



May 27, 2025

City Plan Commission
City of Kansas City Missouri
414 E. 12th Street, 15th Floor
Kansas City, MO 64106
Via Electronic Mail To: publicengagement@kcmo.org
Via Electronic Mail To: genevieve.kohn@kcmo.org

RE: 3825 Roanoke [CD-CPC-2025-00054,55, and 56]
Compliance with Midtown Plaza Area Plan

Dear Commission Members:

Since its founding in 1974, Historic Kansas City (HKC) has been the only greater Kansas City nonprofit organization dedicated to the preservation of the area's heritage, neighborhoods, and historic built environment. Through advocacy, public policy, outreach, and educational programming, HKC is an advocate for the thoughtful and meaningful preservation and rehabilitation of historic buildings, landscapes, and neighborhoods.

HKC is offering testimony in support of impacted owners in the Roanoke Neighborhood (RN Owners). HKC shares RN Owners' concern about the negative precedent that is set if the City chooses to override the existing adopted Midtown Plaza Area Plan (MPAP) that was approved by the City Council by Committee Substitute for Resolution No. 150899, as Amended, adopted January 7, 2016.

HKC is providing testimony in support of applying the recommendations of the MPAP in the context of the rezoning of 3825 Roanoke, particularly as to the land uses. The MPAP recommendations should be relied upon by this Commission, and the Council, as they have been by existing residents, but also future developers.

The MPAP is the most detailed of Kansas City's Area Plans due to the historic nature of the Midtown/Plaza area, its neighborhoods and the natural course of new and infill development pressure drawn to it. The formation of the MPAP was led by City staff and consultants and a Community Steering Committee, consisting of developers, institutions, neighborhoods, businesses and non-profit stakeholders who spent 3 years detailing, negotiating and measuring future impacts of changes and growth for the area with strategies that also protect its original assets and success. ***The main purpose of MPAP is to work out challenges and disagreements before any particular project is submitted for zoning approval. It is to solve the problem of having every project that comes before Council becoming a political football and reinventing the wheel on serious issues that have already been negotiated among all stakeholders before any specific project raises those same issues for a particular proposal.*** The MPAP does not slow down or discourage development if it is consistently applied. An ability to rely upon the MPAP protects the investment of all in our community, residential owners and developers.

These plans are the primary tool neighborhoods have to weigh in on redevelopment proposals.

Developers, residents and the City should *all* rely on these plans for guiding positive growth in an efficient manner. Every property owner has the right to request a rezoning. But Missouri law requires that zoning decisions follow a city's comprehensive plan. The 19 area plans and their future land use maps are part of the comprehensive plan. Ignoring the MPAP recommendations will set a precedent for other susceptible blocks in this neighborhood.

The developer has submitted a development plan that shifts a portion of the site from residential low density to mixed use neighborhood which is why a plan amendment resolution is a part of this proposed development. See description in Case No. CD-CPC-2025-00055. Similarly, a rezoning is sought that changes a portion of the property from R-5 to B-3. 3. This is the area in closest proximity to the single-family homes fronting on W. 38th St. which are zoned R-5.

Particular consideration should be given to these components of the MPAP:

- strong statements favoring preservation of historic character in Midtown (MPAP Pages 3 and 25 (and elsewhere));
- it recommends respecting the scale and character of adjacent development with redevelopment, including respecting established land uses and preventing encroachment (MPAP Page 24), *this development plan does neither;*
- this frontage along West 39th Street is recommended as an area of Mixed Use Neighborhood (MPAP Pages 29-30) but those existing parcels are split with the area to the north being an area of transition of Low Density Residential (and this is the area sought to be changed by the developer to a more intense and dense use), *a less dense multi-family proposal more significantly stepping down in height to the north would more respect the abutting single family homes;*
- Residential Low is defined as primarily single-family homes with about 7.2 units to the acre (MPAP Page 27) and Mixed Use Neighborhood is defined as generally corresponding to B1 (MPAP Page 28) *instead of the B-3.3 that is being sought through rezoning;*
- recognition of the character of 39th Street, with its smaller scale unique buildings, narrow streets, on street parking and walkability as contributing to making it a special place within the City (MPAP Page 94), *the scale of what is proposed dwarfs its surroundings and significantly diminishes the unique smaller scale of the existing buildings contrary to the MPAP;* and
- the MPAP strongly discourages encroachment into existing neighborhoods and favors transition elements for development adjacent to residential neighborhoods (MPAP Page 97), *that is not achieved by this rezoning or the proposed development plan.*

It is apparent from that these specific recommendations argue for less density, height and mass at this site and more architectural compatibility with historic context (such as the surrounding residential neighborhoods) in needed to adhere to the recommendations of the MPAP.

