



Planning, Development & Inspections

TEL (PLANNING) 919 856 6310
TEL (INSPECTIONS) 919 856 6222

A Division of Community Services
P.O. Box 550 • Raleigh, NC 27602
www.wakegov.com

February 24, 2021

Mr. Kip Padgett
Town Manager
Town of Wake Forest
301 S. Brooks St.
Wake Forest, NC 27587

RE: Wake County Comprehensive Plan – PLANWake

Dear Mr. Padgett,

Thank you again for allowing us to present the County's draft comprehensive plan to your Board last month. The conversation was very helpful as we finalize the plan for consideration by our Board in the coming weeks.

Since that time, we have corresponded with your staff regarding the Town's desire to amend certain classifications in the draft plan that would accommodate future municipal expansion into the Smith Creek Water Supply Watershed. Specifically, change the "Rural" classification designated for the water supply watershed to "Community". This change would allow the town to contemplate municipal expansion into the watershed.

As you know, Wake County has a long history of working with the State of North Carolina and municipal partners to protect and preserve its usable water supply. There are seven water supply watersheds in Wake County with a State classification applied to each of them. In addition, the County imposes specific development regulations that provide water quality protections. Because of this, it was intentional that these policies be maintained and recognized throughout development of the Comprehensive Plan.

Town staff also shared the 2019 merger agreement amendment between Wake Forest and Raleigh which states that Raleigh no longer sees Smith Creek as a water supply resource. This is very helpful, however we feel further conversations are needed between the parties, including the State, before we consider any changes to our policies related to Smith Creek.

At this time, the County prefers to maintain the Smith Creek Water Supply Watershed designation as "Rural", as this designation most closely aligns with our current watershed land use management policies. After approval of the plan, County staff will be glad to work in partnership with the Town, City and State on potential changes to the watershed's designation. Should the parties reach a mutual decision on any changes, County staff will initiate the process to amend the Comprehensive Plan in accordance with those changes.

We feel this approach is consistent with our ongoing commitment to watershed protection while recognizing the importance to include our key partners in this matter. We value our relationship with the Town and look forward to working toward a solution that meets the Town's desire.

For your reference, I've attached a map that depicts what staff will be recommending for this area. It includes the Town's requested changes to areas outside of the watersheds. Should you have any questions or want to discuss this further, please feel free to contact me.







Sincerely,

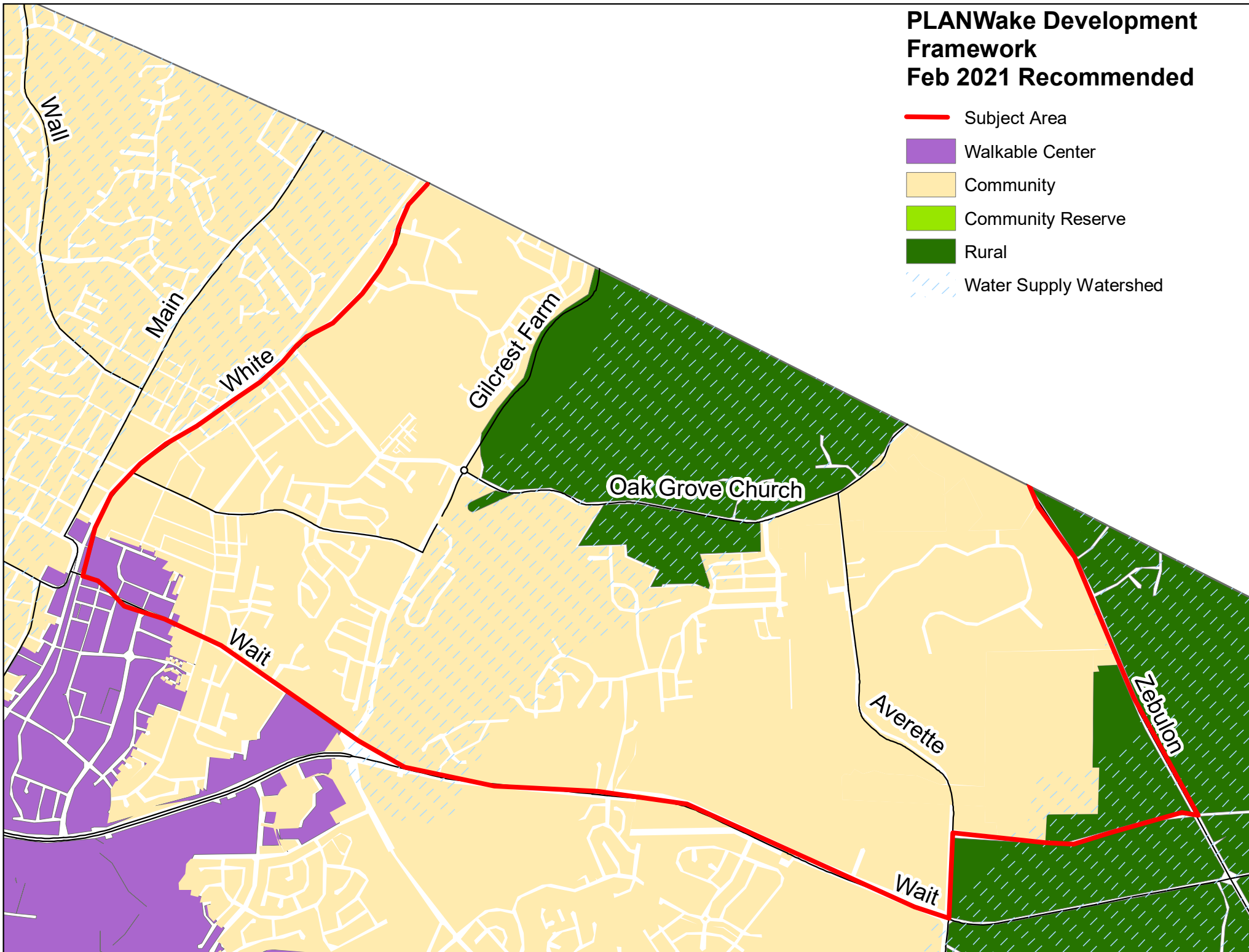
A handwritten signature in black ink, reading "Timothy W. Maloney". The signature is written in a cursive, flowing style.

Timothy W. Maloney, Director

cc: David Ellis, Wake County Manager
Frank Cope, Wake County Community Services Director
Courtney Tanner, Wake Forest Planning Director

**PLANWake Development
Framework
Feb 2021 Recommended**

-  Subject Area
-  Walkable Center
-  Community
-  Community Reserve
-  Rural
-  Water Supply Watershed



RESOLUTION 2021-7

**RESOLUTION OF THE BOARD OF COMMISSIONERS
OF THE TOWN OF WAKE FOREST
SUPPORTING THE DRAFT WAKE COUNTY COMPREHENSIVE (LAND USE) PLAN
(PlanWAKE) WITH MODIFICATIONS**

WHEREAS, pursuant to NCGS §160D, cities and counties are required to have an up-to-date comprehensive plan or land use plan in order to adopt and apply zoning regulations.

WHEREAS, Wake County has embarked on a multiyear update in order to define Wake County's priorities for the future; renew the community's vision and goals on range of issues; and outline a path to success for the coming decade.

WHEREAS, Wake County staff presented the draft Wake County Land Use Plan ("draft Plan") to the Wake Forest Board of Commissioners on January 5, 2021.

WHEREAS, the draft Plan includes a Development Framework Map that identifies portions of Wake Forest as Walkable Center, Community, and Rural.

WHEREAS, the Rural designation is inconsistent with approved Town of Wake Forest plans, policies, and development applications.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Town of Wake Forest that the Town supports the draft Wake County Land Use Plan (PlanWake) subject to modifying the Development Framework Map by changing all the Rural classified areas to Community east of N. White Street, north of NC98 from N. White Street to Averette Road, north of Jack Jones Road from Averette Road to NC96, west of NC96, and south of the Wake/Franklin County line.

This the 19th day of January, 2021.

Motion by: Chad Sary

Second by: Liz Simpers

Mayor: 

ATTEST:


Town Clerk



Planning, Development & Inspections

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A Division of Community Services
P.O. Box 550 • Raleigh, NC 27602
www.wakegov.com

February 25, 2021

Mr. Randy Harrington
Town Manager
Town of Holly Springs
128 S. Main St.
Holly Springs, NC 27540

Via Electronic Mail

RE: Wake County Comprehensive Plan – PLANWake

Dear Mr. Harrington,

Thank you again for allowing us to present the County's draft comprehensive plan to your Board last month. The conversation was very helpful as we finalize the plan for consideration by our Board in the coming weeks.

We are addressing the concerns of Holly Springs in the following ways:

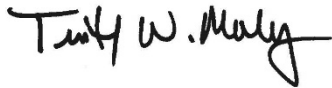
1. Wake County acknowledges the need for continued partnership with Holly Springs to address the issues at the landfill. The January 11, 2021 Board of Commissioners work session was a step in a positive direction to brainstorm solutions together. Our collaboration will be carried out through specific actions outlined in the 2020 Comprehensive Solid Waste Plan. In response to your comments, we've added more description about how PLANWake will interact with operational plans such as the solid waste management plan.
2. Wake County staff has revised the Development Framework Map to align with the Holly Springs Land Use & Character Plan. We appreciate the assistance provided by Holly Springs planning staff.
3. Wake County will need to utilize a variety of tools to support the goals of PLANWake within the municipalities. We anticipate using existing tools like housing and transit funds as well as exploring new ideas to incentivize the character and amenities recommended in the plan.
4. The revised ETJ criteria strengthen the collaborative planning between the county and municipalities to anticipate and prepare for ETJ expansions. The goal is to make the request process more strategically defined geographically and less cumbersome, particularly for Community areas. The request process for Community Reserve and Rural areas will likely take longer and be more involved because those areas have been

identified as less ready for near term municipal growth. The Board of Commissioners will continue to be mindful of public input during the entire process.

5. The County Growth Framework Map sets a vision for how the County overall can set priorities for development and grow intentionally. Wake County staff anticipate that regular modifications to the map will be made to reflect on the ground changes. Map amendments will also be considered after joint County / Municipal area plan updates.
6. While the Development Framework Map categories may not line up perfectly with municipal plans, the map is meant to capture the spirit of intentional growth and the overarching goals of creating more walkable and sustainable places. It is anticipated that the county will work closely with the municipalities on the Walkable Center areas over the next few years. The keys are appropriate density, connections, stress free pathways, utilities and uses.
7. The County recognizes each municipality has unique priorities and constraints and will work with municipalities to achieve our shared goals of prosperity, livability, and sustainability.

Please let me know if you have any other questions or if we need to discuss these items further. As always, we value our partnership with the Town as we work collaboratively in trying to achieve all our goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy W. Maloney". The signature is fluid and cursive, with the first name "Timothy" being more prominent.

Timothy W. Maloney, ASLA
Director

Cc: David Ellis, Wake County Manager
Frank Cope, Community Services Director



Town of Holly Springs
Town Manager

P.O. Box 8 | 128 S. Main St.
Holly Springs, NC 27540
(919) 557-3924
www.hollyspringsnc.gov

January 29, 2021

Mr. David Ellis
Wake County Manager
P.O. Box 550
Raleigh, NC 27602

Dear Mr. Ellis,

On behalf of the Town of Holly Springs Town Council, I am submitting the following comments to Wake County regarding the draft PLANWake Comprehensive Plan:

1. As identified in the Wake County 2020 Comprehensive Solid Waste Management Plan (August 2020), Section 1.3 Plan Priorities, the highest priority for Holly Springs and several other jurisdictions in the County is to identify and evaluate long-term waste management and disposal options. Other priorities identified by Holly Springs include evaluating recycling options (reducing contamination, improving the economics, etc.) and identifying and increasing options for yard waste management. Holly Springs additionally identified that developing alternative plans for disposal, including relocation of the landfill and waste-to-energy, should be an additional consideration of the County's Solid Waste Management Plan.

All of the previously identified priority areas are directly linked to increased growth and development within the County. The introduction to PLANWake states, "Over the next decade, these growth trends are expected to continue and another 250,000 new residents will likely call Wake County their home. Under current growth rates, 28,000 additional acres of new development could occur and all remaining unprotected land in the County could be converted to development within 25-50 years." For Holly Springs, additional growth and development throughout the County specifically impacts the health and wellbeing of our community as it relates to the impacts of the South Wake Landfill. The Town requests continued partnership with the County related to considerations on how PLANWake and the Comprehensive Solid Waste Management Plan can work together to address the growth issues and present odor issue facing our community.

2. The Town has identified several areas on the proposed Development Framework Map that should be modified to reflect desired land uses shown on the recently adopted Town of Holly Springs Land Use & Character Plan (Section 1 of the Holly Springs Comprehensive Plan). Those modifications are attached.

3. In areas designated as Walkable Center, the Town requests that the County fund or participate in funding the cost of infrastructure that would increase walkability and enhance pedestrian safety.
4. The proposed Criteria 1, states that a requested ETJ must be located within an area designated as Walkable Center or Community on the PLANWake Development Framework Map and that ETJ expansion in areas not noted as one of these two designations will require an amendment to the Wake County Comprehensive Plan. How will Wake County work with municipalities to ensure that ETJ requests that require a Plan amendment will not result in a substantial increase in the amount of time or effort to request ETJ from the County?
5. How often will Wake County be making amendments to the Development Framework Map to adjust areas designated as Walkable Center or Community to account for increased development around the edges of municipalities where new ETJ might be requested? Regular communication with the Town is requested so that the Development Framework Map remains up-to-date with future Town growth areas to facilitate new ETJ requests.
6. The proposed Criteria 3, states that Municipal Comprehensive Plans must align with the Wake County Comprehensive Plan and Development Framework. How will the County work with the Town to resolve conflicts between locally adopted plans and the Wake County Plan? The Town believes there needs to be flexibility around ETJ expansion policies that account for different priorities policies and goals between the County and the Town.
7. The proposed Criteria 6, states that a municipality must demonstrate a track record of working with the County to achieve county-wide comprehensive goals. This track record will be assessed on the following factors: support and actions related to affordable housing, walkability, transit use, vulnerable communities, storm water and green infrastructure. How will the County evaluate this criteria given that a municipality may have differing or alternate goals from the County or have funding constraints that limit progress towards achieving county-wide comprehensive goals? The Town believes there needs to be flexibility around ETJ expansion policies that account for different priorities policies and goals between the County and the Town.

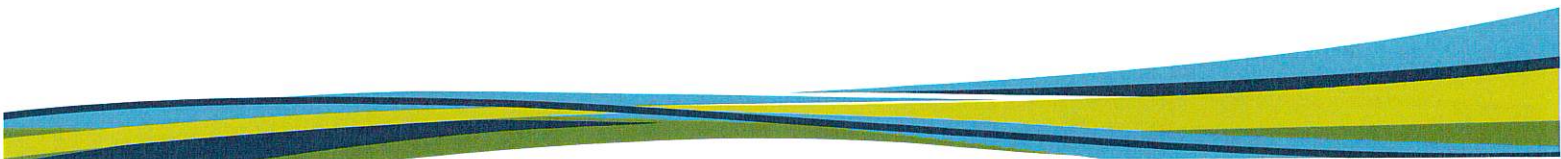
The Town greatly values the County's work on PLANWake and its importance in shaping growth and ETJ expansion throughout the County. I hope our observations and requests will be viewed constructively and help in the further refinement of PLANWake. Please let me know if any additional conversation on the above would be helpful in your PLANWake efforts.

