning changes until both NPUs and City Council can review and approve each policy. Secondly, the NPU-Y Zoning Committee requested that the CDP should be on the NPUs’ agenda as a voting matter as it may fundamentally change the neighborhood’s character.

For these reasons, the NPU-Y Zoning Committee recommends that the City of Atlanta remove any policy action items or incorporate our aforementioned suggestions. Another alternative is to reset the comprehensive development planning process by only focusing on the required updates this year, and begin a more robust process in 2022 as originally suggested by the office of City Planning. Like NPU-A, NPU-B, and NPU-C, the NPUs voice and voice of neighborhoods may be weakened by the new policies and policy action proposed in the CDP due to new legislation like proactive zoning. Furthermore, we recommend that CDP maintains the Growth and Conservation areas defined in the Atlanta Design Plan.
and the 2016 CDP and seeks to achieve density by using adaptive re-use of properties in the Growth Areas as defined in the 2016 CDP and the Atlanta Design Plan.

We discuss each opposition and offer recommendations in detail.

**CDP should focus on increasing density of adaptive reuse of Growth Areas rather than density in the Atlanta Conservation Area.**

The original purpose of the CDP 2016 and the Atlanta Design was to divide the City of Atlanta into Growth Areas and Conservation Areas. Here is the definition of Growth and Conservation area as described in the NPU A, B, C August 26, 2021 letter.

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The Growth Areas consists of legacy Industrial Area that are not in current use; underutilize Big Box commercial areas such as the Stewart-Lakewood Shopping; and major already dense transportation corridors in Downtown, Midtown (Ponce De Leon Avenue), Buckhead (Peachtree Road), Metropolitan Avenue, the Hollowell Parkway, and Northside Drive. In NPU-Y, we have not seen significant improvements within these growth areas as proposed in CDP 2016 and legacy Industrial Areas continue to exist in large concentrations.

Thus, the NPU-Y Zoning Committee recommends to focus more into placing density in Growth Areas while preserving the single family core and low-density Conservation Areas in southern NPUs. Also, by placing density in the underutilized Industrial property, minority neighborhoods can be freed from the negative health effect of living next to negative industrial uses such as Metal and Plastics Recycling Plant, Waste Treatment Plans, Auto Salvage yard and Car Towing Yards, while achieving increased density in
city. Furthermore, this recommendation will help promote economic development as it increases our density and diversity of residential income profile, which are major indicators for new business opportunities (e.g., grocery stores, doctor offices, live-work-play districts) to enhance our quality of life. Moreover, a focus on adaptive reuse of legacy industrial uses allows the city to achieve environmental justice in the largely black neighborhoods in SE and SW quadrants of Atlanta.

In fact, in the talk, ‘How Big Can Atlanta Get’ by Arthur C. Nelson, who made the original 1.2M forecast, Professor Nelson advocates for adaptive re-use of underutilized Industrial areas and empty big box commercial areas rather than a change in single family zoning policies as shown in Figure 2.

![Create An Even more Atlanta kind of Atlanta](image)

*Figure 2: Slide from ‘How Big Can Atlanta Get’ by Arthur C. Nelson*

**Atlanta City Design Plan lacks to enforce equitable and affordable Single Family Zoning in housing across all parts of Atlanta.**

Section HC1 (as shown in Figure 3) of 2021 CDP mentions that the city plans to invest in $1B to preserve affordable housing. However, it does not specify the amount of affordable housing or which locations within the city of Atlanta will be impacted. This non-specification can result in a high density of the affordable housing in communities like NPU-Y, which negatively impacts economic development equity in the community.
As a result, NPU-Y Zoning Committee requests in CDP that the city plans to conduct an audit to find out how many units of affordable housing already exist, how many people are already living in that affordable housing, and the density of affordable housing in various regions. A count should be taken of how many persons not already living in affordable housing need affordable housing and how many units of affordable housing needs to be produced to house those persons. This audit should be an independent city-run audit and should not rely on the depression era criteria of being rent burdened as reported in the Census.

NPU-Y Zoning Committee recommends to modify the CDP so that needed affordable housing units for the city should be distributed to each quadrant of the city based on Median Family Income of each quadrant. With this proposed change, the city can produce more quadrants of equality and equitability.

Furthermore the CDP 2021 push for density in the Atlanta Conservation Areas is being done on the theory that the more units allowed in an area through any form of up-zoning will make those units more affordable. This concept is called ‘Filtering’. Although this sounds like good Supply and Demand economics, there a few studies that says it does not work:

- **Up-zoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction** By Yonan Freemark. This article states that up-zoning of properties near public transportation did not produce more affordable housing but raised property values.
- **YIMBY Movement Is Not the Answer to Housing Crisis, Grassroots Activists Say.** This article says that market-oriented ways to create more units of housing in a market does not lower housing prices. This article advocates more public housing instead.

NPU-Y Zoning Committee suggests that the city review and suggest solutions that will prevent lack of affordability due to up-zoning like in Chicago.
The city growth projections and model may be outdated.

The 2021 CDP justification for massive density increases in Single-Family areas is based on an outdated forecast that Atlanta’s population will be 1.2M by 2050. This forecast is based on a 2016 presentation to the City of Atlanta Planning department entitled ‘How Big Can Atlanta Get’ by the Georgia Tech Professor Arthur C. Nelson, Ph.D., FAIC. Professor Nelson’s forecast was originally 1.2M by 2040 but it has been scaled back to what it is now or 1.2M by 2050. This forecast did take into account the recent global changes with the pandemic, which has dramatically changed the landscape of live, work, and play areas. Currently, many companies are moving to a fully virtual workplace, which could affect the population models.

Last month, the Census released population counts to be used for congressional redistricting. The Census redistricting files say that the City of Atlanta 2020 population grew 71,400 from 427,312 in 2010 to 498,715 in 2020. This 2020 population is just about what the population of the City of Atlanta in 1970 which was 496,973. The 2010 to 2020 decade population growth of 71,400 was the highest since the 1950 to 1960 decade which was 156,141. However, that decade growth number resulted from a massive annexation of Buckhead, West Atlanta and Lakewood and other parts of SE Atlanta into the city of Atlanta from Fulton County and not a result of a City of Atlanta development plan.

We suggest that the city perform another evaluation of growth in our city before performing swift policy reform as implicated in CDP. The new findings may show that the city can perform a phased approach over multiple CDP revisions (over a decade) rather than promoting swift policy reform in the next few years.

Atlanta City Design Plan should strongly review existing transportation and infrastructural changes before zoning policy reform.

After 50 years, the City of Atlanta in 2020 has just reached the population it had in 1970. As a result, its recent growth increase did not stress infrastructure inventory since it was already there and had been there since 1970. However, even growth in population over the next 3 decades at a rate of 250K in 30 years will impact transportation (streets and bridges), tree canopy and public utilities such as schools, water, sewer, schools and electricity. The 2021 CDP does not address how the city of Atlanta infrastructure will keep up with increased population.

This potentially outdated projection has spurred a narrative of a massive policy reform in creating more units through affordable housing, ADU’s, Missing Middle (MR-MU) zoning reform proposals, and affordable housing. However, the city has little attention towards planning transportation, mobility, and city infrastructure (e.g., Tree Canopy, water reserves, streets, schools and sewerage). Thus, we recommend the following:

1. NPU-Y Zoning Committee supports NPU A Chairperson Brinkley Dickerson in his July 16, 2021 letter to Tim Keane that any change to the CDP or Zoning Ordinance that would facilitate
increases in density should be permitted only after transportation and infrastructure improvement has been planned and determined credible financing sources to account for growth.

2. NPU-Y Zoning Committee supports NPU-A’s request for the deletion of HC6.1 and wishes to extend the maintenance of parking restrictions to all residential zoning categories including R4, R4A and R5 as shown in Figure 4.

![Figure 4: NPU-A’s request of the deletion of HC6.1](image)

3. Since single family neighborhoods host 77% of the City’s Trees, NPU-Y Zoning Committee supports to introduce stronger language in the 2021 CDP or legislation to how to address efforts density Single-Family areas through ADU’s and Missing Middle housing will impact this tree canopy as introduced in NPU-A’s letter shown in Figure 5.

![Figure 5: Statement to Address Mismanagement of tree Canopy](image)

The current CDP should remove any policy action items seeking specific zoning changes until both NPUs and City Council can review and approve.

The high priorities of NPU-Y (shown in our submitted CDP policies) are:
1. Prevent high density of Industrial uses such as metal recycling, waste treatment plants, auto
salvage yards, used car lots and tow lots that endanger the health of nearby residents.
2. Prevent High-density of closed businesses and promote new business growth.
3. Lower crime.
4. Promote higher home ownership levels.
5. Prevent abandoned and blighted housing and illegal boarding houses.
6. Prevent lack of upkeep of rental housing by absentee landlords.

NPU-Y Zoning Committee sees little in the 2021 CDP that will solve the high priorities within NPU-Y. Rather, it focuses on density increases by growing the “Missing Middle.” MR-MUs and attached/detached ADUs in R1-R4 zoning.

Secondly, our 2000 Southside Redevelopment Plan removes multi-family zoning such as R5 with the intent to prevent developments such duplexes, Tri-, Quad’s and small apartment buildings into single family and other NPU-Y conservation areas while CDP violates our plan by the proposing more ADUs and laxed MU-MR policies.

Instead, we urged the city to follow through with the original intent of the 2016 CDP and the Atlanta Design Plan rather focusing on drastically different zoning policy in the 2021 CDP as stated in the NPU A, B and C letter August 26, 2021 letter to Tim Keane as shown in Figure 4:

- It prioritizes increased residential density in Atlanta’s single-family neighborhoods over any considerations of neighborhood stability or “the unique character of established neighborhoods.”
- It prioritizes increased residential density in Atlanta’s single-family neighborhoods over the impact of that density on Atlanta’s iconic tree canopy.
- It prioritizes increased density in Atlanta’s single-family neighborhoods over the impact of that density on the flooding many Atlanta neighborhoods already suffer.
- It prioritizes density-producing development in established, stable neighborhoods over efforts to promote growth in areas that need and want it.
- And it prioritizes elimination of off-street parking requirements over any considerations of the traffic congestion such elimination would invariably entail.10

![Figure 4: Claims for CDP](image)

Since zoning policy can not require that the owner of ADU enhanced properties and “Missing Middle” properties be resident there, NPU-Y may see an increase in lack of upkeep of rental housing by absentee landlords absentee landlord rental property and potentially result in a lack of residential homeownership rise, which conflicts with our priorities in NPU-Y.
For example, recently in NPU-Y, a developer in Lakewood Heights, tore down a house that could have been renovated, subdivided the lot of the demolished house along with another lot, plans to build 3 houses, each with its own ADU and plans to rent the whole development. If not regulated by local communities like Lakewood Heights and NPU-Y, these developments like these can negatively impact the character of communities.

As a result, NPU-Y Zoning Committee requests the removal of the following policy actions from the HOUSING DENSITY & VARIETY section of the current draft of the 2021 CDP on p. 103. We would like to revisit these policies in future amendments of the CDP.

![Figure 5: Policy Actions](image)

**Conclusion**

Lastly, the historically black neighborhood South Atlanta, from a review of the 1911 Sanborn maps, had the same single family lot structure and housing as it does today in 2021 (Figure 6 and Figure 7). This Single Family detached housing pattern in a historically black neighborhood like South Atlanta was realized by the choice of the residents and before this type of choice was codified in any municipal zoning code and this housing pattern has been preserve in over a century.
Figure 6: 1911 Sanborn Maps From GSU Digital Library – South Atlanta Neighborhood Around Community Ground. The Sanborn Maps contains a few more slides of other parts of the same neighborhood.
A sample of housing available in South Atlanta as shown can be found at: GSU Digital Library.
https://dlg.usg.edu/record/dlg_sanb_atlanta-1911 (page 420-430). NPU-Y Zoning Committee wishes
the city focus on density of Growth Areas before proactively altering the original character of
neighborhoods like South Atlanta unless South Atlanta decides otherwise.

In conclusion, NPU-Y Zoning Committee suggests to modify CDP before final draft to include: focus on
increasing density of adaptive reuse of Growth Areas rather than Density in the Atlanta Conservation
Area, enforce equitable and affordable Single Family Zoning in housing across all parts of Atlanta, update
growth projections and model, retain the choice of the residents, review existing transportation and
infrastructural changes before introducing zoning policy reform, and remove any policy action items
seeking specific zoning changes that weakens the NPU voice. If aforementioned reasons for opposition
can not be addressed before final draft, then we suggest resetting the comprehensive development
planning process by only focusing on the required updates this year, and begin a more robust process in
2022 as originally suggested by the office of city planning.

Sincerely,

Troy Nunnally, PhD
NPU-Y Chairperson
7. Comments from Midtown Alliance

From: Karl Smith-Davids <karl@midtownatl.com>
Sent: Thursday, August 12, 2021 11:40 AM
To: Comprehensive Development Plan 2021
Subject: [EXTERNAL] Comments on the Transportation Section of Plan A-Draft II

Comments regarding the Transportation Section of Plan A-Draft II:

Section 3 – Transportation Planning

- Intro should connect travel behavior and transportation options to climate change and City’s climate change goals. Transportation makes up about 30% of greenhouse gas emissions.

Vision Zero

- This sentence in the Needs and Opportunities paragraph seems out of place – too specific, suggesting that if we just fix this one issue we’ll have safe streets.

- “Giving pedestrians more time to cross by improving signal operations and reducing vehicle speeds will transform these high-crash corridors and intersections—and ultimately all of Atlanta’s streets.”

- Need a policy action around enforcement of speeding. Can the City pursue a change of state law that would allow Atlanta to enforce speed via cameras? Can City devote more APD resources to enforcement? Can we begin camera enforcement around schools (which is legal today)?

Micromobility

- Walking is not commonly thought of as micromobility and I would argue that walking is important enough to call out separately. Perhaps this section needs to be titled, “Walking and Micromobility.”
- Where do ADA needs and opportunities get addressed? Seems like this should be added to Needs and Opportunities and added as a Policy Action.
- TP2.2 should be higher level to match other Policy Actions rather than getting into highly specific needs like LPIs. There are plenty of strategies in addition to LPIs that would make intersections safer for people on foot. The current City criteria for adding a new traffic signal at an intersection is too heavily weighted toward vehicle throughput. Something like – Develop policies for adding new traffic signals, signal timing, and operations that encourages safe pedestrian crossing.
- TP2.3 – recommend adding “with a focus on making connections to existing bicycle facilities”

Transit

- TP3.1 – This policy is suggesting that we should increase transit coverage rather than maximizing ridership. Is that the policy? Shouldn’t both be policies?
- TP3.2 and 3.3 could be combined since they both dealing with making bus service faster and more reliable.
- Consider adding a new policy that calls for adding more transit stop amenities like shelters, seating, real-time information, etc.
- Consider adding a new policy that encourages dense and affordable development around transit stations (TOD).
P:156

Plan A: Atlanta's 2021 Comprehensive Development Plan

Parking

- The Needs and Opportunities section focuses almost exclusively on curbside mgt. Consider adding how the excessive provision of parking takes away from safety, vibrancy, and the productive use of land. There is a clear need and opportunity to reduce the amount of parking in the City and we should state this clearly in my opinion.
- TP4.1 – Considering moving to Transportation Financing section.
- TP4.6 – Broaden this so that the City is not just viewing metered parking spaces as revenue. We end up trying to meter every space to get more parking revenue even when there are more important needs that could be satisfied (bike lanes, expanded sidewalks, bike/scooter parking, outdoor dining, etc.). On-street parking spaces should be managed to support curbside needs, not just to raise revenue.
- Consider adding an additional Policy Action that calls for eliminating parking minimums and reducing parking maximums in the zoning code.
- Consider adding an additional Policy Action that calls for requiring or incentivizing that new parking decks be designed/built so that they can be converted to other uses in the future.
- Consider adding an additional Policy Action that ensures that all new residential parking decks have electric vehicle charging stations installed for all parking.

Access to Jobs and Services

- Consider expanding this section to include trip types other than just jobs and services – trips for recreation, shopping trips, access to homes, access to school, etc.
- TP5.1 is super vague – need more info to understand what might be included in this.

Transportation Financing

- Consider adding a Policy Action that calls for identifying the appropriate mix of funding sources to deal with the infrastructure backlog. Funding sources should encourage the kind of behavior we want and discourage behaviors that we don’t want. These sources should be in line with other City goals around equity (no regressive taxes), supporting economic development, climate change, etc.
- Consider adding a Policy Action that calls for continuing to partner with Community Improvement Districts to fund transportation projects and maintenance of transportation infrastructure.

Project Delivery

- Consider adding a Policy Action that calls for creating the ability for ATL DOT to design and construct small-scale projects in-house
- Consider adding a Policy Action that calls for improving coordination between various departments (DOT, Procurement, Law, DCP, etc.) in order to reduce project delay and project costs.

Dan Hourigan, LEED GA
Director, Transportation & Sustainability
Midtown Alliance
999 Peachtree St., Ste. 730
Atlanta, GA 30309
8. Comments from Atlanta Housing

Comments received via email from Bithia Ratnasamy and Paul Vranicar

Plan A: Draft II

Emailed August 18, 2021

Page xii
- We are officially “Atlanta Housing” rather than Atlanta Housing Authority 😊

Page 26
- HAAP was released in 2019

Page 31
One Atlanta: Housing Affordability Action Plan (2019)

One Atlanta: Housing Affordability Action Plan outlines a pathway to affordable and equitable housing opportunities for all who desire to call Atlanta home. The key target is to create or preserve 20,000 affordable homes by 2026 and increase the overall supply of housing. The City’s housing leaders—Department of City Planning, Department of Grants and Community Development, Atlanta Housing, Invest Atlanta, Metro Atlanta Land Bank, and Atlanta BeltLine—are committed to implementing the 13 initiatives and 45 actions to achieve the goals laid out in the plan by 2026. These groups routinely communicate with elected officials and the community about progress. New tools and reports, such as an inter-agency Housing Affordability Tracker, provide real-time information, transparency, and accountability.

Page 32
- Remove Authority from Atlanta Housing Authority

Page 100
- I’d be precise with the language in the callout regarding race- v class-based exclusion since in present day the class aspect plays out in SW Atlanta
- Missing a colon in One Atlanta: HAAP (for consistency!)