This application is to rezone from a parcel that is made up of two zoning districts: B-3.2 and R- 5, to solely and entirely B-3.3. It is important to note that the existing R-5 portion of this site is a transition zone abutting the single-family homes that front on W. 38th St. which is a boulevard and governed by unique regulations to preserve that historic character of the Parks' boulevard system. Such rezoning is

counter to the recommendations of the MPAP.

As an area plan, the MPAP is intended to "inform" future zoning decisions. When property is acquired with existing zoning well-known to the buyer, changes allowing higher density or intensity of use are a windfall for the buyer, at the expense of surrounding neighbors who have relied on what supposedly could and could not be done there. **It is important to remember that the area plans do not just tell you what you cannot do - they tell you what you CAN do, especially where commercial areas exist next to established neighborhoods, where together they both contribute to be an important part of the City. MPAP does not prohibit growth & change, it spells out in detail the best way to accomplish growth, change & new infill in a balanced strategic way.**

What is proposed is sufficiently inconsistent with the recommendations of the MPAP that it is defensible for the Commission to reject this rezoning application and the amendment to the MPAP. HKC supports the application of MPAP and encourages the Commissioners to do so as well to meet the review criteria stated in **88-515-08-A** to conform with adopted plans and planning policies. The MPAP is the applicable area plan and what is proposed does not conform to it.

Respectfully,

HISTORIC KANSAS CITY FOUNDATION



Vicki Noteis, President

cc (via email): Crispin Rea, 4th District At-Large Councilmember
Eric Bunch, In-District 4th District Councilmember
HKC Board of Directors
Hadley Arnett for Roanoke Neighborhood Owners
Amanda Butler, Volker Neighborhood Association

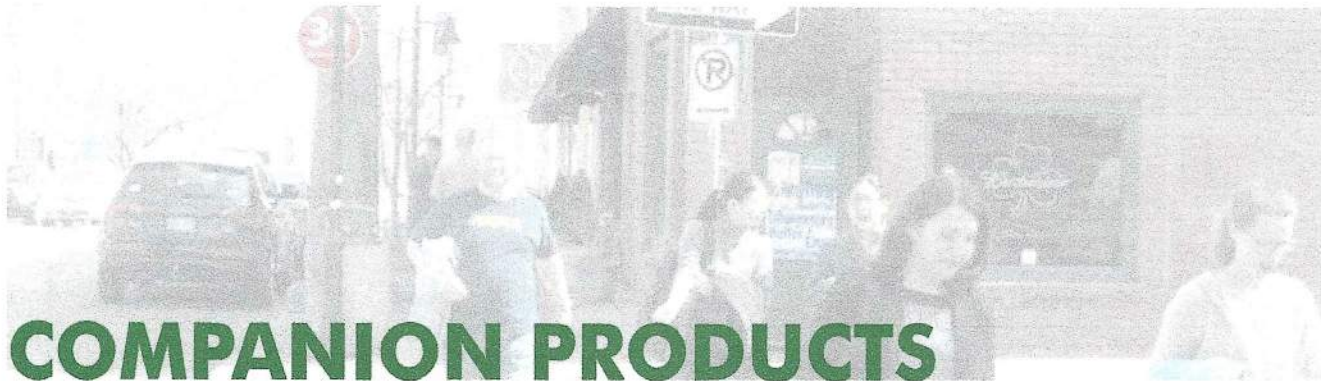
Attachment: Pertinent Pages of Midtown Plaza Area Plan Cited in Testimony

MIDTOWN / PLAZA AREA PLAN

KANSAS CITY, MISSOURI

Approved by the City Planning Commission on October 22, 2015
Approved by the City Council on January 7, 2016
by Resolution Number 150899
As Amended by Resolution Number 190989 on December 19, 2019
to incorporate the Westport District Master Plan





COMPANION PRODUCTS

DATA BOOK

The Data Book is a collection of background and supporting information for the development of the *Midtown / Plaza Area Plan*. The Data Book provides the following:

- Relevant facts, trends and key issues that serve as a foundation for recommendations
- Information about past, on-going and planned initiatives in the Plan Area
- A preliminary list of planning issues to be addressed in the plan

RESIDENT SURVEY

To ensure that input from a broad audience of residents was considered during the planning process, a statistically significant survey was conducted of area residents. The purpose of the survey was to provide a statistically valid measurement of the opinions and needs of residents. The results established direction for plan recommendations, provided balanced input on the opinions and needs of residents in all neighborhoods, and helped determine priorities for the plan. Below are some key findings of the survey and other findings are located throughout the Plan to support recommendations.

