

# Project Report

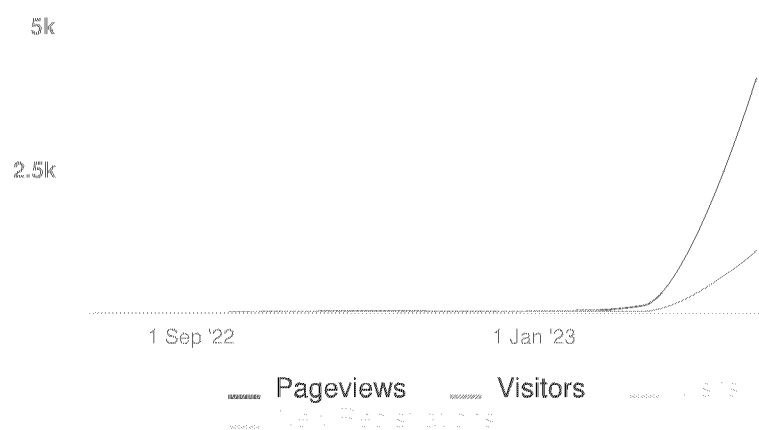
15 March 2023

## Let's Talk Bloomington

### Single and Two Family Development Standards Update



#### Visitors Summary

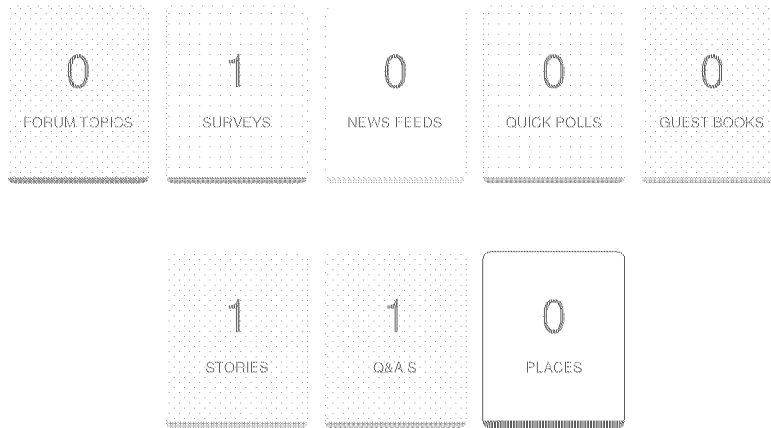


#### Highlights

TOTAL VISITS	MAX VISITORS PER DAY	
1.3 k	201	
NEW REGISTRATIONS		
1		
ENGAGED VISITORS	INFORMED VISITORS	AWARE VISITORS
21	367	1.1 k

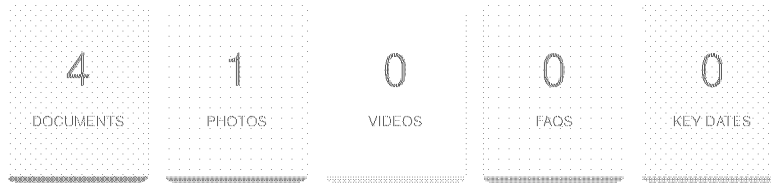
Aware Participants	1,051	Engaged Participants	21		
Aware Actions Performed	Participants	Engaged Actions Performed	Registered	Unverified	Anonymous
Visited a Project or Tool Page	1,051				
Informed Participants	367	Contributed on Forums	0	0	0
Informed Actions Performed	Participants	Participated in Surveys	0	0	2
Viewed a video	0	Contributed to Newsfeeds	0	0	0
Viewed a photo	16	Participated in Quick Polls	0	0	0
Downloaded a document	296	Posted on Guestbooks	0	0	0
Visited the Key Dates page	0	Contributed to Stories	1	6	0
Visited an FAQ list Page	0	Asked Questions	0	13	0
Visited Instagram Page	0	Placed Pins on Places	0	0	0
Visited Multiple Project Pages	317	Contributed to Ideas	0	0	0
Contributed to a tool (engaged)	21				