Page 101
- Is investing $1B a policy?
- Similarly, I’d recommend removing HC 1.6 since that’s an outcome of the other actions

Pages 104-105
- The first sentence contradicts that stats that show Atlanta is not affordable to almost half of Atlantans. We can’t keep Atlanta affordable if it’s not affordable for most residents.
- Clarity around what “supportive tools enable the use of good programs that would otherwise go underutilized” would be helpful.
- HC 4.5 (p103) says continue HIL prototyping while p105 says establish an HIL
- I’m not sure if 9.2 belongs on this page; might better align with HC 14 since it effectively reduces property tax bills.
- Can remove “state mortgage assistance” from 9.2 since the program that was related to has sunset

Pages 106-107
- I’d chat with Cathryn Marchman/Partners for Home regarding the language of 12.4 since they do utilize the Housing First model.
- How is 12.5 different from 12.4?
- Where did 12.6 come from? Is this something we have resources for?

Pages 152-153
- Is it possible for the PFH page be included in the housing section? While I know this isn’t the intent, it may be read by some that addressing homelessness is linked to people feeling unsafe/unwelcome rather than connecting unhoused residents to housing for the sake of providing shelter/care.
Plan A: Draft II

Page 103 – I think these are all great ideas, has the City yet mapped out where these changes will occur?

Page 104 – I’m unclear what is meant by “supportive tools.” It may be helpful to provide an example or a short explanation of what is meant by that (continuing on to the next page did not clarify it any for me).

Page 105 – HC 9 “High quality methods and standards” of what? Construction? It was unclear to me what this meant. Just an observation from an impartial reader.

Page 116 – “Raise the standard for public subsidy” – Similar to my last comment, I’m just not sure what this means. I realize it needs to be concise, but if it’s not explained later in an appendix, I’m not sure it’s helpful to include it.

Page 120 - BI 1.2 - Please feel free to add Atlanta Housing to this paragraph, as we are working to supply broadband accessibility to residents as well.

Page 152 – I agree with BR’s comments that emergency shelter for people experiencing homelessness doesn’t really belong in Public Safety. It’s about housing for all Atlantans, regardless of incomes.

Appendix III

III-27 – G-5 – AH is especially favorable to this item.

Appendix IV

There are two definitions of “affordable housing,” one with a capitalized H and one without. They seem to be very similar definitions, and I’m not sure if this was intentional. It also seems to me that both definitions more accurately describe “cost burden,” or perhaps “housing affordability,” since they are not limited by income range. I would consider adding an income level cap for the “Affordable Housing” definition that is 80% or 120% of AMI. I’m unaware of any definition of affordable housing that deals with incomes greater than 120% of AMI, and most true affordability is reserved for 80% or below.
## 9. Comments from MARTA

**Department of Planning**

### Atlanta 2021 Comprehensive Development Plan Comments (August 2021)

<table>
<thead>
<tr>
<th>Page #</th>
<th>Topic</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>Sidewalk Improvements</td>
<td>MARTA would support City efforts to push for new funding for sidewalks and other pedestrian or accessibility improvements. Projects of this nature are intrinsically tied to the usability of public transit, as they provide more residents and employees within the City ways to safely access public transit stops and stations.</td>
</tr>
<tr>
<td>General</td>
<td>Station Buffers</td>
<td>MARTA understands that the city is not making changes to character areas in Plan A. However, we have a concern based on character area maps we’ve seen outside of Plan A that the 1/4 and 1/2 mile buffers around MARTA Stations may not be accurate. Please verify buffers as they are incorporated into Plan A and other activities. Again, we are not requesting a policy change, but asking to verify that there are no map errors.</td>
</tr>
<tr>
<td>General</td>
<td>Station Buffers</td>
<td>Please base transit station buffers used in the Character Areas map (p 55), Transit-Oriented Development areas (p 86) and other activities around individual station entrances, rather than a single point for the station. Some stations have multiple entrances that are geographically far apart - buffers from a single point could underestimate transit's ability to affect development. An example is Buckhead Station, where the Peachtree Rd and Stratford Rd entrances are nearly 1/4 mile apart.</td>
</tr>
<tr>
<td>30-32</td>
<td>Land Use</td>
<td>The City's Transit Oriented Atlanta Plan (2015) is missing from the &quot;Related Plans and Initiatives&quot; section.</td>
</tr>
<tr>
<td>52</td>
<td>Land Use</td>
<td>Add MARTA rail lines and stations to the Future Land Use Map. In the related language, please clearly correlate the Future Land Use Map and the Station Typologies that were defined in the City's Transit Oriented Atlanta Plan.</td>
</tr>
<tr>
<td>55</td>
<td>Land Use</td>
<td>Add MARTA expansion project alignments to the Character Area Map.</td>
</tr>
<tr>
<td>55</td>
<td>Land Use</td>
<td>Will Character Area land uses provide transit-supportive densities along the expansion alignments?</td>
</tr>
<tr>
<td>56</td>
<td>Land Use</td>
<td>Please edit Policy CW 6 to address accessibility and highlight commercial, residential, and mixed-use zoning. This is intended to clearly relate the policy's increased connectivity and safety outcomes to high-density zoning that supports transit. The policy could be edited as &quot;Increase sidewalk, bicycle, trail, and transit connectivity, accessibility and safety, especially to nearby residential neighborhoods, commercial districts, parks, schools, areas of high-density zoning (including commercial, residential, and mixed-use), as well as other community facilities.&quot;</td>
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<tr>
<td>71, 73, 83</td>
<td>Parking Requirements</td>
<td>Several sections seem to have contradictory policies related to parking. For example, on p71 (Neighborhood Center), there are Development Policies to &quot;encourage appropriately scaled transit-oriented development&quot; (NC 10) and &quot;discourage auto-oriented development&quot; (NC 11), but also to &quot;minimize use of adjacent neighborhood streets for commercial parking by establish parking requirements&quot; (NC 12). Please clarify or reconcile these recommended policies. Other alternatives to minimize commercial parking on neighborhood streets could be consolidating existing parking in commercial areas, or implementing residential permit-based parking.</td>
</tr>
<tr>
<td>73</td>
<td>Town Centers</td>
<td>Edit language in the Description - remove &quot;transit accessibility is not always present or reliable,&quot; and replace it with wording that promotes transit in Town Centers. Add a Development Policy to encourage supporting transit in these areas, similar to Policy RAC-7 on p75 (Regional Center). Such a policy could read &quot;TC X - Support public transit and alternative transportation options to alleviate the dependency on cars in the areas.&quot;</td>
</tr>
<tr>
<td>81</td>
<td>Land Use</td>
<td>Include a transit-supportive development policy to improve safety and accessibility to transit stops in industrial areas. These areas are often designed around large commercial vehicles (particularly trucks), creating challenges for pedestrians and disabled people who use transit to access industrial jobs. Policy 1-11 could be amended as &quot;Balance the need to move both goods and people safely and efficiently in Atlanta by improving pedestrian conditions and transit stops in industrial areas,&quot; or similar language could be used to create a new policy altogether.</td>
</tr>
<tr>
<td>86</td>
<td>TOD</td>
<td>Add MARTA expansion project alignments to the Transit-Oriented Development map.</td>
</tr>
<tr>
<td>87</td>
<td>TOD</td>
<td>Add language to the description about preparing for transit-oriented development around future transit stations and high-capacity transit corridors, such as as Campbellton Rd, Summerhill BRT, Cleveland Ave ART, streetcar extensions and Beltline, etc.</td>
</tr>
<tr>
<td>87</td>
<td>TOD</td>
<td>To avoid potential misperception by readers, please refer to &quot;stations and high-capacity transit corridors&quot; or &quot;stations and BRT/ART corridors&quot; rather than just stations. This wording is inclusive of BRT and ART bus services, and helps avoid implying to readers that &quot;stations&quot; relate only to rail service.</td>
</tr>
<tr>
<td>91</td>
<td>Safety</td>
<td>Add a Vision Zero policy action to coordinate with MARTA to identify why and where crashes are happening, and to redesign infrastructure at high-crash locations near rail stations and bus stops.</td>
</tr>
<tr>
<td>92</td>
<td>Micromobility</td>
<td>Add language to the &quot;Needs and Opportunities&quot; section to state that micromobility infrastructure also supports better first-mile/last-mile connectivity to MARTA. <strong>Changed to mass transit (not just MARTA)</strong></td>
</tr>
<tr>
<td>92</td>
<td>Micromobility</td>
<td>Consider adding language to allow cyclists and LIT users to follow leading pedestrian intervals, and consider amending TP 2.3 to include additional dedicate bike/LIT signals.</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>In Policy TP 3, avoid the phrase &quot;21st Century Transit Network.&quot; Instead, describe the characteristics of the transit network that MARTA and the City are working to build, and specifically state the City and MARTA's partnership in the language.</td>
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<tr>
<td>92</td>
<td>Transit</td>
<td>Add a new policy action or amend one mentioning partnership with MARTA. For example: &quot;TP 3.X - Continue partnership with MARTA to deliver planned transit expansion projects.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Micromobility</td>
<td>Regarding Policy Action 2.3, implementation of bicycle and LIT lanes should be coordinated between MARTA and City staff to ensure that bus stops are safe and ADA compliant along these projects, and that buses have safe access to the curb when making stops. MARTA will consider potential bus stop location changes in coordination with bicycle and LIT lane projects.</td>
</tr>
<tr>
<td>92</td>
<td>Micromobility</td>
<td>Regarding Policy Action TP 2.1, sidewalk improvement projects present a coordination opportunity to improve sidewalks at bus stops. New sidewalks, upgrades, repairs, and others should include ADA access (including ADA-required boarding and alighting areas) at bus stops.</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Regarding TP 3.2 and 3.3, the City and MARTA should coordinate to develop a priority list for bus lanes, queue jumps, and transit signal priority.</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Edit TP 3.3 to include streetcars as well as buses, such as &quot;...to reduce bus and streetcar delay at stops and intersections.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Add a Policy Action to integrate improvements to bus stops as part of the permitting process for redevelopments or new construction, with improvements providing (at minimum) a boarding and alighting area meeting ADA requirements, and possibly including amenities such as shelters or seating. This Policy Action would help leverage private development to create improved transit stops and transit-supportive streetscapes. For example, such a policy action could be worded: &quot;TP 3.X - Implement a procedural framework for ensuring transit stop accessibility through the zoning and permitting processes.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Add a Policy Action to improve transit-supportive pedestrian infrastructure and safe pedestrian crossings, based on guidance from PEDS' Safe Routes to Transit Toolkit. Such a policy action could be worded as: &quot;TP 3.X - Implement a Safe Routes to Transit program.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Add a Policy Action to enable improved streetcar operations during special events. Such a policy action could be worded as: &quot;TP 3.X - Plan special events to sustain ongoing streetcar service rather than planning to cease streetcar service.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Add a Policy Action to enable improved streetcar operations by converting Auburn Ave and Edgewood Ave to one-way vehicular traffic. Such a policy action could be worded as: &quot;TP 3.X - Convert Auburn Ave and Edgewood Ave to one-way vehicular traffic to enable improved streetcar operations.&quot;</td>
</tr>
<tr>
<td>92</td>
<td>Transit</td>
<td>Add a Policy Action to increase enforcement of pedestrian and vehicular traffic at the Centennial Olympic Park streetcar stop. Such a policy action could be worded as: &quot;TP 3.X - Increase enforcement of pedestrian and vehicular traffic at Centennial Olympic Park to enable improved streetcar operations.&quot;</td>
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<tr>
<td>93</td>
<td>Parking</td>
<td>Add a Policy Action aimed at reducing minimum parking space requirements near transit stations and high-capacity transit alignments (including ART and BRT corridors). For example, such a policy action could be worded: &quot;TP 4.X - Evaluate the feasibility of reducing minimum parking space requirements near transit stations and high-capacity transit corridors.&quot;</td>
</tr>
<tr>
<td>93</td>
<td>Parking</td>
<td>Transit is an existing curb space use, so please add to the language regarding curb space (for example: &quot;By managing our valuable curb space for parking, transit, new mobility options, deliver, and freight more efficiently...&quot;). Additionally, no-parking zones established by City of Atlanta ordinances (Chapter 150-116 (a) - Identification of Bus Stops, Length) are often not enforced, resulting in safety issues and a loss of ADA accessibility due to conflicts with on-street parking.</td>
</tr>
<tr>
<td>93</td>
<td>Parking</td>
<td>Add a Policy Action aimed at resolving conflicts between on-street parking and bus stops to improve safety and accessibility, and increases compliance with existing City ordinances. Such a policy action could be worded: &quot;TP 4.X - Resolve conflicts between bus stops and on-street parking by enforcing existing ordinances and implementing design solutions.&quot;</td>
</tr>
<tr>
<td>93</td>
<td>Parking</td>
<td>Add a Policy Action aimed at reducing streetcar delays and disruptions due to illegal parking. Such a policy action could be worded: &quot;4.X - Increase enforcement of illegally parked vehicles on Auburn Ave and Edgewood Ave to enable improved streetcar operations.&quot;</td>
</tr>
<tr>
<td>94</td>
<td>Transportation Financing</td>
<td>Amend Policy TP 6 to address short-term improvements. Such a revision could be worded as &quot;Explore and create new opportunities for financing short and long-term improvements.&quot;</td>
</tr>
<tr>
<td>95</td>
<td>Project Delivery</td>
<td>Regarding Policy Action TP 7.1, more clearly define the meaning of &quot;standard palette of materials.&quot;</td>
</tr>
<tr>
<td>95</td>
<td>Project Delivery</td>
<td>Add a Policy Action to explore new and creative project delivery methods such as public-private partnerships (P3), design-build, construction manager at risk (CMAR), etc. Such a policy action could be worded: &quot;TP 7.X - Explore new and creative project delivery methods.&quot;</td>
</tr>
<tr>
<td>102</td>
<td>Housing</td>
<td>Regarding Policy HC 5, the City should allow the maximum permitted combined density under the zoning regulations for residential projects on MARTA property.</td>
</tr>
<tr>
<td>103</td>
<td>Residential Parking</td>
<td>Amend Policy Action HC 6.1 to state &quot;Amend the zoning ordinance to reduce residential parking requirements, especially near high capacity transit stations and corridors.&quot;</td>
</tr>
<tr>
<td>107</td>
<td>Reduce Housing + Transportation Cost Burden</td>
<td>Add a Policy Action to encourage affordable housing near transit. Such a policy action could be worded as: &quot;HC 14.X - Incentivize affordable housing near existing or planned high capacity transit stations and corridors.&quot;</td>
</tr>
<tr>
<td>Page #</td>
<td>Topic</td>
<td>Comment</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>116</td>
<td>Thriving Neighborhoods</td>
<td>Revise language in the Needs and Opportunities section, particularly &quot;Atlanta ranks low in the numbers of jobs that people can reach using transit&quot; - this is a potentially misleading statement, when an equal or greater issue is that housing isn't necessarily reachable by transit either. MARTA's recent Bus Network Redesign project Choices Report documents that &quot;more of the area's jobs are near frequent services than are residents... jobs are concentrated at the center of the rail network and near some rail stations.&quot;</td>
</tr>
<tr>
<td>141</td>
<td>Urban Design - Private Development</td>
<td>Regarding private development, new developments and redevelopments often affect adjacent transit stops. New landscaping, streetscapes, turn lanes, and other streetside features can worsen bus stop conditions, cause a loss of ADA access, or completely eliminate stops by creating unsafe waiting or boarding/alighting conditions. We have recommended a policy action to address this on page 92 (Transit section) but consider adding similar language here.</td>
</tr>
<tr>
<td>App. A</td>
<td>Community Work Program</td>
<td>Please include and consult MARTA in Community Work Program projects that would affect bus stops (sidewalks, pedestrian crossings, streetscapes, etc), bus operations (intersection improvements or other projects affecting turning radii or stop bar locations), or affect MARTA's expansion corridors (such as the Summerhill BRT alignment, Campbellton Rd, Cleveland Ave, etc).</td>
</tr>
<tr>
<td>App. A</td>
<td>Community Work Program</td>
<td>Please provide supporting GIS data that represents the City's 2016-2021 and 2021-2026 Community Work Program projects.</td>
</tr>
</tbody>
</table>
10. Comments from Atlanta BeltLine

Date: August 26, 2021
To: Office of Design Team/ Nate Hoelzel & Kevin Bacon
From: ABI Planning, Lynnette Reid
Re: Draft Plan A CDP Comments

1. **Page 59** - In the policy section, add new policy that addresses re-purposing of former public work facilities/ open areas which could be used as greenspace and/or community facility. For example, the decommissioned Hillside Facility in Subarea 2 - was mentioned in the original master plan in 2009 and again the update as possible park/open space for the community. Also, the City's Water Works site off Howell Mill and Huff Road. Obviously not the entire site, put reopening parts of the property to the public. This was a recommendation in the Subarea 8 master plan, and it's also mentioned at length in the Upper Westside CID Plan.

2. **Page 63** – (TNR 3) What agency/department is prioritizing maintenance and rehabilitation of private owned property? I suggest stating the name of the department/agency. Or the alternative is to say that the city “encourages” instead of prioritizes.

3. **Page 63** – (TNR 6) Should the responsible department be identified by name?

4. **Page 64** – (High Density Residential Map) - The narrative gives the impression that it is referring to moderately dense residential, but the image is a dense apartment building. If higher density residential is a dense apartment, I would think that more high-density apartments areas would be shown on the map, especially around the BeltLine/Eastside Trail. Can you confirm if the map is showing all existing high density residential development? It doesn't seem like it is.

5. **Page 68** (Industrial Live Work) – Shouldn’t LEE+White be shown on this map? And does this map represent only what's zoned I-Mix or is this still reflecting the property identified in the 2011 Update as potential I-Mix?

6. **Page 75** (Regional Center) - "Buckhead and Midtown are increasingly becoming denser and emerging as Atlanta’s premier centers for culture, innovation, and business”. - The BeltLine must be identified in one of these characters, as it is a huge driver for growth/economic development and not to acknowledge it is a grave miss. If a RAC designation is not appropriate, then perhaps an “Emerging Town Center” or Redevelopment Corridor, or a new Character area designation should be developed.