Sincerely,

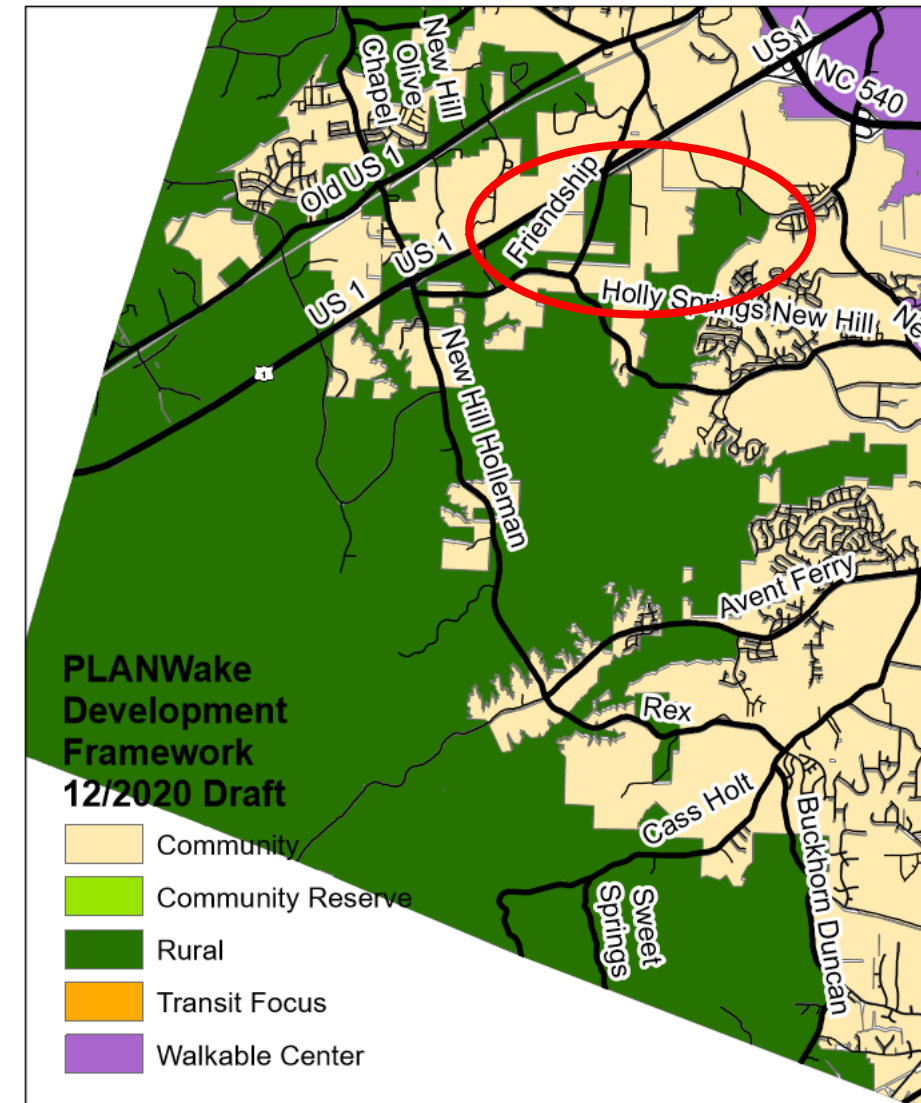


Randy Harrington
Town Manager
Town of Holly Springs

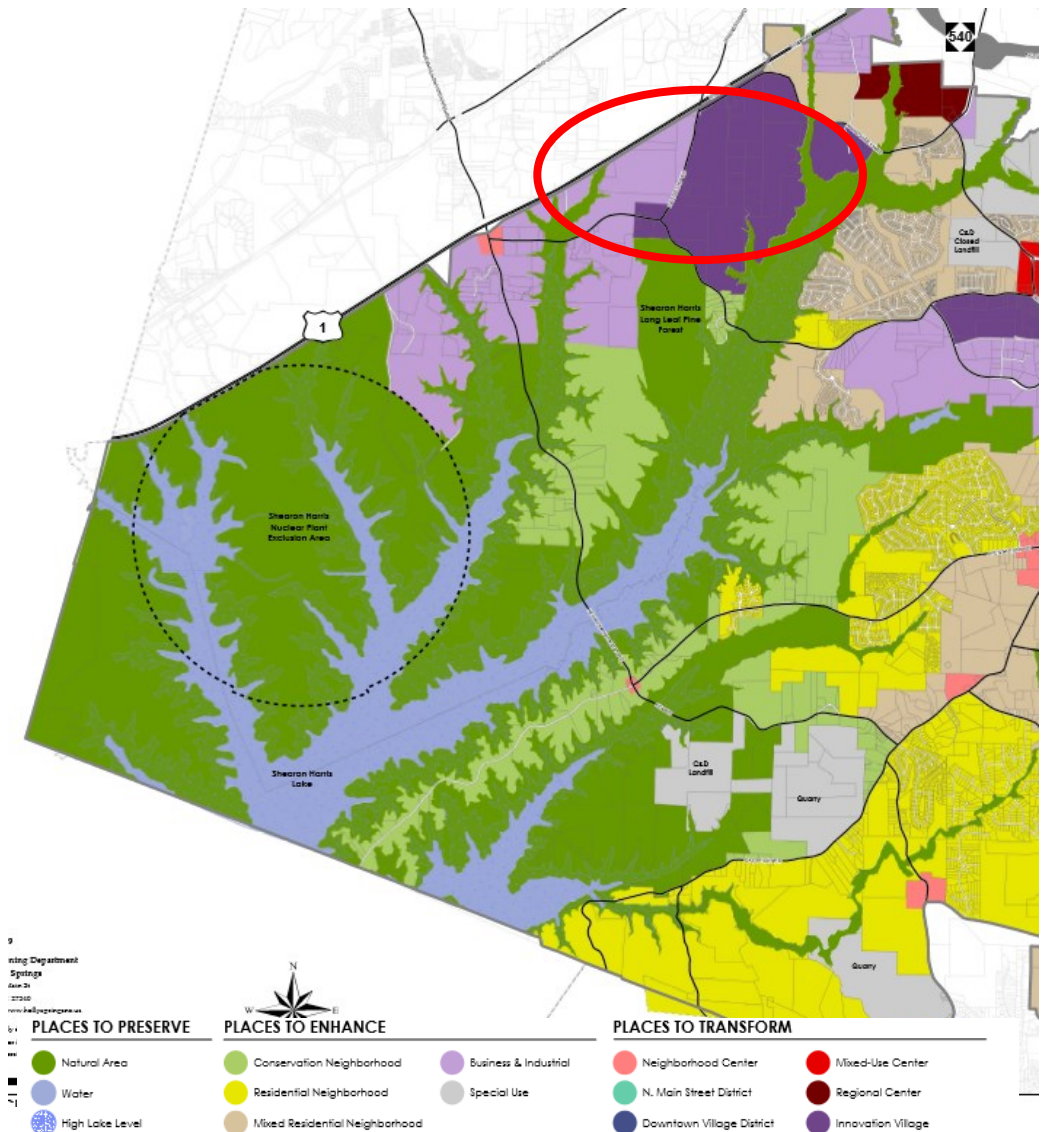
Cc: Timothy Maloney, Planning, Development, and Inspections Director
Cc: Terry Nolan, Planner III



Comment: Area circled in red is currently in Holly Springs ETJ and is planned for industrial development. Suggest that the designation be modified to Community.

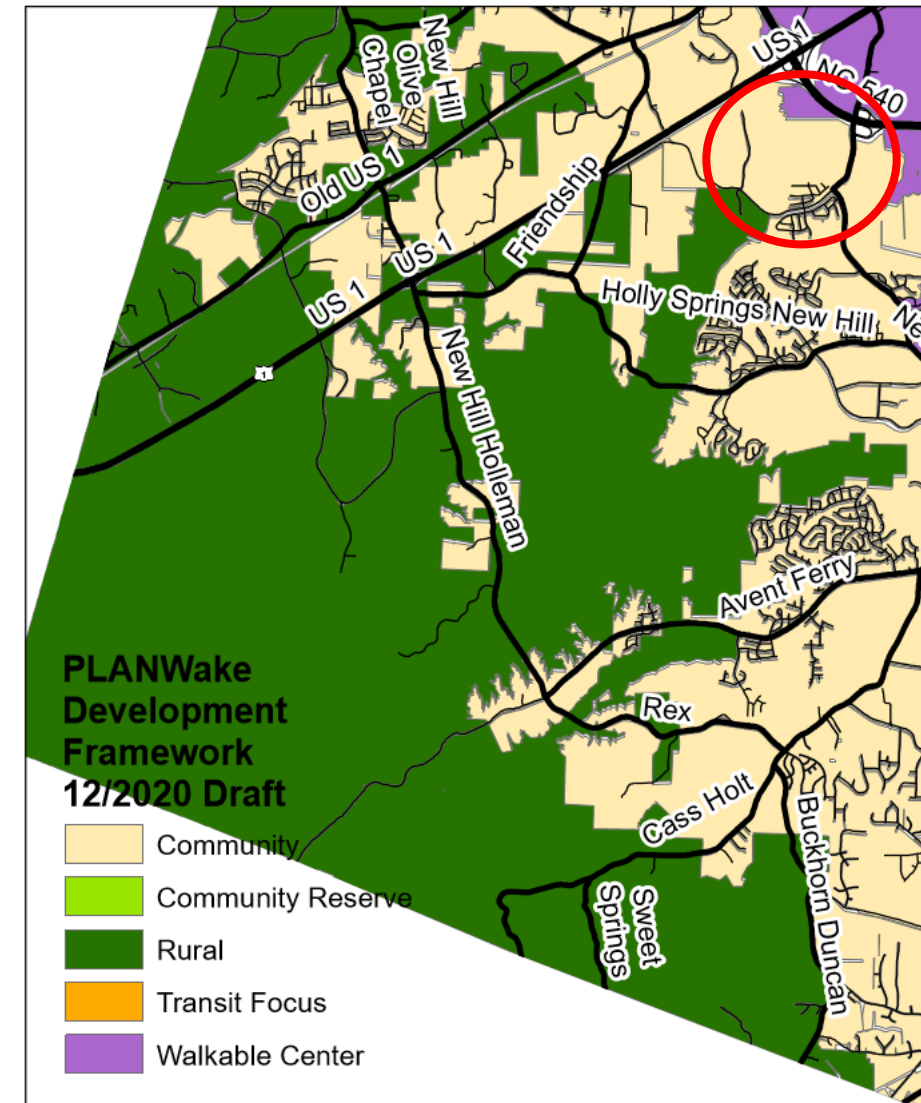


Proposed Development Framework

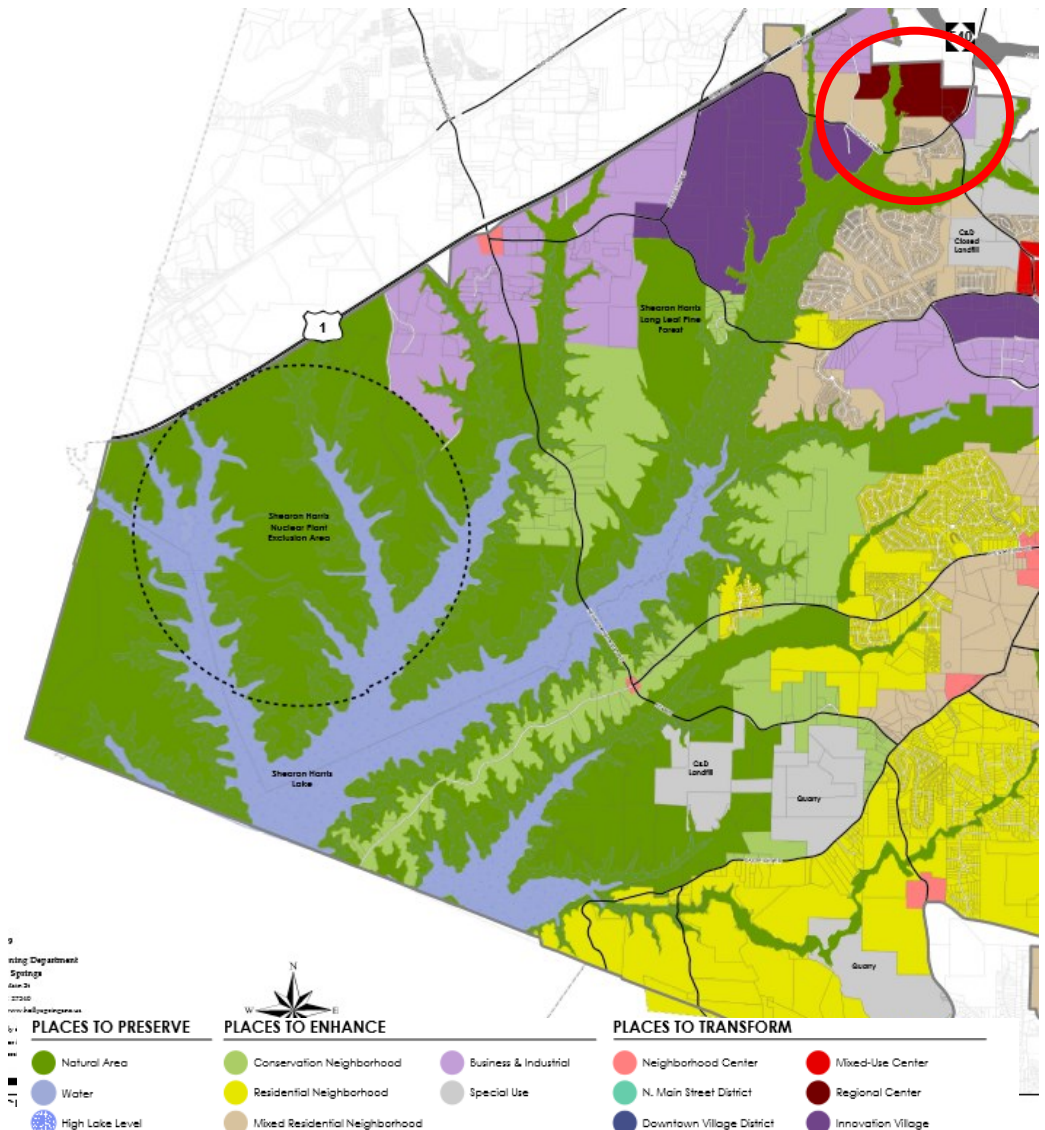


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Regional Center on the Holly Springs Land Use & Character Map. The definition of Regional Center appears to align better with Walkable Center than Community. Suggest that designation be changed to Walkable Center.

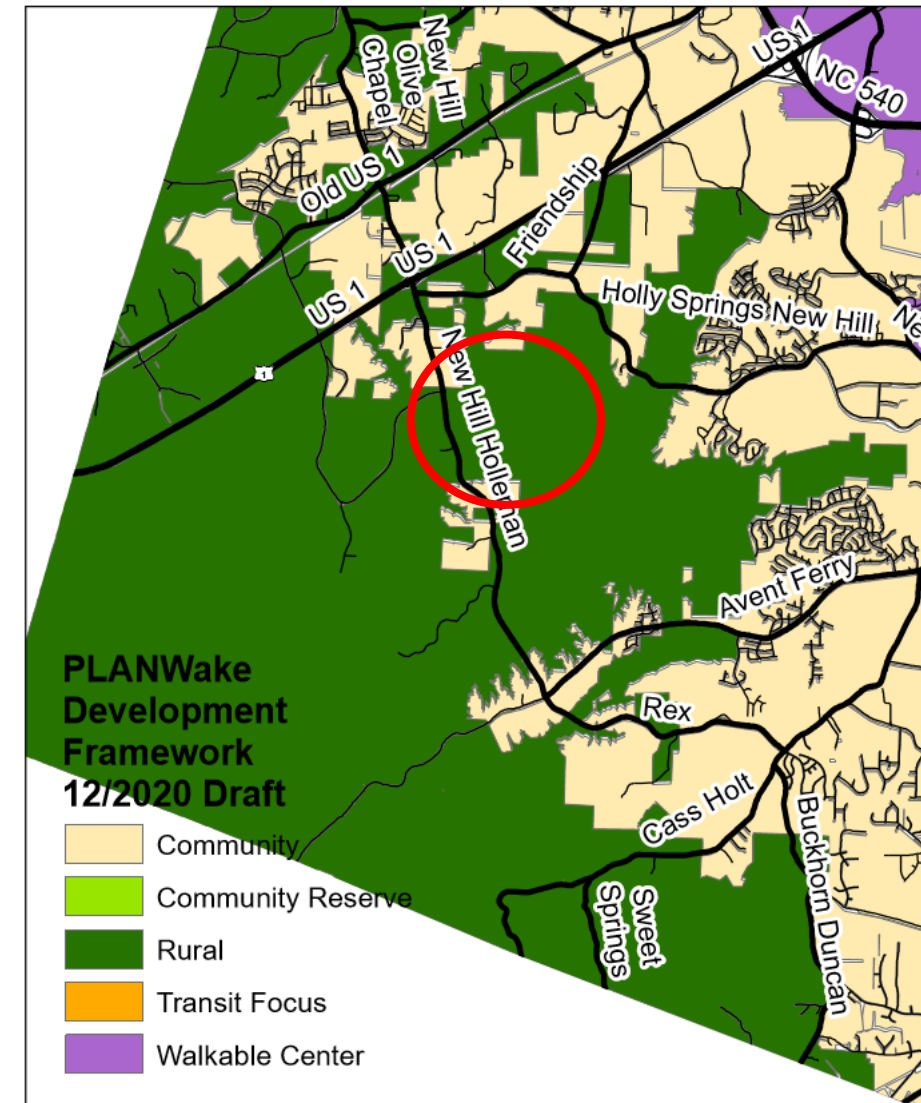


Proposed Development Framework

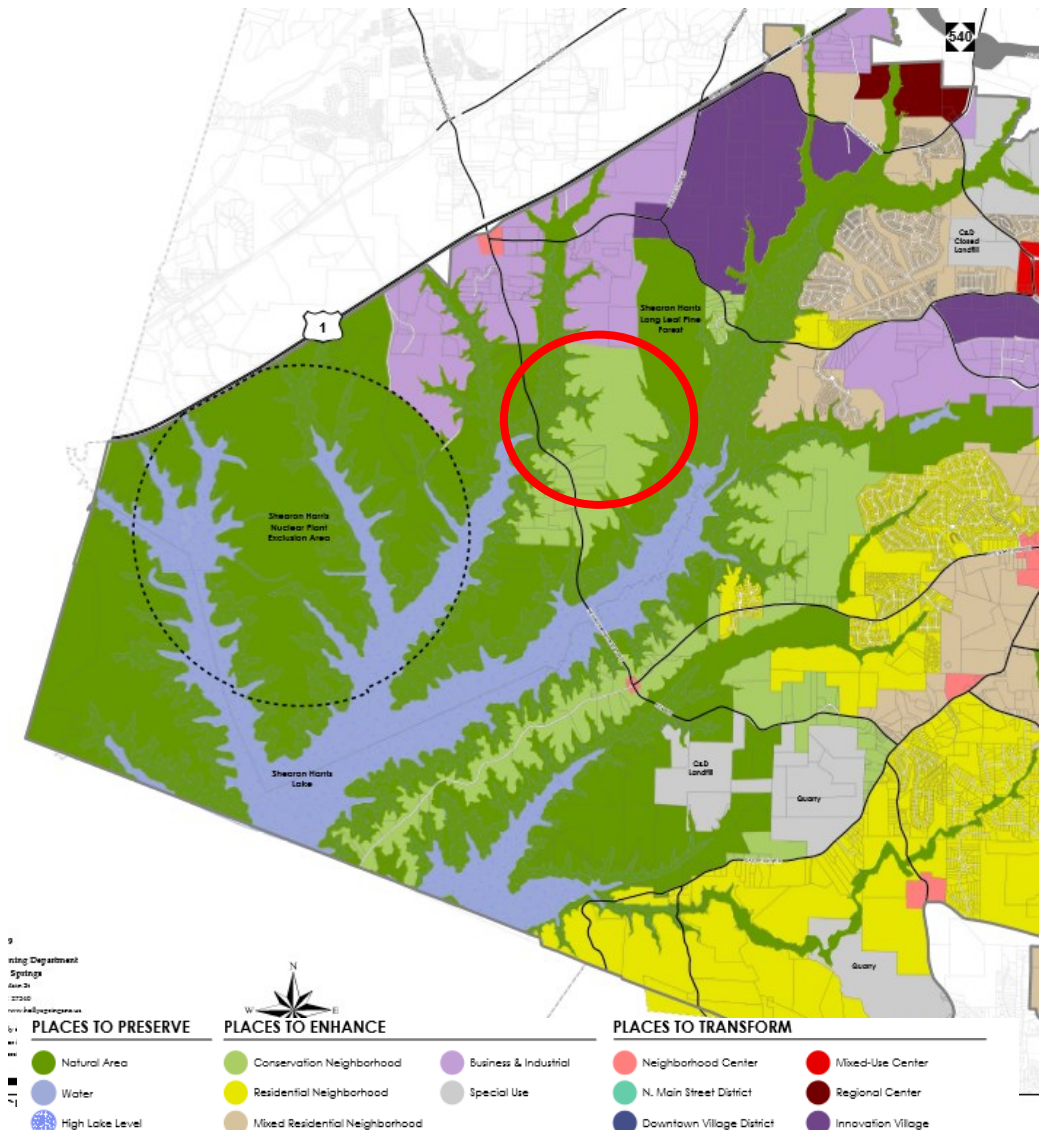


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Conservation Neighborhood on the Holly Springs Land Use & Character Map. The definition of Conservation Neighborhood appears to align better with Community Reserve than Rural. Suggest that designation be changed to Community Reserve.

