

## Public Comments received for Planning Commission – June 18, 2026

UPDATED 05/22/2026

### **Agenda #01 SUB-003642-2026 Rogers Group Subdivision**

Dear Planning Commissioners and Staff,

I am representing the Mobile Environmental Justice Action Coalition in writing a Public Comment regarding the Rogers Group Inc. City of Mobile Subdivision Application, Sub-003730-2026. We have numerous concerns about both the substance of the Rogers Group, Inc's (the Applicant) Subdivision Application (Sub App) itself as well as the historic land use at the site, including City of Mobile Code Enforcement. These substantive concerns include an apparent lack of due diligence with respect to existing rights of ways and easements. We also have many questions about what appears to be land disturbance already underway at the site that may plainly be in violation of City of Mobile development guidance norms and rules. Additionally, there's important cultural and historic context about the properties in question that we strongly feel must be added to the Public Record. We will dive deeper into each of these concerns below.

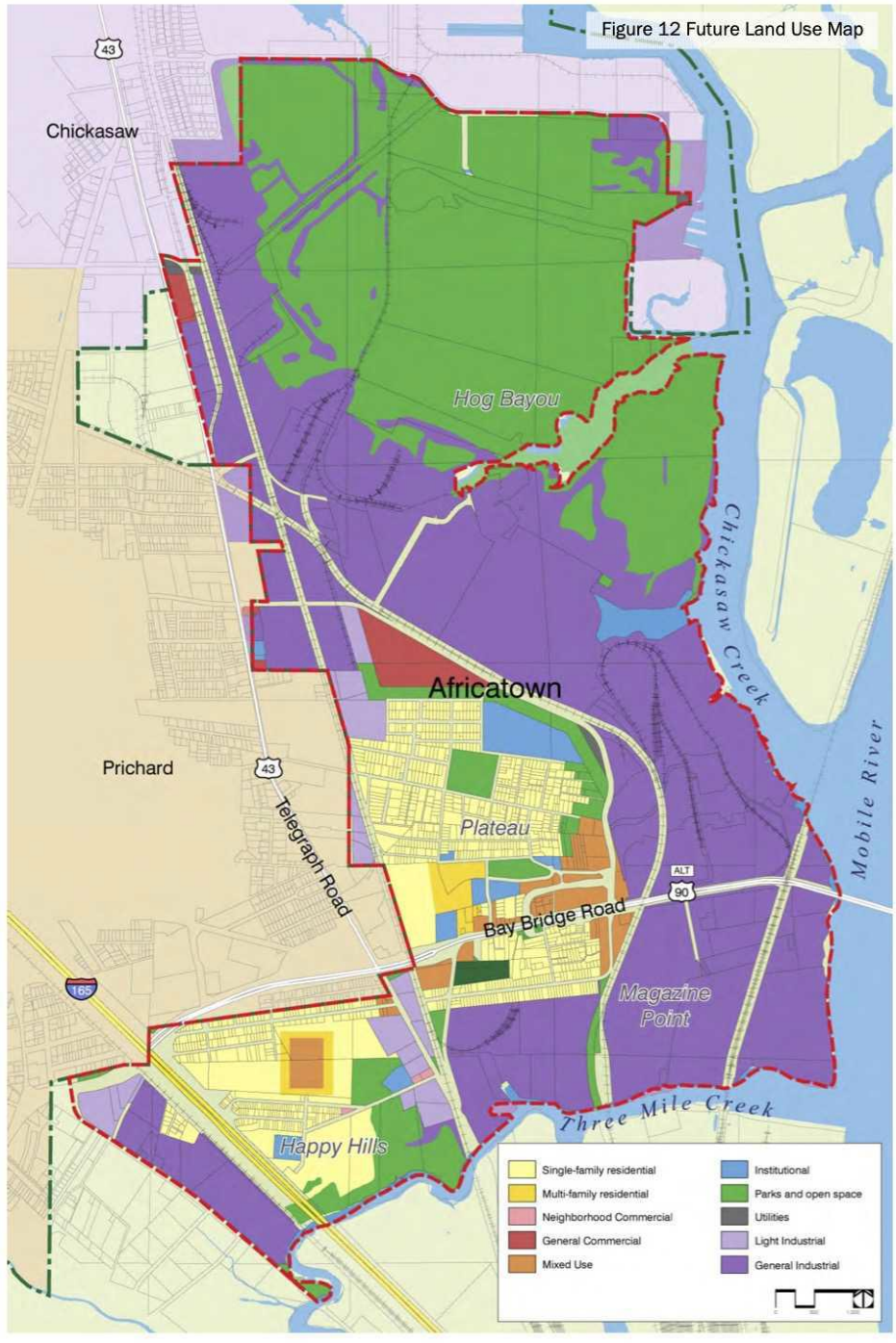
For the reasons stated in our opening paragraph, we are seeking a Hold Over for a month to afford ourselves, Planning Staff, and the Applicant the time to run down answers to these critical questions and provide clarity to the historic Africatown community and its many stakeholders committed to the fair treatment and meaningful involvement of Africatown residents in these sorts of legal governmental decision-making processes.