7. **Page 78** (Intown Corridor & Redevelopment Corridor Map) – The redevelopment corridor is shown all along the BeltLine and it’s imperative to acknowledge the BeltLine’s influence and impact on this corridor in the description and in the development policies.
8. **Page 90 (Related Plans and Initiatives)** – Please provide more narrative about the Atlanta BeltLine Master Plans in this section? The suggested language is as follows:

Adopted by City Council in 2005, the Atlanta BeltLine Redevelopment Plan includes the initial proposal to combine greenspace, trails, transit, and new development along 22 miles of historic rail segments that encircle Atlanta’s urban core. There are 10 Subarea Master plans developed by the Atlanta BeltLine, Inc. in collaboration with the Community and the City of Atlanta to guide future population growth and development for transit-oriented development within a half mile on either side of the corridor. To serve as a policy tool to help guide future growth for vibrant, livable mixed-use communities by applying recommendations for best management practices for transit-oriented development, affordable housing, mobility, green space, land use, urban design and alternative modes of Transportation.

9. **Page 92 (Transit Policy Actions)** - Add New Policy - Continue to partner with the MARTA, the Atlanta BeltLine to implement future transit along the BeltLine Corridor as outlined in the More MARTA Program.

10. **Page 93 (Parking Policy Action) -** We must identify creative solutions to address parking. Consider adding a new policy action that encourages the redevelopment of surface lots and encourages parking decks be designed so that they may be repurposed to other uses in the future.

11. **Page 107 (An Equitable Policy Actions) –** Consider adding a new policy action - Explore how CDBG monies could be used to develop or support neighborhood stabilization programs.

12. **Page 128 (Parks and Trail)** – I like the mention of the integration of various trail systems in this section (NR.7.1)

13. **Page 134 (Atlanta BeltLine Image/caption)** - This image of the BeltLine and its caption below seem more appropriately placed in the mobility section, or the trails and parks on page 129. Could page 129 on Trails and Parks, and the Trails & Waterways on Page 140 be combined into one section? Also, I would suggest providing more diversity in the images on trails. On both page 129 and 134 the images of the people using the trail are not diverse.

14. **Page 141 (Private Development Policy Actions)** - Can you add the word “Citywide” urban design guide for developers for UD-8.1)

15. **Page 142 (Engagement and Equity)** - Housing, jobs and transportation are critical components of equitable development, and should be referenced in the introduction section. How does the City’s department of Equity and Inclusion fit into this plan, and should their current efforts and future policies be identified here, or connected back to that agency?

16. **Page 150 (Public Safety Facilities Planning Image)** - This appears to be a picture of a protest; I think it should be carefully placed to better align with the appropriate content. Perhaps the image is better in the equity section of the plan. It’s my opinion that it does align with community facilities. If the image stays, then should this section connect back to any of APD’s efforts toward improving community policing?
11. Comments from Atlanta Bicycle Coalition

From: Rebecca Serna <rebecca@atlantabike.org>
Sent: Thursday, August 26, 2021 10:27 AM
To: Comprehensive Development Plan 2021
Subject: [EXTERNAL] Comments on transportation section of CDP

Hi there,

We'd like to submit comments on the Transportation section starting on page 89.

- re "equitable access" recommend a focus on equitable outcomes instead
- re " Maintain and improve accessibility and connectivity for pedestrians, shared transit, cyclists and in-city and through-city freight traffic. " Through-city freight is often in conflict with the other types of transportation. Heavy truck traffic and pedestrian access don't mix well. To truly prioritize pedestrians the City should look for ways to discourage truck through-traffic and restrict in-city freight traffic to smaller trucks to make people walking, using wheelchairs, and biking (as well as driving) safer.
- re "equity and affordability" - equity is mentioned here but not defined, and it's unclear how equity would be prioritized through th
- appreciate the Vision Zero section not including any enforcement tactics
- to LPIs, make it a priority to ask state to adopt the City's policy for signal timing and LPIs on state routes inside the city limits
- Transit - specify how MARTA should improve bus routes and services - by increasing frequency? expanding hours? etc. Relevant due to bus network redesign
- Transportation Funding section seems incomplete. Will bonds and TSPLOSTS be part of transportation funding structure going forward? How will sidewalks be funded? what about federal funding opportunities - are those a priority?

Thank you,
Rebecca

Rebecca Serna
Executive Director
rebecca@atlantabike.org | 404-881-1112 ext. 4

Atlanta Bicycle Coalition
Reclaiming Atlanta’s streets as safe, inclusive, and thriving spaces for people to ride, walk, and roll. To support our work, visit www.atlantabike.org/donate.
12. Letter from Sierra Club Georgia Chapter

To the City of Atlanta Department of City Planning,

Thank you for this opportunity to comment on Plan A, Draft II. The Sierra Club—Georgia Chapter cares deeply about the future of the state’s central city, and on how housing, transportation, and land use can contribute to mitigating climate change and enhancing equity. A large part of this must be achieved by shifting people out of cars and onto buses, trains, bikes, and sidewalks. This requires a shift in how we build our society in a very physical way. Plan A, Draft II does an admirable job in moving the City of Atlanta towards these goals, but there are places where it can do better. We hope that you will take our comments into account when revising this plan and updating it in the coming years.

Many of the changes for Draft I addressed on page 3 in Element 4: Housing and Community Development Planning are both understandable and disappointing. While it is necessary to gain community support for these proposed changes, these Draft II modifications water down some of the best aspects of the original plan. The City must rezone to allow for more housing stock, more variety of housing, and more mixed use development. These kinds of changes are necessary to create the urban density and walkable neighbourhoods that Atlanta needs to manage growth, encouraging missing middle housing, and providing new avenues for affordable housing. Future zoning updates should include the original ideas of reducing lot sizes and allowing ADUs citywide. These zoning updates would allow more housing stock to be built and more efficient use of land. The proposals spelled out here must only be the first steps towards larger changes.

Mixed-use buildings wherein a retail or service business can operate out of one part of a home. A house being divided for use as a home and a grocery store, small clinic, or barber shoppe would be examples of this. Legalizing this would allow for entrepreneurship, more autonomy for owner’s over their property, and could gently transform our more suburban areas into places where cars are optional. ED 7.2 and ED 7.4 appear to allow these kinds of housing-business mix. They should be amended if that is not their intent, and this kind of development should be advertised and encouraged in the coming years.

We strongly support the Parking policies on page 93. Parking is necessary for those who must drive, but the City must move towards eliminating free parking as it is a subsidy for those who drive at the detriment of those who do not or cannot. Parking is something to be bought and sold in a marketplace, not a right. Consider furthering these policies to include decoupling parking and rent for both new and existing multifamily housing. Those who do not drive should not have the cost of parking fees built into their rent, and it would encourage developers to build a more reasonable amount of parking rather than overbuilding as they do now.

We support the Access to Jobs & Services policies on page 93. Please also include increased car pooling and van pooling. These options give individuals flexibility in their schedules that our transit system currently does not. While continued investment in MARTA should result in frequent, reliable, 24/7 service, we are not there yet. Increasing the ridership within cars can be a good step towards reducing congestion and transportation-related emissions. Similarly, consider the needs of non-work trips such as grocery trips, childcare trips, and recreational trips. These journeys make up a large portion of our lives and we should consider them as priority just as much as work trips.
We support and appreciate the language throughout the document towards increasing walking and cycling in the City, and towards developing and building a citywide trail network. Neighbourhood greenspaces and connectivity could be increased by developing Neighbourhood Greenways that prioritize walking and biking through a residential area. These could be achieved through road diets that slow car traffic in neighbourhoods so that pedestrians and cyclists can more safely and freely walk in their own communities. Building short trails that cut across more suburban style streets to create more direct connections to main corridors, destinations, or just the other side of the same community would also be very beneficial. This can help connect the existing street network without building a wider, car-oriented street. The Byway that connects St. Louis Place to Ponce de Leon in Atkins Park is a great example of this kind of infrastructure.

Adherence to Plan A in any form must involve rejecting the development of a police training facility of any size in the South River Forest. The administration and City Council must preserve this greenspace for flood management, park space, and climate change mitigation. While our police and firefighters do need high quality training, other sites in the city, county, and metro area are available that would not require destruction of valuable forest lands.

Thank you again for this opportunity to comment on Plan A, Draft II. Please reach out if you have any questions or wish to engage more with the Sierra Club—Georgia Chapter.

Sincerely,

Tejas Kotak
Sierra Club—Georgia Chapter, Transportation Chair
Housing Justice League would like to strongly the CPD to support and advocate for those who are low income renters to provide and establish

I. Establishing a dedicated Office of the Tenant Advocate

Over the course of organizing, deep listening, and meeting with tenants at high risk of eviction and displacement, one of the most resounding issues tenants lifted up was a fundamental lack of accountability for landlords who violate the law. Without local enforcement of existing tenant protections, tenants are left battling against the whims of bad-actor landlords who have far more resources to leverage, particularly in court. Tenants deserve to have dedicated municipal staffing to help them protect themselves and their families against abuse where they live. We want to see a new office established in Atlanta to focus on enforcing existing tenant protections to reduce the number of incidents of tenant and families living in uninhabitable conditions, or experiencing illegal evictions, discrimination, and harassment.

II. “The District of Columbia passed the Tenant Opportunity to Purchase Act, which prevents displacement by empowering tenants to determine the future of their housing when the owner is ready to sell the property. TOPA does this by creating legal rights to purchase (right of first offer, right of first refusal, and right to assign to a qualified affordable housing developer) and extending the timelines for purchase. TOPA also connects tenants and affordable housing developers with technical assistance, education, and financing to help make these purchases possible. Support adopting a similar ordinance in Atlanta and providing the necessary resources for tenants to exercise these rights?

Alison Johnson
Housing Justice League
Executive Director
alison@housingjusticeleague.org
she/her/her
"There is no greater agony than bearing an untold story inside you." — Dr. Maya Angelou
Plan A: Atlanta’s 2021 Comprehensive Development Plan

14. Letter from Council for Quality Growth

September 27, 2021

Commissioner Tim Keane
Department of City Planning
City of Atlanta
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

Re: 2021 Comprehensive Development Plan Comment on Historic Preservation

Dear Commissioner Tim Keane:

The Council for Quality Growth is a not-for-profit trade association representing over 300 companies comprised of architects, attorneys, contractors, developers, engineers, financial executives with a vested interest in quality growth and development in the City of Atlanta.

The Council has thoroughly reviewed the City of Atlanta 2021 Comprehensive Development Plan A Draft II and appreciates the amount work conducted by the Department of City Planning in guiding the city’s growth and development. As such, the Council is grateful for the opportunity to provide feedback and looks forward to continued engagement in shaping the future of Atlanta.

Anticipating the growth of Atlanta, the Council is deeply involved in policy initiatives concerning density, housing diversity and attainability, accessory dwelling units (ADUs), transit and mobility, parking minimums, and sustainability of development and growth. These initiatives, present in the CDP, are important considerations in laying the groundwork and vision for Atlanta.

Encouraging redevelopment, infill development, and adaptive reuse within the City of Atlanta is important in creating a thriving city. We do not consider an additional review process for properties 40+ years of age, as proposed in HP 5.2, a beneficial historic preservation policy.

Given the many thoughtful, housing centric policies in the CDP, a demolition and major alterations review would diminish attainability and diversity of housing in Atlanta. This additional regulatory hurdle has the potential to hinder development given that nearly 68% of Atlanta housing stock is 40+ years old.

We ask for your consideration of a more precise and metric-based policy action that could more authentically preserve historic Atlanta properties. A policy aimed at placing historical merit rather than age to justify review could ensure future development, especially critical housing solutions, are feasible.

Sincerely,

Michael E. Paris
President & CEO
Council for Quality Growth

Tate Davis
Senior Policy Analyst
Council for Quality Growth
Public Review and Comment on Draft I | June 8th - July 26th, 2021

The Department of City Planning published Draft I of Plan A on June 8, 2021 for public review and comment. Feedback received during this time was incorporated in Draft II. The department received comments from some members of the Technical Advisory Committee and the public. The City incorporated comments specific to the draft’s format and policy recommendations. Other feedback received via email or during the June virtual meetings can be summarized into the following themes with the City’s response and revisions in Draft II or recommendation to further engagement and analysis during the second phase of comprehensive plan update.

Themes:

Accommodating more density in Atlanta

Several emails in addition to many messages left during the public comment period for the CD/HS public hearing on June 28th voiced opposition to rewriting the zoning ordinance to allow attached dwelling units and reduce minimum lot size across all zoning districts. There were specific requests to remove the policy actions HC 4.1, HC 6.1, HC 6.2, and HC 7.1 in Draft I of Plan A.

Other responses from residents voiced that density is not a threat, it’s an asset that increases the wealth, livability, and vitality of our neighborhoods and cities. The City should expand housing types within residential character areas.

City’s Response:
The department is not suggesting eliminating single family zoning, we want to expand the zoning categories to allow more options for residents. Cities that restrict ADUs to certain districts significantly constrain the number of eligible properties and suppress the number of ADUs that can (legally) get built under the code. This frequent comment was incorporated by revising policy action HC 4.1 to read: Amend the zoning ordinance to allow attached and detached ADUs in more areas. After public comment for the June 28th CD/HS public hearing city staff removed HC 6.2 and HC 7.1 from the CDP draft. Additionally, based on feedback from SAC and TAC members and some small group discussions with NPUs the character area policy from the June 2021 draft, “TOD 5: Discourage single-family and low-density residential development as well as low-density commercial and industrial development.”, was removed.

In Phase 2 of this update, the department will conduct more extensive community conversations around various tools for increasing density that is neighborhood specific. The department is currently going through an in-depth technical analysis of the zoning rewrite process but will begin to engage residents at the end of this year and next year to have these density discussions.
Housing and Community Development, Draft I

Policy Actions

HC 4.1 Amend the zoning ordinance to allow attached and detached ADUs citywide.
HC 4.2 Implement the missing middle housing ordinance.
HC 4.3 Amend the zoning and building codes to allow offsite construction models.
HC 4.4 Amend the zoning ordinance to remove the definition of family in favor of maximum occupancy regulated by the building code.
HC 4.5 Continue Housing Innovation Lab prototyping of new approaches to design, construction, and financing to reduce the cost of housing, and integrate successful prototypes into the City’s regulatory process.
HC 5.1 Amend the zoning ordinance to allow small apartment buildings and cottage courts near transit.
HC 5.2 Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.
HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.
HC 6.2 Amend the zoning ordinance to reduce minimum lot size requirements.
HC 7.1 Create fee simple subdivision for accessory dwelling units to promote affordable ownership options.
HC 7.2 Increase use of community land trusts to expand options for homeownership.

Housing and Community Development, Draft II

Policy Actions

HC 4.1 Amend the zoning ordinance to allow attached and detached ADUs in more areas.
HC 4.2 Amend the zoning ordinance to support missing middle housing.
HC 4.3 Amend the zoning and building codes to allow offsite construction models.
HC 4.4 Amend the zoning ordinance to update or remove the definition of family in favor of maximum occupancy regulated by the building code.
HC 4.5 Continue Housing Innovation Lab prototyping of new approaches to design, construction, and financing to reduce the cost of housing, and integrate successful prototypes into the City’s regulatory process.
HC 5.1 Amend the zoning ordinance to allow small apartment buildings and cottage courts near transit.
HC 5.2 Develop a program that provides homeowners in high-opportunity areas low-interest loans to finance construction of ADUs on their property in exchange for a commitment to affordability restrictions on the new ADU.
HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.
HC 7.1 Increase use of community land trusts to better match existing patterns, including reducing lot size and setback standards.
Impact of future land use and character areas

Several questions about specific development plans, both underway and proposed, and their alignment or misalignment with the City’s values stated in this comprehensive plan. Do the future land use and character area designations for these sites hold any weight? Can the land use designations in the CDP prevent future development that is inequitable and/or harmful to the City’s ecology?

City’s Response:
During the development of Draft I of Plan A City staff considered the usefulness of the two designations - future land use and character areas. Staff considered eliminating one of the two to simplify land use planning. However, we decided to keep both for this administrative update with the intention of discussing whether to eliminate one of the designations with the public in Phase 2 of this update. In terms of the weight future land use and character areas hold, the zoning ordinance takes precedence over the two types of designation. It is our hope that during the zoning rewrite process, currently underway, the department will clarify these questions of impact and being proactive regarding future developments that are misaligned with the City’s values and policies.

Equitable residential and economic development

During the virtual meetings several residents asked what parts of the plan address equity and what plans the department has to ensure poorer neighborhoods receive more local economic investment.

Others voiced concern about the increased construction of unaffordable residential developments throughout the city causing the displacement of many native Atlantans and communities of color. How does the plan address equity and economic growth?

City’s Response:
In terms of what sections of the plan address equity city staff guided residents to look at policy action ED 9.2 within Section 7: Local Economic Development. This section also outlines policy actions to increase funding for local small businesses, create a small business anti-displacement program and support local buyer programs in disinvested neighborhoods. Additionally, policy actions under Thriving Neighborhoods outline ways the City intends to lower barriers for small businesses and ensure communities have agency when new employers set up shop in their neighborhood.
Review of Plan A, Draft I from NPUs

On July 16, 2021 the project management team received an email and letter from NPU-A stating their comments and concerns about Draft I. The NPU-A chair also shared their comments in an email to APAB on July 17, 2021. We have attached NPU-A’s letter as well as the email to APAB as the final documentation for comments in the July 2021 version of the CDP.

NPU-A Chair’s Letter to APAB:

Sent: Saturday, July 17, 2021, 08:46:26 AM EDT
Subject: 2021 CDP

I write as Chair of NPU-A.

As you know, the Planning Department has solicited comments on the proposed 2021 Comprehensive Development Plan. NPU-A submitted comments yesterday, and attached is a copy of our comment letter.

As you will see from the comment letter, the proposed CDP is very troubling to NPU-A. Rather than addressing the issues that concern us the most from a planning perspective – transportation, watershed, and continuing destruction of the tree canopy – the proposed CDP focuses on increasing density and facilitating a tripling of Atlanta’s population. Of more concern, it directly attacks the single family residential character that is so critical to the character of many of our communities. It is a planner’s dream but a resident’s nightmare.

Moreover, it pays lip service to increasing affordable housing and improving social equity and reflects solutions that simply will not work.