## ENGAGEMENT TOOLS SUMMARY



Tool Type	Engagement Tool Name	Tool Status	Visitors	Contributors		
				Registered	Unverified	Anonymous
Story Telling Tool	Education Materials Need to Target Your Audience	NewlyAdded	7	1	0	0
Story Telling Tool	current Bloomington resident	NewlyAdded	0	0	1	0
Story Telling Tool	Bringing us down	NewlyAdded	0	0	1	0
Story Telling Tool	Who Started This Conversation	NewlyAdded	0	0	1	0
Story Telling Tool	Resident	NewlyAdded	0	0	1	0
Story Telling Tool	I don't agree with the changes there is a reason I moved ...	NewlyAdded	0	0	1	0
Story Telling Tool	HUD and the FEDS.	NewlyAdded	0	0	1	0
Qanda	Questions	Published	117	0	13	0
Survey Tool	Single and Two Family Home	Draft	6	0	0	2

## INFORMATION WIDGET SUMMARY



Widget Type	Engagement Tool Name	Visitors	Views/Downloads
Document	Summary of Changes.pdf	290	328
Document	SF and TF Zoning Update Goals.pdf	26	30
Document	SF TF Ordinance.pdf	17	18
Document	SF TF Staff Report.pdf	16	20
Photo	2_INFORM IAP2.jpg	16	18

Questions	Answers
<p>Would these proposed changes allow homeowners an ADU where they may not have qualified before? There aren't many buildable lots left unless were Tearing down existing housing otherwise.</p>	<p>The proposed ordinance does not directly change requirements for Accessory Dwelling Units (ADUs). However, some of the standards for ADUs that inform eligibility are tied to meeting requirements for Single-Family Dwellings. For example, sites with ADUs must comply with parking requirements for single-family dwellings. There is also a requirement that minimum floor areas be met for the resulting single-family dwelling after the creation on an ADU. If these requirements are changed as part of the single and Two-Family Zoning Update, there could be some indirect impacts on ADUs that might expand eligibility. Every site and case must be reviewed on its owner merits to see if all City Code standards are met.</p> <p>For reference, here is a link to the City's regulations pertaining to Accessory Dwelling Units:  <a href="https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-110593">https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-110593</a></p> <p>Please contact the Planning Division at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a> if you have questions about a specific site.</p>
<p>Not clear how higher density housing (smaller lots, reduced setbacks, etc) reduces the total cost significantly given the costs associated with construction standards and maintenance. Therefore, what is the sustainability cost model and who bears the costs responsibility?</p>	<p>The reduction of certain minimum zoning standards may allow non-profit and other actors focused on the creation of affordable home ownership and other housing opportunities the chance to create more infill housing. Those opportunities are very limited today. Modifications to zoning rules is one of the tools cities have to attempt to create more opportunities for housing that does not currently exist, whereas cities have less influence over the cost of construction (materials, labor, etc.).</p> <p>From a sustainability standpoint, infill development is generally preferred over more sprawling exurban development, as the public facilities and utilities are already in place to accommodate new housing units, as opposed to greenfield development. As the Twin Cities region continues to grow, more housing must be provided to meet the needs of said growth. The growth of the region continues to place a lot of pressure on the Bloomington housing market given our desirable location. The demand for housing in Bloomington far outpaces the supply, resulting in increased overall cost.</p> <p>If you have additional question, please contact the Planning Division at (952) 563-8925 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>

<p>I am responding to this: "No minimum outside building code requirements per room" Leaving this undefined will lead to structures that are unsafe, likely against ADA requirements and could greatly diminish resale value (translates to reduce property values).</p> <p>The current requirements are in place for a reason, correct?</p> <p>single family: 1,040 sq. ft. in R-1, RS-1 District 1,700 sq. ft. in R-1A District two family; 960 sq. ft.</p> <p>Why are you not taking the current requirements and reducing them by approximately 20% like you are doing with other dimensions?</p>	<p>The Minnesota State Building Code establishes minimum areas for all habitable spaces within a dwelling, including all sleeping, living, eating, and cooking spaces. The combination of spaces that are necessary to meet the minimum requirements for a dwelling under the Building Code do establish minimum floor areas outside of the current zoning requirement. As such, establishing a lower minimum floor area within the Zoning Code, as opposed to eliminating the requirement, was viewed as duplicative of the requirements of the State Building Code. In addition, one of the goals of the overall project is to allow for the opportunity of a greater variety of dwelling types and sizes than what the existing ordinance allows for, recognizing that the housing needs of the community are varied depending on household size and consumer preference. Finally, staff has observed that nearly all new dwellings constructed in the last 10 years exceed the minimum areas of floor area required in the Zoning Code by a significant amount. This trend is driven by consumer and lifestyle preferences. The cost associated with lot acquisition and new home construction typically results in larger single-family dwellings for those residents or builders that pursue these projects. Thank you for your question.</p>
<p>Will you be able to buy a lot in a single family per home neighborhood and suddenly turn it into a duplex and ruin the ambience of the neighborhood and lower all the other home values, with no consideration for the rest of the homeowners in that neighborhood?</p>	<p>Two-family dwellings are currently a permitted use in the R-1 Single-Family Residential Zoning District. The proposed ordinance would not change the use allowance for two-family dwellings. Rather, the proposed ordinance does propose to reduce the minimum requirements for lot size and lot width that would make a site eligible for a two-family dwelling. In addition, some miscellaneous performance standards are proposed to be revised, including structure setbacks and parking requirements. Finally, the ordinance does propose to modify the approval process for a grouping of two-family dwellings from a Rezoning process to a Conditional Use Permit process. A grouping of two-family dwellings is defined as whenever there is a two-family dwelling within 500 feet of another two-family dwelling.</p> <p>Thank you for your question. If you have any other questions about standards or procedures, contact the Planning Division at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>