#### **Background**

The Mobile Environmental Justice Action Coalition (MEJAC) was formed in September 2013 by Africatown residents in partnership with Africatown stakeholders and regional advocates with the mission to engage and organize with Mobile, Alabama's most threatened communities in order to defend the inalienable rights to clean air, water, soil, health, and safety; to promote environmental justice; and to take direct action when the government fails to do so, ensuring community self-determination.

MEJAC is no stranger to the Planning Commission, though at the time of submission of this Public Comment, we have not had the pleasure of having had a conversation with the Applicant. That said, we are looking forward to having the opportunity to meet with them this afternoon. This Public Comment will be shared with them today, as well. We have always been committed to public dialogue and public participation since our inception.

MEJAC has been one of the most active community based organization participants in the City of Mobile's Zoning and Planning public participation opportunities since our inception. Our interest in these parcels stretches back to the Africatown Neighborhood Plan, which was adopted by the Planning Commission as a guiding document in January 2016. In that document, the community identified a desired alternative use for several parcels included in the Applicant's Sub App. Here is a look at page 26 of the Africatown Neighborhood Plan, a map of the Future Land Use Map for Africatown derived from the Plan:



Much to the dismay of engaged Africatown residents and stakeholders, the City of Mobile did not formally adopt this or the other "Parks and open space" areas along Three Mile Creek described in its formal Future Land Use Map derived from the Map for Mobile deliberative process. Still, the vision was maintained and further codified in the concurrent development of the Africatown Connections Blueway. Through years of consultation with Africatown-area faith institutions, the area of Africatown that the Applicant has acquired was embraced as the "Place of Baptisms" Point of Interest on the Africatown Connections Blueway map, as seen below in the latest iteration of the promotional brochure for the Blueway:

## THE AFRICATOWN CONNECTIONS BLUEWAY

For more details on each point of interest and the blueway, please visit the Africatown Heritage Preservation Foundation's website:  
<https://AfricatownHPF.org/>

**Local Outfitters: Rent Kayaks**

**WildNative Tours:**  
[www.WildNativeTours.com](http://www.WildNativeTours.com)  
 (251) 272 4088

**Mobile Kayak Rental Company:**  
[www.MobileKayakRentalCompany.com](http://www.MobileKayakRentalCompany.com)  
 (251) 786 2902




## THANK YOU TO OUR PARTNERS



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**MOBILE ENVIRONMENTAL JUSTICE ACTION COALITION**  
@MEJACoalition(.org)



**C.H.E.S.S.**



**Mobile Alabama**  
BORN TO CELEBRATE



**MOBILE BAYKEEPER.**

Mobile County Training School Alumni Association



**The Heartbeat of AFRICATOWN**



**NPS RTCA**  
RIVERS, TRAILS & CONSERVATION ASSISTANCE PROGRAM  
[www.nps.gov/rtca](http://www.nps.gov/rtca)

Additional thanks to Dr. David Padgett from Tennessee State University for the GPS coordinates.



WELCOME TO

## THE AFRICATOWN CONNECTIONS BLUEWAY



## Points of Interest

1. Lewis Landing 1\*
  2. Lewis Landing 2\*
  3. Africatown's Place of Baptisms\*
  4. Clotilda Landing\*
  5. Chickasabogue CSX Railroad Turnbridge
  6. Hog Bayou Habitat
  7. Historic Chickasaw Docks
  8. William Brooks Park
  9. Off the Hook Marina & Grill
  10. Chickasabogue Park
  11. Shelton Beach Road Park\*
  12. Africatown USA State Park\*
  13. University of Mobile Paddle Launch (Ledbetter Trail)
  14. Highway 158 Paddle Launch\*
- \*Future Development Sites



## Suggested Routes

- **1** Launch at Lewis Landing One. Paddle south towards downtown to the dead end. Approx 45-minute, 2 miles roundtrip.
- **1** Launch at Lewis Landing One. Follow the straight canal to a waterfall at S. Ridge Rd (6 miles roundtrip); Approx 2 hours, 6 miles roundtrip. To keep paddling to Langan Park, the full trip takes 2.5 hours of paddling + 6 portages; 8 miles total.
- **8** Launch at William Brooks Park. Paddle to Shelton Beach Road. Approximately 4 hours paddling; 10.5+ miles roundtrip.
- **9** Launch at Off the Hook Marina & Grill. Paddle NW on Chickasaw Creek to continue onto the Robbers Island Loop and return to Off the Hook. The trip is 3.25 miles and takes approximately 1 hour to complete.