We need a CDP that does not put the cart before the horse and that includes real solutions to the real problems that Atlantans face. We do not need a CDP that will pile more people into small areas without addressing the transportation and other challenges first. To borrow from The Field of Dreams, the proposed CDP operates under a philosophy of “If you build it, they will come,” without any clue as to how the heck they are going to get there on streets that sometimes are backed up for several miles, e.g., West Paces Ferry Road in our NPU. Similarly, believing that you can subdivide an already overpriced piece of property into two halves and create affordable housing is fantastical. It would be nice if they would start by proposing ways to slow down the gentrification that is taking over neighborhood after neighborhood and effectively evicting residents from affordable housing.

Everyone receiving this e-mail will have a different view on its subject matter and the contents of our comment letter. Some largely will agree; others will think that I have no clue about the items that are the most important. Whether you agree or disagree, I encourage you to express your views to the Department of Planning – you can do something as simple as e-mailing cdp@atlatnaga.gov and telling them that your NPU supports the comments of NPU-A or you can write your own letter. More critically, I encourage you to express your views to your City Council Representative (and the at large members) and to make sure that your neighborhood associations are aware of what is going on.

It is important to remember that the Planning Department has told us that the proposed CDP is an interim CDP. (We also were told that it would not contain any significant substantive changes, which proved to be incorrect.) The Planning Department intends to commence work on a more extensive rewrite to the CDP as soon as it can. As a result, this is just the first inning of a longer process, and, as our comment letter emphasizes, it is important that the ultimate CDP reflects the views of all of Atlanta’s Citizens and not just professional planners.

Thank you for all of your efforts.

Brinkley Dickerson
NPU-A Comments:

Neighborhood Planning Unit – A

c/o Brinkley Dickerson, Chair
4206 Tuxedo Forest Drive
Atlanta, Georgia 30342

July 16, 2021

Mr. Tim Keane
Department of City Planning
City of Atlanta
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

Dear Commissioner Keane:

I write on behalf of NPU-A to provide comments with respect to the proposed 2021 Comprehensive Development Plan – Plan A. While much of proposed CDP reflects a great vision for the evolution of our City, there are several aspects that give us significant concern.

Planning for Growth

We believe that the Department is acting under a significant misunderstanding. The views of the current Citizens of Atlanta should control the Department’s objectives, and there is a clear disconnect between those views and the Department’s expectations with respect to population growth. Based upon our outreach to Citizens across all parts of the City, a group that is both racially and economically diverse, your fellow Citizens unambiguously do not want the City to be three times as populated as it currently is. This growth is a dream of urban planners and tax collectors; it is not reflective of what Citizens want. While there appears to be willingness to accommodate some growth, even significant growth, and there is ample developable vacant land within the City to support that, the CDP should be designed to produce the City that its Citizens want, not something that would be destructive of their wishes. Atlanta at 500,000 residents is a great city; a three-fold increase would destroy its greatness, and there is nothing that even the very best planning can do to prevent that. Your fellow Citizens are perfectly comfortable with a substantial portion of the future growth occurring in the suburbs, and, consistent with that, we believe that more planning attention should be focused on the daily ingress and egress of commuters from nearby communities. The proposed CDP includes no focus on that.

Infrastructure Must Precede Development

Much of the bad development in the City has been the result of a CDP and Zoning Ordinance that permitted development before necessary infrastructure was in place. While the proposed CDP acknowledges that transportation and watershed improvements are essential, talk is cheap, and the proposed CDP does nothing to regulate development until those improvements are in place.
Mr. Tim Keane  
July 16, 2021  
Page 2

More specifically, the proposed CDP appears to envision that transportation improvements magically will occur even though today, despite a series of transportation plans over the last 15 years, the needed improvements largely remain unplanned and unfunded. It is fantastical to think that the needed transportation improvements will occur without their being a top priority! In the last 50 years the only significant, move-the-needle improvements within Atlanta to its transportation infrastructure were (i) the construction of GA 400 and the related flyover to I-85 and Buford Highway Connector, (ii) the widening of the Downtown Connector, and (iii) the construction of Freedom Parkway, with only (iii) having a meaningful urban impact. The only other noteworthy effort at improvement, the light rail to the MLK historic district, has been an utter and complete failure, and lengthening the light rail system is not going to generate an improved outcome.

MARTA, which clearly is critical to the improvement of Atlanta’s transportation infrastructure, is best known for moving people from where they are not to where they do not want to be. Expecting MARTA to upgrade its footprint as quickly as financially motivated developers will take advantage of permissive rules relating to new development is unrealistic and contrary to history. Moreover, much of the recent density increase – e.g., all of the West Side development¹ - and many of the anticipated ones, exceed realistic walking distance (and sometimes bus distance) from the closest MARTA rail station, exacerbating transportation problems. The growth in central Buckhead also is an example of this² and has been a transportation disaster, with the east-west traffic to and from that area clogging all four of the major east-west streets, all of which are two-lane and unexpandable, thereby imposing substantial burdens on Citizens. As a result, we believe that any changes to the CDP or Zoning Ordinance that would facilitate increases in density should be permitted only after any needed transportation improvements have at least reached the planning stage and have credible financing sources.

On this topic, it is important to note the views of the Atlanta Police Department. When recently we asked what factors they thought lead to the recent burst in crime in North Atlanta, two senior officials independently identified traffic as one of those causes. Zone 2 has the highest average response time in the City, and both of the officers attributed that to how difficult it is for officers to get to calls because of traffic. This increasingly is an issue throughout Atlanta. Criminals know that if the police cannot get to a home or other location quickly, there is little likelihood that the criminals will be caught. For this reason alone, it would be unsafe for the City to foster further development until the critical transportation issues are addressed.

Similarly, we believe that upgrades to our watershed capacity should precede any increases in density. The number of houses that the City has had to purchase because neighborhoods were converted into floodplains as a result of poorly regulated upstream development has been ridiculous, particularly since a number of these purchases directly reduced the affordable housing stock. We also now have innumerable streets that rapidly turn into waterways with even modest

¹ It is a 1+ hour, 3.7-mile walk from the Chattahoochee Food Works to the Arts Center Marta Station, which is typical of the near-West Side development.
² It is a 20-minute, 1-mile walk to the Peachtree Station, and a 37-minute, 1.9-mile walk to the Lindbergh Station, from central Buckhead.
Mr. Tim Keane
July 16, 2021
Page 3

rains, again because of poorly regulated upstream development. The City will destroy significant portions of several neighborhoods if it does not address watershed issues in advance of expanding development opportunities.

**Tree Canopy**

After decades of mismanagement of our tree canopy, it also is vital that the proposed CDP be revised to prevent future destruction of that canopy. Promoting the subdivision of single-family neighborhoods and the addition of ADUs as the means to increase density almost ensures further destruction of the canopy, and it is not something that the current, or the proposed, tree ordinance will prevent³.

Today, single-family neighborhoods host 77% of the City’s trees. What have you determined will be the impact from decreasing that percentage? For instance, what would the impact be of a ten percentage point decrease in tree population, which probably is a low-end estimate for the destruction that increased density would cause? Our tree canopy is critical to slowing the flow of rain into our watershed, keeping Atlanta from increasingly being a heatsink, and for our contributing to the prevention of climate change. And, the quality of life generally within the City will erode if the tree canopy is reduced. It is disappointing that the proposed CDP does not include a substantial focus on increasing the overall canopy but instead invites its destruction.

On precisely this topic, on June 30, 2021, The New York Times reported:

Communities with too few trees are feeling the consequences this week, as a heat wave has swept through much of the Pacific Northwest. The average temperature can vary up to 10 degrees between places with trees and those without. And where there is more heat, there is more death: Heat kills more people in the United States than any other kind of extreme weather. We can expect up to a tenfold increase in heat-related deaths in the eastern United States by the latter half of the 2050s and at least a 70 percent increase in the largest cities nationwide by 2050.

Trees today prevent approximately 1,200 more heat-related deaths annually in American cities.

Being in the vicinity of this living infrastructure provides many other benefits: Healthy trees trap air pollutants, which helps avoid 670,000 incidences of acute respiratory symptoms each year. Being in the presence of trees has also been found to improve youth educational performance, mental health, physical health and social connections. A well-maintained tree canopy may even reduce several types of crime and create economic opportunities, including careers that cannot be outsourced to plant and maintain those trees.

³ The elimination of trees for foundations and driveways is not prohibited by the tree ordinance. Also, when the space between two structures decreases below 20', whether because of a setback reduction or the use of a wall to level the ground, it is impossible to grow canopy trees in that area ever again. Yes, some trees can be replaced, but the practice in Atlanta has been to allow the continued destruction of the tree canopy without any net additions, ever.
We appreciate that addressing the importance of our Tree Canopy is not a traditional role of the Department. However, given the rapid destruction of that canopy and its unarguable importance, never-the-less climate change, it needs to be! Protecting the long-term habitability of our City is far more important than facilitating growth.

It is important to remember, as has been proven over and over in Atlanta, that developers as a whole do not care about transportation, watershed, safety, and tree canopy issues! If given the opportunity to build more units, they will, regardless of the larger consequences.

Some of the Proposed Solutions are Not Solutions

Commentary in the proposed CDP appears to suggest that by increasing density near the City’s best schools, educational opportunities for the economically challenged will be improved. Nothing could be further from the truth. First, increasing density in the two areas within the City best known for good schools – NPU-A, -B and -C (the North Atlanta Cluster) and NPU-F (the Grady Cluster) – will not create a single additional unit of affordable housing. The land values in both of these areas simply are too high for affordable housing to be built, even if subsidized. Instead, increasing density in those areas will create additional expensive housing for an affluent and largely non-diverse population.

For example, the typical one-bedroom ADU in Buckhead – grandfathered from before Buckhead was annexed in 1952 – rents for around $1,500 per month and is either an efficiency or a small one bedroom housing unit, hardly a likely destination for a family with school-aged children. The solution to the gap in educational opportunities lies in intensive reform of the Atlanta Public Schools, not in looking to a handful of schools (out of 91 learning sites), all of which already are operating at or above capacity, to somehow solve the problem. Please do not add children to either of these clusters unless you first significantly increase APS’ construction and operating budgets.

To some extent, the Proposed CDP is Disingenuous

We are disturbed by the disingenuity of the overall approach to the proposed CDP. Cloaked in false claims of social equality, the direction that the proposed CDP is heading will not remedy the inequities in Atlanta that need to be addressed. Rather than trying to punish residents in our single family residential communities, which is one practical effect of the concepts included in the proposed CDP from the Atlanta City Design Housing, the Department needs to focus its attention on the social and development trends that are destroying affordable housing in our City and on developing vacant land, of which there is an ample supply. Where was the Department when Cabbagetown converted from affordable housing to yuppified cottages? What about Summerhill? What about Kirkwood? What about Castleberry Hill? What about Vine City? What about Washington Park? The list goes on, and it is growing as I write. In each case, the Department stood by as gentrification took over a community and displaced its legacy residents and affordable housing was converted into expensive communities. Now, the Department
purports to want to address the problems that it permitted – maybe even encouraged⁴ – by
dismantling successful residential designs in other parts of the City. We recognize that Atlanta,
like most large cities, has an affordable housing crisis and that the crisis is at least in part a
product of racist land-use and other policies over an extended period of time, and we strongly
support proposals that truly address both that crisis and issues of social inequality. However, the
process used needs to be constructive, not destructive, and should not include the implementation
of greater density, when not needed or wanted, that will not meaningfully address any of the
underlying social issues or opportunities.

Specific Comments

We have several specific drafting comments:

- HC 4.1 should be amended to read as follows: “Amend the zoning ordinance to allow
attached and detached ADUs in Zoning Classifications other than R-1 through R-
3Bcitywide.”

  We have discussed this extensively with the Department. Permitting ADUs in these
zoning classifications would be destructive of the character of these communities and the
quality of the overall housing mix in Atlanta.

- HC 4.2 should be deleted.

  As currently drafted, it provides, “Implement the missing middle housing ordinance.”
It is unclear what the middle housing ordinance is or how it fits into the remainder of the
CDP. Moreover, “implement” suggests not just “allowing” changes in zoning to permit
middle housing, it suggests that these changes should be made. In any event this
reference is too non-specific to be included in a policy document without significantly
more clarification.

- HC 4.3 should be amended to read as follows: “Amend the zoning and building codes to
allow offsite construction models in Zoning Classifications other than R-1 through R-
3B.”

  While construction models certainly can be built in R-1 through R-3B, they need to meet
the zoning requirements for the parcel on which they are built. An exception would invite
not-conforming construction.

- HC 4.4 should be deleted.

  As currently drafted, it provides, “Amend the zoning ordinance to remove the definition
of family in favor of maximum occupancy regulated by the building code.” This is social

⁴ Prior administrations have recognized that gentrification reduces the demand for City services and at the same time
increases the tax base.
engineering at its worst and destructive of the concept of “single family residences” that is core to the quality of so much of our housing stock. The Citizens of Atlanta do not want to depart from the traditional approach.

- HC 6.1 should be deleted or narrowed to neighborhoods where street parking does not impede traffic.

As currently drafted, it provides, “Amend the zoning ordinance to reduce residential parking requirements.” Lot sizes in traditional Zoning Classifications of R-1 through R-3B are ample to provide the required parking, but often the streets are not. For instance, there are no east-west throughfares in North Atlanta that could accommodate street parking without worsening already horrible traffic. Increases in street parking in other locations would create safety issues that the proposed CDP does not address. You need go no further on a Saturday than the Krog Street Market, many of the access points to the Beltline, or Midtown, all of which are residential communities, to appreciate the insufficiency of street parking and the inappropriateness of relying more heavily upon it except when carefully considered on a street-by-street basis.

- HC 6.2 should be deleted.

As currently drafted, it provides, “Amend the zoning ordinance to reduce minimum lot size requirements.” There is no more destructive change in the CDP than this one. The reduction of minimum lot sizes would be a disaster. It would increase transportation problems, lead to a substantial increase in impervious surface, over-tax the already inadequate sewer and storm water systems, and utterly destroy tree canopy. It would destroy the “character” of many communities, a concept that the proposed CDP references in more than 150 places.

- HC 7.1 should be substantially limited, if not deleted.

As currently drafted, it provides, “Create fee simple subdivision for accessory dwelling units to promote affordable ownership options.” While we do recognize that smaller lot sizes will cost somewhat less, this approach carries with it all of the same ill-effects that HC 6.2 does. It will be destructive in virtually all areas where it is implemented and will not address the social equality issues that are intended to be addressed.

- The Land Use and Zoning Compatibility table on page 81 should be amended to eliminate the suggestion that R-1 through R-3A zoning is compatible with Medium-Density Residential, Very High-Density Residential, Low-Density Commercial, and High-Density Commercial.

As drafted, the table simply is not correct, and it appears to be a carryover from prior CDPs that may not have received the same attention as the proposed one.
Conclusions

We want to finish where we started: The proposed CDP reflects a great vision for the City. However, it overlooks an important aspect of what has made Atlanta great, the diversity and character of its communities. Just as we need concentrations of people near transportation corridors, we need to protect the strong single-family residential structure that for decades has made Atlanta appealing to its Citizens and to new arrivals. New arrivals, and the new businesses that attracted them, did not move to Atlanta for congestion and crime; they moved here for the character of our communities, Atlanta’s defining natural feature – our tree canopy – and the other aspects of Atlanta life that have proven to be good and passed the test of time. To put the character of our communities at risk for misguided aspirations for size and density would be destructive and inappropriate and would not accomplish the purported goals. Yes, Atlanta needs to improve its schools and social equity, but it can and should do that by building upon its strengths, not destroying them. Most critically, Atlanta must quit putting the cart before the horse. We need to address the inadequacies in our infrastructure before we make things worse by adding density.

On behalf of the 12,000+ Citizens in Atlanta living in NPU-A, and many of the other 485,000+ Citizens of Atlanta, I am,

Sincerely yours,

Brinkley Dickerson

cc: Councilmember J. P. Matzigkeit
    Councilmember Michael Julian Bond
    Councilmember Matt Westmorland
    Councilmember Andre Dickens
    NPU Chairs
Feedback from Stakeholder Meetings | Fall - Winter 2020-2021

During the fall and winter stakeholder meetings, we received a lot of questions and suggestions for content to be included in Plan A. Much of the feedback could be grouped into the following themes, and the department incorporated much of this feedback into the first draft of Plan A. Further, all this feedback will inform phase 2 to updating the comprehensive development plan next year.

- **Housing and Density:** Affordability was brought up throughout the stakeholder meetings as well as questions surrounding recommendations from Atlanta City Design: Housing that relate to the current nature of single-family residential zoning in the city. There were several discussions about where affordable housing should be built and whether to allow more density in Atlanta's single-family neighborhoods. We acknowledge more space and time is needed for these discussions that affect residents' lives. We will coordinate with our offices and other City departments to make sure the discussions occur in Phase 2 of Plan A, the Zoning Rewrite and any other legislation and citywide planning efforts related to development and infrastructure. The current draft of Plan A's housing section reflects the recommendations from Atlanta City Design: Housing and the efforts of the Office of Housing and Community Development to analyze the City's current housing conditions and needs. Furthermore, these are recommendations and adopting the comprehensive development plan does not change the zoning ordinance. The comprehensive development plan only sets the agenda to discuss future changes to the zoning ordinance—any changes will reflect extensive public engagement over the next year(s) as part of ongoing zoning code.

- **Homelessness:** Stakeholders asked where in the plan is the unsheltered population accounted for? The homelessness population has only increased with gentrification and the economic impact of COVID-19, what is the City doing to address this? Currently the administrative update of Plan A only provides broad recommendations when it comes to services and housing for the unsheltered (see HC 12.4, HC 12.5, HC 12.6, ED 1.2, and Serving the Unhoused in Section 10). We need to be more detailed in our strategies for phase 2 of Plan A, this includes working with SAC and TAC members directly involved with housing programs.

- **Climate Change:** Several stakeholders mentioned the Atlanta region could be one of the largest destinations for climate migrants particularly due to climate disruption in coastal cities. They asked whether the City of Atlanta is accounting for this in their population growth projections and how the City intends to sustainably accommodate this growth. The Department of City Planning is aware of this issue however, our current analysis has not parsed out what percentage of the population projections would be climate migrants. In terms of how Plan A addresses the climate crisis and increased population, the plan's Section 7: Natural Systems & Resiliency Planning builds on the recommendations from Atlanta City Design Nature. Such recommendations include aligning capital investments to address the interrelationships between water and wastewater sub-systems to ensure new green infrastructure is in place for future developments and retrofits (NR 5.1 and 5.2). The plan also includes policy actions to evaluate vacant land stormwater runoff and pairing green infrastructure systems with any complete street projects (NR 5.3 and 5.4).
- **Tree Canopy:** Stakeholders had questions regarding housing affordability and the tree canopy, is the City taking the approach of there can be both increased housing development and maintain the tree canopy? The department worked closely with the Office of Resiliency as well as internal staff that manage the Tree Protection Ordinance and develop housing policy for the City to incorporate goals and policies that increase affordability while maintaining the tree canopy. Adopting a new tree protection ordinance (NR 3.1), setting aside funds to protect and restore trees (NR 3.2 and 4.1), and coordination between the offices of housing, zoning and city arborists are key to realizing affordability and an adequate tree canopy.

