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Cc: [Amelia McIntyre](#); [Lisa Briscoe](#); [MaryJo Draper](#); [Kate Barsotti](#)
Subject: Ordinance 231047 - NPD 2/28, public testimony
Date: Wednesday, February 28, 2024 7:25:34 AM

Good morning,

I am not able to attend the February 28, 2024, NPD committee hearing, but wanted to provide feedback on behalf of the Kansas City Neighborhood Advisory Council (KCNAC) in the ongoing discussion of the proposed amendment language.

I did not find any new documents for today's hearing, so these comments are based on documents prepared for prior hearings. Additionally, I did not see the committee substitute introduced at the 2/21 NPD hearing and would appreciate clarification as to whether that version will be formally included in the perfection of this ordinance.

Communications Service Establishments

- District R-80 - We recommend that these establishments be considered by **special permit only** for the following reasons:
 - The impact on land use and adjacent properties in these areas may not be limited. As compared to B&D districts, the underlying zoning of residential property is dramatically different from the commercial nature of a data center and may not provide adequate project guidance or protection for adjacent land uses. A facility of even 50,000 square feet should likely require rezoning to engage all necessary input for successful integration into a residential zone.
 - Data centers can, based on their size and operational design, use large amounts of water for cooling. R-80 zones in Kansas City, Missouri, are generally not on municipal water or wastewater systems. Any water use of commercial scale that draws from natural water sources should be carefully considered. This activity could deplete natural aquifers and subsurface sources to the detriment of adjacent and existing agricultural and residential activities, including private wells serving residents where there is no plan to connect to a municipal water system or where that connection is cost prohibitive for the City.
 - Similarly, the disposal of waste water should be carefully considered as to avoid impacting adjacent land uses and natural systems.
 - Long range planning documents should be reviewed, not simply amended, through the process of rezoning and development reviews to forecast future infill development in areas zoned R-80 and mitigate large facilities in areas that have potential higher uses or those that are more suitable for residential, neighborhood business, or job centers.
 - Existing street infrastructure in existing R-80 zones may be insufficient for both construction activity and ongoing operations. This gap in serviceability could negatively impact adjacent residents and businesses through rapid deterioration of existing infrastructure and/or further burden

the City with the cost of improvements with minimal return to the city or county in offsetting property taxes and business income.

- B&D Districts
 - The current dialogue around limiting the size of communications establishments in these zones is appropriate as is the development of design standards to protect pedestrian-oriented areas of the City. We look forward to reviewing any proposed changes in this section of the amendments.
- Home Occupations
 - It is our understanding that this section of the original ordinance will be removed and reintroduced as a separate ordinance. The timing of that introduction has not been discussed, however, KCNAC looks forward to participating in that process.
- Amendments to Development Plans or Project Plans
 - It is our understanding that this section of the original ordinance will be removed and reintroduced as a separate ordinance. The timing of that introduction has not been discussed, however, KCNAC will continue to support Historic Kansas City in the development of this language and looks forward to participating in that process.

Thank-you,

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