- November 2024 Edition -

Both the Africatown International Design Idea Competition and Mississippi State University's Department of Landscape Architecture went further in elaborating on the possibilities of some of the Applicant's parcels that form the vision of the Africatown Connection's Blueway's Place of Baptisms site. Some graphic design mock ups MSU developed in partnership with Africatown groups are below:

# Africatown Connections Blueway

The Place of Baptisms

Group 1 - Simon Powney



LA 3654/LA 8523 SPRING 2018



# Africatown Connections Blueway

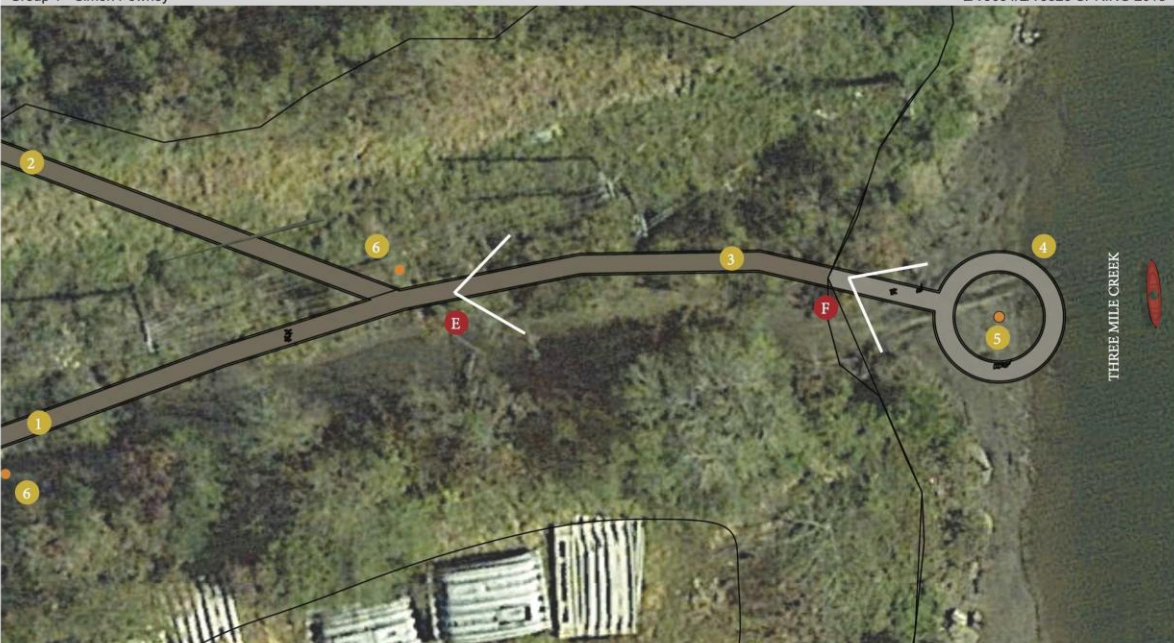
The Place of Baptisms

Group 1 - Simon Powney

- |                             |                                |
|-----------------------------|--------------------------------|
| 1 6ft WIDE BOARDWALK        | 5 EAST FACING ART INSTALLATION |
| 2 WILD LIFE TRAIL           | 6 ART INSTALLATION             |
| 3 WALKING TRAIL 6FT         | 7                              |
| 4 CIRCULAR VIEWING PLATFORM | 8                              |