- **NPU Engagement:** Many attendees of the stakeholder meetings were NPU chairs or residents involved in their NPU. They voiced concern about how often the NPUs were engaged or updated about the CDP process. This point is well taken, when a reset strategy was established to do an administrative update rather than a full comprehensive plan we began to communicate with the NPUs more frequently. But this open communication channel should have been well-established at the beginning of the process, we hope this will be evident in Phase 2. Several residents also stated they had trouble reading the future land use and character area maps, we have combined NPU policies and detailed maps (future land use and character areas broken down by NPU) in Appendix III for improved accessibility to the public.

- **Engagement Methods/Educating the Public:** During these meetings it was mentioned that many residents lack access to reliable broadband and can’t be reached through virtual methods. The first part of this concern is noted in the newly required section, Broadband Internet Planning, which calls for expanded affordable and reliable broadband internet access in currently underserved areas through partnerships with Atlanta Public Schools, Atlanta Housing, libraries and Invest Atlanta (BI 1.2). The restrictions on gatherings during the pandemic have made it difficult to engage with residents in a non-virtual setting, this is one of the major priorities in Phase 2 of Plan A. In terms of reviewing the draft of Plan A we placed copies of the draft at public libraries and community centers to increase accessibility within various neighborhoods of Atlanta. Something we will also work on in Phase 2 that was brought up by stakeholders were improved efforts to educate the public on the CDP to gain a baseline understanding of how this document impacts their neighborhood and livelihood and what it does and does not include. Additionally, there were many calls for meeting with community business owners, CIDs, and grassroot organizations (particularly in Southwest Atlanta) to gain their input for the CDP. These organizations and businesses can help further share ideas and information throughout the process. Many suggestions focused on engaging residents more frequently and even informally at bus stations or train stations.
PUBLIC OUTREACH

The following pages provide a snapshot of our online and analog outreach efforts during this administrative update.

**Plan A Online**

The Plan A website at atlcitydesign.com will remain the digital hub containing all relevant data, documents, updated FAQ’s, and engagement tools for public access. Participants of the planning process can use the website to find answers about the plan, contact the Department of City Planning, and follow the plan's progress. Anyone can sign up to receive updates, including notifications about events and document releases.

**NPU Public Notices**

The department included Public Notices on May/June and September and October 2021 NPU monthly agendas to inform residents of where they could review a draft of the CDP as well as key dates for public hearings and adoption of the 2021 CDP.
The department utilized various social media platforms to spread the word about engagement sessions and where to view the draft of the plan.
Plan A in the News

Plan A was featured in several news articles. The first one was related to the public comment and opposition received in regards to the housing policy recommendations from the June 2021 draft. As Commissioner Keane mentions in the article, we have revised or removed several of the policies that residents were concerned about in the July 2021 draft.

The second article was related to recent legislation introduced by Council member Farokhi in coordination with the policy recommendations of Atlanta City Design Housing. The ordinances would increase density around transit stations, expand the allowance of ADUs in certain zoning districts, and reduce parking requirements. All three items are featured in Plan A as necessary steps to accommodate population growth in the city of Atlanta.

Links to these proposed ordinances are found below:

- 21-O-0454
- 21-O-0455
- 21-O-0456
How to View *Plan A*

The Atlanta City Design website hosts the draft document, updates, recordings of past meetings and a platform for leaving comments. We acknowledge that not everyone has consistent access to a computer or the internet, so we made Draft I and Draft II available as a physical book at various libraries and community centers throughout the city. The bound document also includes pages to leave your comments. We will incorporate these notes into our final plan in October 2021.
Atlanta Libraries and Rec Centers with CDP Draft Hard Copies:

1. Ponce de Leon Branch Library
2. Kirkwood Branch Library
3. East Atlanta Branch Library
4. Metropolitan Library
5. Adams Park Branch Library
6. West End Branch Library
7. Adamsville-Collier Heights Branch Library
8. Northwest Branch Library
9. Dogwood Branch Library
10. Buckhead Branch Library
11. Cleveland Avenue Branch Library
12. C.T. Martin Recreation Center
13. Bessie Branham Recreation Center
14. Anderson Recreation Center
15. Rosel Fann Recreation Center
B. Land Use and Zoning Compatibility Table and I-Mix Ordinances
AN ORDINANCE CDP-19-003
BY: COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE

AN ORDINANCE TO AMEND THE LAND USE ELEMENT OF THE 2016 ATLANTA COMPREHENSIVE DEVELOPMENT PLAN (CDP) SO AS TO ADD THE MULTI-FAMILY RESIDENTIAL - MULTI-UNIT (MR-MU) ZONING DISTRICT, TO REMOVE THE MRC-2 ZONING DISTRICT COMPATIBILITY WITH THE LOW DENSITY COMMERCIAL LAND USE AND TO ADD THE INDUSTRIAL MIXED USE (I-MIX) LAND USE DESIGNATION TO THE LAND USE COMPATIBILITY TABLE AND TO DESIGNATE THE COMPATIBLE LAND USES AND ZONING DISTRICTS, AND FOR OTHER PURPOSES.

ADOPTED BY APR 15 2019

COUNCIL

Date Referred: 3-18-19
Referred To: C0/4S
AN ORDINANCE
BY: COMMUNITY DEVELOPMENT / HUMAN SERVICES COMMITTEE

AN ORDINANCE TO AMEND THE LAND USE ELEMENT OF THE 2016 ATLANTA COMPREHENSIVE DEVELOPMENT PLAN (CDP) SO AS TO ADD THE MULTI-FAMILY RESIDENTIAL - MULTI-UNIT (MR-MU) ZONING DISTRICT; TO REMOVE THE MRC-2 ZONING DISTRICT COMPATIBILITY WITH THE LOW DENSITY COMMERCIAL LAND USE AND TO ADD THE INDUSTRIAL MIXED USE (I-MIX) LAND USE DESIGNATION TO THE LAND USE COMPATIBILITY TABLE AND TO DESIGNATE THE COMPATIBLE LAND USES AND ZONING DISTRICTS; AND FOR OTHER PURPOSES.

THE CITY COUNCIL OF THE CITY OF ATLANTA, GEORGIA HEREBY ORDAINS:

SECTION 1. An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to add the Multi-Family Residential - Multi-Unit (MR-MU) zoning district, to remove the MRC-2 Zoning District compatibility with the Low Density Commercial land use and to add the Industrial Mixed Use (I-Mix) land use designation to the Land Use and Zoning Compatibility table and to designate the compatible land uses and zoning districts; more specifically shown on the attached table, Exhibit 'A', which is hereby made a part of this ordinance and for other purposes.

SECTION 2. That all ordinances or parts of ordinances which are in conflict with this ordinance are hereby repealed.
## Exhibit A

### Table 9-3: Land Use and Zoning Compatibility Table

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Note: Shaded areas represent land use designations and the compatible zoning classifications. Non-shaded areas represent zoning classifications that are not compatible with land use designations.
RESULT: ADOPTED BY CONSENT VOTE [UNANIMOUS]

AYES: Bond, Smith, Westmoreland, Sheperd, Archibong, Hillis, Boone, Overstreet, Dickens, Farokhi, Ide, Matzigkeit

ABSENT: Winslow, Shook

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19-O-1098
Adopted by the Atlanta City Council
April 15, 2019

APPROVED
APR 24 2019
WITHOUT SIGNATURE
BY OPERATION OF LAW

MAYOR'S ACTION
Ordinance establishing I-Mix
AN ORDINANCE
BY: COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE

AN ORDINANCE TO AMEND THE LAND USE ELEMENT OF THE 2016 ATLANTA COMPREHENSIVE DEVELOPMENT PLAN (CDP) SO AS TO ADD THE INDUSTRIAL MIXED USE (I-MIX) ZONING DISTRICT TO THE LAND USE COMPATIBILITY TABLE AND TO DESIGNATE THE COMPATIBLE LAND USES TO THIS ZONING; AND FOR PURPOSES (Z-16-11).

NPU (ALL) COUNCIL DISTRICT (ALL)

THE CITY COUNCIL OF THE CITY OF ATLANTA, GEORGIA HEREBY ORDAINS:

SECTION 1. An ordinance to amend the Land Use element of the 2016 Atlanta Comprehensive Development Plan (CDP) so as to add the Industrial Mixed Use (I-Mix) zoning to the Land Use and Zoning Compatibility table and to designate the compatible land uses to the Industrial Mixed Use zoning; more specifically shown on the attached table, Exhibit ‘A’, which is hereby made a part of this ordinance and for purposes

SECTION 2. That all ordinances or parts of ordinances which are in conflict with this ordinance are hereby repealed.
Atlanta City Council

CONSENT I

CONSENT SECTION I: ADOPT ALL ITEMS EXCEPT
17-R-4247
ADOPT

YEAS: 14
NAYS: 0
ABSTENTIONS: 0
NOT VOTING: 2
EXCUSED: 0
ABSENT 0

Y Smith    Y Archibong    Y Moore    Y Bond
Y Hall     Y Wan          Y Martin   Y Norwood
Y Young    Y Shook        Y Bottoms NV Dickens
Y Winslow  Y Adrean       Y Sheperd NV Mitchell

CONSENT I
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17-O-1305
Adopted by the Atlanta City Council
September 5, 2017

APPROVED
SEP 14 2017
WITHOUT SIGNATURE
BY OPERATION OF LAW

MAYOR’S ACTION
C. Consideration of the Regional Water Plan and Environmental Planning Criteria
03/08/2021

Mikita Browning, Commissioner
Department of Watershed Management
72 Marietta Street NW
Atlanta, Georgia 30303

RE: Metropolitan North Georgia Water Planning District (MNGWPD) 2020 Audit

Dear Ms. Browning:

A representative of the Environmental Protection Division (EPD) recently conducted an audit of the City of Atlanta (City) to determine compliance with the MNGWPD’s Water Resource Management Plan (Plan).

During the audit, objective evidence was provided to EPD staff that the City is complying with most provisions of the Plan and making a good faith effort to comply with the rest. EPD requests that an update be provided by July 1, 2021, for items Wastewater (WW)-1.2 and WW-1.4, which are planned to be completed by 2022.

Based on EPD staff recommendations, and as allowed in O.C.G.A. 12-5-582(e)(3), O.C.G.A. 12-5-583(e)(3), and O.G.C.A. 12-5-584(d)(3), I hereby certify that the City of Atlanta is making a good faith effort to comply with the MNGWPD Plan.

We look forward to working with the City in all your future water-related endeavors.

Sincerely,

Richard E. Dunn
Director

cc: Mikita Browning, Commissioner (mbrowning@atlantaga.gov)
Todd Hill, Deputy Commissioner (thill@atlantaga.gov)
Paul Moisan, Watershed Manager (pmoisan@atlantaga.gov)
MNGWPD Technical Assistance Program (technicalassistance@northeastwater.com)

RED/akh
D. Other Documentation

- City of Atlanta Transmittal Letter
- ARC and DCA Communications
- Staff Report
- Plan A Adopted Ordinance
July 10, 2021

Greg Giuffrida
Plan Reviews Program Manager, Community Development
Atlanta Regional Commission
International Tower
229 Peachtree Street NE, Suite 100
Atlanta, Georgia 30303
Emailed: GGiuffrida@atlantaregional.org

RE: City of Atlanta 2021 Comprehensive Plan Update Submittal

Mr. Giuffrida:

The City of Atlanta has completed a draft update of its comprehensive plan and is submitting it with this letter for review by the Atlanta Regional Commission and the Department of Community Affairs.

I certify that we have held the required public hearings and have involved the public in development of the plan in a manner appropriate to our community’s dynamics and resources. Evidence of this has been included with our submittal.

I certify that appropriate staff and decision-makers have reviewed both the Metropolitan North Georgia Water Planning District (MNGWPD) Regional Water Plan covering our area and the Rules for Environmental Planning Criteria (O.C.G.A. 12-2-8) and taken them into consideration in formulating our plan.

If you have any questions concerning our submittal, please contact Janide Sidifall, Deputy Commissioner Atlanta Department of City Planning, at jsidifall@atlantaga.gov or 404.640.0552.

Sincerely,

Keisha Lance Bottoms

Enclosures

City of Atlanta 2021 Comprehensive Development Plan (Draft)
Communication between City and ARC/DCA to begin Review Period
Dear Mr. Smith and Mr. Lombard,

Atlanta's Department of City Planning is pleased to submit the City of Atlanta's 2021 Comprehensive Development Plan, our Plan A, for ARC and DCA review and approval. This is Atlanta's 5-year plan update.

Plan A is a large document (596 pages), and it is too large to email as an attachment...However, we uploaded the draft to our website at atlcitydesign.com.

Plan A Main Document
Appendix I: Implementing Elements
Appendix II: Additional Documentation
Appendix III: NPU Policies and Maps
Appendix IV: Glossary and Acronyms

Since early June, a draft of Plan A has been reviewed and commented by the public and our stakeholder groups. On 6/28 we held our State-required public hearing before submittal and received over 1,000 voicemail comments-these comments and others received up to 7/16 are reflected in the submitted draft.

In addition to posting this draft on our website at atlcitydesign.com, we placed hardcopies, including all appendices, at 15 libraries and community centers around the city.

Upcoming Public Review and Comment Periods

July 27 to August 27 - Public Review and Comment Period for Draft #2 of Plan A
September 13 to September 27 – Public Review and Comment Period for Draft #3 of Plan A

We will incorporate public comments and any comments from ARC and DCA in the next draft anticipated to be published online and placed in libraries and community centers on Monday, 9/13. We are asking for public comments to be submitted by 8/27 so we have time as a project team to review and consider.

It is our understanding the ARC and DCA may take up to 45 days to review our submission, but ARC/DCA may provide the Department feedback during the review period. It is our goal to incorporate final feedback from ARC and DCA in the 9/13 draft.

A third public comment period from 9/13 to 9/27 will end with Atlanta City Council Community Development and Human Services (CD/HS) committee’s final public hearing for Plan A on the evening of 9/27.

We are constantly reviewing, addressing, and responding to public comments and will continue to do so. We will make final revisions to Plan A immediately after the 9/27 public hearing. This final draft of Plan A will incorporate feedback and document public outreach between now and 9/27. As required by Atlanta's City Charter, the draft of Plan A will be ready for adoption at the full City Council meeting on 10/4 (or, 10/18).

Below are more details about the timeline of Atlanta’s legislation process for adopting Plan A.

The submitted draft of Plan A for DCA and ARC review and approval includes the comprehensive development plan report and four (4) supporting appendices.
Appendix I includes the newly required Report of Accomplishments of the 2016-2021 Community Work Program (CWP), the 2022-2026 CWP, and the draft 2022-2026 Capital Improvements Element (the CIE is currently being reviewed by ARC/DCA under a different process).

Appendix II documents public engagement and outreach, environmental/water considerations, and other background materials.

Appendix III includes revised Neighborhood Planning Unit (NPU) comprehensive development plan policies and maps.

Appendix IV has a useful glossary and acronym list.

New to the 5-year plan update, is the required Broadband Internet Planning Element.

Comprehensive development planning during the pandemic has challenged all of us, but the current version of Plan A reflects the work, experience, and thoughts of our staff, leadership, stakeholder groups, and the public since our virtual process started in August 2020. This is just Phase I to Plan A. We will start Phase II in 2022 to further update Atlanta’s comprehensive development plan.

Please confirm receipt of this submission via email and provide any further instructions to start the review process.

If you have any questions, please feel free to contact Janide Sidifall at jsidifall@atlantaga.gov and (cell) 404-640-0552, or Nate Hoelzel at nhoelzel@atlantaga.gov and (cell) 404-594-1531. We also monitor cdp2021@AtlantaGa.Gov for comments.

We sincerely appreciate all the guidance you have provided to date, and we thank you for your consideration on Atlanta’s Plan A.

Thank you.

****

Upcoming City Council Meetings for Plan A Adoption (by October 31, 2021)

August 24 – Adoption Legislation Introduced at Community Development/Human Services (CD/HS) Committee Meeting

September 7 – City Council Full Meeting Legislation Reading #1

September 14 – CD/HS Committee Meeting #2

September 20 – City Council Full Meeting Legislation Reading #2

September 27 at 6pm – Final Virtual CD/HS Public Hearing for Plan A (other State-required public hearings previously held on 9/28/2020, 3/22/2021, and 6/28/2021)

September 28 – CD/HS Committee Meeting #3

October 4 or October 18 – Final City Council Full Meeting Plan A Adoption at Reading #3

******

Nate Hoelzel, AICP
Urban Planner III
Office of Design, Planning Studio

City of Atlanta Department of City Planning
Fw: ATL CDP - Confirm Receipt of Submission

Hoelzel, Nathanael <nhoelzel@AtlantaGa.Gov>
Wed 7/28/2021 8:44 AM
To: Comprehensive Development Plan 2021 <CDP2021@AtlantaGa.Gov>

Nate Hoelzel, AICP
Urban Planner III
Office of Design, Planning Studio

City of Atlanta Department of City Planning
55 Trinity Ave SW, Suite 1450, Atlanta, GA 30303
Office (404) 330-6724  Cell (404) 594-1531
nhoelzel@atlantaga.gov
www.atlantaga.gov/government/departments/city-planning

Please go to the Department of City Planning’s official website for the most current information on our operational responses to COVID-19.

From: Andrew Smith <ASmith@atlantaregional.org>
Sent: Wednesday, July 28, 2021 8:42 AM
To: Hoelzel, Nathanael <nhoelzel@AtlantaGa.Gov>; Jared Lombard <jlombard@atlantaregional.org>
Cc: Sidifall, Janide <jsidifall@AtlantaGa.Gov>
Subject: [EXTERNAL] RE: ATL CDP - Confirm Receipt of Submission

Thanks, Nate. The links worked fine, and I saw that the Mayor’s cover letter was included in the linked document, so that’s good. I’ll get the review opened ASAP.