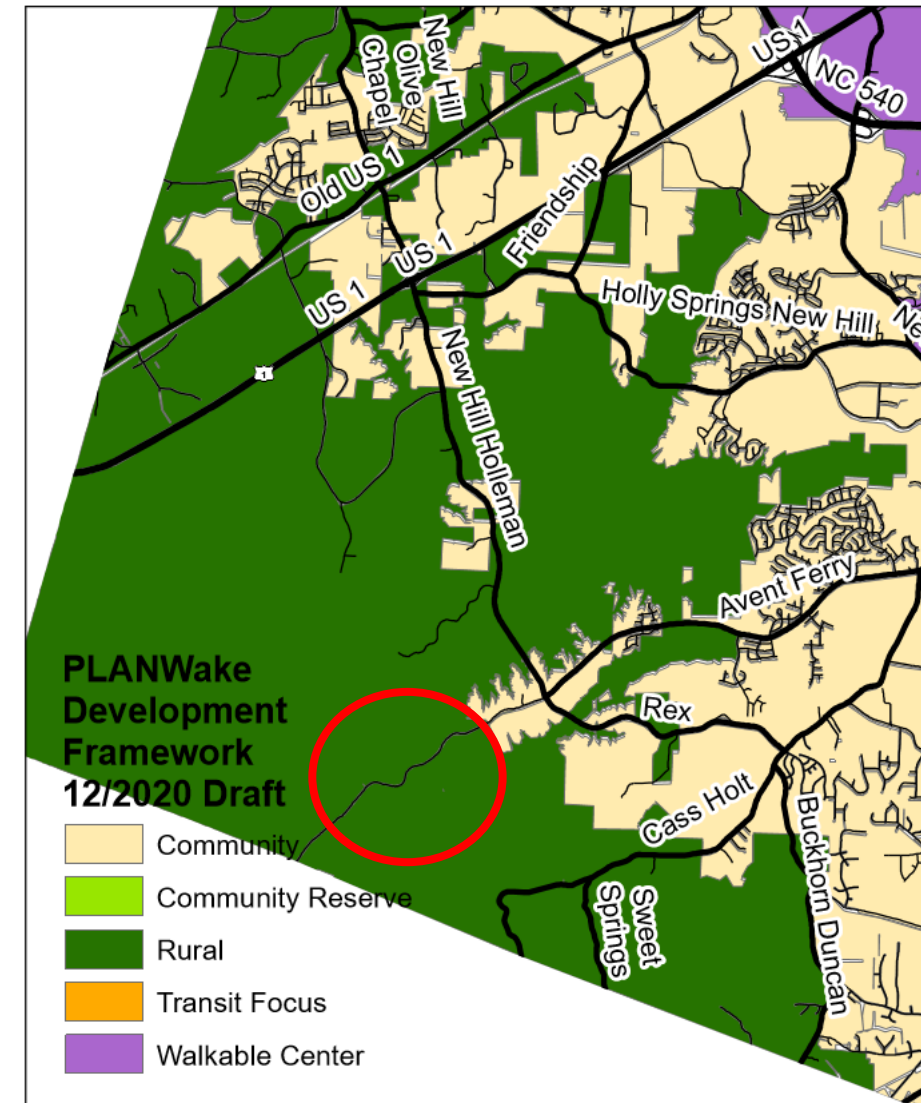


Proposed Development Framework

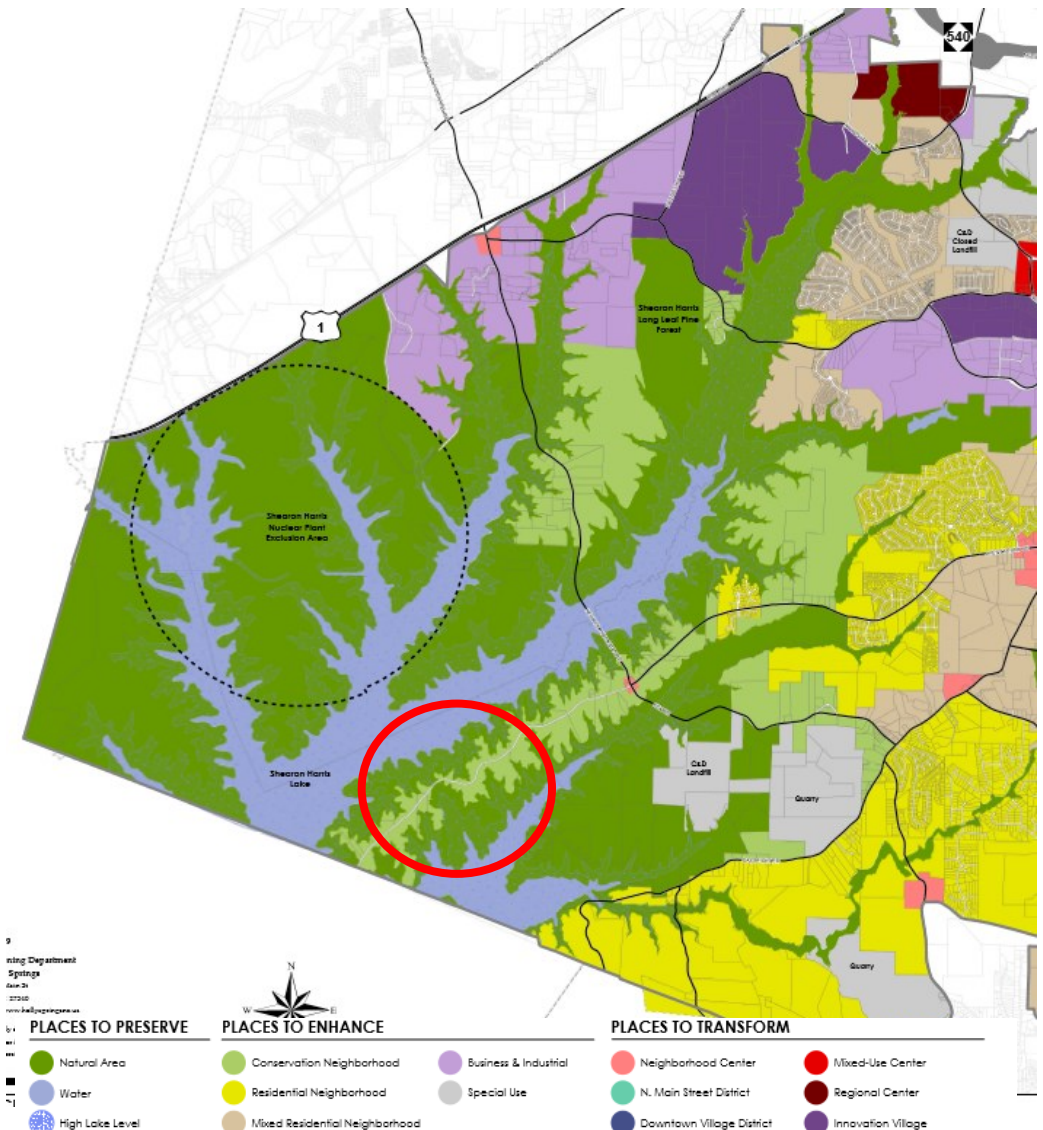


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Conservation Neighborhood on the Holly Springs Land Use & Character Map. The definition of Conservation Neighborhood appears to align better with Community Reserve than Rural. Suggest that designation be changed to Community Reserve.

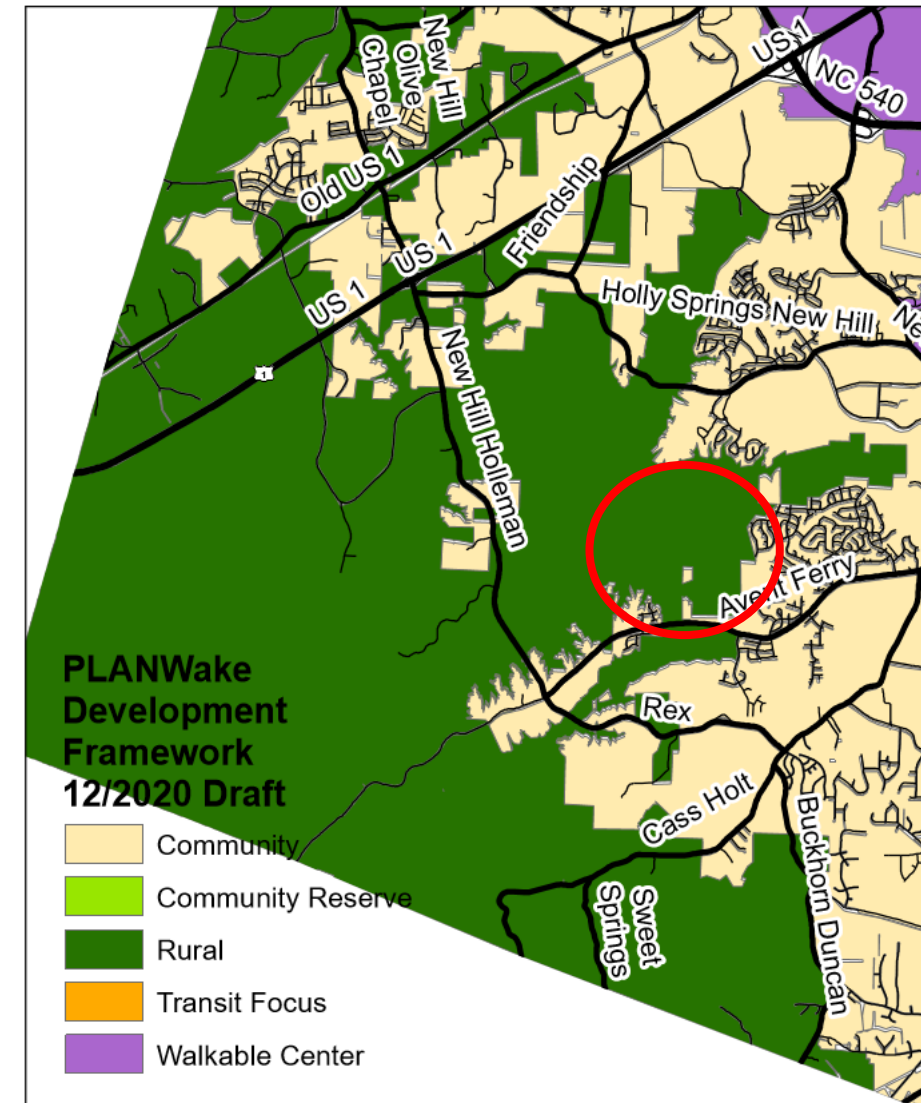


Proposed Development Framework

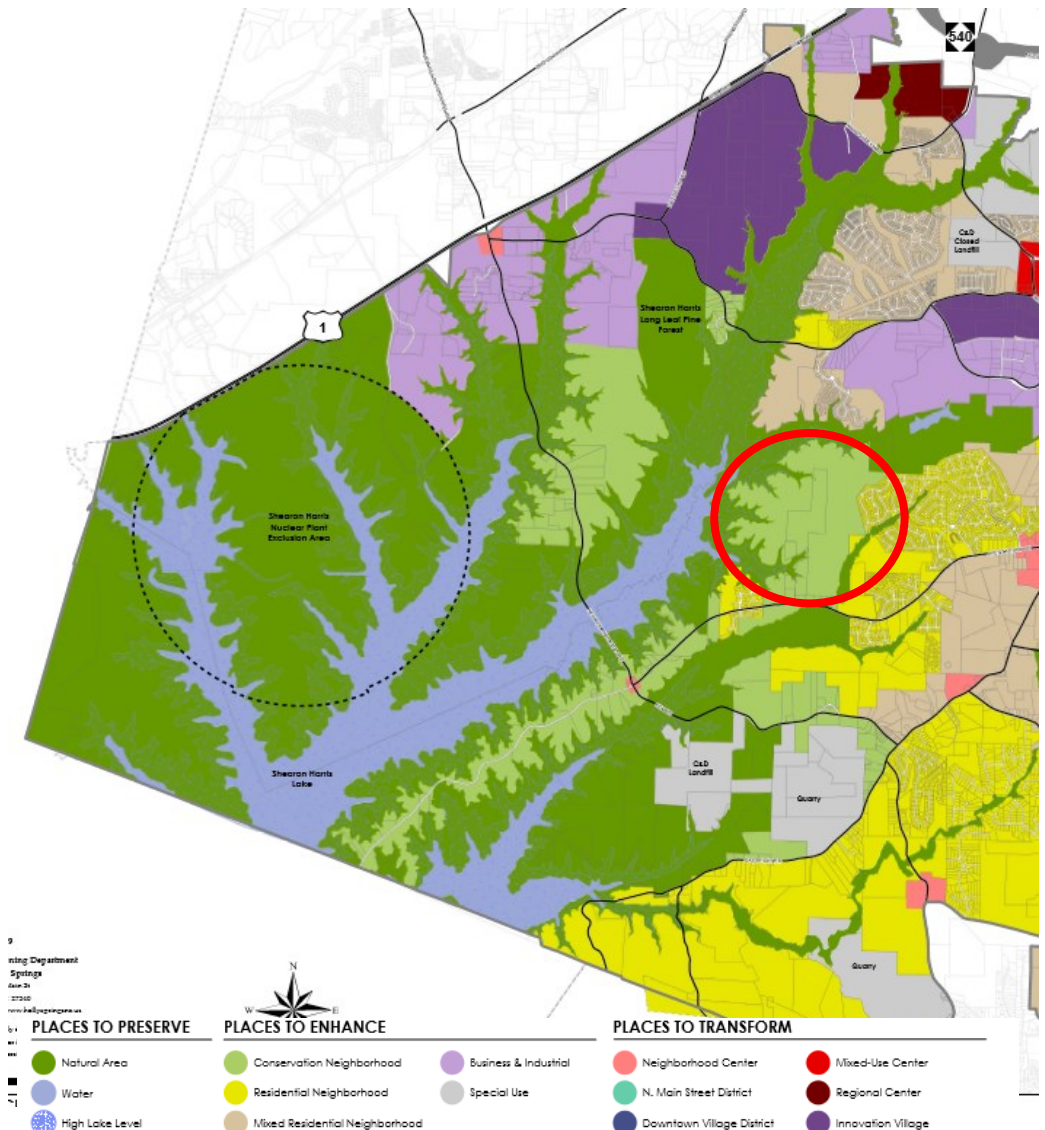


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Conservation Neighborhood on the Holly Springs Land Use & Character Map. The definition of Conservation Neighborhood appears to align better with Community Reserve than Rural. Suggest that designation be changed to Community Reserve.

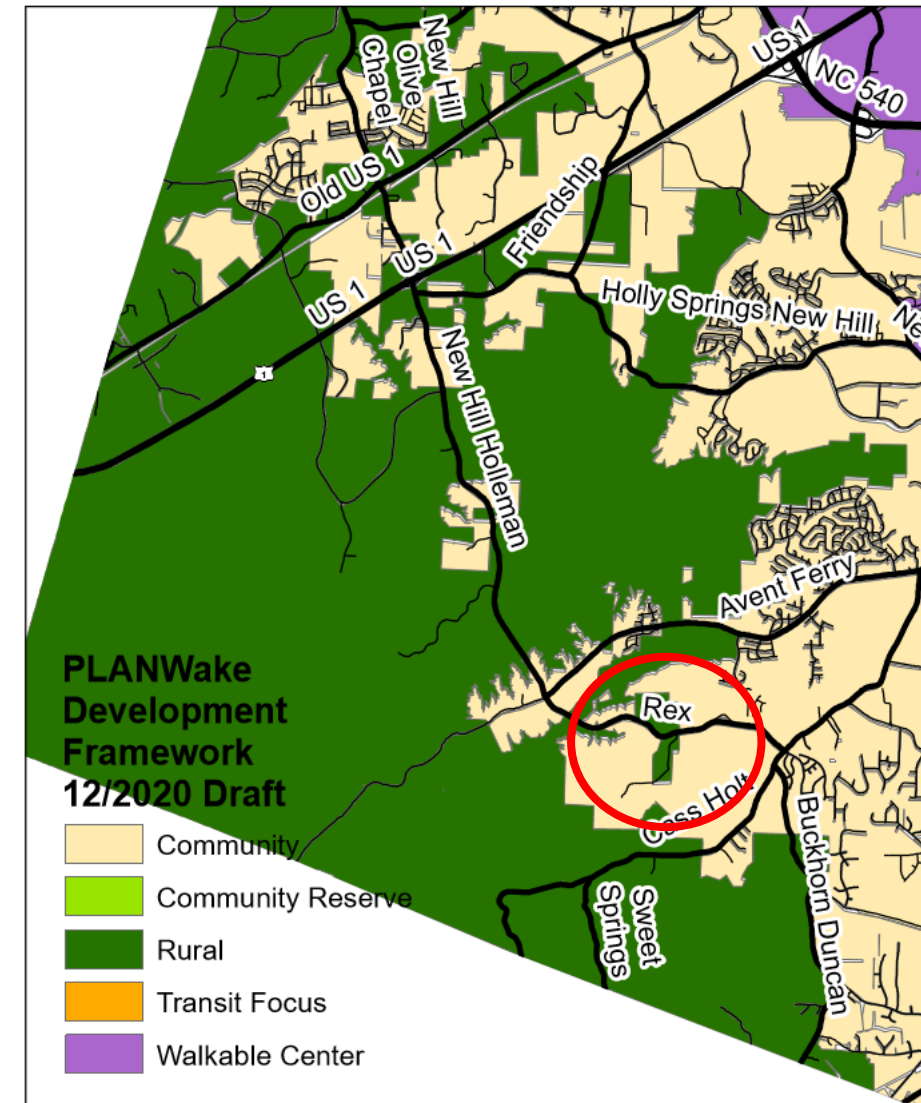


Proposed Development Framework

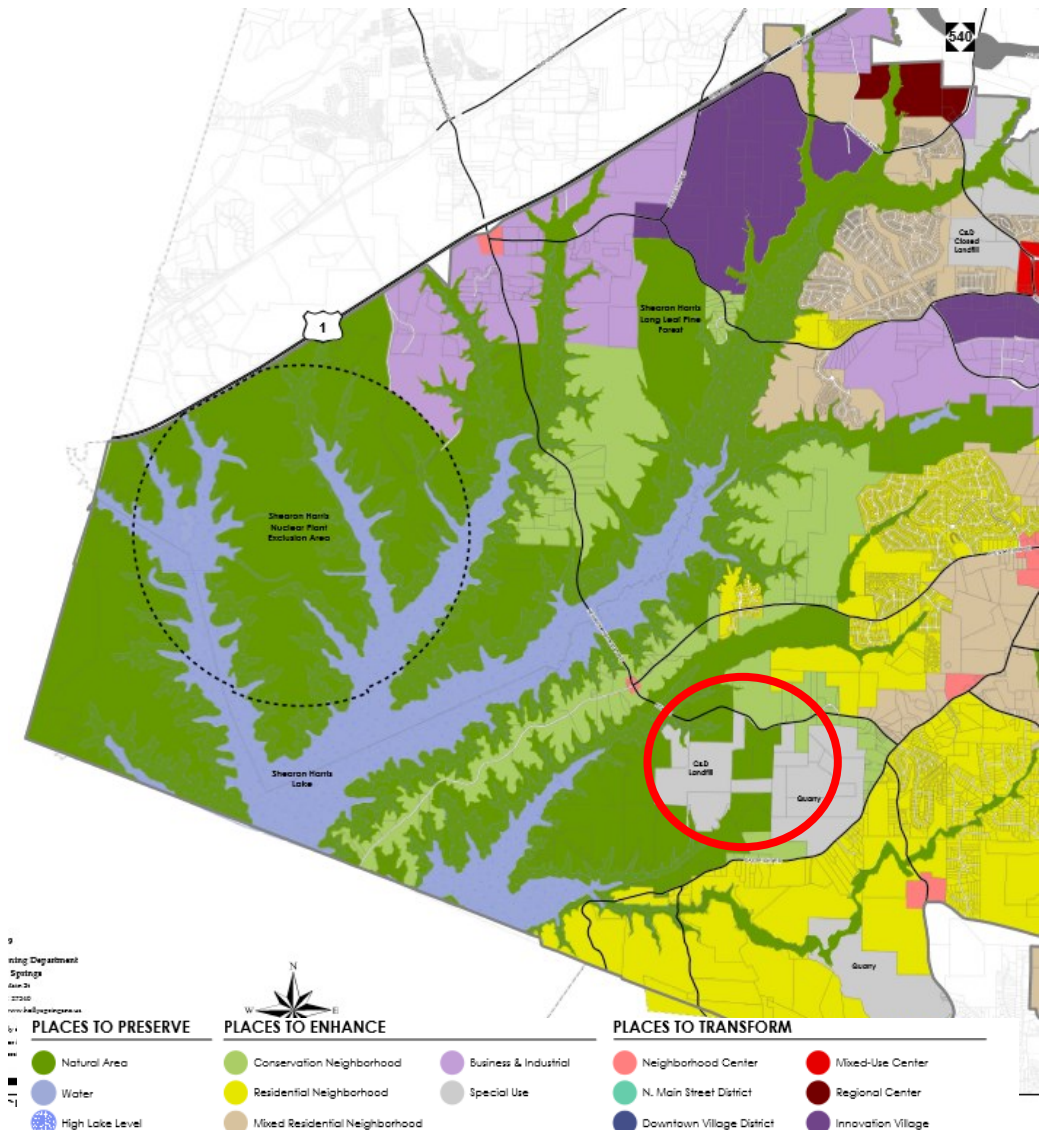


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red on north side of Rex Road is already in Holly Springs ETJ and is planned Conservation Neighborhood on the Holly Springs Land Use & Character Map. Suggest that the designation be modified to Community.