- 86% of households thought their neighborhood was pedestrian friendly
- 81% of households support commuter transit services in the Midtown / Plaza area
- 94% of households thought it was very or somewhat important to preserve historic buildings and heritage of the Midtown / Plaza Area
- 89% of households thought it was very or somewhat important to establish design guidelines for new development and redevelopment in their neighborhood, so development is compatible with the current character of their neighborhood
- Based on the sum of their top five choices, the issues that households indicated are most important include: vacant building maintenance/renovation/security/demolition (49%), additional police presence/patrols (49%), sidewalk maintenance (45%), vacant lot maintenance/upkeep/reuse (38%), access to fresh fruits and vegetables (38%) and enhanced streetscapes (37%).

BUSINESS SURVEY

To ensure that input from area businesses was considered during the planning process, a statistically significant survey was conducted of area businesses. At the same time, the same survey was conducted for the Economic Development Corporation of businesses Citywide. The purpose of the survey was to identify the importance of various issues to businesses, to identify where needs are not being met, and to identify expansion/retention plans of businesses in the future. Below are some key findings of the survey and other findings are located throughout the Plan to support recommendations.

- Businesses were asked to choose from a list of 32 the issues that were the most important to their decision to stay in their current location. The top three issues were: overall perception of the area, physical appearance of the area, and safety/security.
- With the same 32 issues, businesses were asked if their needs were being met in Kansas City. The greatest gap between the order of importance and needs being met were with:
 - Overall perception of the area - 1st in importance - 22nd at being met
 - Physical appearance of the area - 2nd in importance - 27th at being met
 - Safety/security - 3rd in importance - 28th at being met

provide more detail, and should be referred to as noted on Page 12. Major property owners and institutions are encouraged to work with adjacent neighborhoods to create “master plans” that coordinate future expansions within this Area Plan’s policy framework. For physical development and / or where appropriate, major property owners and institutions should apply to the City for Master Planned Development (MPD) zoning to provide more certainty as to future development. Examples of “master planning” processes that have been completed or are underway at the time of the adoption of this Area Plan include (See Appendix B, Page 208):

Completed -

- The UMKC Campus Master Plan completed in 2002, updated in 2014 .
- The Rockhurst University Master Plan completed in 2010, MPD zoning approved in 2011.

Underway -

- The Nelson-Atkins Museum of Art master planning process that is considering properties within their ownership and will include involvement with the surrounding community organizations.
- The Kansas City Art Institute is undertaking a campus master plan that is considering properties within their ownership and will include involvement with surrounding community organizations.

A benefit of the Midtown / Plaza area is the diversity of land uses in close proximity. This diversity adds to the richness of the community. However, it is a delicate balance and encroachment, especially into single family residential neighborhoods, is not appropriate.

- The Recommended Land Use Map and Development Form Guidelines of this Plan should be followed to protect existing uses and to ensure compatibility of new development into the area’s existing fabric.
- Rezoning will be supported where the existing zoning is not consistent with the adopted land use policy (Recommended Land Use Map). Neighborhood associations and other stakeholders are encouraged to undertake the rezoning of property when existing zoning is inconsistent with the recommendations of the Recommended Land Use Map.
- Neighborhoods should be well connected to but appropriately buffered from adjacent districts, nodes and corridors, per the Development Form Guidelines.
- Where higher intensity uses abut lower intensity uses, transitions should be provided, per the Development Form Guidelines.

RESPECT THE SCALE AND CHARACTER OF ADJACENT DEVELOPMENT WITH INFILL DEVELOPMENT / REDEVELOPMENT

Midtown / Plaza is an existing urban community. Development / redevelopment within the area should respect and work to fit within that community.

- It is important to consider both density and building type when referring to the Recommended Land Use Map. Often, the recommendation was based on the allowed building types, with less attention to the density. As new development is proposed, consider both issues before amending the Recommended Land Use Map, while understanding:
 - The goal to “Strengthen an urban development pattern with appropriate density, physical layout, and infrastructure that integrates the diversity of uses found throughout the Plan Area.”
 - The other guiding principles:
 - Reinforce and embrace an urban development pattern.
 - Respect appropriate, established land uses and prevent encroachment.
- The Recommended Land Use Map and Development Form Guidelines together should be applied to ensure that new development meets a minimum standard of quality. Incorporating area / neighborhood specific characteristics into

infill development / redevelopment is encouraged and should be required if incentives or additional land use approvals are requested. Any property that requires a rezoning, a special use permit, receives tax incentives or requires a development plan shall be subject to the Plan's Development Form Guidelines.

