



Lawrence City Commission
6 East 6th Street
Lawrence, KS 66044

July 2, 2019

Dear Commissioners:

The Lawrence Home Builders Association and the Lawrence Board of Realtors have expressed concerns about Plan 2040, particularly its restrictions on annexation. The Chamber shares those concerns and has actively participated in both the early and intermediate stages of the planning and adoption process. Plan 2040 appears to have strong momentum and consensus among the City staff, its advisory boards, and, presumably, its governing body. Consequently, this letter is not a detailed list of revisions. In general, Plan 2040 imposes new restrictions on annexation not previously contained in Horizon 2020. Plan 2040 requires not only that a new development provide a “community benefit,” but also: (a) in Tier 2 (which geographically is a small area), a finding of an “established demand”; and (b) in Tier 3, a finding that annexation is the “only way” to address an identified community need. Before adopting Plan 2040, the City Commission should seriously consider whether these restrictions on geographic expansion would contribute to or accelerate the increase in the cost of housing and development in Lawrence.

Plan 2040 is based on an assumption that annexation, growth and development does not “pay for itself” unless it provides some additional “community benefit” beyond expanding the tax base. Whether or not growth pays for itself is a highly localized question and we have seen no study or analysis establishing this assumption to be accurate. The City’s comprehensive plan is too important to be based upon an unproven belief, and Plan 2040’s restrictions, which are billed as a solution to this “problem”, are too extreme. Lawrence already has geographic limitations on its ability to expand. Plan 2040 creates an additional artificial barrier to expansion, which may significantly handicap the City’s opportunities for future growth.

The cost of housing in Lawrence should be affordable for all its residents. The Chamber supported the City’s 0.05% sales tax to subsidize affordable housing. However, the Chamber also believes that the cost of unrestricted, market rate housing must remain aligned with its peer communities, and we must have the ability to create new commercial and industrial land. By effectively limiting development in the existing City limits, the Chamber anticipates that the increasing cost of housing – and development in general – will accelerate. While the Chamber is an advocate for the growth and prosperity of all Douglas County residents, it does not believe the City’s adopted policies should, by their restrictive nature, encourage development in Baldwin City, Eudora, Tonganoxie, Topeka, or other areas outside the Urban Growth Area.

The Chamber is a representative organization with nearly 800 members of the local business community. Part of its core function is to assist in the attraction of new business, and facilitate the retention and expansion of existing business. Your consideration of our concerns is greatly appreciated.

Sincerely,

Bonnie Lowe
President & CEO