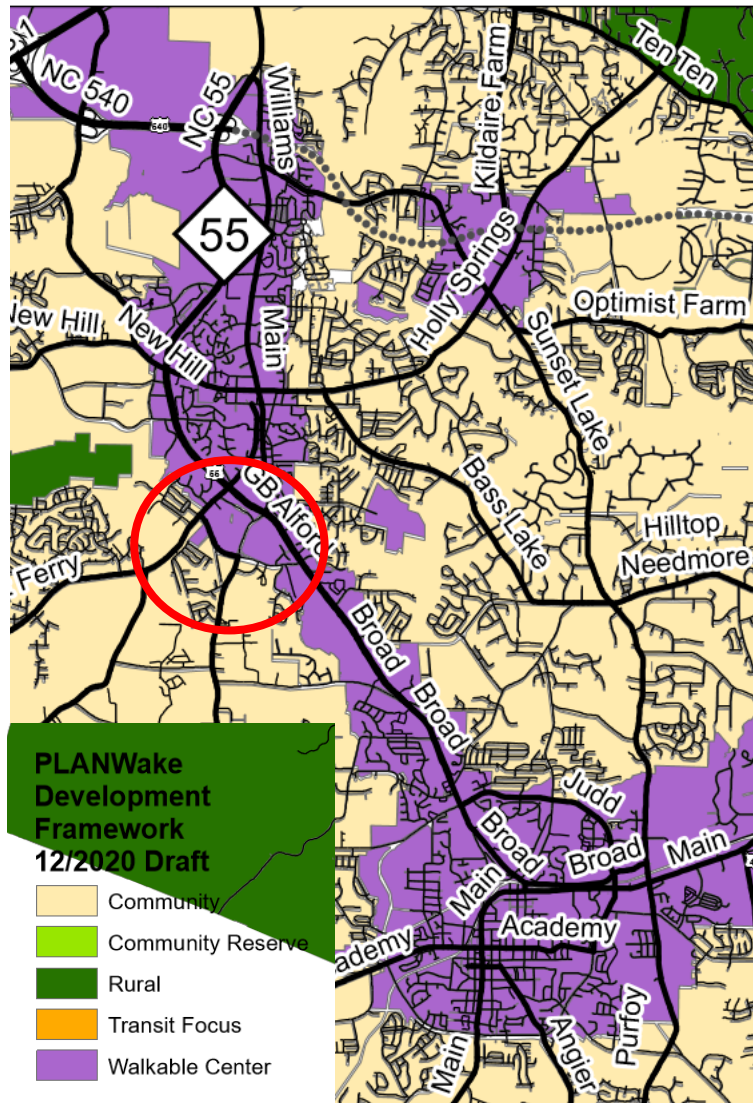


Proposed Development Framework

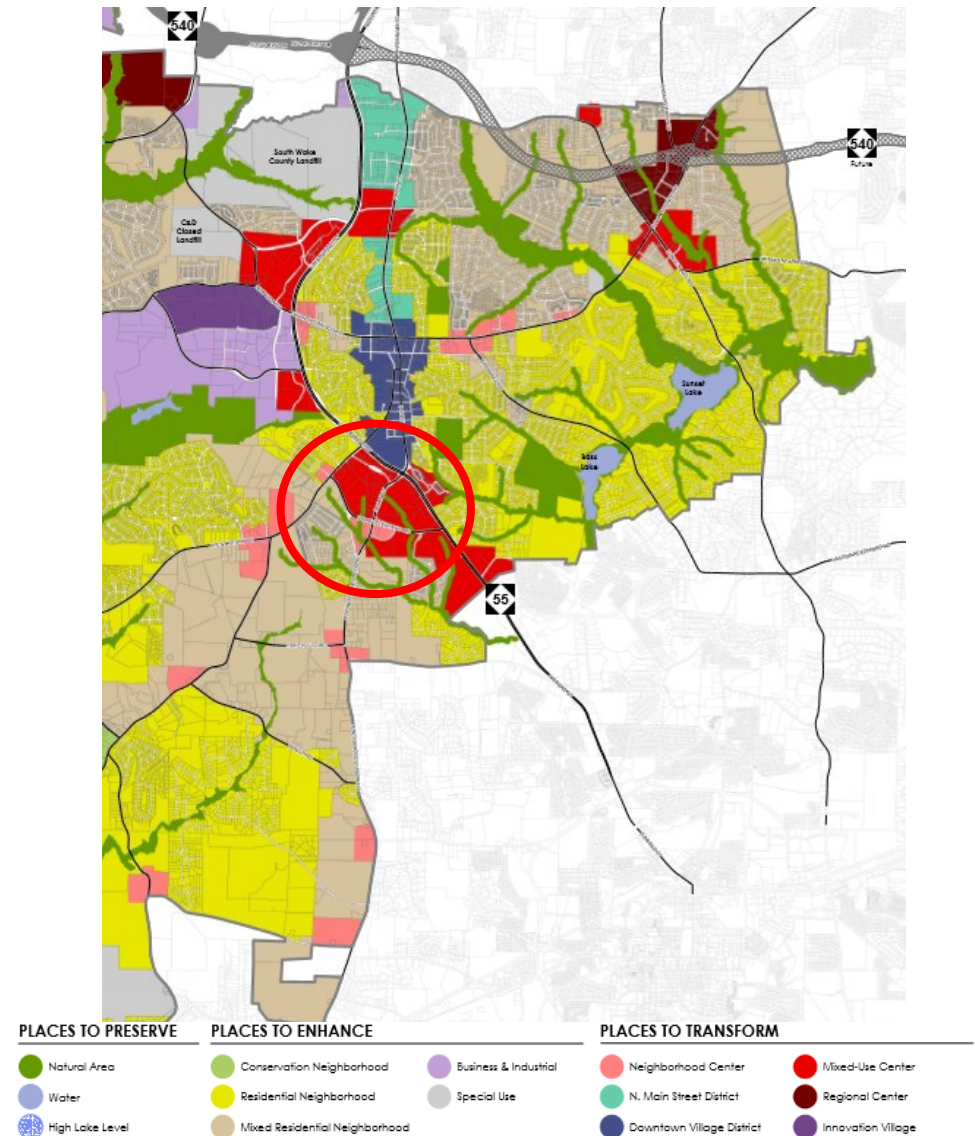


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Mixed-Use Center on the Holly Springs Land Use & Character Map. The definition of Mixed-Use Center and Walkable Center align, however the boundaries should be modified to match the extent shown on the Land Use & Character Plan.

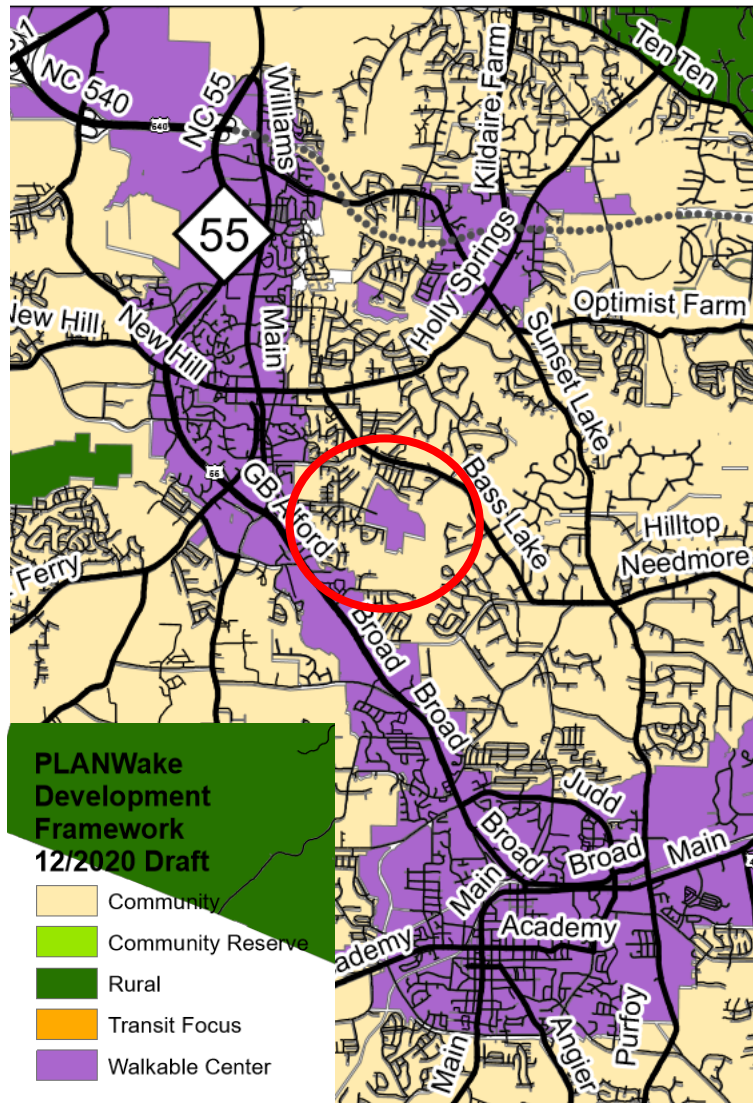


Proposed Development Framework

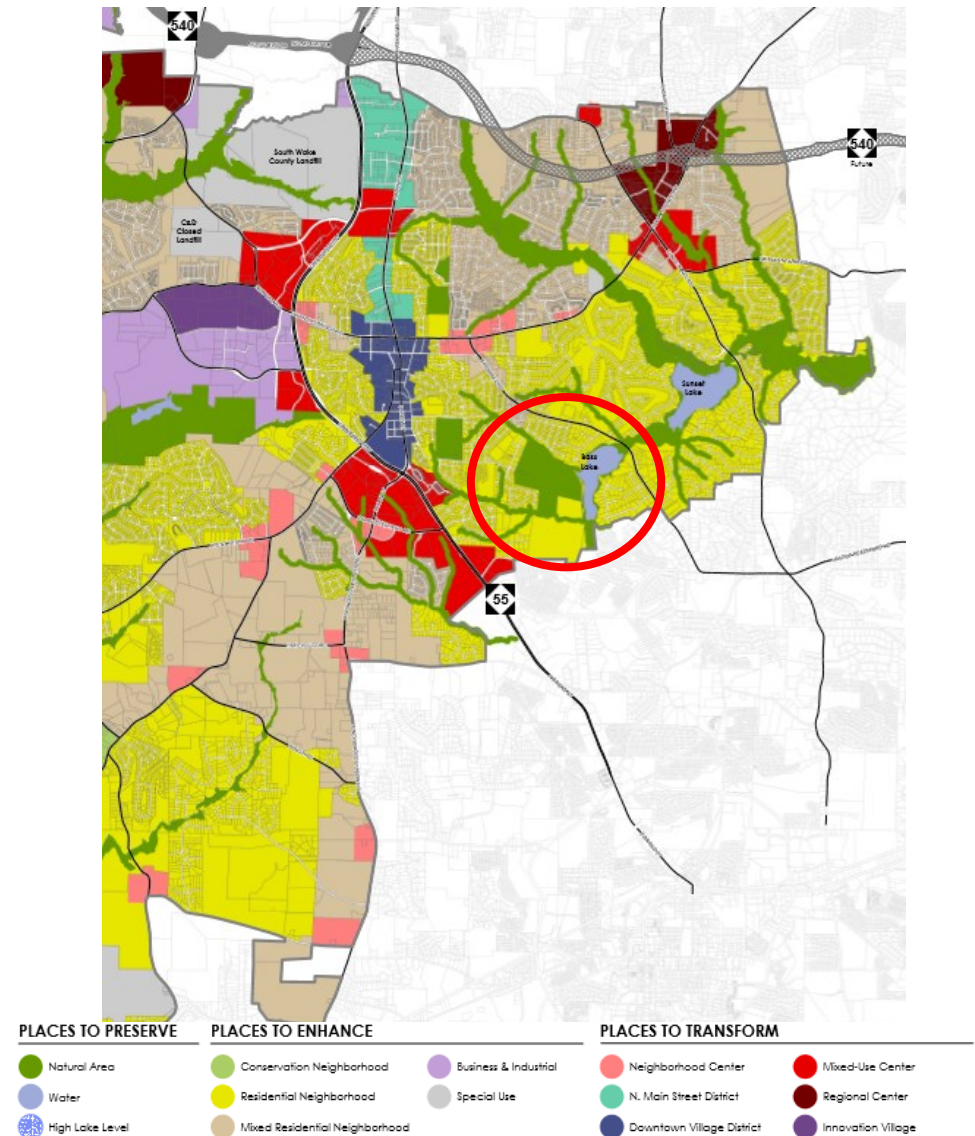


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Natural Area on the Holly Springs Land Use & Character Map. This is a park that has a conservation easement in place. It will not be developed or redeveloped. Suggest the designation be changed to Community.



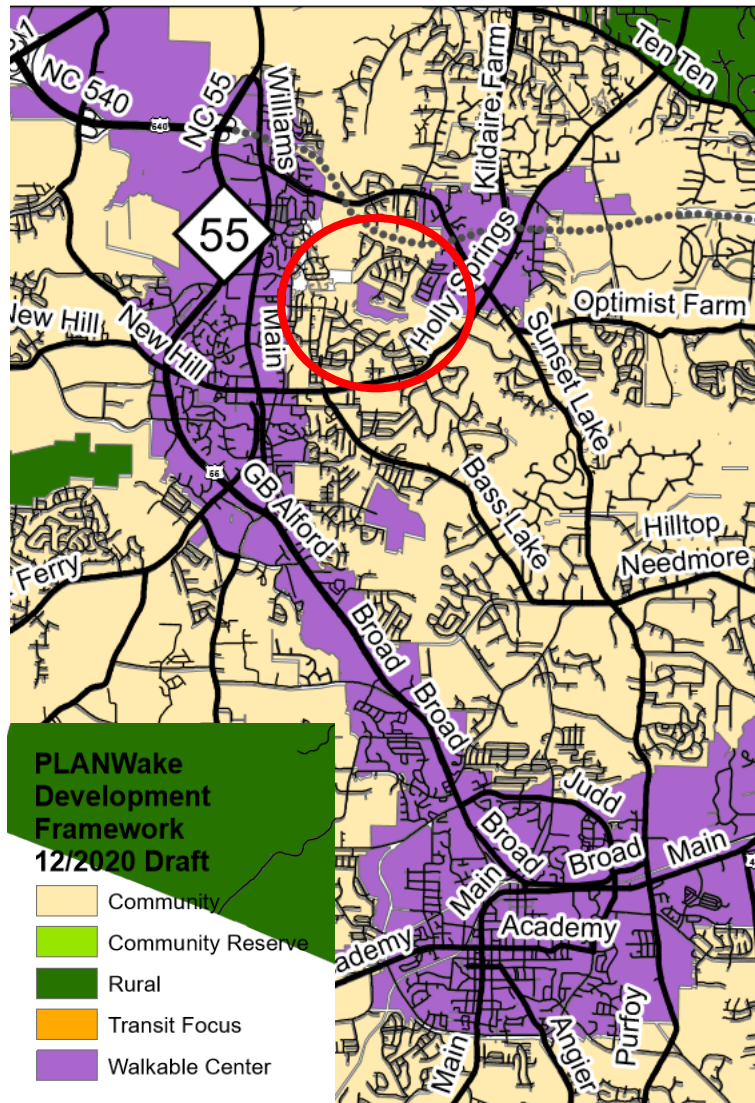
Proposed Development Framework



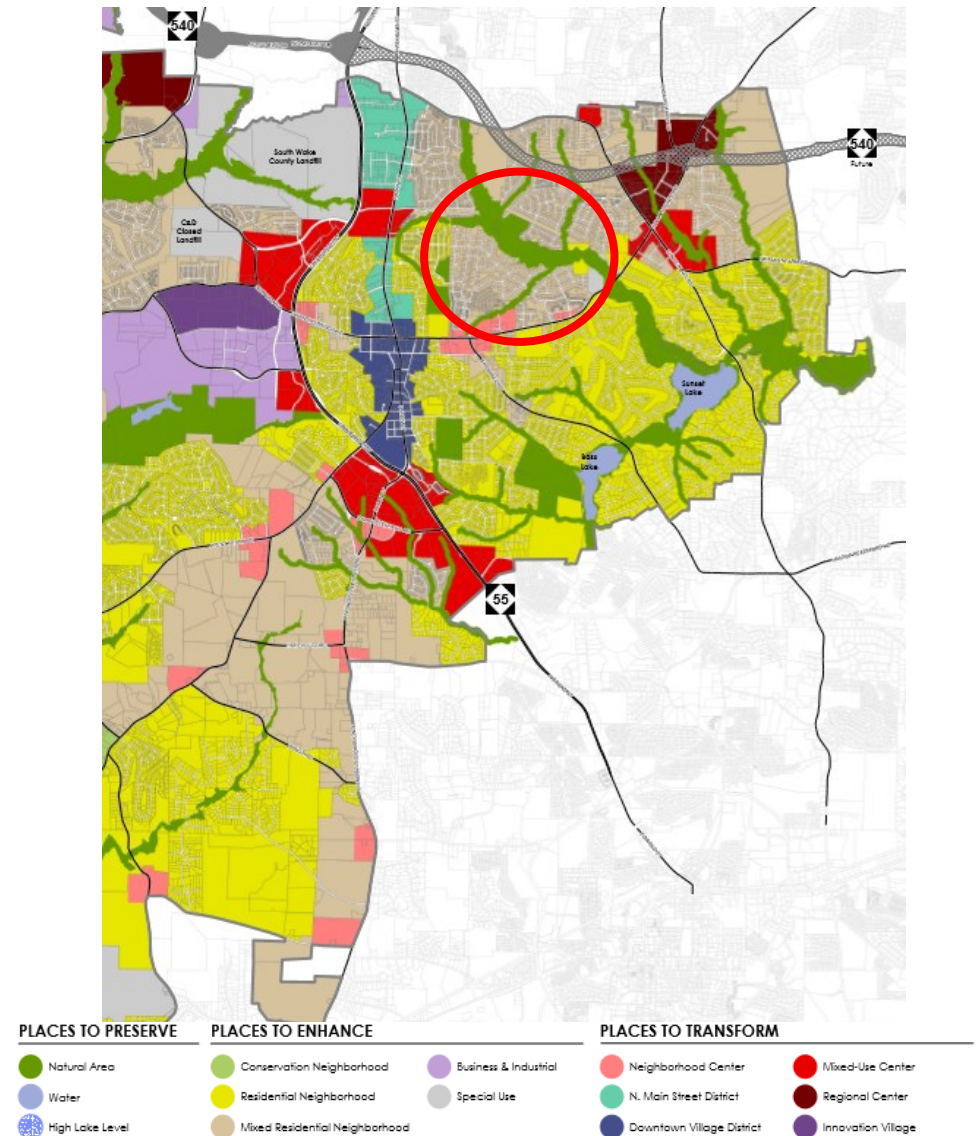
Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Natural Area on the Holly Springs Land Use & Character Map. This is a future park. It will not be developed or redeveloped. Suggest the designation be changed to Community.

There also appears to be a few parcels with no designation (white).