- For the Development Form Guidelines that are fundamental, quantifiable, and could be applied citywide, the Zoning and Development Code should be amended to add those guidelines from the Development Form Map and Guidelines directly into the Zoning and Development Code. These guidelines should then be required and reviewed and approved by staff, not requiring an applicant to apply to a separate board or committee and not changing the time required for staff review.
- When design guidelines are appropriate only for certain neighborhoods, corridors, districts, etc., customization is needed, and / or enforcement is desired, zoning overlays are the tool within the Development Code that should be utilized. Stakeholders should work with City staff to establish an overlay zoning district (further defined on page 40) that is more appropriate for their specific area and needs.
- Amend the Development Code, where necessary, to ensure zoning categories allow new construction at the scale of the existing "good" development, without also allowing development that is inappropriate for the scale and character of areas.
- Encourage major property owners and institutions to work with adjoining neighborhoods to create "master plans" that coordinate future expansions within this Plan's policy framework
 - For physical development and / or where appropriate, major property owners and institutions should apply to the City for Master Planned Development (MPD) zoning to provide more certainty as to future development.

ENCOURAGE THE PRESERVATION AND ADAPTIVE REUSE OF HISTORIC BUILDINGS

Historic districts and structures exist throughout the Midtown / Plaza area and many significant historic buildings exist that are not formally designated. Retaining historic structures is important to the character of the Midtown / Plaza area and steps should be taken to ensure the buildings are preserved for future generations.

- To protect historically and/or architecturally significant structures, they should be listed on the National and/or Local Register of Historic Places (Local Register of Historic Places offers more "protection".)
- This Plan encourages the preservation and adaptive re-use of historic buildings. Historic buildings (whether designated or not) contribute to the area identity and should be preserved and integrated into new development. Even if the original intent of the structures is obsolete, reusing the buildings in new ways may be the best solution to retain the structure.
- When a historic building (designed or potentially eligible for historic designation) is part of a redevelopment, the Recommended Land Use map's recommendations should be flexible, in order to retain historic resources, while achieving the goals of this Plan. Any impacts should be minimized and the physical attributes of the structure should remain and appear to fit within the character of the Recommended Land Use and surrounding neighborhood.
- In order to maintain the historic fabric of the area, tools such as tax incentives, overlay districts or other appropriate measures should be utilized when a historic property is redeveloped.

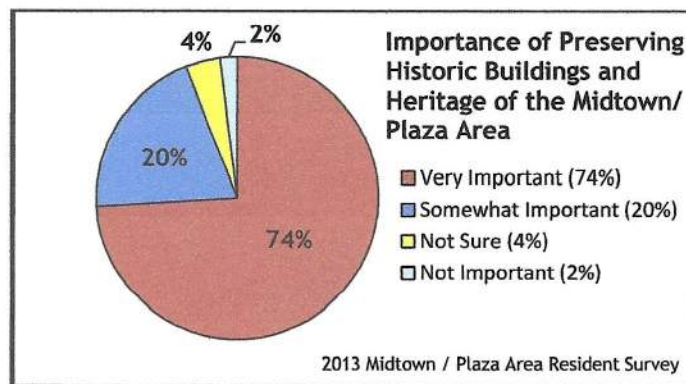


FIG. 4.1 - RESIDENTIAL SURVEY RESPONSE

LAND USE CATEGORIES AND DEFINITIONS

The Recommended Land Use Map identifies the specific land use types and densities for a location. It is intended to prevent future land use conflicts, safeguard natural resources and plan for the orderly and predictable development of the area. The plan helps to ensure that land uses and the transportation system are integrated and support each other. It is also a reflection of the community's values and aspirations for the future development of the area. The Recommended Land Use Map is a guide which does not represent a zoning document. Implementation will happen incrementally on individual sites through the development review process as well as in larger areas through the application of the proactive rezoning of property and establishment of overlay districts. Factors that were considered when determining the recommended land use include, but are not limited to (in no particular order):

- Values and Aspirations of the Community
- Market (per Market Analysis and Experts)
- Resource Preservation
- Existing Land Use
- Existing Zoning
- Transportation System

THE LAND USE CATEGORIES AND DEFINITIONS ARE DESCRIBED BELOW AND ON THE PROCEEDING PAGES.



RESIDENTIAL LOW - Primarily intended for single family detached residential building types up to 7.2 units per acre. This land use classification generally corresponds with the "R-6," "R-7.5," and "R-10" zoning categories within the zoning ordinance.