--Andrew

From: Hoelzel, Nathanael <nhoelzel@AtlantaGa.Gov>
Sent: Tuesday, July 27, 2021 4:57 PM
To: Andrew Smith <ASmith@atlantaregional.org>; Jared Lombard <JLombard@atlantaregional.org>
Cc: Sidifall, Janide <jsidifall@AtlantaGa.Gov>
Subject: ATL CDP - Confirm Receipt of Submission

Andrew,
Per our discussion earlier today, I re-sent the City of Atlanta's 2021 CDP submission (direct links to our public website to download). Hopefully, it was not blocked. Can you please confirm receipt? Thanks!
[EXTERNAL] ARC Plan Review Notice: 2021 City of Atlanta Comprehensive Plan Update and CIE Annual Update

Andrew Smith <ASmith@atlantaregional.org>

Wed 7/28/2021 8:35 PM

To: Holmes, Keyetta <kmholmes@AtlantaGa.Gov>; Olteanu, Christian <colteanu@AtlantaGa.Gov>; Sidifall, Janide <jsidifall@AtlantaGa.Gov>; Bacon, Kevin <kbacon@AtlantaGa.Gov>; Hoelzel, Nathanael <nhoelzel@AtlantaGa.Gov>; Forte, Monique B. <MBForte@AtlantaGa.Gov>; Tallon, Kimberly J. <KJTallon@AtlantaGa.Gov>; Cope, Tiffani <tcope@AtlantaGa.Gov>; Coffelt, Matthew <Matthew.Coffelt@atl.com>; Madolyn Spann - Clayton County (MAdolyn.Spann@claytoncountyga.gov); Madolyn Spann@claytoncountyga.gov; patrick.ejike@claytoncountyga.gov; Lee Kelley - Clayton County (Lee.Kelley@claytoncountyga.gov); Lee.Kelley@claytoncountyga.gov; Webb, David (Com Dev) <David.LWebb@cobbcounty.org>; Jason.gaines@cobbcounty.org; Jason.gaines@cobbcounty.org; johnpederson@cobbcounty.org; johnpederson@cobbcounty.org; Laura Beall - Cobb County DOT (Laura.Beall@cobbcounty.org); Laura.Beall@cobbcounty.org; Diaz, Amy <amy.diaz@cobbcounty.org>; Rettig, Abby <Abby.Rettig@cobbcounty.org>; Andrew Baker (aabaker@co.dekalb.ga.us) <aabaker@co.dekalb.ga.us>; Community Development <CommunityDevelopment@atlantaregional.org>; Jim Santo <JSanto@atlantaregional.org>; Jim Skinner <JSkinner@atlantaregional.org>; Katie Perumbeti <KPerumbeti@atlantaregional.org>; Aries Little <ALittle@atlantaregional.org>; David Haynes <DHaynes@atlantaregional.org>; Marquis Mangham <MMangham@atlantaregional.org>; Jean Hee P. Barrett <JBarrett@atlantaregional.org>; Patrick Bradshaw <PBradshaw@atlantaregional.org>; Reginald James <RJames@atlantaregional.org>; Mike Alexander <MAlexander@atlantaregional.org>; Mike Carnathan <MCarnathan@atlantaregional.org>; Wei Wang <WWang@atlantaregional.org>

Cc: Community Development <CommunityDevelopment@atlantaregional.org>; Jim Santo <JSanto@atlantaregional.org>; Jim Skinner <JSkinner@atlantaregional.org>; Katie Perumbeti <KPerumbeti@atlantaregional.org>; Aries Little <ALittle@atlantaregional.org>; David Haynes <DHaynes@atlantaregional.org>; Marquis Mangham <MMangham@atlantaregional.org>; Jean Hee P. Barrett <JBarrett@atlantaregional.org>; Patrick Bradshaw <PBradshaw@atlantaregional.org>; Reginald James <RJames@atlantaregional.org>; Mike Alexander <MAlexander@atlantaregional.org>; Mike Carnathan <MCarnathan@atlantaregional.org>; Wei Wang <WWang@atlantaregional.org>

Local Comprehensive Plan – Request for Comments

This email serves as notice that the Atlanta Regional Commission (ARC) has begun the regional review of the draft 2021 City of Atlanta Comprehensive Plan Update and CIE Annual Update. You may download the files here:

- 2021 Comprehensive Plan Update:

The Comprehensive Plan is also available on the City of Atlanta’s website at https://www.atlcitydesign.com/2021-cdp. The CIE Annual Update is in Appendix I of the Plan.

As a nearby community or other potentially affected party, ARC requests that you or your staff review the documents and provide any comments to ARC on or before Wednesday, August 18, 2021.

Review Opened: July 28, 2021
Deadline for Comments: August 18, 2021
Review Closes: Upon approval by Georgia DCA

Comments must be emailed to Andrew Smith at asmith@atlantaregional.org. These documents will also be archived as of tomorrow at http://www.atlantaregional.org/land-use/planreviews by searching for “2021 City of Atlanta Comprehensive Plan Update and 2021 CIE Annual Update.”

For more information on ARC’s Comprehensive Plan review process, go to http://www.atlantaregional.org/land-use/local-comprehensive-planning. For more information on other Comprehensive Plans reviewed by ARC, visit http://www.atlantaregional.org/land-use/planreviews.

Best,
Andrew Smith
Principal Planner, Community Development
Atlanta Regional Commission
P | 470.378.1645
Approval email from ARC and DCA
Andrew Smith <ASmith@atlantaregional.org>
Mon 9/13/2021 4:21 PM
To: Sidifall, Janide <jsidifall@AtlantaGa.Gov>; Bacon, Kevin <kbacon@AtlantaGa.Gov>; Morgan, Jason <JMorgan@AtlantaGa.Gov>; Hoelzel, Nathanael <nhoelzel@AtlantaGa.Gov>; Holmes, Keyetta <kmholmes@AtlantaGa.Gov>; Olteanu, Christian <colteanu@AtlantaGa.Gov>; Forte, Monique B. <MBForte@AtlantaGa.Gov>
Cc: Donald Shockey <DShockey@atlantaregional.org>

All,

ARC has completed the regional review and comment period for the 2021 City of Atlanta Comprehensive Plan Update. Per the below, we’re pleased to inform you that the Georgia Department of Community Affairs (DCA) has determined that the Update conforms to the Minimum Standards and Procedures for Local Comprehensive Planning.

Please also see the below advisory comments from DCA staff. They’re not technically required to be addressed, but we do recommend you review and address them if possible.

Renewal of Qualified Local Government (QLG) status is contingent upon local adoption of the Plan Update, which may take place at any time. Once adopted, please send ARC digital copies of the adoption resolution and the final, “as adopted” Update itself, so that we may forward them to DCA. Upon receiving notice of local adoption, DCA will renew the City’s QLG status.

I commend the City’s leadership and staff for your commitment to the comprehensive planning process. Please contact me if you have any questions or if we can provide further assistance.

Best,

Andrew Smith
Principal Planner, Community Development
Atlanta Regional Commission
P | 470.378.1645
asmith@atlantaregional.org
atlantaregional.org
International Tower
229 Peachtree Street NE | Suite 100
Atlanta, Georgia 30303

From: Jon West <jon.west@dca.ga.gov>
Sent: Friday, September 10, 2021 3:02 PM
To: Jared Lombard <JLombard@atlantaregional.org>
Cc: PEMD OPQG Administration <pemd.opqga@dca.ga.gov>; Andrew Smith <ASmith@atlantaregional.org>; Donald Shockey <DShockey@atlantaregional.org>
Subject: Atlanta Comp Plan Update: Approved w/ Advisories

Jared,

Our staff has reviewed the comprehensive plan update for the City of Atlanta and determined that it adequately addresses the Minimum Standards for Local Comprehensive Planning. However, we have provided advisory comments that we believe could assist the local government in making its plan more useful. Please review these comments with the local government before they adopt the plan update. If you have any questions about our comments, please contact us at 404-679-5279. As soon as your office provides written notice that the plan has
been adopted and provides DCA with a digital copy of the final adopted version of this document, we will award Qualified Local Government status to the local government.

**Advisory Comments on the Plan Update**

Please consider addressing these items before moving forward with adoption of the plan update. We believe they will improve the usability of the document and help maximize its potential benefits.

*Community Goals: Character Areas*

- We are happy to see Character Areas addressed in your local comprehensive plan. However, the Defining Narrative for each character area could be improved by more clearly delineating the vision and plan of action for future development of the area. Specifically, additional pictures, and/or illustrations to make it clear what styles, types, forms and patterns of development are to be encouraged in each character area would be helpful. Also, enhanced detail about the specific implementation measure to be employed in moving each character area toward the community’s vision for each area would be helpful.

*Document Construction*

- In order to ensure that the plan is as usable as possible for local decision-makers, we think it’s important for each community to end up with a concise and well-organized plan document. We think plan documents you prepare in the future could be improved by focusing on the following factors:
  - Brevity – include only key information needed by decision-makers in the plan document itself while moving background information and explanatory text to an appendix.
  - Clarity – draw decision-makers’ attention to the highest priority goals and initiatives by focusing on them in an executive summary and highlighting throughout the document.
  - Functionality – make it easy to find sections of the plan likely to be referenced most frequently (e.g., the Community Work Program and the Policies) by grouping these together at the front of the document, using tabs or bookmarks, or providing a pull-out “users section” of the plan.
- The page numbers shown in the Table of Contents provided for the comprehensive plan update does not align with the actual page numbers throughout the document. This significantly impacts the document’s ease of use. Please revise the Table of Contents to address this prior to adopting it.

*Community Work Program / Report of Accomplishments*

- The report of accomplishments included many items that are noted as “long-term” indicating the community’s continuing desire to undertake those projects at some time beyond the current 5-year planning horizon. Please consider adding a “Long-Term Work Program” to accompany the 5-Year Community Work Program in this plan. This will ensure that those long-term items are not “lost” between iterations of the plan.

**NOTE: Annual CIE Update**

This comprehensive plan included materials pertaining to an annual update of the City’s Capital Improvements Element. The City’s annual Capital Improvements Element was previously submitted to and reviewed/approved by our office. This material was not re-reviewed as a function of the current review. Please ensure that subsequent local adoptions clearly reflect adoption of BOTH the annual CIE Update and the Local Comprehensive Plan Update.

Thanks,

[Signature]

**Jon West**
Principal Planner | Manager, Community & Regional Planning
Georgia Department of Community Affairs

Plan A: Atlanta’s 2021 Comprehensive Development Plan
City of Atlanta’s Response to ARC/DCA Approval and Feedback on *Plan A*
From: Sidifall, Janide <jsidifall@atlantaga.gov>
Sent: Monday, September 27, 2021 6:59 PM
To: Andrew Smith <ASmith@atlantaregional.org>; Jon West <jon.west@dca.ga.gov>; Jared Lombard <jlombard@atlantaregional.org>
Cc: Hoelzel, Nathanael <nhoelzel@atlantaga.gov>; Bacon, Kevin <kbacon@atlantaga.gov>; Morgan, Jason <JMorgan@atlantaga.gov>
Subject: RE: 2021 City of Atlanta Comp Plan Update: Approved

DCA and ARC Reviewers,

Atlanta’s Department of City Planning appreciates DCA/ARC’s notification on September 13, 2021, that Atlanta’s 2021 Comprehensive Development Plan (“Plan A”) meets Georgia’s “Minimum Standards and Procedures for Local Comprehensive Planning.”

Additionally, we reviewed your advisory comments and will incorporate the suggestions to improve the plan as we move forward with this year’s update and the next. The Department’s response to these comments will be in Appendix II of the plan, but below is a summary.

**Comment #1) Community Goals: Character Areas** — Reviewers commented that the Character Area section in the Land Use Planning Element could be improved by better defining the styles, types, forms and patterns of development encouraged in each character area. They suggested establishing a clearer vision and plan of action for future development in addition to adding details on specific implementation actions to be done in each character area.

**Response:** The Department agrees with the reviewers’ suggestions for improving character area planning. Character area geographies, preferred future land uses, and development policies have largely remained the same since being introduced in the 2011 CDP update. The Department views the work ahead to better align Atlanta City Design Growth and Conservation Areas with Character Areas and Future Land Use Categories as the most significant technical task to Phase 2 of Plan A.

**Comment #2) Document Construction** — DCA and ARC are strong proponents of plans that are well organized, concise, and usable. The reviewers suggested that the Department continue to focus on the comprehensive development plan’s brevity, clarity, and functionality.

**Response:** The Department shares the reviewers’ interest in making the CDP as usable and readable as possible for decision-makers and the public. The 2016 CDP is nearly 1,100 pages long, when including the 600-page Community Work Program—Plan A is several hundred pages less at around 700. Readers of Plan A can more easily navigate to sections using internal links between the table of contents and sections as well as bookmarks in the digital version of the plan. NPU policies and maps are particularly easier to find now that they are in their own appendix. The Department will also follow the reviewers’ recommendation and publish a stand-alone executive summary of the adopted plan in November. The Department set out to make Plan A much more readable and approachable with clearer writing, informative graphics, and selective, limited use of maps, tables, and charts—the Department will continue to improve the document’s construction in the next update.

**Comment #3) Community Work Program/Report of Accomplishments** — Reviewers noted that the Report of Accomplishments of the 2016 Community Work Program included many actions that are noted as “long-term” indicating the community’s continuing desire to undertake those projects at some time beyond the 5-year planning horizon of the 2021 CDP. The reviewers suggested to pull these actions from the existing report and create a separate list of “long-term” projects to ensure that they are not “lost” in future updates.

**Response:** A separate “Long-Term Status” list will be in the final Report of Accomplishments.
We are moving through the legislative process to adopt both the CIE and the CDP by October 31, 2021. Again, thank you for your guidance as we update Atlanta’s comprehensive development plan. If there is anything you need from us, please don’t hesitate to ask.

Sincerely,

Janide Sidifall

Deputy Commissioner – Operations

Mobile: 404-640-0552

Email: jsidifall@atlantaga.gov
Staff Report

(as of October 25, 2021)
MEMORANDUM

TO: Matt Westmoreland, Chair, Community Development/Human Services Committee
FROM: Janide Sidifall, Deputy Commissioner
SUBJECT: 21-O-0671/ CDP-21-049 – Plan A: Atlanta’s Comprehensive Development Plan
DATE: October 25, 2021

SUMMARY:
An Ordinance to adopt the 2021 Comprehensive Development Plan (“Plan A”) as the official comprehensive development plan for the City of Atlanta, Georgia, in compliance with the requirements of the Georgia Planning Act of 1989, and for other purposes.

FINDINGS OF FACT:

The Comprehensive Development Plan and the Purpose of this Legislation

The comprehensive development plan, or CDP, is Atlanta’s guide for growth and development. The CDP shows relationships among land use, transportation, housing, economic and community development, nature, urban design, historic preservation, and other aspects to city building.

The purpose of this legislation is to adopt the City of Atlanta’s 2021 Comprehensive Development Plan (entitled “Plan A”) as mandated by Atlanta’s City Charter Sections 3-602, 3-603, and 3-604 and as required by the Georgia Department of Community Affairs and the Georgia Planning Act of 1989. State “Minimum Standards and Procedures for Local Comprehensive Planning” (Georgia Administrative Code 110-12-1) as amended in October 2018 establish standards and procedures for comprehensive planning by all local governments in Georgia. Those standards and procedures emphasize preparing plans and help local governments address immediate needs and opportunities while moving toward realization of long-term goals for the future. To maintain Qualified Local Government (QLG) certification, and thereby remain eligible for select state funding and permitting programs, each local government must prepare, adopt, maintain, and implement a comprehensive development plan as specified in these standards at least every 5 years. The City of Atlanta last adopted a comprehensive development plan in 2016, and it must adopt an update by October 31, 2021, to maintain its QLG status. Atlanta’s comprehensive development plan must include a set of required plan elements, including community vision and goals, needs and opportunities, community work program, impact-fee funded capital improvements, land use, transportation, economic development, broadband internet, and housing and community development. Cities are encouraged to go beyond these required elements and...
supplement comprehensive development plans with other plan elements to make the overall plan a good local fit. The Georgia Department of Community Affairs (DCA) and Atlanta Regional Commission (ARC) determine that Atlanta’s updates conform to the Minimum Standards and Procedures for Local Comprehensive Planning before Atlanta City Council adopts plan updates.

Plan A and Atlanta City Design

This is the first 5-year comprehensive development plan update since City Council adopted Atlanta City Design to Atlanta’s City Charter in 2017. Atlanta’s City Charter establishes Atlanta City Design as the principal design concept for Atlanta and the framework for comprehensive planning. Atlanta City Design is premised on two ideas: (1) Atlanta is going to change, and (2) almost always, more people are better than fewer. Understanding growth over the next 30 years is paramount to translating and implementing Atlanta City Design. Moreover, Atlanta City Design revolves around the five values of progress, ambition, access, nature, and equity, and it is also very much rooted in a decades-old vision of the “Beloved Community:”

In many ways, Dr. King’s lasting influence changed our trajectory and made us the city we are today. His goal, however, was not to fulfill our slogan, “a city too busy to hate.” His goal was the beloved community… Far from a utopian fantasy, Dr. King saw the beloved community as a realistic and achievable goal… With that as our goal, twenty years from now, we should be able to say that our city has grown not into a different kind of place, but into a better version of itself — an Atlanta ever more confident of its identity and committed to its voice for peace in the world (Atlanta City Design, pp ii-iii).

Atlanta City Design proposes three goals, or design principles, to building the Beloved Community: (1) Design for People, (2) Design for Nature, and (3) Design for People in Nature. The vision and design principles for growth and development now guide drafting the comprehensive development plan.

The 2021 version of Plan A starts to align several plans and initiatives using Atlanta City Design as a framework. Highlights of Atlanta City Design’s influence in this year’s comprehensive development plan update are establishing the vision and aspiration of the Beloved Community; introducing growth and conservation areas in land use planning; and, identifying vision, goals, needs and opportunities, policies, and actions from Atlanta’s Transportation Plan (2018), Atlanta City Design: Nature (2020) Atlanta City Design: Housing (2020), and, Atlanta City Design: Future Places Project (2020).