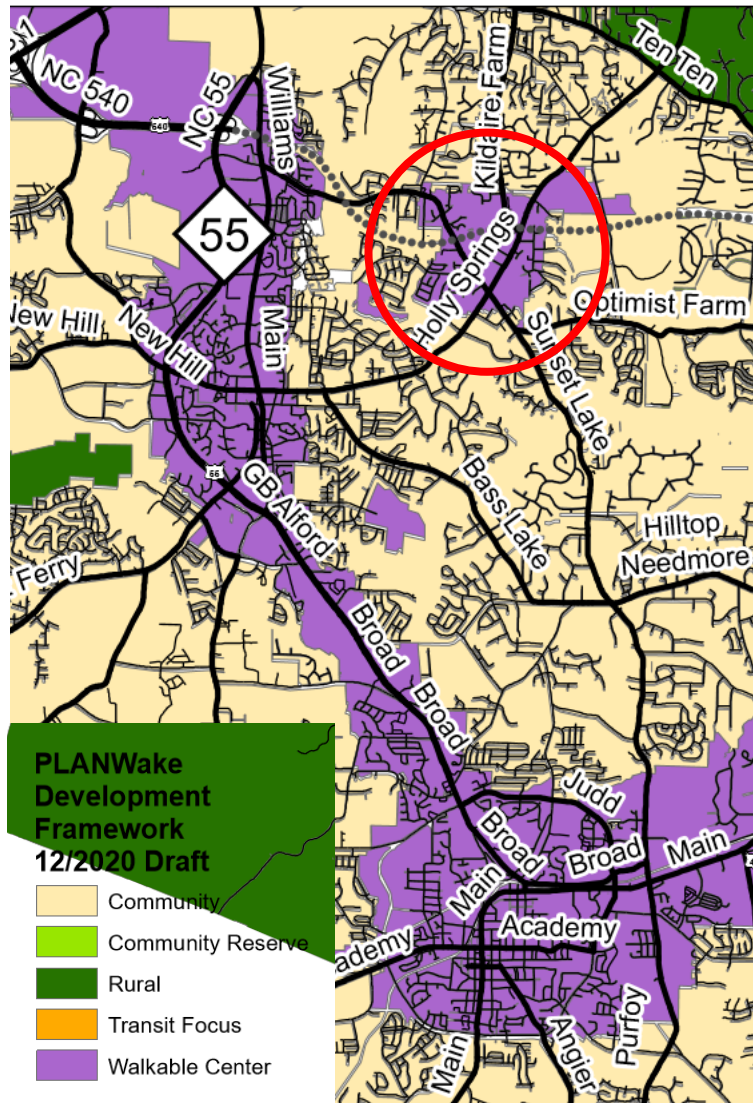


Proposed Development Framework

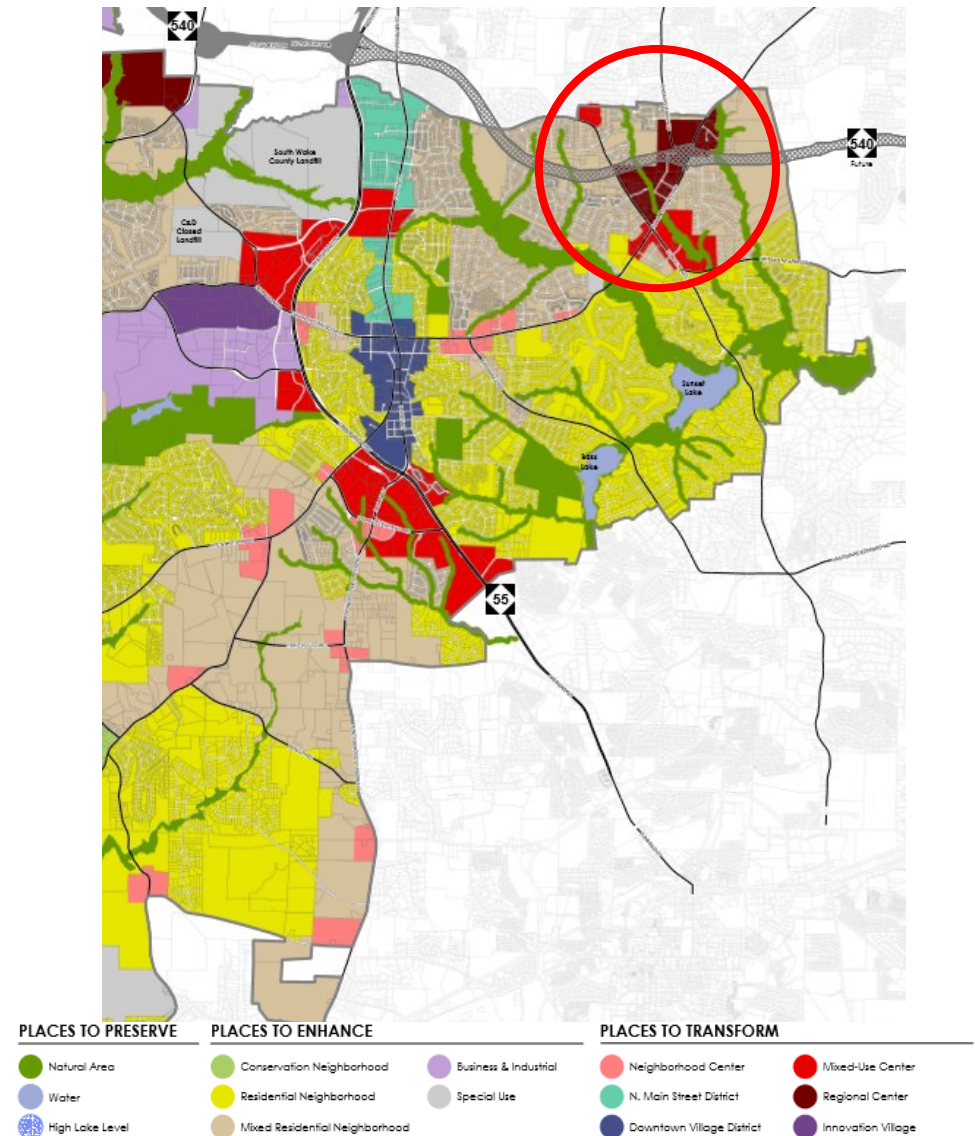


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned Regional Center and Mixed-Use Center on the Holly Springs Land Use & Character Map. The definition of Regional Center, Mixed-Use Center, and Walkable Center align, however the boundaries should be modified to match the extent shown on the Land Use & Character Plan.

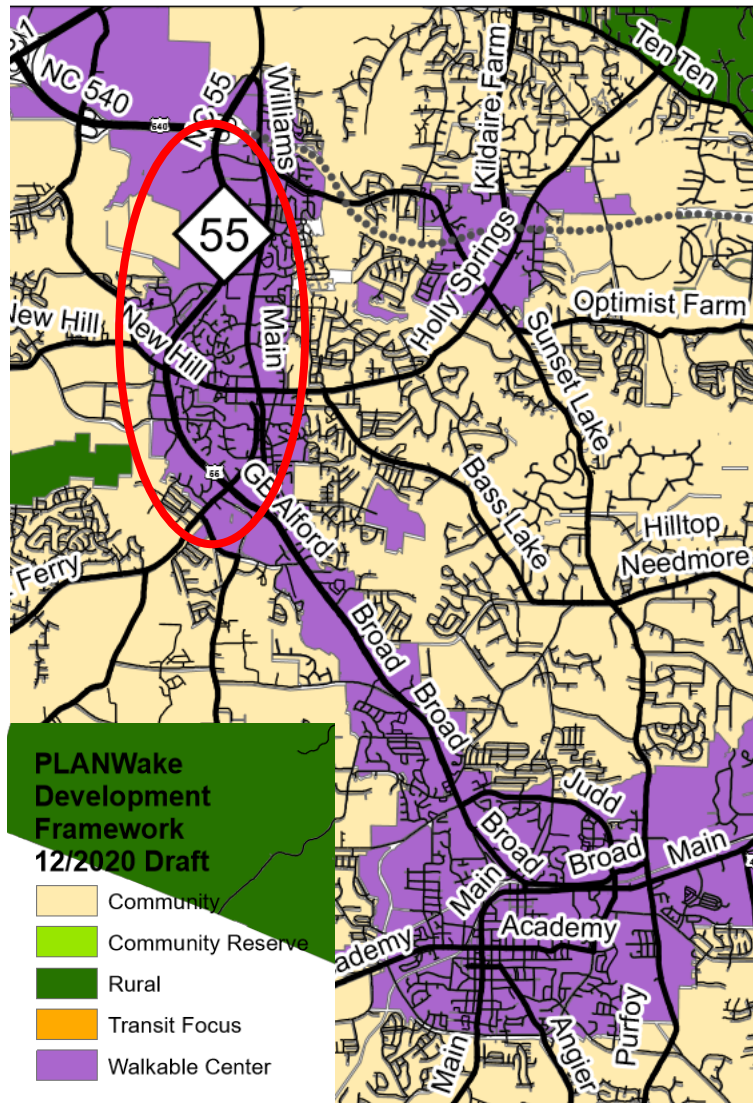


Proposed Development Framework

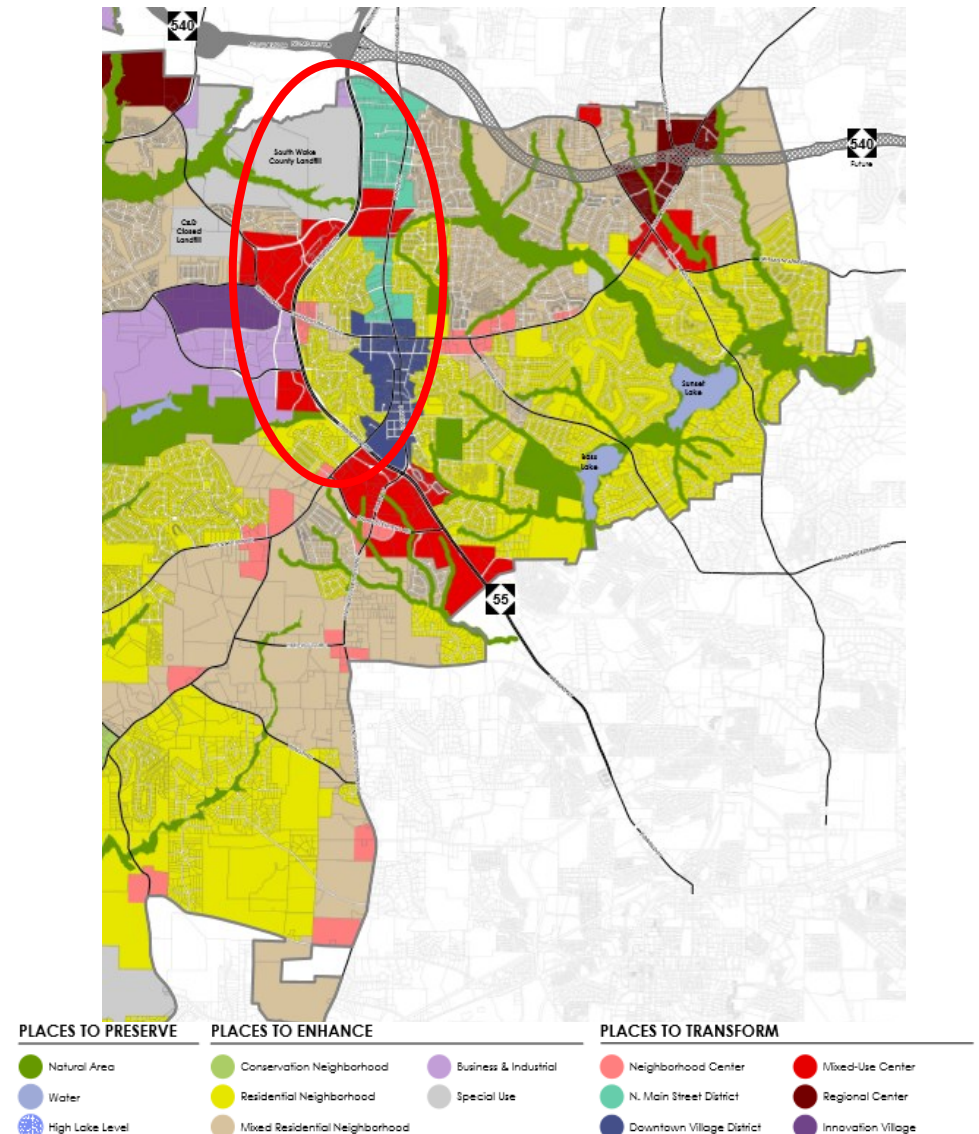


Adopted Land Use & Character Plan (Holly Springs)

Comment: Area circled in red is a planned N Main District, Neighborhood Center, Mixed-Use Center, and Downtown Village District on the Holly Springs Land Use & Character Map. The definition of N Main District, Mixed-Use Center, Downtown Village District, and Walkable Center align, however the boundaries should be modified to match the extent shown on the Land Use & Character Plan. Adjacent residential areas currently included in the Walkable Center are not generally seen as redevelopment areas but could still be included if we can discuss this further.



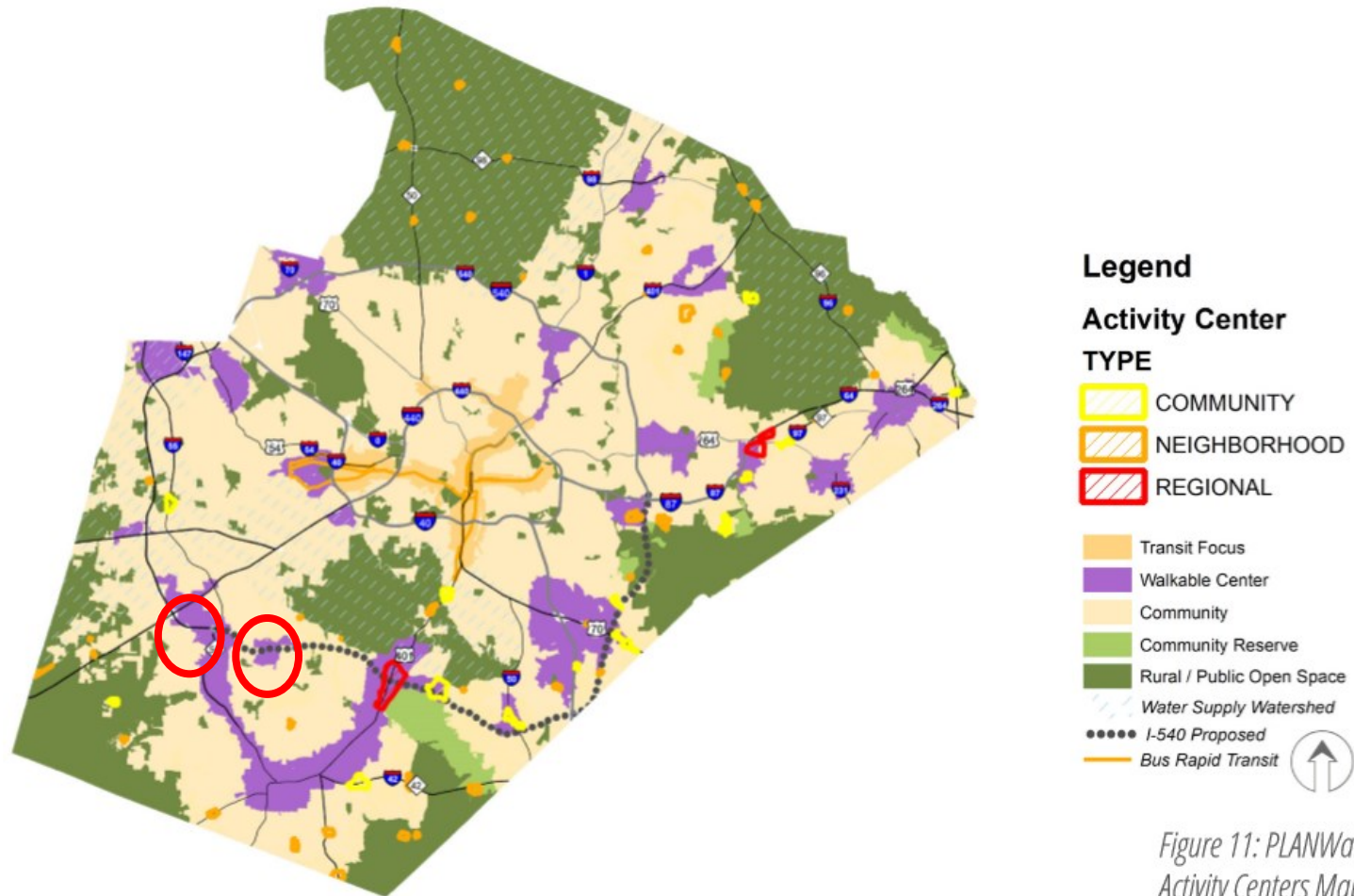
Proposed Development Framework



Adopted Land Use & Character Plan (Holly Springs)

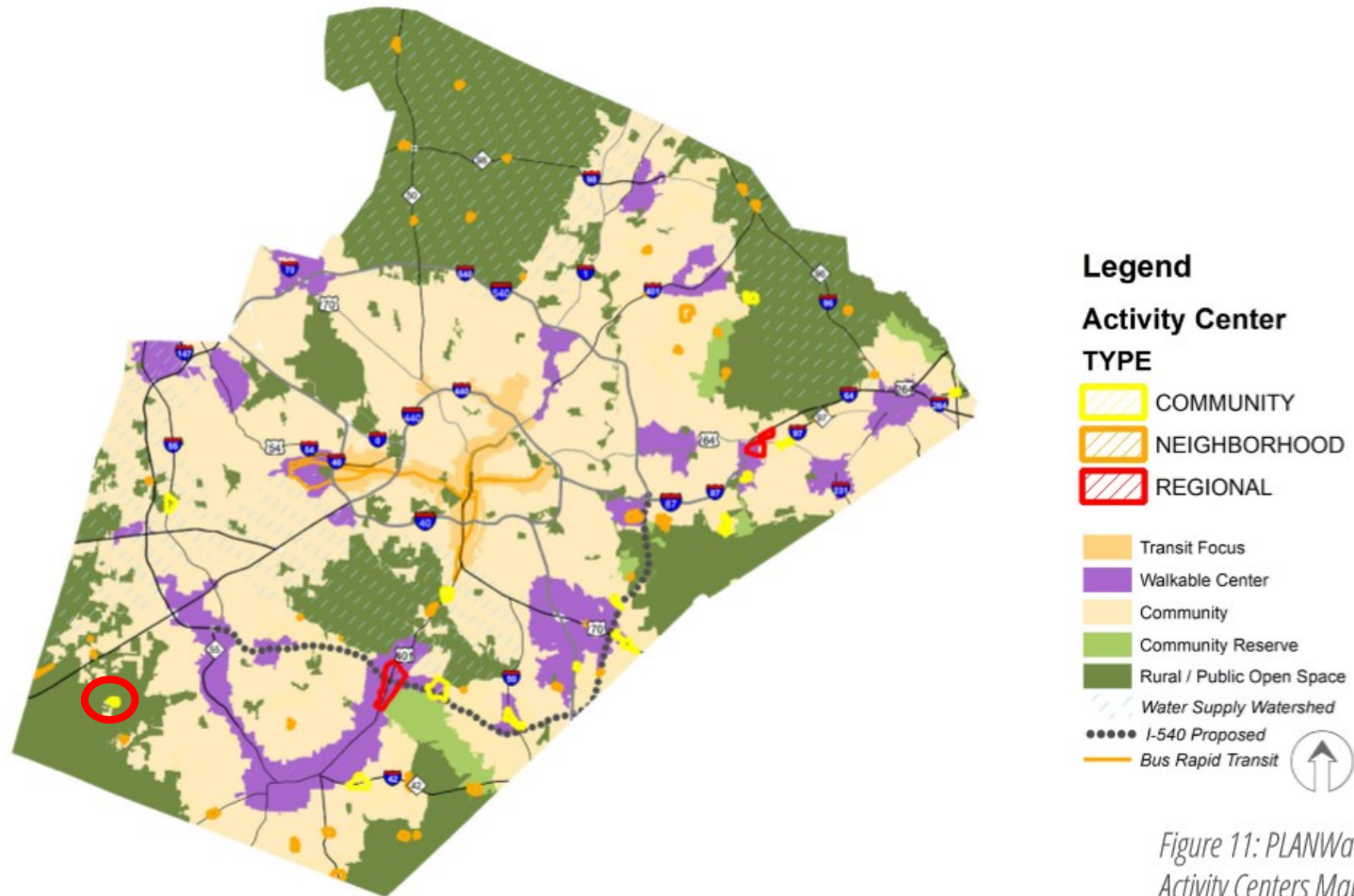
Comment: Area circled in red is a planned Regional Centers on the Holly Springs Land Use & Character Map. Should these be designed as an activity center on the Activity Centers Map?