RESIDENTIAL LOW-MEDIUM - Intended for single family detached, semi-attached, and two-unit building types with similar lot sizes, heights, and exterior appearance as the Residential Low Density land use category.



RESIDENTIAL MEDIUM - Intended for a variety of single family, semi-attached, townhome, and two-unit building types that allow up to 8.7 units per acre. This land use classification generally corresponds with the "R5" zoning category within the zoning ordinance.



RESIDENTIAL MEDIUM-HIGH - Intended for single family, townhome, two-unit houses, and multi-unit houses (3 to 8 dwelling units) up to 17.4 units per acre. This land use classification generally corresponds with the “R-2.5” zoning category within the zoning ordinance.



RESIDENTIAL HIGH - Intended for single-family, townhome, two-unit houses, multi-unit houses, multiplexes, and multi-unit buildings up to 29 units per acre. This land use classification generally corresponds with the “R-1.5” zoning category within the zoning ordinance.



RESIDENTIAL URBAN - Intended for the highest density developments, up to 145 units per acre. This land use classification generally corresponds with the “R-0.3” and “R-0.5” zoning categories within the zoning ordinance.



MIXED USE NEIGHBORHOOD - Primarily intended to accommodate and promote neighborhood serving retail sales or service uses, as well as mixed-use development consisting of business uses on a building’s lower floors and residential uses on upper floors. This type of vertical, mixed-use development that includes a variety of business and residential choices should enhance the pedestrian environment of the community. Encouraging residential development in mixed-use areas provides increased housing choice and promotes higher density housing. This land use classification generally corresponds with the “B1” zoning category within the zoning ordinance.



MIXED USE COMMUNITY - Primarily intended to accommodate and promote a variety of community-serving retail sales or service uses generally of a higher intensity and larger scale than what is allowed in Mixed Use Neighborhood areas. This category should include a mix of business and residential uses designed to enhance the pedestrian environment of the community and generally corresponds with the “B2” zoning category within the zoning ordinance.



COMMERCIAL - Primarily intended to accommodate “heavier” commercial activities and/or operations that are not found in or compatible with mixed-use neighborhood oriented environments. Included are large-scale commercial development targeted in designated areas along major arterials. This land use classification generally corresponds with the “B3” and “B4” zoning category within the zoning ordinance.



OFFICE - Primarily intended to accommodate professional, administrative and corporate office uses (uses that require a large public interface should be reserved for Commercial and Mixed-Use areas).



OFFICE/RESIDENTIAL - Primarily intended for office and/or residential development. These areas are intended to promote flexible infill development of either office buildings, multi-family residential buildings, or live-work units.



INSTITUTIONAL - Areas designated as Institutional include a variety of public and quasi-public uses and facilities including but not limited to: schools, churches, and public facilities that are government owned. Institutional uses are allowed in a variety of zoning categories, depending on their specific use and intensity.



LIGHT INDUSTRIAL - Primarily intended for industrial uses that might include light manufacturing, warehousing, wholesale storage, distribution centers, office parks and will allow on-site customers and other less intensive industrial uses. These areas are intended to promote the economic viability of industrial uses; encourage employment growth; and limit the encroachment of unplanned residential and other non-industrial development into industrial areas. This land use classification generally corresponds with the "M1" zoning category within the zoning ordinance.



PARKS - Public or private land reserved for parks and parkways that is intended to accommodate active and passive parklands, trails, recreational uses, or any other lands reserved for permanent park or recreation purposes.



SPECIAL TRANSIT CORRIDOR - A dedicated public corridor intended to accommodate transit and trail users.



BUFFER - Consists of private or public lands that are in some way either temporarily or permanently reserved from development, including lands unsuitable for development. This includes but is not limited to creeks and stream buffers, floodplains, woodlands, severe slopes, and buffer zones around natural resources (areas difficult for development due to topography, hydrology, aged woodlands, archaeological findings, etc.).



CONSERVATION DISTRICT - Areas intended for conservation or open space developments. Conservation Districts are intended to encourage flexibility in design standards (example: reduced lot sizes or increased density) in exchange for 60% or 30% open space preservation. These areas will provide additional open space and recreational amenities for residents, preserve environmentally sensitive resources as well as reduce stormwater runoff and water pollutants. This land use classification generally corresponds with the Conservation or Open Space Development option for "R" Districts within the zoning ordinance.