<p>Are the empty lots facing 35 W on 83rd and 84th blocks on Humboldt being considered for this multi family housing change?</p>	<p>The lots you reference are zoned R-1. As such, some of the changes being proposed in the Single and Two-Family Zoning Update could be relevant to any potential development that could occur on those lots. That being said, multiple-family dwellings are not permitted in the R-1 zoning district, nor are townhomes. Single and two-family dwellings are permitted in the R-1 zoning district. The proposed ordinance does not propose to change the underlying use allowances of the R-1 zoning district. You can find the use tables within the City Code at this link:</p> <p><a href="https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-109729">https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-109729</a></p> <p>If you have any follow up questions, you can contact Planning staff at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
<p>Address racial equity by identifying and removing potentially discriminatory policies</p> <p>What are the current racial discriminatory policies the city has in place causing racial inequity in housing options? ~ Former Bloomington Human Rights Commissioner 2016</p>	<p>There is a large home ownership gap in Bloomington by race and ethnicity. In 2020, Bloomington home ownership rates were:</p> <ul style="list-style-type: none"> <li>75% - White Alone</li> <li>56% - Asian</li> <li>51% - Two or More Races</li> <li>44% - American Indian and Alaska Native</li> <li>43% - Some Other Race</li> <li>42% - Hispanic or Latino Origin</li> <li>20% - Black or African American</li> </ul> <p>The affordability of Bloomington housing impacts the ownership gap. To the extent that existing zoning standards (such as minimum unit size requirements, minimum lot area requirements, minimum lot width requirements, minimum garage size requirements, additional setback requirements, etc.) add costs to housing, the standards contribute to the ownership gap.</p>
<p>I'm not seeing info on changes for duplex and 4plex rules on bigger lots. We live on the pleasant street super block. I am interested how changes would affect our neighborhood</p>	<p>Two family dwellings are currently a permitted use in the R-1 zoning district, subject to regulations around groupings of two-family dwellings. The minimum lot size and lot width for two family dwellings are proposed to be modestly reduced. Other related performance standards are proposed to be adjusted as well, including the front setback requirements and minimum garage parking requirement. Finally, the approval process for a grouping of two-family dwellings is proposed to be adjusted from a Planned Development (PD) approval process to a Conditional Use Permit (CUP) process. A two-family dwelling is considered a grouping when there is another two-family dwelling located within 500 feet of the subject site as measured along streets.</p> <p>If you have additional questions, contact the Planning Division at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>