DRAFT ACTIVITY CENTERS MAP



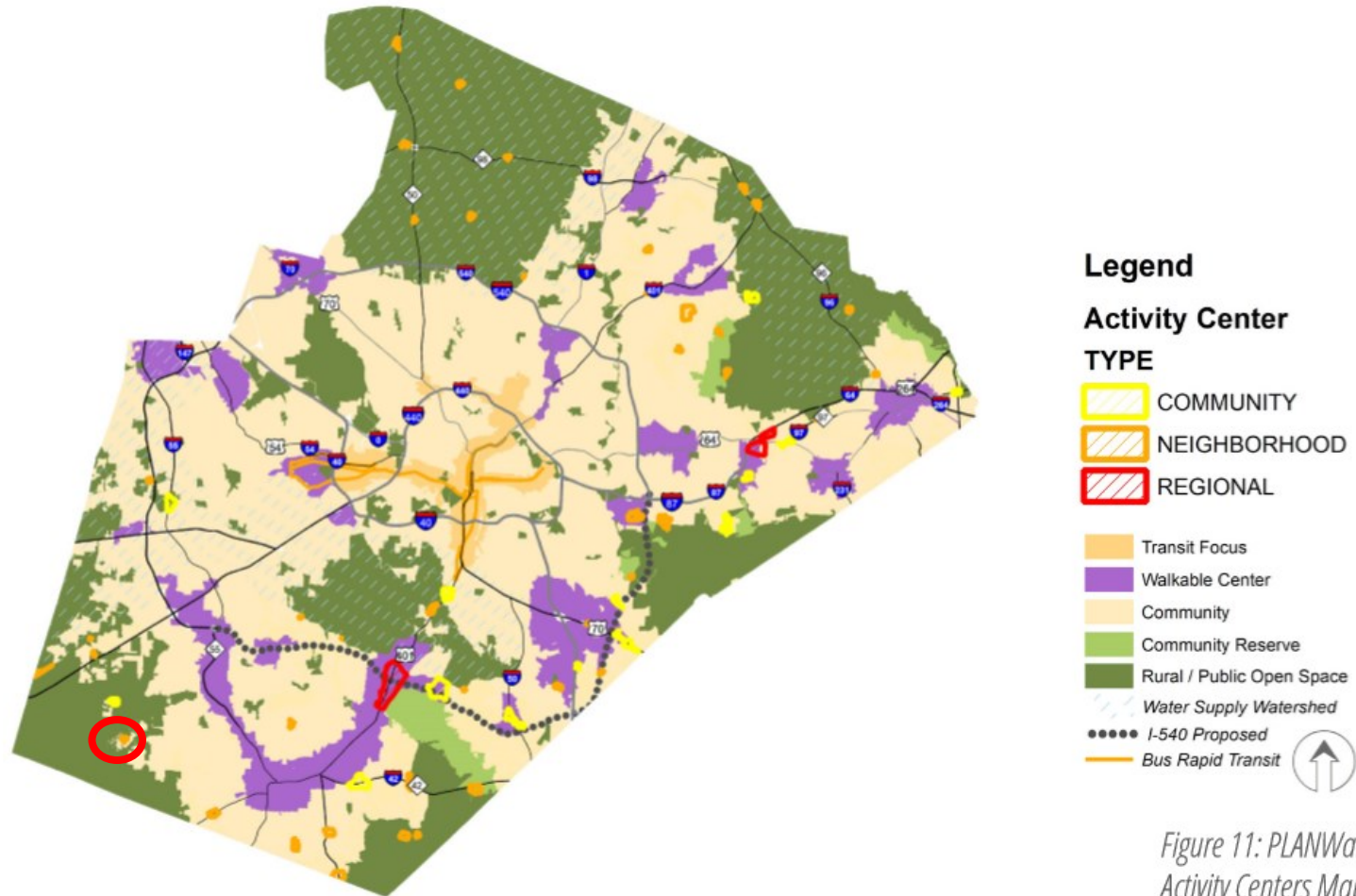
Comment: Area circled in red is in Holly Springs ETJ and is planned for Conservation Neighborhood on the Holly Springs Land Use & Character Map. This designation does not appear to align with the description of a Community Activity Center. Suggest this Activity Center be removed.

DRAFT ACTIVITY CENTERS MAP



Comment: Area circled in red is a planned Neighborhood Center on the Holly Springs Land Use & Character Map. The definition of Neighborhood Center and Neighborhood Activity Center appear to align, however the boundaries should be modified to match the extent shown on the Land Use & Character Plan.

DRAFT ACTIVITY CENTERS MAP





TOWN OF WENDELL

NORTH CAROLINA

**RESOLUTION OF THE TOWN OF WENDELL
BOARD OF COMMISSIONERS
SUPPORTING THE DRAFT WAKE COUNTY
COMPREHENSIVE LAND USE PLAN(PlanWAKE)**

RESOLUTION NO.: R-15-2021

WHEREAS, pursuant to NCGS §160D, cities and counties are required to have an up-to-date comprehensive plan or land use plan in order to adopt and apply zoning regulations.

WHEREAS, Wake County has embarked on a multiyear update in order to define Wake County's priorities for the future; renew the community's vision and goals on range of issues; and outline a path to success for the coming decade.

WHEREAS, the draft Wake County Land Use Plan (PlanWake) was presented to the Wendell Board of Commissioners on March 8, 2021.

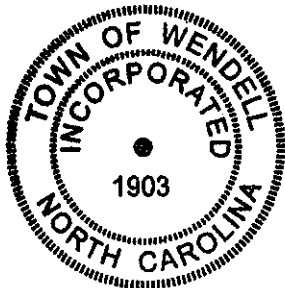
WHEREAS, the draft Plan includes a Development Framework Map that identifies portions of Wendell and its Urban Service Area as Walkable Center, Community, and Rural.

WHEREAS, the plan designations are closely aligned with the Town of Wendell's plans, policies, and development related to growth areas;


WHEREAS, where there is a conflict between PlanWake and the Town's Land Use Plan, the Town's Land Use Plan will control.

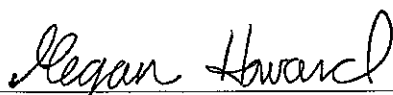
NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Town of Wendell that the Town supports the draft Wake County Land Use Plan (PlanWake) to the extent it is consistent with the Town's Land Use Plan.

This this 8th day of March 2021, while in regular session.



ATTEST:


Virginia R. Gray
Mayor


Megan Howard
Town Clerk



RESOLUTION NO. 2021-R-03
PLANWAKE – GUIDING OUR COUNTY'S FUTURE

WHEREAS, Wake County is preparing a new comprehensive plan called "PlanWake" for the County's jurisdiction

WHEREAS, Wake County Planning Staff has shared and presented the draft "PlanWake" to the Rolesville Board of Commissioners on January 19, 2021

WHEREAS, The proposed PlanWake will significantly impact the Town of Rolesville's surrounding growth areas for the Town's future growth and development.

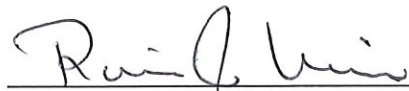
WHEREAS, The proposed PlanWake encourages the consideration of identified "Area Land Use Plans" upon request for a more detailed comprehensive study.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE TOWN OF ROLESVILLE:

Upon approval of the "PlanWake" Comprehensive Plan, the Town of Rolesville intends to submit a request for an "Area Land Use Plan" for the areas outside of the current Town Limits and Extraterritorial Planning Jurisdiction to the North, East, and South for more detailed study and recommendation for the future growth and development surrounding the Town of Rolesville.

The preceding resolution, having been submitted to a vote, received the following vote and was duly adopted the 2nd day of February, 2021.

Ayes: 5
Noes: 0
Absent or Excused: 0



Ronnie Currin, Mayor

ATTEST:



Robin E. Peyton, Town Clerk





Planning, Development & Inspections

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TEL (INSPECTIONS) 919 856 6222

A Division of Community Services
P.O. Box 550 • Raleigh, NC 27602
www.wakegov.com

February 25, 2021

Ms. Suzanne Harris
Homebuilders Association of Raleigh-Wake County
5580 Centerview Dr., Ste 115
Raleigh, NC 27606

Via Electronic Mail

RE: Wake County Comprehensive Plan – PLANWake

Dear Ms. Harris,

Thank you again for allowing us to present the County's draft comprehensive plan to your Governmental Affairs Committee. The feedback we received is very helpful as we finalize the plan for consideration by our Board in the coming weeks. To facilitate our response, we have grouped your questions and comments into appropriate topics on the attached pages.

We value our relationship with the Homebuilders Association and look forward to working with you and your organization on the development of tools and strategies toward implementation of the plan. Should you have any questions or want to discuss this further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Timothy W. Maloney".

Timothy W. Maloney, Director

cc: David Ellis, County Manager
Frank Cope, Director, Community Services

**PLANWake Responses to Comments by the HBA on draft PLANWake Draft Document
February 25, 2021**

Housing Demand:

What if market demands for location of housing isn't in municipal areas, but further out? COVID-19 has altered housing demands/ideas since the inception of this plan. Does the plan take into consideration the massive changes in our county, state, nation and world over the last year?

The report states that "Many residents choose where to live by what they can afford rather than where they want." It puts this in a negative context when in actually this is the basis of a) capitalism, b) housing markets, c) the American Dream, d) Supply and Demand, etc.... The goal should be to make more places desirable and raise the bar for all. Maybe there should be a section in the report suggesting that all communities should seek to make housing more affordable (see above), and not by placing the burden solely on the developer/builder through "inclusionary zoning" tactics.

Under "Create Walkable Spaces and Places" it says, "Similarly, when asked where they would live in the future if they chose to move, 64% of survey respondents identified they would prefer to live in a downtown or walkable neighborhood where more transportation options are available." I wonder, how would this percentage change now if asked again? Much has changed in the world since this question was first asked and our industry is seeing a shift that would suggest different preferences.

Response: Regarding housing balance, demand in the Wake County market has remained strong in all segments and we expect to see that continue post-pandemic. The identified lack of affordable and walkable housing options in the County, that is mostly attributable to high population growth, strict municipal zoning, and parking requirements, is expected to be a key concern in future years. The municipalities are best suited to provide the range of affordable and walkable housing options anticipated.

Natural Systems:

No citation to support statement, "Studies have shown that preserving natural systems is almost always..."

Response: There are many studies that demonstrate the benefits of preserving our natural systems. Please refer to these two resources as examples:

<https://www.epa.gov/hwp/benefits-healthy-watersheds>

<https://www.conservationfinancenetwork.org/2018/04/24/conservation-partnerships-with-water-utilities>

Vulnerable Communities and Poverty:

A map depicting income levels around the County would be helpful. Where do the residents live below the poverty line? Are most of these people in 3 - 5 areas or are they scattered across every municipality? How has the location of this demographic changed over the years?

Some pockets of poverty have relatively good access to the existing public transportation, but they lack easy access to food stores and healthcare facilities.

The quote that was selected for this section "We want Wake to remain affordable to low and median income families." is actually kind of bizarre. How can it "remain affordable" when the stated problem is that it is not affordable?

A more positive approach would be to ask for an increase in job opportunities, childcare and health care so that families can get out of poverty.

Since the goal is to keep homes affordable, the County should include in this section requirements for Municipalities to provide opportunities for the private sector to increase housing opportunities for all families. This would be by lowering fees and development and construction costs. If communities are not encouraged to reduce the costs of housing then municipalities can get rid of residents who are below the poverty line by increasing housing costs so that they leave.

Response: The Wake County Social Equity Atlas Maps are located here:

<https://www.wakegov.com/departments-government/planning-development-inspections/planning/social-equity-atlas>

These maps were created to allow stakeholders, agencies, and organizations to better understand the issues. PLANWake anticipates working with housing, transportation, job training and economic development to address issues moving forward. It is important to keep in mind that housing affordability is an issue that impacts all income groups to an extent as everyone is competing for a limited resource. The housing affordability issue is most acute for households making 30% to 125% of the County's area median income. For these groups, access to proximate affordable and safe housing can be key to attaining and holding a job.

PLANWake and the Wake County Comprehensive Affordable Housing Plan state that all municipalities are and will be responsible for supporting and creating affordable housing. It is anticipated that the municipalities will use various tools to achieve results. The City of Raleigh and the County specifically have recently committed new funding resources to this effort and to tracking results.

PLANWake Development Framework Map:

Need to reconsider some classifications given future road projects such as the completion of 540 around the south/southeast side of the County and the land designation around that area. Is it really “rural”?

Does this Transit Focus section jive with the City of Raleigh Transportation Plan along BRT?

Are “Walkable district with pedestrian and bicycle amenities” like what was done and then reversed with Fayetteville Street Mall in Raleigh?

We agree that “to the extent possible, the County [should] seek to unify and align relevant development policies across jurisdictions.”

Response: The next version of the Development Framework Map will change the designations in many areas based on municipal coordination. In some locations the County’s perspective is different than the municipality’s community-vetted conversations. In these areas the County is working in partnership with the municipal areas to determine the best designation. Examples of these areas are the BRT areas in Cary, Raleigh, Garner where each municipality has agreed that enough work been completed to designate these areas as Transit Focus and, the I-540 / NC-540 areas in Raleigh and Holly Springs where the municipalities would like further work to be completed before determining if a Walkable Center designation is appropriate.

It is anticipated that County will work closely with the municipalities on the Walkable Center areas over the next few years. The keys are appropriate density, connections, stress free pathways, utilities and uses. The lessons learned in early efforts will improve results in future areas. The County has intentionally designated multiple areas with significant acreage to allow for experimentation and creativity.

Municipal Transition Standards:

What are examples of MTS’s? This approach sounds like a way for the County to prohibit development in areas that municipalities aren’t ready to expand into with water and sewer, but where there is a demand for a certain type of development...for example, large lot subdivisions. This would be concerning to both the residential housing industry and land owners interested in selling their land.

Response: The County has had its Transitional Urban Development Standards (TUDS) ordinance in place for over a decade. This ordinance requires development within a specific distance of public utility line to tie on. The proposed Municipal Transition Standards (MTS) ordinance will be similar but require the municipality and the County to work in partnership on the decision made on a particular development. This is done to some extent with TUDS ordinance, but the MTS will formalize the process alongside new tools and strategies.

Community Areas:

The definition of Community Areas states that: “Community areas are lands for municipalities to expand and grow beyond their current boundaries. Public utilities are not currently provided in these areas, but they will likely be extended to serve these areas within the next decade. Community areas are primarily undeveloped and offer a significant opportunity to create walkable, sustainable and mixed use places through good design principles and careful planning. These areas also offer the opportunity to conserve valuable open space and to develop parks and other green recreational pursuits that can support the local economy and foster a connection to the land.” However, the Community Areas cover over half of the County. In reality, Community areas are the areas of the County that have developed with a suburban character. There are few opportunities to reimagine them in the manner that this report suggests. Please clarify how the County sees achieving this goal.

Response: The definition of the Community Areas in the Plan will be updated in the next draft. The version in the draft is not a correct summary of the Community Areas. The Community Areas include corporate limits, ETJ and some future expansion areas (currently in the County). The majority of the land in the Community Areas are currently existing corporate limits and existing ETJ. The expectation is that these areas will be tied to the “fabric” of the municipalities as the municipalities implement their comprehensive plans.

Portions of the municipal areas are already seeing notable redevelopment and other areas are designated for change. The County plans to achieve its goals in the Community Areas as the identified areas are redeveloped, and these new areas are better connected into the surrounding land uses.

Metrics:

Overall Response: As noted, this plan is not intended to provide a solution to every issue identified. Rather it is expected the County and its partners will work year over year on other tactical plans to achieve results. The details below are provided to give some insight into how the County will start addressing the metrics. It is expected the tools will evolve over time. The County believes these metrics are not at odds with each other.

Increase Non-Automotive Trips – How has 2020 affected this?

Trips: NCDOT’s Vehicle Miles Traveled (VMT) numbers suggest the County’s trip miles were down only about 19% from 2019. The Lock-downs have specifically impacted school and work trips for those willing and able to stay at home. It is expected that school trips will return but work trips may be permanently altered. The Lock-downs also highlighted the benefits of walkability for many. The relatively high VMT even in a lock down suggest that people are still required to drive to access basic services and employment. PLANWake hopes to work with municipalities to better connect uses in specific areas with stress free pedestrian and bicycling options.

Decrease Population Experiencing Severe Housing Problems – How will Wake County achieve this lofty goal?

Severe Housing Problems: The primary sub-standard housing issues in Wake County are environmental (water, mold, asbestos), non functioning utilities (electric, water, heat) and overcrowding (multiple families in a single unit). These conditions are tolerated primarily based on cost. The County anticipates addressing this issue by investing in affordable housing options and other specific interventions when needed.

Protect Open Space – How can 30% goal be achieved, while still accommodating the doubling of population growth and also achieving affordable housing goals? Seems like something has to give.

Open Space: The short answer is appropriate density. Even with only slight changes to density, many of which we are seeing built by the market today, the County and its partners have more than enough land to meet this goal. Also note that this 30% open space area will include the future municipal parks, open areas, and public and private conservation easements, etc. all of which are key parts of the community fabric.

Increase Household Income – How will the County reduce the number of employees earning less than \$15 per hour by 50% through this particular plan?

Household Income: The County has various initiatives including job recruitment, job training and incentives already underway on this. See the links for example programs. PLANWake will create an annual look at progress and relate this progress to the other metrics.

<https://indyweek.com/news/wake/wake-county-wake-tech-wake-works/>
<https://raleigh-wake.org/business-advantages/equitable-economic-development>

Intentional Development – How did the County come up with the breakdown of the percentages shown here?

Development Targets: The County developed the percentages by examining current development trends, available land and municipal goals. For example, Raleigh's recent Equitable Development Around Transit study identified as much as 60% of the City's future population could be in the key BRT corridors.

<https://raleighnc.gov/equitable-transit-development>

Maintain and Expand Tree Canopy – This will be tough to add another 20% onto what's already required and try to create more affordable housing options to ensure people aren't spending too great a percentage of their income for housing.

Tree Canopy: The tree canopy metric will not be included in the next draft. The County has not determined an appropriate way to measure the expected transition from natural tree canopy

areas to urban tree canopy locations. The County will revisit this metric when tools for measurement are determined. Sustaining an adequate tree canopy is an ongoing concern and the County is very interested strategies and equitable tools to address it.

Reduce the Percentage of Households Burdened by the Cost of Housing and Transportation – How will County do this 40% reduction coupled with adding more to open space and expanding tree canopy?

Housing and Transportation: It is anticipated this metric will benefit from appropriate densities, a focus on transit and transportation nodes and efforts on housing affordability.

Expand Access to Services for Vulnerable Populations – Is this access purely related to proximity or to knowledge and comfort level? How does County plan to reach this goal?

Expand Access: This will likely entail a blend of proximity, i.e. testing that services are in the right place, access, i.e. testing that potential clients can access services, education, i.e. testing that potential clients are aware of services and alignment, i.e. testing that services are set up in ways that potential clients can actually use. The County and its various partners already have various programs in place and each of these programs are being asked to regularly assess how well they are linked to need groups.