Recommended Land Use

Midtown / Plaza Area Plan

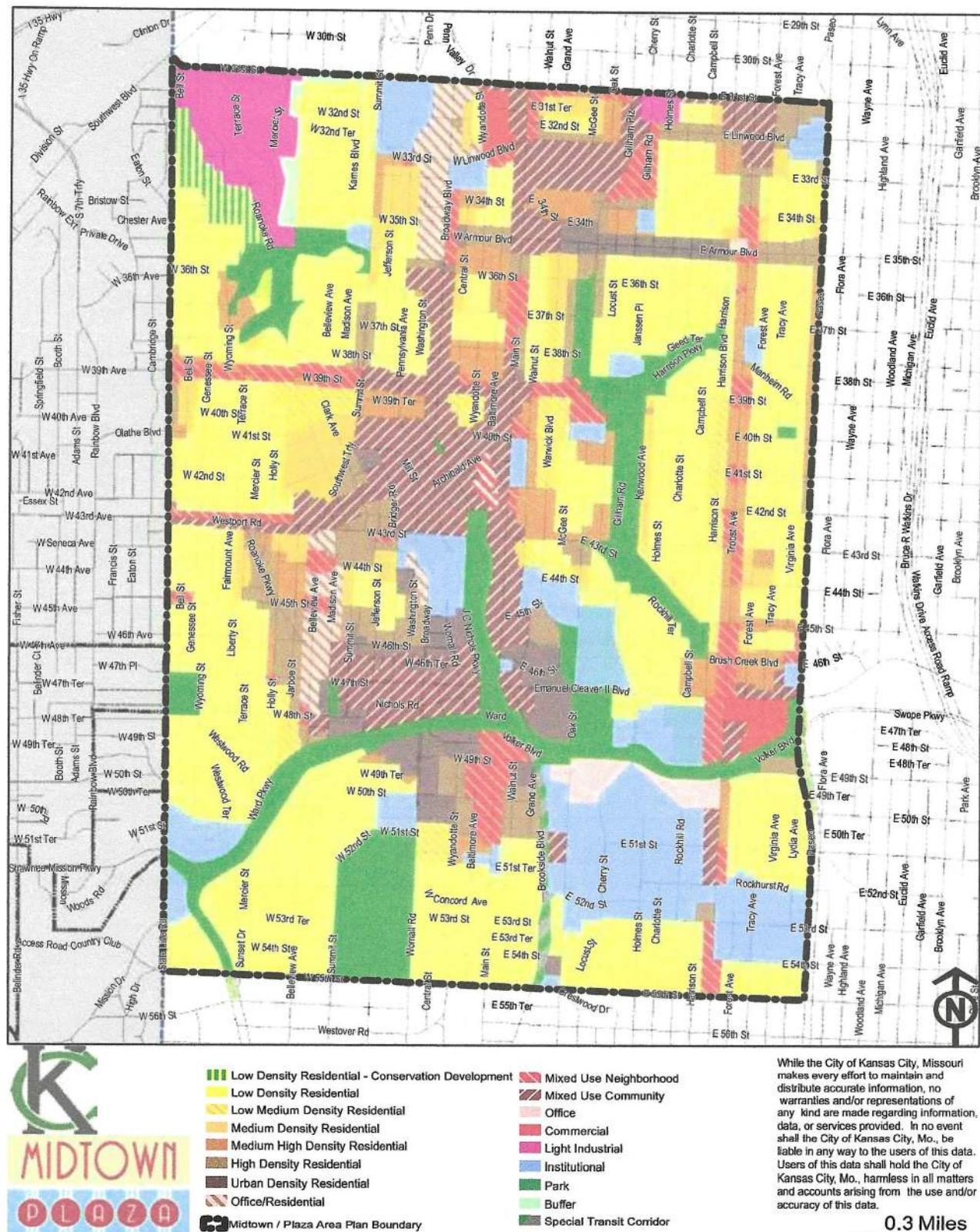


FIGURE 4.2 - RECOMMENDED LAND USE MAP

NORTH WEST SUB-AREA

STATELINE TO SUMMIT STREET
31ST STREET TO WESTPORT ROAD

CONTEXT

The North West Sub Area is predominately a residential area. It is also home to an industrial district along Roanoke Road off of 31st Street, Roanoke Park, and commercial corridors along 39th Street and 43rd Street. Originally a neighborhood serving corridor, 39th Street within this area has become a “restaurant row” destination supplemented with unique retail. The character of 39th Street, with its smaller scale unique buildings, narrow streets, on street parking, and walkability all contribute to making it a special place within the City. Southwest Trafficway is the eastern boundary of this sub area, while it moves a great number of vehicles, the way the roadway currently functions is viewed by some as separating the neighborhoods on either side.