<p>There has always been city planning. Why are you considering changing the plan and tucking in multi family homes within an established neighborhood?</p>	<p>Thank you for your question. For clarification, two-family homes have been permitted in low density areas and single-family zoning districts in Bloomington since the 1960s. The proposed ordinance would not change this allowance. Multiple-family dwellings (apartments) and townhomes are not currently permitted in Bloomington’s single-family zoning districts, and the subject ordinance does not propose to change this allowance in any way.</p> <p>Here is a link to the Use Tables in the Bloomington Zoning Code if you find it to be helpful:  <a href="https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-109730">https://codelibrary.amlegal.com/codes/bloomington/latest/bloomington_mn/0-0-0-109730</a></p> <p>If you have any questions about allowed uses by zoning district or some of the performance standards included in the ordinance, contact Planning at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
<p>The ordinance language strategy 1.2 states “Encourage age growth to occur in appropriate locations” and later “ Use land use controls to restrict development in natural areas and mitigate related impacts on natural resources.” The City owns 9 acres of wetland and related area in the middle of Norman Ridge. This is home to deer, fox and turkeys year-round. So what new development controls does the City plan to implement to mitigate the impact of increased density on this parkland?</p>	<p>Thanks for your questions. The Comprehensive Plan has an extensive list of goals, strategies, and actions in each chapter or element of the plan. Based on the fact that the Comprehensive Plan serves as the high-level guiding document or vision for the community, it is not uncommon for some of the goals, strategies, or actions to be or appear in conflict with one another. Many public policy questions or problems to be solved are often both difficult and complex where the potential solutions may result in an evaluation of competing interests. This dynamic can be highlighted in the strategy and action you reference from the Land Use Element, while the following goal, strategy, and actions are found in the Housing Element (chapter 3) of the Plan:</p> <ul style="list-style-type: none"> <li>• Goal 2: Provide a range of housing choices.             <ul style="list-style-type: none"> <li>○ Strategy 2.1: Promote development of a mix of housing types.                 <ul style="list-style-type: none"> <li>▪ Routinely monitor and evaluate housing supply and demand to identify underserved housing needs.</li> <li>▪ Consider amendments to official controls and development standards to promote a variety of housing types to meet evolving market demands and reduce barriers to creation of non-traditional housing types (e.g., accessory dwelling units, smaller lots and/or unit sizes).</li> </ul> </li> </ul> </li> </ul> <p>Regarding Norman Ridge Park, the City has no plans to change the use of this property as a public park. In addition, due to the likely presence of wetlands on this property, any land disturbing activity would likely be highly restricted under the Wetland Conservation Act (WCA). You can find more information about WCA here: <a href="https://www.leg.mn.gov/docs/2007/other/070605.pdf">https://www.leg.mn.gov/docs/2007/other/070605.pdf</a>. In terms of mitigating impacts to the park, any proposed development in</p>

	<p>Bloomington would be subject to stormwater management requirements (impervious surface limits, treatment, volume control, and rate control, etc.). Staff reviews development on a site-by-site basis to ensure compliance with the City Code and best practices from a civil engineering standpoint.</p> <p>If you have any follow up questions or want to discuss specific scenarios, please contact the Planning Division at (952) 563-8920 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
<p>I am responding to the answer to the question on racial equity in housing..... I read the response but it doesn't answer the question for me. I don't understand what the stats in the answer represent. Shouldn't something add up to 100%?? What are these numbers? Second, as you seek to increase equitable housing how do you know that the family who buys it will increase racial equity? This seems like an assumption that cannot be counted on.</p>	<p>The numbers reflect the percentage of households in Bloomington in 2020 in each group who own housing as opposed to rent housing. For each group the number could be anywhere between 0% and 100%. The numbers do not (and would not be anticipated to) add to 100% as the data depicts group by group information. The disparities among groups reflect varying income levels and generational wealth. To the extent that the proposed amendments lower costs for housing, they provide more opportunities for individuals who may be priced out of today's housing market in Bloomington.</p>
<p>One of my favorite things about Bloomington is how I live in the city, but I also feel I live in the woods. I love the steep slopes for walking, and I love the wetlands and woods for all the wildlife I get to see. I was happy to see the proposal to change this code had a strategy to protect and enhance environmentally sensitive areas including the steep slopes and wetlands.</p> <p>However, as I dug deeper I learned that the MN DNR estimates MN has already lost an estimated 50% of its original wetland acreage. And the City of Bloomington owns nearly 9 acres of wetlands and natural systems in the middle of the Norman Ridge Neighborhood.</p> <p>How will the city protect and enhance that wetland area if the neighborhood continues to see construction and increased density? Which of these actions can the residents of Norman Ridge look out for if and when construction occurs? Has the city considered impacts on wildlife?</p>	<p>Thank you for your questions. Regarding protection and restoration of wetlands, the City's Water Resource staff (part of Public Works Department) works on various priority projects across Bloomington. There is an annual pond maintenance project, monitoring of about 30 different ponds for water quality, partnership with Nine Mile Watershed District for the ongoing management of the buffer around Bush Lake, and development of a new management framework for Penn Lake to name a few. Water Resource staff also administer the Wetland Conservation Act (WCA) for Bloomington, which establishes the regulatory requirements around land disturbing activities around wetlands.</p> <p>Regarding the wetland area in the middle of Norman Ridge Park, the City has no plans for any development activity within this parcel. In terms of how this area is protected, individual development or construction projects must meet City rules around stormwater management, including limits on impervious surface. I should note that there are stricter limits on impervious surface on steep slope sites. To meet the rules, typically on-site facilities must be provided to retain and treat a certain volume of stormwater within the site. If there is a wetland nearby to a development site, design of stormwater systems must be sensitive to this nearby resource.</p> <p>Regarding wildlife, Bloomington does not have a dedicated program focused on wildlife necessarily. However, the City is interested in the protection and restoration of natural resources, most specifically in City parks and other publicly owned lands. The City adopted a</p>