<https://www.wakegov.com/departments-government/planning-development-inspections/planning/social-equity-atlas>
<https://www.wakegov.com/departments-government/human-services/programs-assistance/gowake-access-transportation/wake-county-northeast-microtransit-study>
<http://www.wakegov.com/humanservices/behavioralhealth/Pages/default.aspx>

PLANWake Amendments, UDO Changes, Ad Hoc Group:

Given that the recommendation [in the plan] is for Wake County to establish specified pre-determined intervals when plan amendments will be presented to the elected body...” we would recommend the creation of an ad hoc group of stakeholders that could meet at set intervals to help review the proposed UDO amendments prior to them going through the approval process.

Response: The County intends to have a standing group to help vet UDO and other changes that will follow the adoption of PLANWake.

County Jurisdiction Areas and Rural Designations:

Community Reserve Infrastructure states that: "Development occurring within the next 10-20 years will be served by community wells and septic systems. These systems will be designed and built for connection to municipal utility services when they are available." This statement is of concern because the County could say that it requires a developer to install sewer lines in a septic community or install a water system that meets the nearby municipal system's standards when a private system with conflicting design guidelines is serving the new homes. This one statement could cause massive problems, excessive cost to the housing and be used to stop growth.

Another part of the Community reserve plan states "Development projects shall be responsible for roadway upgrades along frontages. Developments should be discouraged if they produce a significantly high volume of traffic on local roads." An interpretation of this statement could cause the County to say that neighborhoods of XXX homes cause too much traffic and therefore should be discouraged. It also means that if Wake County follows this guideline that they will not be able to locate new schools in these areas. Many, if not almost all, recent school sites have been located in these areas. It is critical for this section be modified.

We are concerned about rezoning/redistricting land that would essentially down-zone the property or create a zoning district that would make future development much more expensive by nature of requiring it to be water and sewer ready along with the well and septic it may require at the time, for example. Some other examples of concerning statements on these pages include: Create new districts for rural economy, rural residential, permanent open space, and cluster/conservation neighborhood lands. Require [of who] multi-use paths, protected bicycle facilities, and pedestrian infrastructure. Require [of whom] higher performance stormwater management facilities. Enhance standards for canopy protection and reduction of clearcutting. Incorporate green stormwater infrastructure practices. The suggestion of using zoning as a tool to ensure the appropriate timing of intentional outward growth

Response: The wording on the designing systems and building systems to municipal standards will be changed in the next draft. The language will note that this is only required if community systems, with lines running off and between individual properties, are used. The wording on discouraging high traffic uses will also be updated in the next draft. The language will note that projects of this type will be carefully coordinated with the municipality. School sites, as referenced in your question, require utilities and would be strongly encouraged to be municipal.

The County is considering requiring developers to fund road improvements, greenway connections, street connectivity, open space, tree preservation and storm water facilities to be more in line with municipal development regulations. The tools and strategies to accomplish this will be vetted with our stakeholders as part of any changes to the UDO.

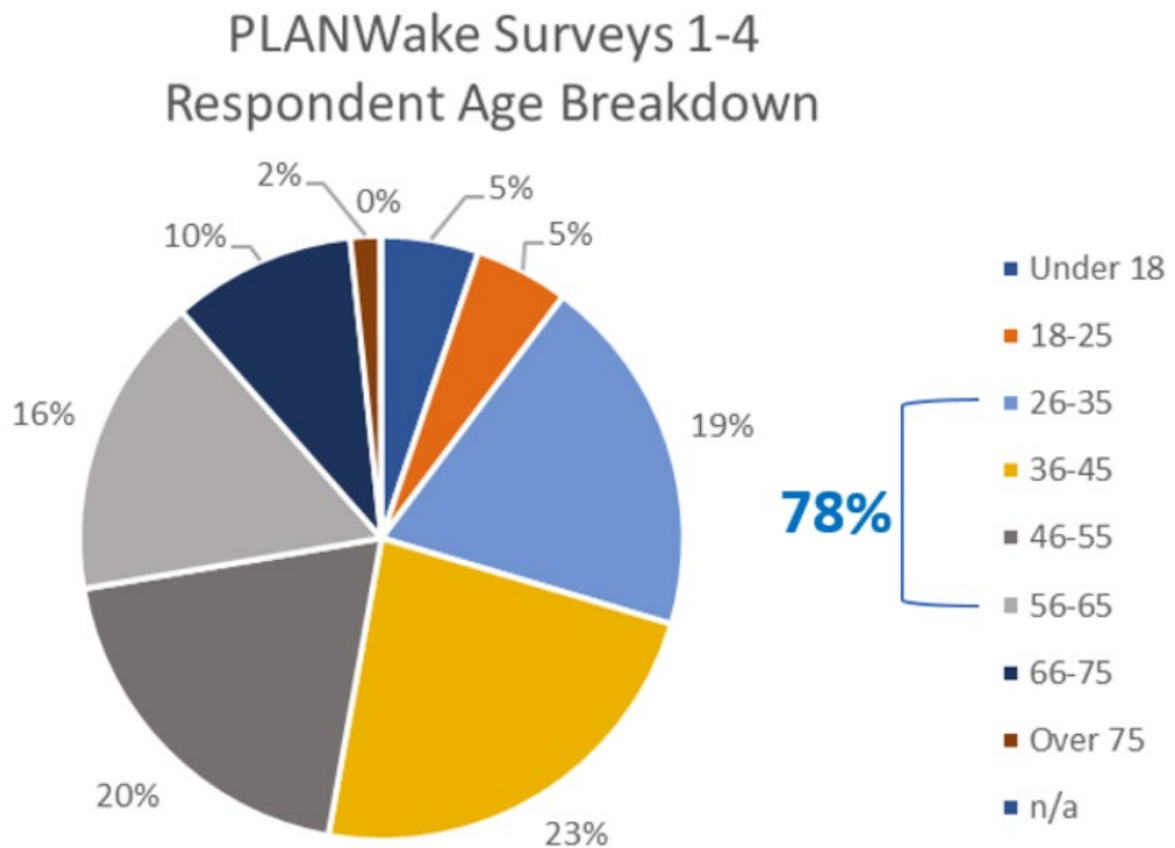
The County has heard concerns about a potential rural district and at this point will look to other tools, specifically tools that encourage growth in Community and Walkable Center Areas, before adjusting zoning. The County will reassess this position based on annual reporting.

Request for more information on Public Engagement:

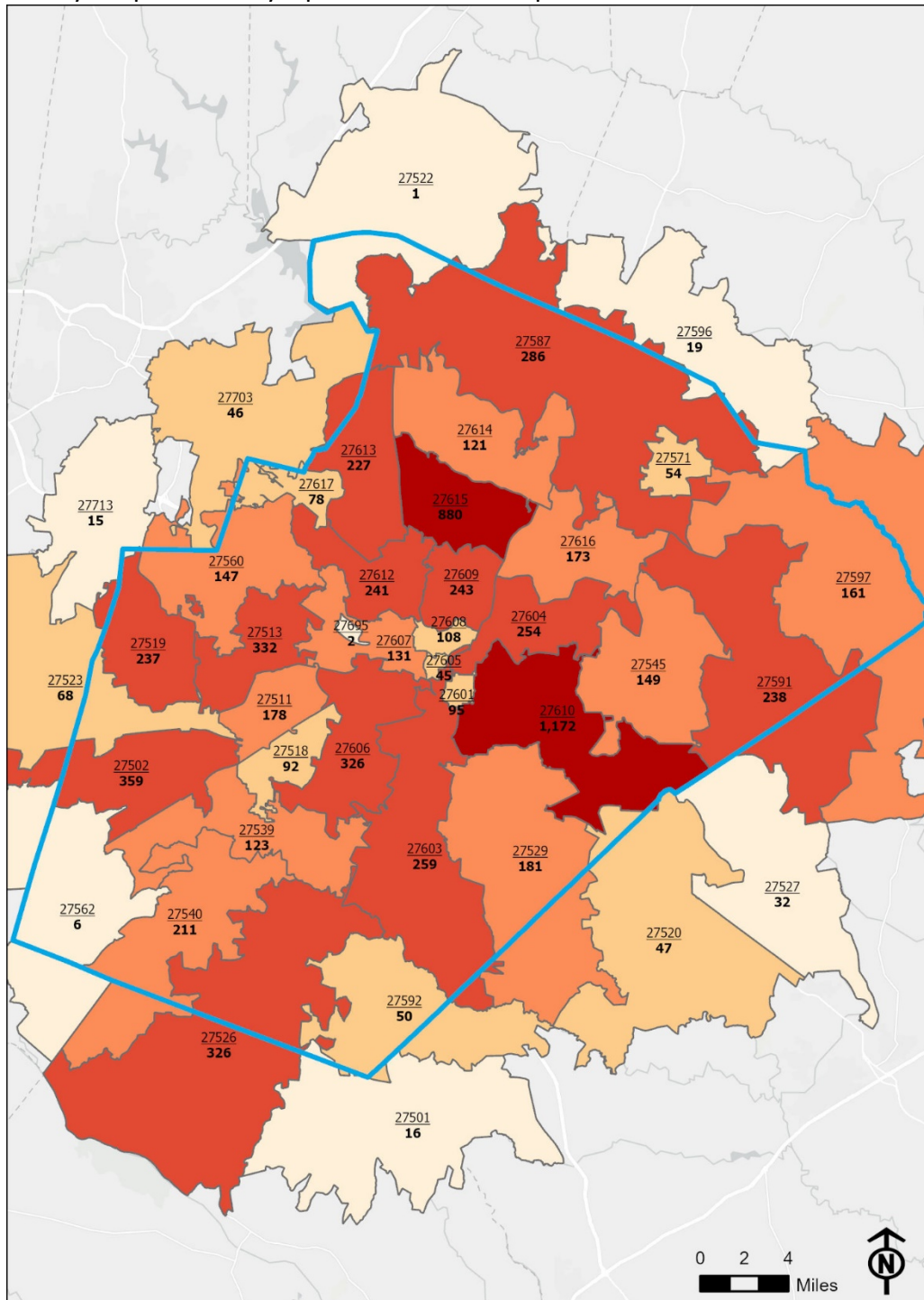
Does the County have a sense for the demographics of respondents? Where they live in the county, male/female, age, race/ethnicity, education, income level?

Response: See the graphs below for category breakdowns of survey respondents. To reduce barriers to participation the County only consistently asked, do you live in the County, age and a general geographic question, i.e. zip code, proximate municipality.

Survey Respondents by Age – 8000+ Respondents

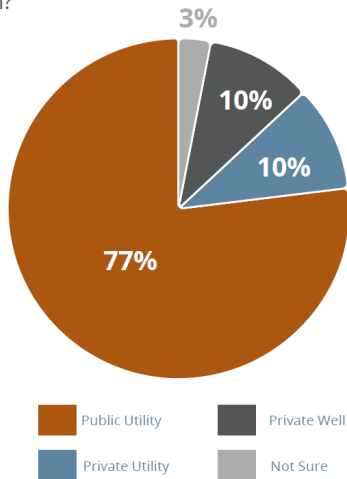


Survey Respondents by Zip Code – 8000+ Respondents



Survey Respondents by Where Does Your Water Come From - 8000+ Respondents

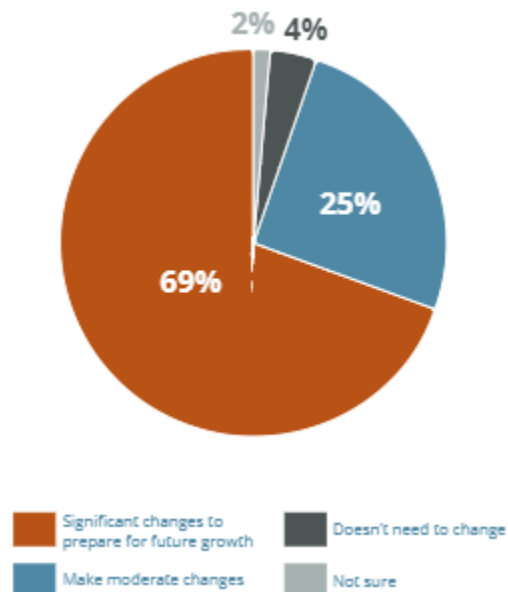
3. Where does the water in your house come from?



Statement is made that “stakeholders from across the community have been consistently requesting change in the way development is managed and investments are made to spark positive change in the community.” Where is citation of data source to back up this statement?

Response: This question was specifically asked in survey 1 with 3,642 participants. The following outreach and surveys were used to determine what types of changes were most important.

Wake County's population grew by 250,000 people from 2008 to 2018. When thinking about how Wake County will accommodate the next 250,000 people that are expected to move to Wake County over the next 10 years, which of the following most accurately describes your opinion?





5580 Centerview Drive, Suite 115, Raleigh, NC 27606

January 29, 2021

Comments by the HBA on the draft PLANWake Document

About PLANWake (pg. 4-7)

Page 4 – Does the County have a sense for the demographics of respondents? Where they live in the county, male/female, age, race/ethnicity, education, income level?

1 PLANWake Vision Outcomes (pg. 8-17)

The “Will Lead to...” statements for all three Vision Outcomes (pgs. 13, 15 & 17) are a bit far overstepping.

Page 8 - Statement is made that “stakeholders from across the community have been consistently requesting change in the way development is managed and investments are made to spark positive change in the community.” Where is citation of data source to back up this statement?

Page 11 – What if market demands for location of housing isn’t in municipal areas, but further out? COVID-19 has altered housing demands/ideas since the inception of this plan. Does the plan take into consideration the massive changes in our county, state, nation and world over the last year?

Page 12 - A map depicting income levels around the County would be helpful. Where do the residents live below the poverty line?

- Are most of these people in 3 - 5 areas or are they scattered across every municipality? How has the location of this demographic changed over the years?
- Some pockets of poverty have relatively good access to the existing public transportation but they lack easy access to food stores and healthcare facilities.
- The quote that was selected for this section “We want Wake to remain affordable to low and median income families.” is actually kind of bizarre. How can it "remain affordable" when the stated problem is that it is not affordable?
- A more positive approach would be to ask for an increase in job opportunities, child care and health care so that families can get out of poverty.
- Since the goal is to keep homes affordable, the County should include in this section requirements for Municipalities to provide opportunities for the private sector to increase housing opportunities for all families.
- This would be by lowering fees and development and construction costs.
- If communities are not encouraged to reduce the costs of housing then municipalities can get rid of residents who are below the poverty line by increasing housing costs so that they leave.

Page 13 - The report states that "Many residents choose where to live by what they can afford rather than where they want." It puts this in a negative context when actually this is the basis of a) capitalism, b) housing markets, c) the American Dream, d) Supply and Demand, etc.... The goal should be to make more places desirable and raise the bar for all. Maybe there should be a section in the report suggesting

that all communities should seek to make housing more affordable (see above), and not by placing the burden solely on the developer/builder through “inclusionary zoning” tactics.

Page 17 – no citation to support statement, “Studies have shown that preserving natural systems is almost always...”

2 PLANWake Development Framework (pg. 18-31)

Page 21 – Need to reconsider some classifications given future road projects such as the completion of 540 around the south/southeast side of the County and the land designation around that area. Is it really “rural”?

Page 22 – Does this Transit Focus section jive with the City of Raleigh Transportation Plan along BRT? Are “Walkable district with pedestrian and bicycle amenities” like what was done and then reversed with Fayetteville Street Mall in Raleigh?

Page 25 – We agree that “to the extent possible, the County [should] seek to unify and align relevant development policies across jurisdictions.”

Page 26 - The definition of Community Areas states that: “Community areas are lands for municipalities to expand and grow beyond their current boundaries. Public utilities are not currently provided in these areas, but they will likely be extended to serve these areas within the next decade. Community areas are primarily undeveloped and offer a significant opportunity to create walkable, sustainable and mixed use places through good design principles and careful planning. These areas also offer the opportunity to conserve valuable open space and to develop parks and other green recreational pursuits that can support the local economy and foster a connection to the land.”

However, the Community Areas cover over half of the County.

In reality, Community areas are the areas of the County that have developed with a suburban character. There are few opportunities to reimagine them in the manner that this report suggests. Please clarify how the County sees achieving this goal.

Page 28 –

Community Reserve Infrastructure states that: “Development occurring within the next 10-20 years will be served by community wells and septic systems. These systems will be designed and built for connection to municipal utility services when they are available.”

This statement is of concern because the County could say that it requires a developer to install sewer lines in a septic community or install a water system that meets the nearby municipal system's standards when a private system with conflicting design guidelines is serving the new homes. ***This one statement could cause massive problems, excessive cost to the housing and be used to stop growth.***

Another part of the Community reserve plan states "Development projects shall be responsible for roadway upgrades along frontages. Developments should be discouraged if they produce a significantly high volume of traffic on local roads."

An interpretation of this statement could cause the County to say that neighborhoods of XXX homes cause too much traffic and therefore should be discouraged. It also means that if Wake County follows this guideline that they will not be able to locate new schools in these areas. Many, if not almost all, recent school sites have been located in these areas. It is critical for this section be modified.

3 PLANWake Performance Metrics (pg. 32-35)

Page 34 –

Increase Non-Automotive Trips – How has 2020 affected this?

Decrease Population Experiencing Severe Housing Problems – How will Wake County achieve this lofty goal?

Protect Open Space – How can 30% goal be achieved, while still accommodating the doubling of population growth and also achieving affordable housing goals? Seems like something has to give.

Increase Household Income – How will the County reduce the number of employees earning less than \$15 per hour by 50% through this particular plan?

Intentional Development – How did the County come up with the breakdown of the percentages shown here?

Maintain and Expand Tree Canopy – This will be tough to add another 20% onto what's already required and try to create more affordable housing options to ensure people aren't spending too great a percentage of their income for housing.

Reduce the Percentage of Households Burdened by the Cost of Housing and Transportation – How will County do this 40% reduction coupled with adding more to open space and expanding tree canopy?

Expand Access to Services for Vulnerable Populations – Is this access purely related to proximity or to knowledge and comfort level? How does County plan to reach this goal?

4 Existing County Policies (pg. 36-47)

Page 42 – What are examples of MTS's? This approach sounds like a way for the County to prohibit development in areas that municipalities aren't ready to expand into with water and sewer, but where there is a demand for a certain type of development...for example, large lot subdivisions. This would be concerning to both the residential housing industry and land owners interested in selling their land.

5 Bringing the Plan into Reality (pg. 48-51)

Page 50 – "Given that the recommendation [in the plan] is for Wake County to establish specified pre-determined intervals when plan amendments will be presented to the elected body..." we would recommend the creation of an ad hoc group of stakeholders that could meet at set intervals to help review the proposed UDO amendments prior to them going through the approval process.

Appendices (pg. 52-60)

Page 55 – Under "Create Walkable Spaces and Places" it says, "Similarly, when asked where they would live in the future if they chose to move, 64% of survey respondents identified they would prefer to live in a downtown or walkable neighborhood where more transportation options are available." I wonder, how would this percentage change now if asked again? Much has changed in the world since this question was first asked and our industry is seeing a shift that would suggest different preferences.

Page 58 & 59 – We are concerned about rezoning/redistricting land that would essentially down-zone the property or create a zoning district that would make future development much more expensive by nature of requiring it to be water and sewer ready along with the well and septic it may require at the time, for example. Some other examples of concerning statements on these pages include:

- Create new districts for rural economy, rural residential, permanent open space, and cluster/conservation neighborhood lands.
- Require (of who) multi-use paths, protected bicycle facilities, and pedestrian infrastructure.