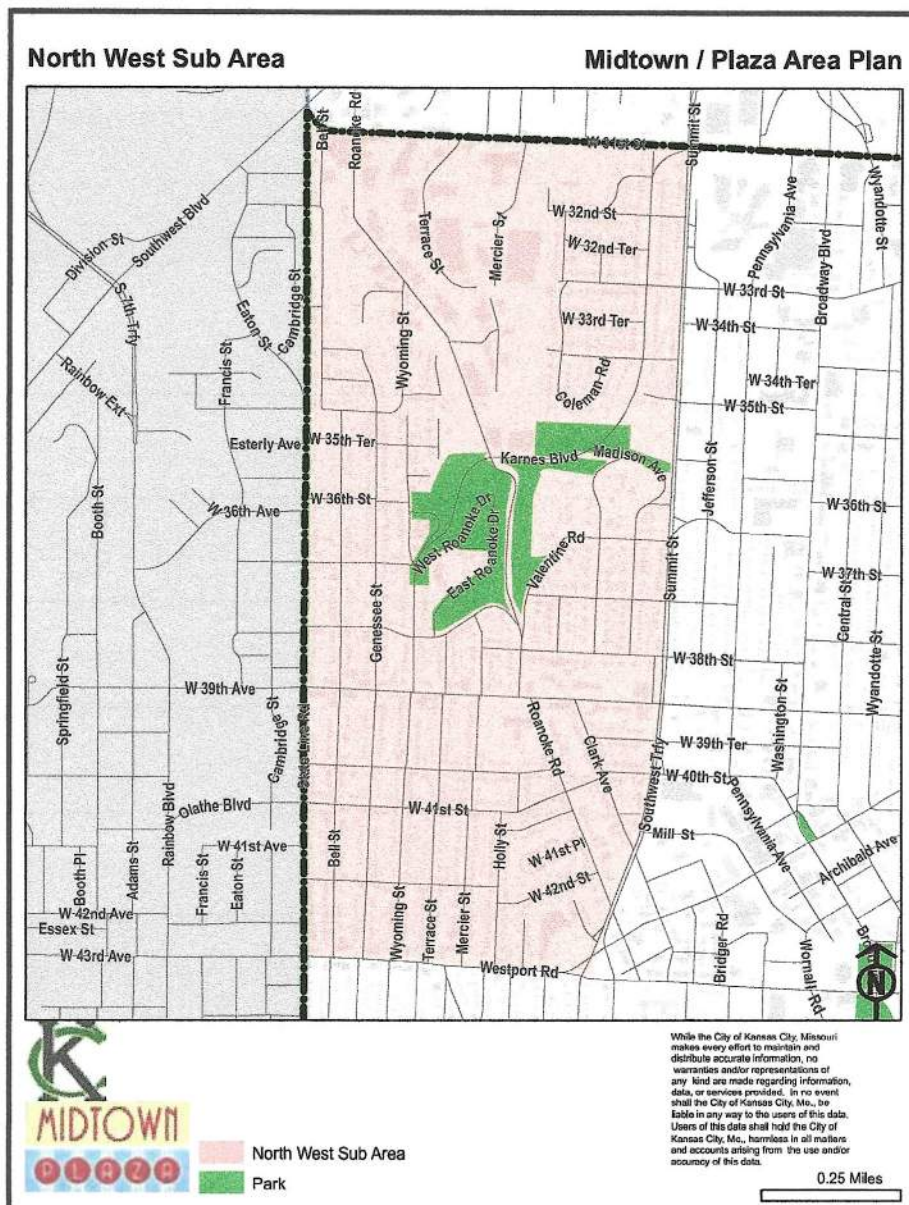


FIG. 4.26 - NORTH WEST SUB AREA MAP

NORTH WEST SUB AREA LAND USE

The Recommended Land Use Map prescribes where specific land use types and densities should be located while the Development Form guidelines describe how the built environment should look, feel and function (independent of the type of use). See pages 27-29 for definitions of the land use categories.

