

TO: Emma Knauerhase – Entitlement Services

FROM: Jason Pauling, AICP – Long Range Planning

SUBJECT: REZ 2024-070: 2040 Comprehensive Plan Consistency

LOCATION: Mount Holly Road (PID’s: 05503202 and 05502109)

DESCRIPTION: Zoning Change Request from **CG (General Commercial)** to **ML-1 (Manufacturing & Logistics)** -- 4.96 acres.

The Long-Range Division of the Planning, Design and Development Department offers the following comments on the above referenced rezoning petition. Please communicate these comments with the petitioner to the greatest extent practical and incorporate into the public hearing staff analysis report.

- I. **Plan Consistency:** This petition is **INCONSISTENT** with the 2040 Policy Map recommendation for **COMMERCIAL**; an amendment to the 2040 Policy Map is required to **MANUFACTURING & LOGISTICS (ML)**. The table below represents elements of IMU Place Types:

Land Uses	Primary uses include manufacturing, research and development, warehousing, distribution, and other similar uses. Uses in this Place Type also include limited office usually to support primary uses; outdoor storage of materials and vehicles; limited hospitality and restaurants, limited retail, and personal services to serve area workers.
Character	This Place Type is typically characterized by large scale, low-rise manufacturing or warehouse buildings, and other assembly and distribution facilities. Parcels are often large, with buildings placed on the interior of the site surrounded by service areas, outdoor and container storage, parking, and landscape buffers to provide a transition to adjacent uses.
Mobility	Manufacturing & Logistics places are accessible by higher capacity transportation facilities, such as arterials and interstates, as well as by freight rail . These places may also benefit from proximity to airports. Streets accommodate large trucks, while still serving all travel modes. The local and collector street network is well-connected to serve sites directly and to provide good access to arterials. Truck traffic will use routes that minimize impacts on neighborhoods and open spaces .

Building Form	The typical building is a high-bay, single-story manufacturing, or warehousing building. Buildings widely range in size and scale depending on their context and use. Buildings include entrances on the street side to provide pedestrian access from the public sidewalk, where possible.
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II. The following criteria should be considered to approve a change to the 2040 Policy Map:

- A. **Adjacencies** – The following adjacencies are present with this petition:
- Manufacturing & Logistics - preferred
 - Commercial - preferred
 - Neighborhood 1 – not ideal, prefer transitional place type and effective use of buffers and tree save areas.
- B. **Location** - The following locational criteria should be considered with this petition
- The subject property is not within Uptown or City Center.
 - The subject property is adjacent to ML and Commercial Place Types to the south and east.
 - The subject property is adjacent to N1 to the west and north across the street. This situation is common across the City, but not ideal, and careful consideration (or conditions) may be necessary such as additional buffering, use limitations, size/height restrictions, etc.)
 - The subject property is not adjacent to N2, or Activity Center place types.
 - The subject property is served by an arterial and abuts an existing rail corridor.
- C. **Preferred Size/Acreage**
- Typically size for new ML requests would be 10 acres, unless the request adjoins existing ML in the area, which this does.


III. **Equitable Growth Framework (EGF) Support:** Please be advised of the following regarding the petitions support of the EGF Manual and Metrics *(NOTE: The EGF Analysis below is intended to provide a broad context on the metrics used in the creation of the Charlotte 2040 Plan. The information is not intended to weigh or provide preference to one metric versus another one).*

- A. Access to Essential Amenities, Goods & Services – **Access to Essential Amenities, Goods & Services is a high priority need in this area according to the EGF Community Reports.** It is unclear if the petition promotes access to amenities, goods, and services, which should be carefully considered when moving away from districts and place types that would seek to address these gaps, such as commercial. The subject Property **IS** within an access to goods, services and amenities gap with a score of 2.
- B. Access to Employment Opportunity – **The subject property is in an area determined to have high priority need for better access to Employment Opportunity.** The petition proposes an ML zoning and place type, which seeks to address access to

employment opportunity depending on the planned use of the property. Subject Property IS within Access to Employment Gap with a score of 0.

- C. Environmental Justice – Environmental Justice (EJ) seeks to minimize and equalize effects of environmental hazards among the entire community regardless of income, ethnicity, or race. Issues of environmental justice often arise from geographic or procedural inequities, which in this case could exist depending on the scale, noise, and access of additional industrial uses adjacent to existing Neighborhood 1 (N1).

IV: **Charlotte 2040 Goals and Objectives Metrics**: The following 2040 Comprehensive Plan Goals should be reviewed when considering this petition, with those **HIGHLIGHTED** being advanced by the petition:

	<p><u>Goal 8: Diverse & Resilient Economic Opportunity</u> – Charlotteans will have opportunity for upward economic mobility through access to a diverse mix of jobs and careers that align with education and skill levels of residents and the economic strengths of the region. <i>This petition potentially ADVANCES this goal with the allowance for additional job-creating uses provided by an ML district and place type.</i></p>
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