Minimal Administrative Update in 2021 and Full Update Starting in 2022

Plan A started in 2020—not an ideal year to take on anything as ambitious and important as updating the comprehensive development plan. In responding to the COVID-19 pandemic, the Department of City Planning gained experienced using new virtual tools and methods for public engagement and outreach, but human interaction is still severely limited.

Considering the challenges of planning during a pandemic, the Department is preparing Plan A over a multi-year process. This year’s update, Phase 1, is a “minimal administrative update.” As such, it meets the State requirements to maintain the City’s QLG status so Atlanta can continue accessing federal and state funds for economic development, affordable housing, and infrastructure. It will also lay a foundation for a more robust “full update” starting in 2022. During
Phase 2 of Plan A, the Department will facilitate extensive stakeholder and public engagement and will dig deeper into issues of density, land use, zoning and other topics frequently raised during this year’s update. Interaction post-pandemic will be more participatory and inclusive as the planning process will accommodate both virtual and in-person engagement and outreach.

A “minimal administrative update” involves updating certain plan elements. The Department made minimal updates to the following elements, as required.

1. **Community Vision and Goals** (State requires including general vision statement, list of community goals and policies)
   a. Refresh existing community goals based on Atlanta City Design and other city-wide adopted or released plans and studies since the 2016 CDP.
2. **Community Needs and Opportunities** (State requires as they relate to each plan element)
   a. Refresh existing needs and opportunities based on Atlanta City Design and other city-wide adopted or released plans and studies since the 2016 CDP.
3. **Land Use Planning** (State requires because Atlanta has regulations subject to Zoning Procedures Law)
   a. Provide a snapshot of Future Land Use and Character Area maps as amended between adopting the 2016 CDP and the CDP amendments completed during the 2nd quarter of 2021.
   b. Make no pro-active changes to the Future Land Use or Character Area maps. Note, changing Zoning Maps is a regulatory and public process separate from preparing comprehensive development plans.
   c. Refresh policies based on adopted or released plans and studies since the 2016 CDP.
4. **Transportation Planning** (State requires because Atlanta is within the jurisdiction of ARC, which is a Metropolitan Planning Organization)
   a. Refresh transportation goals, needs and opportunities, and implementing policies and actions based on adopted or released plans and studies since the 2016 CDP.
5. **Housing and Community Development Planning** (State requires because Atlanta is a Community Development Block Grant entitlement community)
   a. Refresh housing and community development goals, needs and opportunities, and implementing policies and actions based on adopted or released plans and studies since the 2016 CDP.
6. **Natural Systems and Resiliency Planning** (State requires Consideration of Regional Water Plan and Environmental Planning)
   a. Refresh natural systems and resiliency goals, needs and opportunities, and implementing policies and actions based on adopted or released plans and studies since the 2016 CDP.
7. **Capital Improvements Element**, the “CIE” (State requires because Atlanta collects development impact fees)
   a. Include the annual CIE update, currently considered for adoption as Ordinance 21-O-0672.
8. **Community Work Program**, the “CWP” (State requires)
   a. Include carry-overs of “Active” projects from the previous CWP in the 2016 CDP and include a limited number of new priority actions.
For cities, such as Atlanta, who have not updated their comprehensive development plan since changes to State requirements in 2018, the following new elements must be prepared as part of a "minimal administrative update."

1. Report of Accomplishments of projects listed in the last Community Work Program
2. Broadband Internet Planning
   a. Briefly introduce goals, needs and opportunities, and preliminary implementation ideas.

Cities have discretion to include and update other elements (for example economic development, urban design, etc.) if it meets local needs. Atlanta’s City Charter and long-established comprehensive planning practices by the City of Atlanta and Department of City Planning prescribe the following minimal updates to plans every 5 years.

1. Local Economic Development Planning (Charter requires)
   a. Refresh local economic development goals, needs and opportunities, and implementing policies and actions based on adopted or released plans and studies since the 2016 CDP.
2. Urban Design (This is a common practice to include, and the act is further strengthened by adopting Atlanta City Design into the City Charter)
3. Historic Preservation (City Code requires since the 1989 adoption of the City’s Historic Preservation Ordinance)
4. Public Safety Facilities Planning (This is a common practice, and the Charter requires certain aspects)
5. Neighborhood Planning and NPU policies (This is a common practice, and the Charter requires certain aspects)

The Department of City Planning prepared the 2021 update to the comprehensive development plan following this guidance for a "minimal administrative update." During Phase 2 of updating Plan A, the Department anticipates a broader, “full update” to the comprehensive development plan that further aligns the plan to Atlanta City Design. This will entail updating the Land Use Planning Element in close coordination with the ongoing rewrite of the City’s Zoning Ordinance. It will involve fully reviewing the purpose and function of the layered scheme of Atlanta City Design growth and conservation areas, future land use, and character areas to align and support implementing the future Zoning Ordinance. The Department expects to start this Phase 2 planning process in early 2022 and complete the “full update" before the next 5-year CDP update deadline of October 2026—this planning process may take 18 or more months.

The Department of City Planning will present the scope of the Phase 2 planning process and initial public engagement and outreach approach to the CD/HS Committee during the first quarter of 2022.

**The Planning Process and Public Outreach and Engagement**

The planning process took place over the past 12 months. It started with the Department of City Planning presenting at the Atlanta City Council Community Development/Human Services Committee (CD/HS) 3rd quarter CDP public hearing on September 28, 2020, and at the Committee’s regular meeting the next day.
The Department also hosted a series of virtual stakeholder meetings to convene three leadership and advisory groups:

1. Public Leadership Group (PLG) which is accountable for the comprehensive development plan. The State requires involvement of this group for all comprehensive development planning updates and includes elected officials and leadership from City departments and local economic development agencies. The PLG provides high-level direction and decision-making at particular points during the process.

2. Stakeholder Advisory Committee (SAC) which represents the people who will live with the comprehensive development plan. The SAC includes community members, advocacy groups, Neighborhood Planning Units (NPUs), and institutions with interest in Atlanta’s future. SAC members volunteer their time and provide input and feedback on key concepts and ideas.

3. Technical Advisory Committee (TAC) is the group responsible for preparing the comprehensive development plan. Made up of City and local agency staff, the TAC provides expertise and assures close coordination between disciplines contributing to the analysis and writing of the CDP.

The Department of City Planning hosted all three groups at a virtual kickoff meeting for Plan A on October 28, 2020. The meeting brought together 145 people representing 99 organizations for an overview the update and ways to include the public. The PLG met on December 17, 2020, to discuss leadership roles during the planning process and the alignment of the comprehensive development plan with Atlanta City Design. On January 27, 2021, nearly 190 people, representing several organizations, neighborhood associations, and NPUs met virtually to discuss community needs and opportunities and the challenges of public outreach and engagement during the pandemic. After consulting with the PLG, SAC, and TAC members at the December and January meetings, the Department of City Planning decided to reset the comprehensive development planning process by only focusing on the required updates this year and begin a more robust process in 2022. The Department explained the decision and discussed opportunities for public participation and input at the CD/HS quarterly CDP public hearing on March 22, 2021.

The Department released Draft I of Plan A on June 8, 2021. The Department hosted 3 city-wide virtual meetings later in June. Over 150 people attended the June virtual meetings, and the Department received several questions and suggestions on Draft I from attendees. Further, the Department presented at the June 28, 2021, CD/HS 2nd quarter CDP public hearing and received 1,050 voicemail comments at the hearing.

The Department of City Planning presented Plan A at the Atlanta Planning Advisory Board (APAB) this past spring and summer on April 17th and August 21st. In addition, the Department emailed all 25 NPU chairs and zoning contacts in early April about the process to revise NPU policies. To facilitate revisions, the Department provided examples of how these policies are used in decision-making and implementing the comprehensive plan. Department planners, at the request of individual NPUs, met with a dozen NPUs in small group discussions between April and July 2021 to provide further guidance on the changes to the comprehensive development plan and listen to specific ideas and proposals to updating NPU policies. The Department kept the APAB chair updated during this time as NPUs submitted their policy revisions.
The Department incorporated stakeholder, NPU, and public feedback on Draft I and released a revised Plan A on July 27th. The Department submitted Draft II of Plan A to DCA and ARC on July 27th for their required review and approval. The Department received DCA and ARC approval and brief advisory comments on September 13, 2021—the Department’s response to DCA and ARC comments are below, and it will be published in Appendix II of Plan A.

The Department received over 900 email comments on Drafts II and III from stakeholder groups and the public. The review and comment period for Draft II ended at the CD/HS Committee Meeting on September 28, 2021. The Department concluded over 110 consecutive days of public review and comment at this time. After the September 28th CD/HS Committee meeting, the Department incorporated all Draft II comments, including 712 voicemail comments received prior to the Committee Meeting, and published the Draft III of Plan A on October 1st. This third draft was available for public review and comment through October 8th. The Department incorporated the few email comments received during this review period and submitted a final draft at the CD/HS committee meeting on October 12th. CD/HS will consider the adoption legislation on October 26th and Full City Council meets on October 28th for a vote—this will be the 3rd read of the ordinance adopting Atlanta’s 2021 Comprehensive Development Plan.

The Department posted drafts of Plan A online at https://www.atlcitydesign.com/2021-cdp. The Department also printed draft copies and placed them in 11 libraries and 4 community centers. The Department routinely gave updates at NPU meetings and on the website and social media.

**Updates to Plan Elements in 2021**

Plan A is an update to the 2016 Comprehensive Development Plan. This means most proposed goals, policies, and actions outlined in the 2016 CDP are reflected in the 2021 CDP but have been refreshed through the lens of the planning work that has been completed since 2016, including Atlanta City Design. The 2021 version of Plan A consists of the following sections, or elements.

**Section 1** introduces comprehensive planning and sets the Atlanta City Design framework for Plan A’s city-wide **Community Vision** and challenges motivating the work to updating the plan.

**Planning Elements**

**Section 2** is the City’s **Land Use Planning Element**, and the chapter explains the approach to using both Future Land Use Planning and Character Area Planning. The descriptions, policies, and maps in this element serve as the City’s official guide to future physical growth and development. The 2021 Plan A only features changes to the Future Land Use map representing routine amendments made quarterly since 2016 through the 2nd quarter of 2021—no changes are made to Character Area geographies. It will take this and the next update to Atlanta’s comprehensive development plan to fully translate the Atlanta City Design vision and goals for Atlanta’s physical growth and development. The 2021 Plan A consists of existing 2016 policies and practices of Character Area Planning and Future Land Use Planning. The Department recognizes the need to revisit these policies and practices within the context of the ongoing reform of Atlanta’s Zoning Ordinance during the next full CDP update. However, Atlanta City Design concepts of Growth and Conservation Areas are introduced in this year’s CDP. A break from past plans is listing the small area and neighborhood plans City Council adopted since the 2016 CDP in another section, Neighborhood Planning. The Department also moved NPU policies, revised
by each NPU, to Appendix III to make them easier to find in the plan. These changes along with new graphics and streamlined text reflect public input received during the planning process.

3 through 11 are elements addressing city-building activities, including the following:

- **Section 3: Transportation Planning**
- **Section 4: Housing and Community Development Planning**
- **Section 5: Local Economic Development Planning**
- **Section 6: Broadband Internet Planning**
- **Section 7: Natural Systems and Resiliency Planning**
- **Section 8: Urban Design**
- **Section 9: Historic Preservation**
- **Section 10: Public Safety Facilities Planning**
- **Section 11: Neighborhood Planning**

The Department kept the same elements published in the 2016 CDP but spread the discussion of community facilities over multiple elements, including one dedicated to Public Safety Facilities Planning. The State-required Broadband Internet Planning element is new. All content in the planning elements can be found in recent and ongoing initiatives, such as the 2016 CDP or in plans, policies, and studies adopted and/or released after 2016. Among these are the following:

- Atlanta City Design (2017)
- Atlanta City Design: Atlanta’s Transportation Plan (2018)
- One Atlanta: Strategic Plan for Transportation (2019)
- Atlanta Consolidated Plan (2020)
- Atlanta City Design: Nature (2020)
- Atlanta City Design: Housing 2020
- One Atlanta: Economic Mobility, Recovery, and Resiliency Plan (2020)
- Atlanta City Design: Future Places Project (2020)

Each Planning Element begins with a Community Vision as well as prominent, long-term Goals from recent and ongoing city-wide initiatives. In addition to listing key references in the introduction, the Department identifies other Related Plans and Initiatives being implemented and supporting each planning element’s vision, goals, policies, and policy actions.

Following community vision and goals, and the related plans and initiatives, each planning element describes a set of urgent Community Needs and Opportunities and proposes Policies to address them. In contrast to community vision and goals, policies look to the short-term to guide day-to-day decisions to implement the CDP. These policies are pulled from implementing plans and initiatives and were further refined and vetted with stakeholders and the public. Plan A consolidates the highest priority policies in 70 concise policy statements across the 10 planning elements. Following each policy statement are one or more Policy Actions proposed for the community to take over the next five years when implementing the CDP. Several of these policy actions are included in the new Community Work Program. Each policy action is already being implemented by other city-wide initiatives, and stakeholder groups and the public reviewed and commented on all policy action statements.
Implementing Elements

The Community Work Program (CWP) is a required element, and it summarizes the specific actions, responsible entities, estimated costs, and potential funding sources needed to implement Plan A over the next five years. The Community Work Program is not meant to be the City’s complete list of capital improvement projects, but it does include the proposed activities, initiatives, programs, legislation, and administrative changes to be put in place while steadily making progress to realizing the community vision and goals in Plan A. Many actions proposed in the 2016-2021 Community Work Program are active and incorporated into broader initiatives and capital programs, including the following:

- Atlanta Department of Transportation Initiatives and Programs
- Atlanta Department of Watershed Capital Improvement Program
- Atlanta Department of Aviation ATLNext
- Atlanta Department of Parks and Recreation
- ActivateATL Master Plan and future Capital Improvement Program
- City of Atlanta 5-year Consolidated Plan with the U.S. Department of Housing and Urban Development (HUD)
- More MARTA Program
- Atlanta BeltLine

The 2022-2026 CWP list reflects consolidation of actions into these initiatives and programs. During the next phase to updating Plan A, engagement will include opportunities to further review, discuss, and prioritize actions proposed by NPUs. However, no new actions are proposed by NPUs in the 2021 comprehensive development plan update.

Another new requirement to comprehensive planning in Georgia is including a Report of Accomplishments which gives a brief status update on progress implementing actions listed in the previous Community Work Program. Note, the Report of Accomplishments, Community Work Program, and the 2022-2026 Capital Improvements Element (CIE) are included in Appendix I.

Other Documentation in Appendices

Finally, Appendix II provides supplemental information, including correspondences with DCA/ARC reviewers, and documentation for considering State-required Regional Water Plan and the Environmental Planning Criteria as well as public engagement and outreach. Appendix III includes NPU policies and maps. Appendix IV provides a glossary of terms and an acronym list.

DCA and ARC Approval and Submission of Adopted Plan by October 31st

Georgia Department of Community Affairs and Atlanta Regional Commission reviewed Atlanta’s 2021 comprehensive plan update and determined that it addresses the State’s “Minimum Standards for Local Comprehensive Planning.” Atlanta City Council is now responsible for adopting Plan A by October 31, 2021, to maintain the City’s Qualified Local Government status. When adopted, the Department of City Planning will submit the final plan to DCA and ARC. Only when adopted and submitted, will DCA reinstate the City’s QLG status. DCA has already reviewed and approved the City’s annual Capital Improvements Element. It is the City’s responsibility to ensure subsequent adoption of the CIE (ordinance 21-O-0672) and the CDP by October 31st.
Summary of Incorporating DCA, ARC, Stakeholder, and Public Comments

The Department made over 100 revisions to Plan A based on comments and suggestions received during the public comment period starting in early June 2021. The Department provides a memorandum at the beginning of each working draft of Plan A documenting the line-by-line changes. That memo supplements a summary of the comments in Plan A’s Appendix II. The following are the most salient topics from the public review and comment period and the Department’s response.

Topic 1: Balancing Growth and Development with What Makes Atlanta Great — The most discussed topic by far is the approach to balancing Atlanta’s growing residential population and unprecedented development while protecting and enhancing the things that make Atlanta great—its people, diversity, residential neighborhoods, historic and cultural places, walkable urban core, tree canopy, streams and rivers, parks and trails, transit, and schools. Prefaced on Atlanta City Design’s recognition that change is coming and with it is the prospect for Atlanta to account for a larger share of the region’s population, the Department purposely drafted a comprehensive plan for a population that is at least double the city’s current size. And, this means planning for a future Atlanta with greater density and diversity while conserving the unique character and scale of neighborhoods.

Plan A in 2021 starts to align several plans and initiatives already implementing Atlanta City Design. Extensive technical analysis and public engagement will be needed in the next phase of Plan A to draw more connections across plan elements and overhaul the land use planning element, itself. While preparing Plan A, a series of legislation (ordinances 21-O-0454, 21-O-0455, and 21-O-0456) proposing future land uses and zoning changes to support missing middle housing around MARTA transit stations and text amendments to the zoning ordinance for parking minimums and accessory dwelling units was introduced to City Council. This proposed legislation implements recommendations of Atlanta City Design: Housing, and it sparked most of the comments received during the public review and comment period for Plan A. In recognizing the need for further analysis and engagement, the Department revised policies supporting aspects to Atlanta City Design: Housing in Plan A’s Housing Element. These included making the following revisions to Draft I:

HC 4.1: Amend the zoning ordinance to allow attached and detached ADUs citywide. “Amend the zoning ordinance to allow attached and detached ADUs in more areas.”

HC 6.2: Amend the zoning ordinance to reduce minimum lot size requirements. Removed

HC 7.1: Create fee simple subdivision for accessory dwelling units to promote affordable ownership options. Removed

Public discussion over the legislation continues, and the legislation will be considered for adoption after City Council adopts Plan A.

The proposed legislation prompted public discussion and comments, particularly among several NPUs, during the review period for Draft II. Most of these comments focused on the Land Use Planning element and how Growth and Conservation Areas, Future Land Use Categories, Character Areas relate to each other and guide zoning decisions, especially near transit stations and in residential neighborhoods. Acknowledging these comments, the
Department responded by reiterated that Character Area geographies, policies, and preferred future land uses in the 2021 Plan A are substantively the same as they were recommended in the 2016 CDP. For example, transit-oriented development (TOD) character area policies continue to be considered along with overlapping character area policies when making zoning decisions. Additionally, the city-wide character area policy to protect existing single-family, low-density, and medium-density residential from incompatible higher densities and non-residential uses remains (see CW-2). But, the thrust of the comments reinforces the first Land Use Planning Element policy proposed in Plan A.