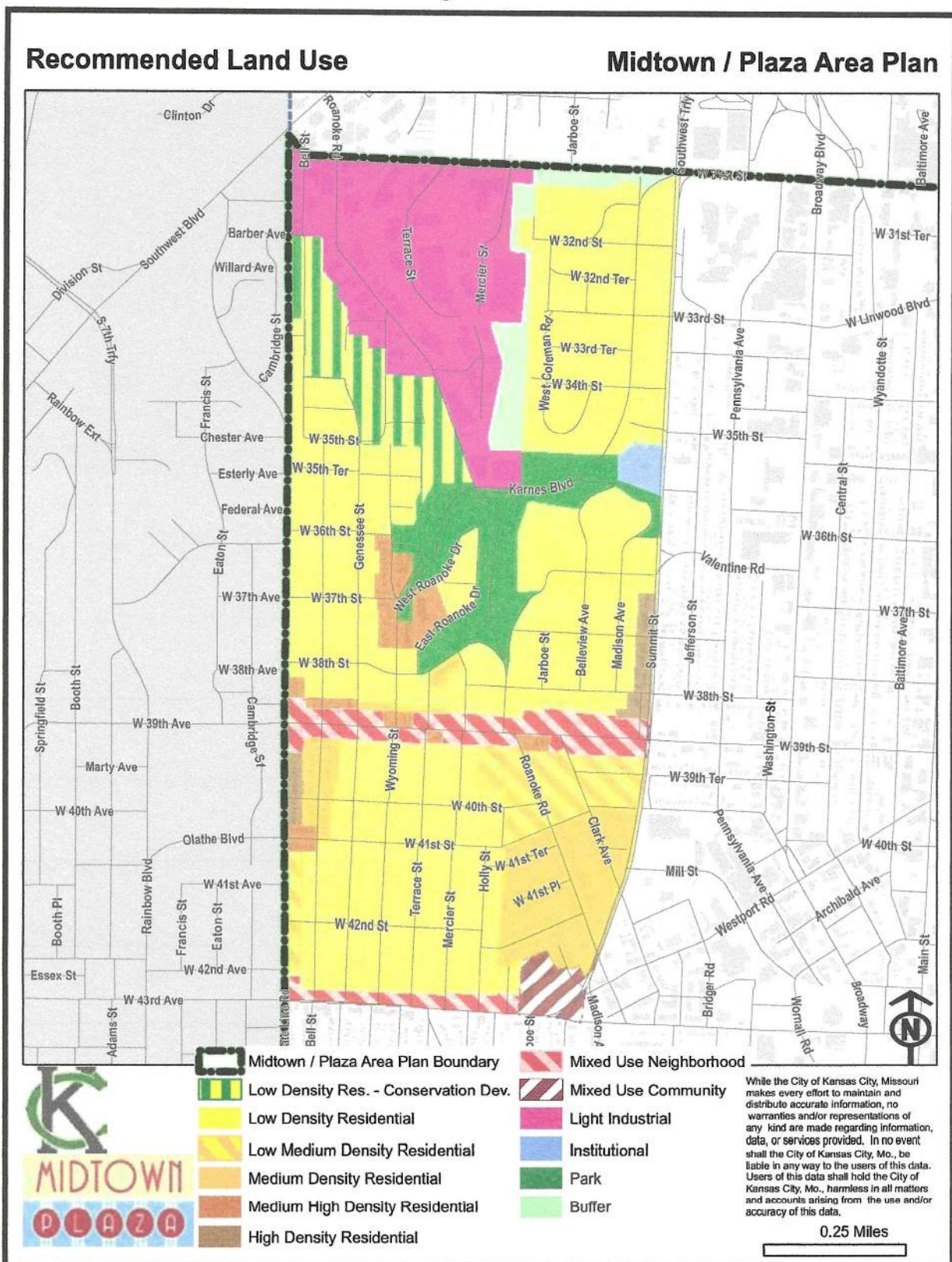


FIG. 4.27 - NORTH WEST SUB AREA RECOMMENDED LAND USE MAP

The Development Form guidelines describe how the built environment should look, feel and function (independent of the type of use). Refer to Appendix A for the full Development Form Guidelines Text.



NORTH WEST SUB AREA RECOMMENDATIONS

- Commercial encroachment from 39th Street or 43rd Street into existing residential neighborhoods is discouraged. Any development adjacent to a residential neighborhood should provide transition elements to that neighborhood consistent with the Development Form Guidelines of this Plan.
- The City of Kansas City, Missouri, the KU Medical Center located near 39th and State Line Road, and Kansas City, Kansas should develop a comprehensive development strategy for the areas adjacent to the KU Campus.
- The boundaries of the North Volker Industrial Area, located to the west of the Coleman Highlands residential area between Karnes Boulevard and 31st Street, should not expand outside its present physical footprint. Future development projects should take measures to mitigate any external effects on neighboring residential properties.
- The “Low Density Residential - Conservation Development” Recommended Land Use was made due to the steep topography and mature vegetation of the area. Any future development should respect the topography and retain as much as the mature vegetation as possible.