	<p>prioritization plan for management of natural resources on City lands. That plan can be found here. The protection and restoration of natural resources on public lands helps support habitat that in turn support wildlife. Where the City's efforts are more limited is in privately owned lands.</p> <p>If you have follow up questions, contact the Planning Division at (952) 563-8925 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
<p>I see in the proposed ordinance change that infrastructure constraints should be considered and to "avoid development that cannot be adequately served by existing infrastructure..." Many of our neighborhoods with large lots exist in hilly portions of the city. making then both beautiful and desirable. However they also twists and turns, sometime blind corners, and not a sidewalk to be found.</p> <p>In those neighborhoods specifically increased density forcing increased on- street parking and traffic is not safe, and the infrastructure related to street lights and sidewalks is not there.</p> <p>If this code change passes, what action would you like residents to take to bring development in infrastructure light areas to your attention? What is your plan for ensuring development happens in the "right" areas with no infrastructure constraints?</p>	<p>Thanks for your question. Depending on the nature of the concern (parking, lighting, utilities, stormwater, etc.), staff does work with builders or property owners as part of the formal review process (zoning approval or building permit for example) to address many of these issues on the front end of the project. All projects must comply with the City Code, which includes requirements for many of the concerns you mention. For example, steep sloped lots are further restricted in the amount of impervious surface they can have (see Sec. 19.57.01 of the City Code). Clear view triangle areas (aka "blind corners") on private lots must be kept free of obstructions above a certain heights. People can also request that Public Works does more trimming in areas of the public right-of-way that may present obstructions for vehicular traffic. Regarding parking, there is a process via petition by which certain areas of public streets can be requested as "No Parking". These are just a few examples of how issues can be resolved. From a bigger picture perspective, staff is always willing to learn about local concerns that relate to infrastructure and development in order to try and improve the situation where possible based on our professional judgment.</p> <p>If you have any follow up questions, please contact the Planning Division at (952) 563-8925 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
<p>As this winter has been grinding on it becomes apparent that the streets increasingly become narrower. With no enforcement of snow emergency rules it seems that some streets would be hard for emergency vehicles to navigate with parked cars on both sides of the street. Shouldn't any new development be required to have ample space for parked vehicles not to park on streets over night to facilitate snow plowing as is the case in Edina?</p>	<p>Thanks for your question. Following the declaration of a snow emergency, parking restrictions do go into effect. Information about Bloomington's approach to snow emergency can be found here: <a href="https://www.bloomingtonmn.gov/mnt/snow-removal-and-snow-emergency-information">https://www.bloomingtonmn.gov/mnt/snow-removal-and-snow-emergency-information</a>. Staff recognizes that compliance can be challenging at times. In general, Bloomington street widths are large enough to accommodate some on-street parking while maintaining emergency access. However, in locations that do have narrower streets than the typical standard in Bloomington, some areas are assigned parking restrictions to maintain minimum widths to ensure emergency vehicle access. These restrictions can apply to one or both sides of a street depending on the road width and surrounding land uses.</p> <p>Regarding minimum parking requirements, it should be noted establishing higher minimum requirements does result in increased impervious surface on all properties, which can have negative impacts</p>

	<p>from a stormwater management perspective if in some cases this additional parking is not routinely utilized. From a market perspective, staff has observed that most newer dwellings do include more parking (both garage and driveway), and it is not anticipated that this dynamic will change regardless of what the established minimum requirements. Lessening the minimum requirement can be beneficial for households or residents who do not need additional parking spaces for a variety of reasons. In these instances, there could be both financial and environmental benefits to requiring less off-street parking.</p> <p>If you have additional questions, please contact the Planning Division at (952) 563-8925 or <a href="mailto:planning@bloomingtonmn.gov">planning@bloomingtonmn.gov</a>.</p>
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## Comments

