

The position of GES Coalition over the proposed zoning change at 2535 E. 40th Ave.

The position of GES Coalition is to “approve the I-MX-3 rezone **with Conditions**” for the proposal at 2535 40th St.. The following are the **conditions** that we would like to see attached to this re-zone regardless of the owner:

- 1.) A Community Benefits Agreement is developed and signed with the GES Coalition and at least 1 Elyria Swansea Registered Neighborhood Organizations and the developer before the Site Development Plan is approved by the City.
- 2.) Complete a full traffic/construction impact analysis reported on to the neighborhood before any construction is started on the site
- 3.) Complete a “**transformative project**” process that includes an “**anti-displacement action plan**” in the neighborhood, led by the City, completed before Site Development Plan is approved to inform the site plan and design.

If adding these conditions is not possible, we feel the proposed I-MX-3 zoning would be harmful to the neighborhood and would ask that you do not approve of this change in the zoning code.

Is the rezoning consistent with completed plans?

- No. Neighborhood plans are no longer reflective of the needs in the neighborhood, especially in relation to housing as displacement started more drastically after the plan was completed.
- No. The Elyria-Swansea Neighborhood Plan also discusses the importance of involving the neighborhood in an inclusive manner in many points of the neighborhood plan.
- No. This specific ATT site was not discussed in the Elyria Swansea neighborhood plan process. This 14 acre area merits a transformative project plan where uses are revisited with neighbors; similar sites were analysed in this way in the Elyria-Swansea Neighborhood Plan.
- No. In the Elyria-Swansea Neighborhood Plan and the Gentrification Study the City conducted both mention the need for Community Planning and Development to work with other City departments to prevent displacement

Does the rezoning further public health, safety and welfare?

- No. The proposal is not taking into account the impact of displacement on health
- No. The proposal is not taking into account market rate development impact on displacement
- No. The proposal is not taking into account the proximity to train and truck route

Are there circumstances that justify the rezoning?

- The current circumstances of heavy construction merit further study and adding additional conditions on this rezone
- The current circumstances of displacement merit an anti-displacement action plan and community benefits agreement.

Is the rezoning consistent with the neighborhood context?

- No. The majority of the neighborhood is single family, single unit.
- No. The exceptions to those circumstances have been projects with a significant commitment to equity and affordability, and completed an extensive process in the neighborhood (ULC property, Habitat property)

Would it result in consistent regulations for each property with the same zoning designation citywide?

- The residential areas of Swansea (which is mostly naturally occurring affordable housing that is not deed protected) are surrounded by industrial which could set a precedent for this type of rezone ongoing. It is critical that actions are taken to ensure that the neighbors and neighborhood character are not erased nor involuntarily displaced due to large economic investment and development