LU 1: Revisit the purpose of Character Area Planning and Future Land Use Planning.

“It will take this and the next update to Atlanta’s comprehensive development plan to properly translate the Atlanta City Design vision and goals for the physical growth and development of the city. For this update, we are working with the existing policies and practices of Character Area Planning and Future Land Use Planning. We also recognize the need to revisit these policies and practices within the context of the ongoing rewrite of Atlanta’s Zoning Ordinance during the next update.”

Topic 2: Aligning Public Infrastructure with Growth and Development — A related topic to balancing growth and development is the need to invest in public infrastructure in places Atlanta City Design and Plan A direct new growth and development. The Department received comments regarding increased burden on stormwater infrastructure in growing residential neighborhoods and car traffic in corridors experiencing new mixed-use development—indicating a lack of public infrastructure investments to support the intensity of growth and development. As discussed above, the Department worked with stakeholder partners implementing infrastructure projects across the city, including City of Atlanta Departments of Watershed Management and Transportation, to prioritize actions in the 2022-2026 Community Work Program based on existing capital programs. The Department will carry this focus on implementation in Phase 2 of Plan A as it increases engagement with both the public and implementing partners to further align infrastructure with growth and development.

Topic 3: Limiting the 2021 CDP Update to a Minimal Administrative Update and Ensuring Meaningful Engagement — During the review period for Draft II, the scope of the administrative update and public engagement emerged as a third salient topic.

The Department received many comments requesting that Plan A conform to the general goals, objectives, policies, and format of the 2016 CDP and only include updates that are legally required and/or mandated by the Atlanta City Charter or the State. As discussed earlier in this staff report, the 2016 CDP together with Atlanta City Design is the basis for the 2021 CDP update. Below are examples of Plan A reflecting the 2016 CDP and Atlanta City Design.

2021 CDP Policy Actions
HC 4.1 Amend the zoning ordinance to allow attached and detached ADUs in more areas.
HC 4.2 Amend the zoning ordinance to support missing middle housing.

2017 Atlanta City Design Policy Actions
- 2.1d Missing Middle. Eliminate barriers to the development of small or attached housing, including accessory dwelling units, two- and three-family homes, small-scale multifamily buildings, tiny houses, micro-units, co-housing, shared housing and other models. Encourage the design of family-friendly multi-family units (p. 162).
2016 CDP Policy Actions
- Encourage a range of housing types, and promote mid-size development compatible in scale with single-family homes (“Missing Middle”), including duplexes, triplexes, fourplexes, bungalows courts, townhouses, multiplexes, and live-work (p. 58).
- Allow accessory units to provide for housing diversity and affordability (p. 228).

2021 CDP Policy Actions
HC 5.1 Amend the zoning ordinance to allow small apartment buildings near transit.
HC 6.1 Amend the zoning ordinance to reduce residential parking requirements.

2017 Atlanta City Design Policy Actions
- 2.1e Rethink Parking. Unbuckle the cost of parking from the cost of housing so people can choose to pay for parking or not. Eliminate parking requirements and set parking maximums where transit, walking and bicycles are real options (p. 162).

2016 CDP Policy Actions
- Encourage transit-oriented development to encourage mixed-income housing near job centers (p. 58).
- Create more dense, transit-oriented development (p. 82).
- Establish maximum parking requirements, encourage shared parking and alternative modes of transportation (p. 218).
- Maximize opportunities for on-street parking (p. 218).

The Department communicated the scope of the administrative update several ways over the past six months. The Department presented specifics about the administrative update with the CD/HS committee in March and at the June CDP quarterly public hearing. The Department discussed the scope at the April and August APAB meetings and at the June community meetings. The Department met with several NPU leadership groups, when requested, since April to discuss the scope of the update. The Department also posted details about the administrative update on its FAQs at www.atlcitydesign.com/2021-cdp. The Department followed the guidance of both DCA and ARC to ensure that the scope discussed with the public and stakeholders meets the Minimum Standards for Local Comprehensive Planning. ARC and DCA instructed the Department that re-adopting the 2016 CDP 5-year update was not option.

Drafting Plan A while relying on virtual engagement during the pandemic has been challenging. The Department has learned from this year’s experiences and will carry those lessons forward as Phase 2 public engagement and outreach strategies are developed and presented in early 2022 to City Council, NPUs, and other stakeholders and the public. The comments received during the public review and comment period for Plan A are all beneficial to the Department as it strives for more participatory and inclusive comprehensive planning.

**DCA and ARC Comments** — The Department received advisory comments to improve Atlanta’s plan from DCA and ARC reviewers along with a determination that Plan A as drafted conforms to the Minimum Standards and Procedures for Local Comprehensive Planning. The Department’s response to these comments will be in Appendix II, and below is a summary.

**Community Goals: Character Areas** — Reviewers commented that the Character Area section in the Land Use Planning Element could be improved by better defining the styles,
types, forms and patterns of development encouraged in each character area. They suggested establishing a clearer vision and plan of action for future development in addition to adding details on specific implementation actions to be done in each character area.

- The Department agrees with the reviewers’ suggestions for improving character area planning. Character area geographies, preferred future land uses, and development policies have largely remained the same since being introduced in the 2011 CDP update. The Department views the work ahead to better align Atlanta City Design Growth and Conservation Areas with Character Areas and Future Land Use Categories as the most significant technical task to Phase 2 of Plan A.

Document Construction — DCA and ARC are strong proponents of plans that are well organized, concise, and usable. The reviewers suggested that the Department continue to focus on the comprehensive development plan’s brevity, clarity, and functionality.

- The Department shares the reviewers’ interest in making the CDP as usable and readable as possible for decision-makers and the public. The 2016 CDP is nearly 1,100 pages long, when including the 600-page Community Work Program—Plan A is several hundred pages less at around 700. Readers of Plan A can more easily navigate to sections using internal links between the table of contents and sections as well as bookmarks in the digital version of the plan. NPU policies and maps are particularly easier to find now that they are in their own appendix. The Department will also follow the reviewers’ recommendation and publish a stand-alone executive summary of the adopted plan in November. The Department set out to make Plan A much more readable and approachable with clearer writing, informative graphics, and selective, limited use of maps, tables, and charts—the Department will continue to improve the document’s construction in the next phase.

Community Work Program/Report of Accomplishments — Reviewers noted that the Report of Accomplishments of the 2016 Community Work Program included many actions that are noted as “long-term” indicating the community’s continuing desire to undertake those projects at some time beyond the 5-year planning horizon of the 2021 CDP. The reviewers suggested to pull these actions from the existing report and create a separate list of “long-term” projects to ensure that they are not “lost” in future updates.

- A separate “Long-Term Status” list will be in the final Report of Accomplishments.

RECOMMENDATIONS ON ORDINANCE:

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS (DCA) AND ATLANTA REGIONAL COMMISSION (ARC) REVIEW: The 2021 Comprehensive Development Plan (“Plan A”) ADEQUATELY ADDRESSES the State’s “Minimum Standards and Procedures for Local Comprehensive Planning.”


cc: Kevin Bacon, Director, Office of Design
    Nate Hoelzel, CDP Project Manager, Office of Design
Plan A Adopted Ordinance
A RESOLUTION
BY COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE

A RESOLUTION EXPRESSING THE INTENT OF THE ATLANTA CITY COUNCIL TO CONTINUE MAKING REVISIONS WHERE APPROPRIATE TO THE 2021 CITY OF ATLANTA COMPREHENSIVE DEVELOPMENT PLAN, IN ACCORDANCE WITH THE RULES OF THE GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS, BASED ON UNPRECEDENTED FEEDBACK FROM ATLANTA RESIDENTS AND NEIGHBORHOOD PLANNING UNIT LEADERSHIP; AND FOR OTHER PURPOSES.

WHEREAS, preparing, adopting, maintaining, and implementing a comprehensive development plan is a requirement for local governments pursuant to the Georgia Planning Act of 1989 and to maintain qualified local government certification to be eligible for select state funding and permitting programs; and

WHEREAS, the Georgia Department of Community Affairs ("DCA") adopted the "Standards and Procedures for Local Comprehensive Planning" effective on October 1, 2018, and established October 31, 2021, as the deadline for the City of Atlanta to adopt a comprehensive development plan that meets the Standards and Procedures for Comprehensive Planning; and

WHEREAS, Atlanta City Design, adopted in the City Charter Section 3-601 in December 2017, is a concept for design of Atlanta and provides a framework for Atlanta’s Comprehensive Development Plan; and

WHEREAS, the Atlanta City Council has received correspondence from the chairs of 16 Neighborhoods Planning Units (A, B, C, D, E, F, G, I, O, P, Q, T, V, W, Y, Z) -- representing 182 neighborhoods -- expressing serious concerns with the structure and content of the proposed 2021 Comprehensive Development Plan; and

WHEREAS, the Atlanta City Council has also received an unprecedented level of communication from Atlanta residents on the proposed 2021 Comprehensive Development Plan, including more than 2,500 voicemails and more than 1,100 emails; and

WHEREAS, that outreach was nearly unanimous in its concerns about the proposals alignment with Atlanta City Design as well as the proposal incorporating a significant shift in approach to the City’s growth plan, a departure from the minimal administrative update that had been communicated as the Department of City Planning’s goal; and

WHEREAS, the feedback from residents and neighborhood leaders also included concerns about prioritizing major density increases without also addressing current infrastructure needs and planning for future ones; and
WHEREAS, there is a clear desire from residents and neighborhood leadership to see the City make additional revisions where appropriate to the 2021 Comprehensive Development Plan; and

WHEREAS, the City Council recognizes additional revisions would be undertaken through the process established by the Rules of the Georgia Department of Community Affairs; and

WHEREAS, there is also a clear desire from residents and neighborhood leadership that future conversations around the Comprehensive Development Plan include a more intensive community engagement effort, so that all NPUs may better understand and evaluate the changes being proposed.

THE CITY COUNCIL OF THE CITY OF ATLANTA, GEORGIA, HEREBY RESOLVES, to continue making revisions where appropriate to the 2021 City of Atlanta Comprehensive Development Plan, in accordance with the rules of the Georgia Department of Community Affairs, based on unprecedented feedback from Atlanta residents and Neighborhood Planning Unit Leadership.

BE IT FURTHER RESOLVED, that these revisions will be accomplished through the process established by the Rules of the Georgia Department of Community Affairs as laid out in Chapter 110-12-1-.04.

BE IT FINALLY RESOLVED, that all resolutions and parts of resolutions in conflict herewith are hereby waived to the extent of any conflict.
WHEREAS, Sections 3-602, 3-603, and 3-604 of the Charter of the City of Atlanta, Georgia, ("Charter") mandate that the Mayor prepares a Comprehensive Development Plan ("CDP") to provide for the physical, social, and economic growth of the City of Atlanta as well as to promote the public health, safety and general welfare of the City’s residents every five years; and

WHEREAS, Atlanta City Design, adopted in the City Charter Section 3-601 in December 2017, is a concept for design of Atlanta and provides a framework for Atlanta’s CDP; and

WHEREAS, Atlanta’s CDP is a guide for the city’s growth and development, and it sets forth the goals to achieve and the policies and actions to implement over the next 5 years; and

WHEREAS, preparing, adopting, maintaining, and implementing a comprehensive development plan is a requirement for local governments pursuant to the Georgia Planning Act of 1989 and to maintain qualified local government certification to be eligible for select state funding and permitting programs; and

WHEREAS, the City of Atlanta has prepared the 2022-2026 Capital Improvements Element ("CIE") and made it a component of Atlanta’s 2021 CDP; and

WHEREAS, proposed policies and actions by Neighborhood Planning Units are incorporated in Atlanta’s 2021 CDP; and

WHEREAS, the Georgia Department of Community Affairs ("DCA") adopted the “Standards and Procedures for Local Comprehensive Planning” effective on October 1, 2018, and established October 31, 2021, as the deadline for the City of Atlanta to adopt a comprehensive development plan that meets the Standards and Procedures for Comprehensive Planning; and

WHEREAS, the draft of Atlanta’s 2021 CDP was prepared in accordance with the Minimum Planning Standards and Procedures for Local Comprehensive Planning established by the Georgia Planning Act of 1989; and
WHEREAS, the City of Atlanta transmitted Atlanta’s 2021 CDP to the Atlanta Regional Commission (“ARC”) and the Georgia Department of Community Affairs (“DCA”) for review in July 2021 as required prior to final adoption; and

WHEREAS, both the ARC and DCA have completed their review of Atlanta’s 2021 CDP in September 2021; and

WHEREAS, initial public hearings for the Atlanta’s 2021 CDP took place at Atlanta City Council Community Development and Human Services Committee Quarterly CDP Public Hearings on September 29, 2020 and March 22, 2021; and

WHEREAS, a draft of Atlanta’s 2021 CDP was available to Atlanta City Council and the public for review and comment from June 8, 2021 to October 25, 2021 with the first draft available on June 8th, the second draft available on July 27th, the third draft available on October 1st, and the fourth available on October 12th, and

WHEREAS, public hearings on the drafts of Atlanta’s 2021 CDP took place at Atlanta City Council Community Development and Human Services Committee Quarterly CDP Public Hearings on June 28, 2021 and October 25, 2021; and

WHEREAS, a final draft of Atlanta’s 2021 CDP was ripe for adoption by the third reading at City Council and prior to October 31, 2021, per Atlanta City Code Section 6-3006; and

WHEREAS, while the COVID-19 pandemic prohibited in-person community meetings in locations around the city, the Department of City Planning hosted virtual meetings on June 10, 2021, June 12, 2021, and June 17, 2021, while preparing Atlanta’s 2021 CDP; and

WHEREAS, notices for public hearings, community meetings, and public review and comment periods were provided online, at Neighborhood Planning Unit meetings, and in newspapers, and drafts were made available online and in print at local libraries and community recreation centers; and

WHEREAS, the City Council of the City of Atlanta finds that adopting the 2021 CDP would be in the best interest of public health, safety, and general welfare of the City’s residents.

THE CITY COUNCIL OF THE CITY OF ATLANTA, GEORGIA, HEREBY ORDAINS AS FOLLOWS:

SECTION 1: The document entitled the City of Atlanta 2021 Comprehensive Development Plan (“Plan A”), on file with the City Clerk and the Department of City Planning and incorporated herein by
reference is hereby adopted as the official Comprehensive Development Plan for the City of Atlanta, Georgia, as mandated by Sections 3-602, 3-603, and 3-604 of the Charter of the City of Atlanta, Georgia.

SECTION 2: Plan A shall become effective immediately upon adoption by the City Council and approval by the Mayor and shall remain in effect until such time as they are amended or repealed.

SECTION 3: All ordinances and parts of ordinances in conflict with this ordinance are hereby waived to the extent of any conflict. Including, but not limited to, Atlanta City Code Sections 6-3014(a) and 6-3015(a) as the Department of City Planning was required to utilize a revised public engagement plan and public hearing plan due to the COVID-19 pandemic including multiple virtual public hearings.
CDP-21-049 AN AMENDED (2) ORDINANCE BY COMMUNITY DEVELOPMENT/HUMAN SERVICES COMMITTEE ADOPTING THE 2021 CITY OF ATLANTA COMPREHENSIVE DEVELOPMENT PLAN (“PLAN A”) AS THE OFFICIAL COMPREHENSIVE DEVELOPMENT PLAN FOR THE CITY OF ATLANTA, GEORGIA, IN COMPLIANCE WITH THE REQUIREMENTS OF THE GEORGIA PLANNING ACT OF 1989; AND FOR OTHER PURPOSES.

►(Held 9/14/21 by the Committee for the 3rd Quarter CDP Public Hearing scheduled for September 27, 2021; 3rd Quarter CDP PH was rescheduled for 10/25/21; Amended and held 10/12/21 by the Committee to attach the Plan A 3rd draft)

Workflow List:

- Tim Keane Completed 08/10/2021 10:07 AM
- Jonathan S Futrell Completed 08/10/2021 10:10 AM
- Mayor's Office Completed 08/10/2021 10:22 AM
- Office of Research and Policy Analysis Completed 08/19/2021 12:10 AM
- Community Development/Human Services Committee Completed 08/24/2021 1:30 PM
- Atlanta City Council Completed 09/07/2021 1:00 PM
- Community Development/Human Services Committee Completed 09/14/2021 1:30 PM
- Atlanta City Council Completed 09/20/2021 1:00 PM
- Community Development/Human Services Committee Completed 09/28/2021 1:30 PM
- Atlanta City Council Completed 10/04/2021 1:00 PM
- Community Development/Human Services Committee Completed 10/12/2021 1:30 PM
- Atlanta City Council Completed 10/18/2021 1:00 PM
- Community Development/Human Services Committee Completed 10/26/2021 1:30 PM
- Atlanta City Council Completed 10/28/2021 10:00 AM
- Atlanta City Council Pending 11/01/2021 1:00 PM

HISTORY:

- 08/24/21 Community Development/Human Services Committee
- 09/07/21 Atlanta City Council REFERRED WITHOUT OBJECTION
- 09/14/21 Community Development/Human Services Committee HELD IN COMMITTEE

RESULT: REFERRED WITHOUT OBJECTION BY CONSENT VOTE

Next: 9/14/2021 1:30 PM

09/14/21 Community Development/Human Services Committee HELD IN COMMITTEE

Last Updated: 10/28/21
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RESULT: ADOPTED AS AMENDED [11 TO 2]
MOVER: Matt Westmoreland, Councilmember, Post 2 At Large
SECONDER: J. P. Matzigkeit, Councilmember, District 8
AYES: Westmoreland, Dickens, Smith, Winslow, Archibong, Ide, Shook, Matzigkeit, Hillis, Boone, Overstreet
NAYS: Michael Julian Bond, Antonio Brown
ABSENT: Amir R Farokhi, Joyce M Sheperd

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Mayor’s Action
See Authentication Page Attachment

Last Updated: 10/28/21
21-O-0671
Adopted by the Atlanta City Council
October 28, 2021

APPROVED
NOV 10 2021
WITHOUT SIGNATURE
BY OPERATION OF LAW

MAYOR’S ACTION
END OF APPENDIX II