<p>Commenting on "Process for single or two-family residential lot splits resulting in two or fewer lots" the current code requires: Planning Commission and City Council Review. Why would you drop the Planning Commission as stated in the proposed changes and leave just the city council to decide this? I ASSUME the planning commission are the ones that would know best if a proposal is a good plan. What qualifies the city council members to have the only say in this?</p>
<p>It's nice that this summary is posted on the platform, but unless you have a real estate background, or have hours to educate yourself on the updates, this engagement is not presented in the language of the audience you are targeting. A more effective summary would read like this: These Updates Effect the R-1 Zoning District - 80% of Residents live in the R-1 Zoning District Reduce minimum lot size by 30% Increase impervious surfaces (roofs, concrete, decks, etc) by 28% Promote on-street parking by reducing the required off-street parking by 50% Promote development through the following means: Eliminate lot-width continuity by removing the 80% minimum Promote groupings of two-unit housing developments by requiring a conditional use permit, rather than a rezoning The City recently passed an ordinance to expedite the approval process of conditional use permits Environmental protections include reviewing existing tree counts on the subject property Thanks for your attention to this.</p>
<p>Why are you trying to make Bloomington a failure like Minneapolis? Drive down some streets in the "Affordable" areas of Bloomington, you see at least 2 vehicles parked outdoors, quite a few on the street and on lawns, makes for great neighborhoods? So we need more parking per home not less." Address racial equity by identifying and removing potentially discriminatory policies"? According to the City of Bloomington there have been no substantiated incidents of racial equity or potentially discriminatory policies reported in the last five or more years. Trying to fix a "problem" that does not exist?</p>
<p>I just moved from St Paul to Bloomington. The reason I moved was the bloated taxes that were connected with an aggressive overall push for more multi use buildings. People are preoccupied with what is above the ground without considering the cost of all the below the ground infrastructure that goes with new buildings. It is infrastructure that residents must pay for. I was tired of the fallacy that they were creating "affordable housing". And it all started with</p>

re-zoning. The most affordable housing is housing stock that has existed for more than 20 years. Building new properties could never be done for anything less than market rate. Adding one or two affordable units in a big development is not a way of truly helping people who are unhoused or who are vulnerable of being so in the way of providing legitimate housing. My question is who really started this conversation? It seems like the (unelected) metropolitan community council's fingerprints are all over this one. I could be wrong but it seems like the push for multi-use buildings (virtuously presented as "affordable housing") is simply the new form of gerrymandering (ie: creating demographically based density towards a specific political party). And it all starts with re-zoning. I hope Bloomington does a better job of listening to their constituents. I'd hate to have to move again.

I am a long-term resident of Bloomington and the proposed changes to the single and two-family development standards I believe are wrong for our city. I think it is safe to say most of us living here chose Bloomington because it is suburban. We are not Minneapolis or St Paul. A city can be diverse without being urban. We chose to live here because we want our green space, our yards, our garages so there isn't street parking everywhere and houses on top of each other. Spend our money to continue to improve our parks, roads, sidewalks, community areas and support our residence so more people are enticed to live here.

One of the reasons to do this is stated to "Address racial equity by identifying and removing potentially discriminatory policies." What are these discriminatory policies? One example given is racial restrictive covenants ( Just Deeds ). Yeah okay, let' s get rid of those. How large an impact will that make? Are there 100 homes sold with these deeds that have prevented minorities from buying a home or is it 1 home (and yes 1 is 1 too many), what I am trying to establish is will this solve the problem or at least make a dent in the issue? Another example is "large lot sizes that artificially inflate housing prices." There e is nothing artificial about it, people are willing to pay more for a large lot. It is part of what makes a house desirable to so me. And finally, it is stated that the "lack of diverse housing stock that accommodates a range needs (two-family homes, larger multiple bedrooms to accommodate intergenerational living, single floor living options, or smaller home sizes for small households, etc.) have contributed to this ownership gap over the last 50+ years. Where is the data. It seems to me that there are a lot of age in place single floor living homes in Bloomington. I live in one. Oh and our house is set up for intergenerational living and I know of several others that are as well. Major Issues Code can sometimes be difficult to understand or cumbersome for existing residents, contractors, and developers Drastically limiting the options is one way of doing this, is it the only way? No, you could just clean up the confusing language. This leads me to believe that your argument is so weak that you need to stretch your logic to try and make your case. Large demand for a wide range of detached housing types but existing code sets minimum development standards above and beyond what the market demands If this is a major issue it deserves to be supported with data. How large is large and how do you know that your changes will fix the problem. What is your estimates of home prices due to the changes.

It's my understanding that once you take the Federal HUD money the local control of housing development is no longer in the hands of the community. It is controlled by the new rules of the department of Housing and Urban development. Please understand the new rules and their ramifications before blindly accepting the Federal handout. The dirt is in the details!