- Require (of whom) higher performance stormwater management facilities.
- Enhance standards for canopy protection and reduction of clearcutting.
- Incorporate green stormwater infrastructure practices.
- The suggestion of using zoning as a tool to ensure the appropriate timing of intentional outward growth



Planning, Development & Inspections

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A Division of Community Services
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www.wakegov.com

February 25, 2021

Mr. Bill Sandifer, A.A.E.
Raleigh-Durham Airport Authority
1000 Trade Dr.
RDU Airport, NC 27623

Via Electronic Mail

RE: Wake County Comprehensive Plan – PLANWake

Dear Mr. Sandifer,

Thank you again for providing feedback on the County's draft Comprehensive Plan. This is very helpful as we finalize the plan for consideration by our Board in the coming weeks. The items you suggest in your letter dated February 17, 2021 will be incorporated into the plan.

Should you have any questions or want to discuss this further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Timothy W. Maloney".

Timothy W. Maloney, Director



Michael J. Landguth, A.A.E.
President & CEO

Raleigh-Durham Airport Authority

1000 Trade Drive • P.O. Box 80001 • RDU Airport, NC 27623
tel: (919) 840-7700 • fax: (919) 840-0715 • www.rdu.com

February 17, 2021

Mr. Timothy Maloney, Director
Wake County – Planning Development & Inspections
P.O. Box 550
Raleigh, NC 27602

Via Electronic Mail

Re: Wake County Comprehensive Plan (PLANWake) Update

Dear Mr. Maloney:

The Raleigh-Durham Airport Authority appreciates the opportunity to provide input on the Wake County Comprehensive Plan (PLANWake) Update. The Authority reviewed the information presented in the November 2020 PLANWake document, including the updated Development Framework Map on page 21 of the Plan (included as Attachment 1). The Authority opposes areas in the Development Framework Map defined as Walkable Centers that are adjacent to RDU in the vicinity of Brier Creek (at the intersection of 540 and 70) and Morrisville (on either side of 54).

Specifically, the Authority opposes the designation of Walkable Center in the areas that fall within the 65 dB DNL that was established by the Authority in 1992 (e.g., the orange area included as Attachment 2). As defined in the November 2020 PLANWake document, Walkable Centers include residential uses. The Federal Aviation Administration's longstanding guidance on land use compatibility near airports is that residential development, as well as certain institutional uses, like places of worship and schools, should be prohibited in areas impacted by aircraft noise levels of 65 dB DNL or higher.

As information, in 2018 Congress asked the Federal Aviation Administration (FAA) to re-evaluate the national noise standards and may seek to lower the outdoor level of residential land use compatibility. As part of this re-evaluation, the FAA recently released the Neighborhood Environmental Survey that shows a substantial increase in the percentage of people who are highly annoyed by aircraft noise over the entire range of aircraft noise levels considered, including noise levels below 65 dB DNL. Because the Authority already receives a large number of complaints from areas outside the 65 dB DNL, allowing any residential development within the 65 dB DNL will only increase the impact of aircraft noise on the public and diminish the long-term viability of RDU. As shown in Attachment 3, residential development has been slowly encroaching on RDU since the 1980's. Long term planning that promotes compatible uses (e.g., commercial and manufacturing/production) within the 65 dB DNL and other areas in close proximity to RDU is crucial to

Raleigh-Durham Airport Authority Board Members

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Ellis Hankins

DURHAM COUNTY

Patrick Hannah, Esq., Acting Chair
David Morgan

CITY OF RALEIGH

Sepideh Saidi, Secretary
Dickie Thompson

CITY OF DURHAM

Robert D. Teer, Jr., Treasurer
Napoleon Wallace



Michael J. Landguth, A.A.E.
President & CEO

Raleigh-Durham Airport Authority

1000 Trade Drive • P.O. Box 80001 • RDU Airport, NC 27623
tel: (919) 840-7700 • fax: (919) 840-0715 • www.rdu.com

protect the health and well-being of the citizens of Wake County. The Authority urges the County to discourage development of residential uses in these areas and to eliminate residential uses within the Walkable Center designations from the Draft Development Framework Map.

Please contact me should you require additional information about this request, or if the County would like the Authority to provide a more detailed briefing.

Very truly yours,

RALEIGH-DURHAM AIRPORT AUTHORITY

William C. Sandifer, A.A.E.
Senior Vice President & Chief Operating Officer

cc: M. Landguth, President & CEO
C. Feldman, Vice President
E. Cayton, Vice President

Raleigh-Durham Airport Authority Board Members

WAKE COUNTY

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Ellis Hankins

DURHAM COUNTY

Patrick Hannah, Esq., Acting Chair
David Morgan

CITY OF RALEIGH

Sepideh Saidi, Secretary
Dickie Thompson

CITY OF DURHAM

Robert D. Teer, Jr., Treasurer
Napoleon Wallace

THE PLANWAKE DEVELOPMENT FRAMEWORK

The PLANWake Development Framework consists of the Development Framework Map with five mapped classifications and a set of policy goals and expectations for each development framework classification. The development framework map is shown in Figure 6 and the development framework classifications are detailed on pages 22 through 31.

PLANWake Development Framework Map

The PLANWake Development Framework Map identifies the future land use and character vision for all of Wake County. This sets a cohesive county-wide framework for Wake County to guide decision-making on unincorporated lands within its formal jurisdiction.

The intention of the Development Framework is to support municipal annexation and growth within the Transit Focus, Walkable Center, Community and Community Reserve areas. Rural and Water Supply Watershed areas are not intended for municipal scale growth during the next decade or beyond.

This map and the following classifications and policies should be used by the Wake County Board of Commissioners, Planning Board and staff to guide land use decision making.

DEVELOPMENT FRAMEWORK MAP

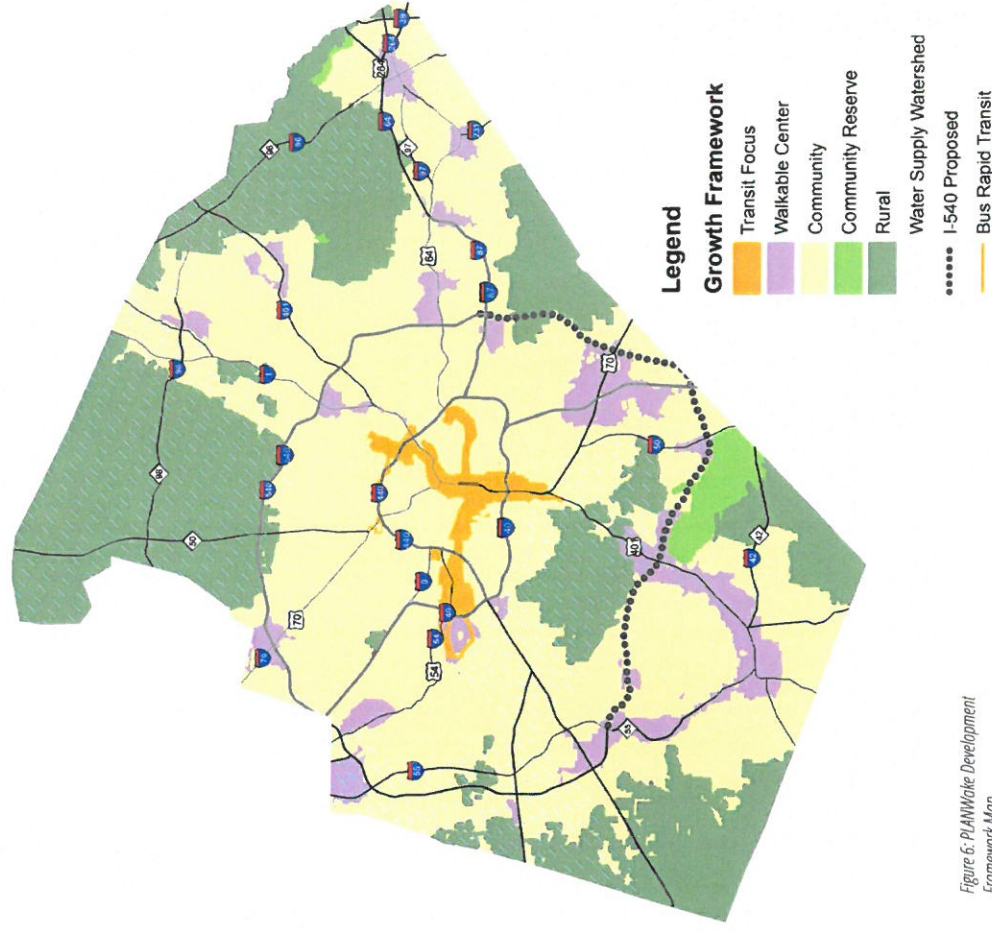


Figure 6: PLANWake Development Framework Map

ATTACHMENT 2

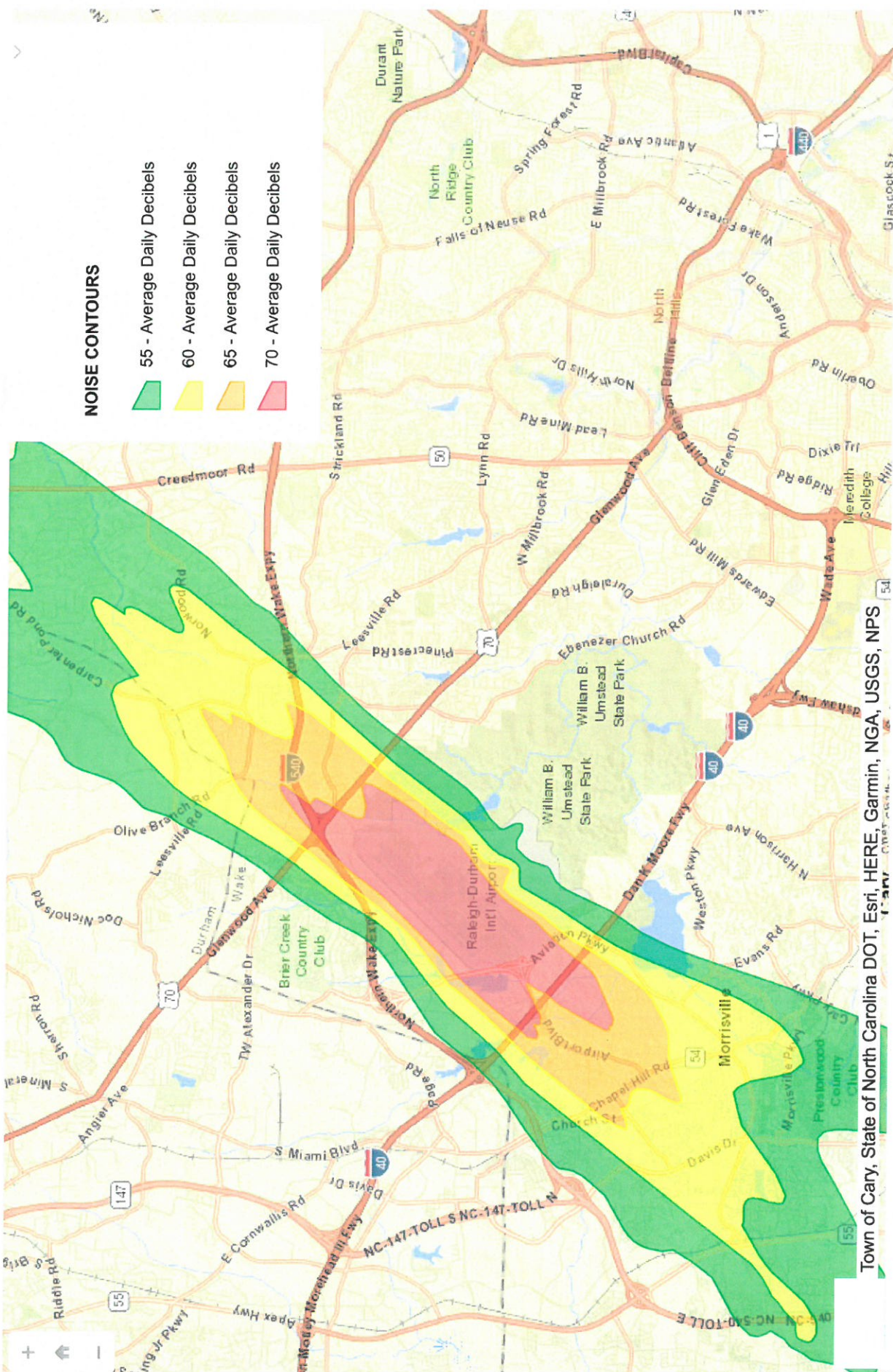
RDU Composite Noise ...

Legend Layers Overview map Measure Print

Legend

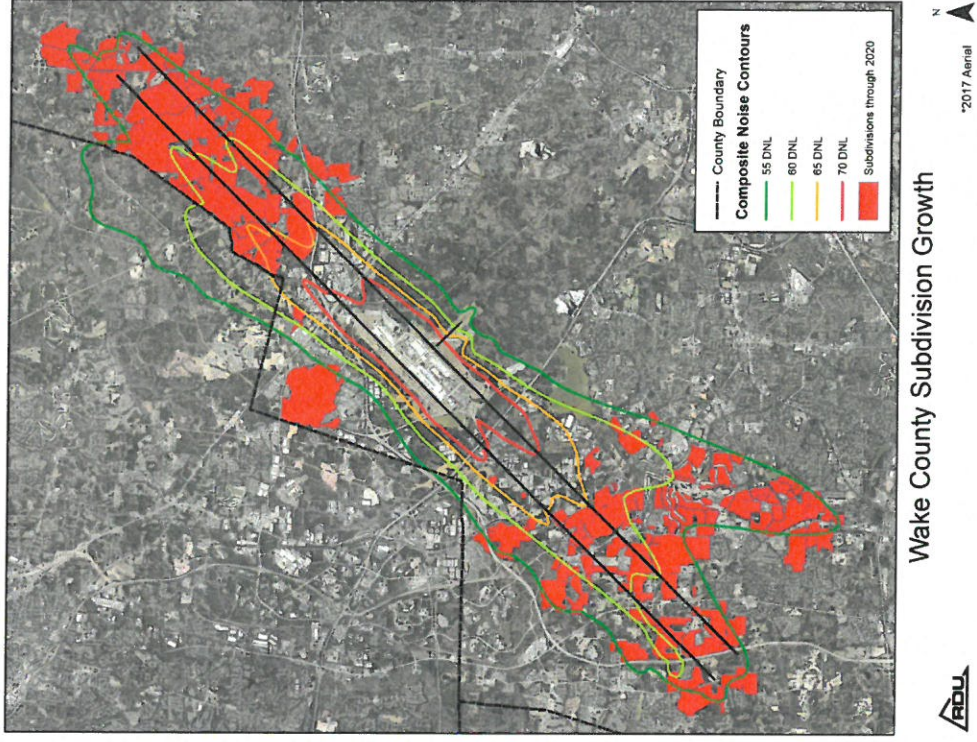
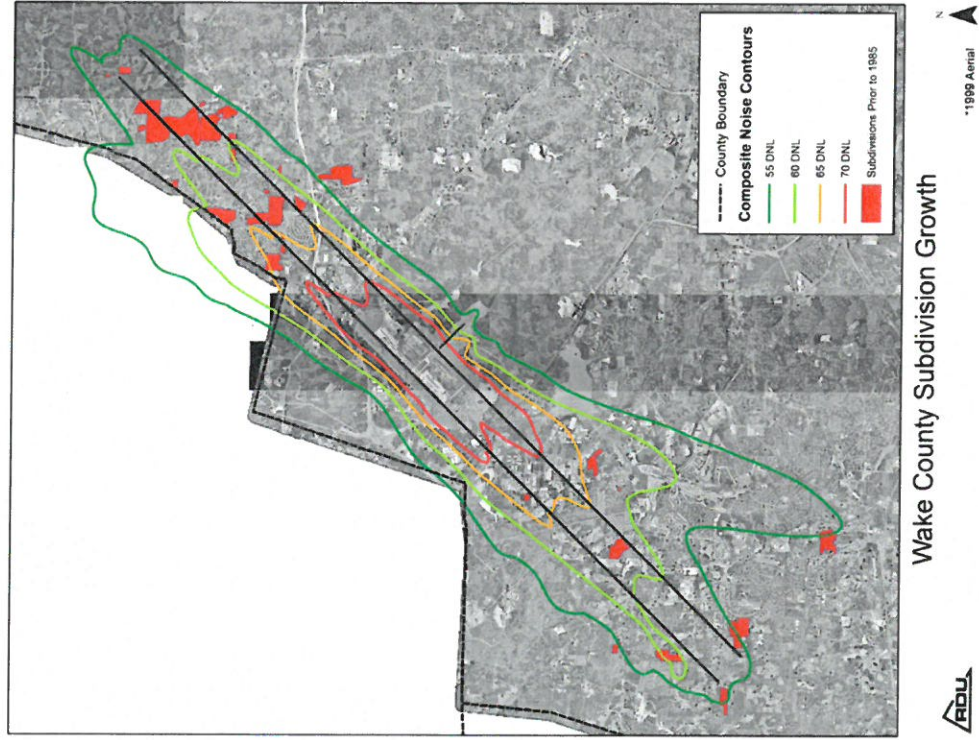
NOISE CONTOURS

- 55 - Average Daily Decibels
- 60 - Average Daily Decibels
- 65 - Average Daily Decibels
- 70 - Average Daily Decibels



Town of Cary, State of North Carolina DOT, Esri, HERE, Garmin, NGA, USGS, NPS

ATTACHMENT 3





Planning, Development & Inspections

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A Division of Community Services
P.O. Box 550 • Raleigh, NC 27602
www.wakegov.com

February 25, 2021

Mr. Robert Hinson, Chair
Wake County Open Space and Parks Advisory Committee
PO Box 550
Raleigh, NC 27602

RE: Wake County Comprehensive Plan – PLANWake

Dear Mr. Hinson,

Thank you again for allowing us to present the County's draft comprehensive plan to your Advisory Committee. The feedback we received is very helpful as we finalize the plan for consideration by our Board in the coming weeks. The items you suggest in your memo will be incorporated into the plan.

We value our relationship with your committee and look forward to future opportunities to work together. Should you have any questions or want to discuss this further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Timothy W. Maloney".

Timothy W. Maloney, Director

cc: Chris Snow, Director, Wake County Parks Recreation and Open Space



Open Space & Parks Advisory Committee

TEL 919 856 6677
FAX 919 743 4853

Wake County Office Building 10th Floor
337 S. Salisbury Street
PO Box 550, Suite 1000
Raleigh, NC 27602
<http://www.wakegov.com/county/parks/default.htm>

MEMORANDUM

To: Tim Maloney, Wake County Planning

From: Robert Hinson, Chair – Open Space and Parks Advisory Committee (OSAPAC)

Date: January 7, 2020

Subject: OSAPAC Comments on PLANWake draft

At its December 14, 2020 meeting, the Open Space and Parks Advisory Committee (OSAPAC) received a presentation on PLANWake, a two-year effort to shape a comprehensive plan that will guide future growth throughout Wake County. OSAPAC has been and continues to be interested in growth patterns in the County as it relates to the preservation of open space and the provision of parks and recreation services.

I'd like to commend the Planning staff and others on the robust public input process including presentations to groups such as OSAPAC.

OSAPAC is supportive of the PLANWake effort and specifically its vision outcome of increasing open space protection. To that end, OSAPAC suggests the following:

- Add the actual 30% acreage equivalent (165,000 acres) to the text in the Performance Metrics (Pg. 34)
- Add "regulation" as a recognized strategy for the protection of open space in addition to "public-private conservation efforts and preservation alongside development" in the Performance Metrics (Pg. 34)
- Determine, in collaboration with other municipal, state and federal agencies as well as non-profit conservation groups, the amount of protected open space within the County (through all means and all jurisdictions) and report this metric annually.

Thank you for involving OSAPAC in this important planning effort! If the Committee can be of any further assistance, please let us know.