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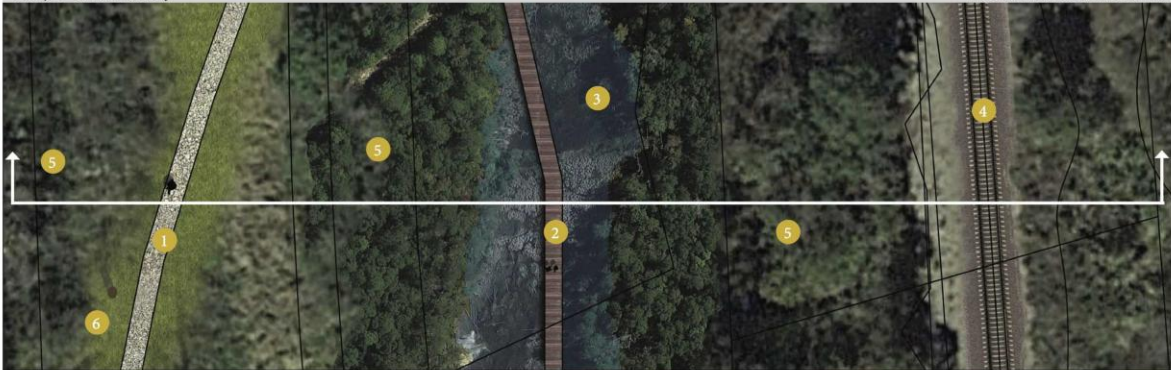
# Africatown Connections Blueway

The Place of Baptisms

1	6ft GRAVEL TRAIL	5	EXISTING WOODLAND BUFFER
2	WILD LIFE BOARDWALK TRAIL	6	ART INSTALLATION
3	WETLAND HABITAT	7	
4	EXISTING RAILROAD	8	

Group 1 - Simon Powney

LA 3654/LA 8523 SPRING 2018



# Africatown Connections Blueway

The Place of Baptisms



Group 1 - Simon Powney

LA 3654/LA 8523 SPRING 2018



## Africatown Connections Blueway

The Place of Baptisms

Group 1 - Simon Powney



LA 3654/LA 8523 SPRING 2018

The trail leads to a circular viewing platform nestled in an inlet along Three Mile Creek where an east-facing totem reminds the visitor of the connections this community has with its past.



None of these big ideas should come as a surprise to commercial developers interested in using Africatown as a base of operations. Our groups are readily recognizable and accessible in terms of contact. Unfortunately, to date, the Applicant's lack of consultation with both their immediate neighbors despite over a year of reported interaction between them with respect to persistent noise and dust concerns but also with the spectrum of interconnected, cooperating Africatown community based organizations informs what is clearly a lack of regard not only of the sensitivities of their immediate neighbors but also to the desires of Africatown resident and stakeholder groups who have never stopped being active and visible in the work that they have produced on behalf of the community's institutions. This work has been guided by the Africatown Neighborhood Plan as well as emergent, harmonious opportunities to deepen the community's ability to both assert the agency of residents as human beings living in a historic residential space but to also tell the community's unique and compelling historical narrative, all of which only enhances the image of Africatown and Mobile as desirable places to live, work, play, and pray.

### **Substantive Concerns with the Sub App**

In addition to the concerning lack of awareness of their social environment, there are several substantive reasons to hold over the Applicant's Sub App.

- The R-2 frontage on Chin Street
  - Being R-2, this section of property prompts much closer examination with respect to conformity with the zoning code. There are general prohibitions to this sort of "flag pole lot" in the zoning code, and the Sub App presents no evidence of necessity or extreme hardship. Whether this portion of the property should be included in the single lot, as requested, is very important to the Applicant's immediate neighbors.

- The Lack of Chin Street on the Preliminary Plat
  - There's no way for Planning to properly review frontage, right-of-way dedication, sidewalk compliance, or any other code compliance requisites when the street isn't even depicted.
  
- Split Zoning
  - R-2 and I-2 are inherently incompatible. There's no proper rationale for Planning Commission to form a basis of compliance if rezoning isn't being sought. To be clear, rezoning any Residential property, especially along a major residential street would be a non-starter for Africatown groups, generally speaking, and we would oppose any recommendations of that nature. However, split zoning isn't an option that is defensible by any normal Planning procedure. The easiest procedure would be that the Planning Commission require that the property along the Chin Street frontage be excluded from the requested single lot of record and instead become a second, exclusively R-2 lot of record. But that would not resolve all concerns and there would still be deficient information in the Sub App to justify any recommendation by Planning or decision by the Planning Commission due to the lack of Chin Street on the preliminary plat as described previously.
  
- Africatown Safety Zone and Africatown Overlay Requirements Unresolved
  - The R-2 "flag pole lot" on Chin Street is within both the Africatown and the Africatown Safety Zone Overlays of the zoning code Article 11. The Applicant's Sub App and the corresponding Staff Report doesn't not properly analyze the provisions of these Overlays and how they interplay with the Applicant's Sub App requests. This sort of analysis is required, not optional. Suffice it to say that those of us who spent years of our lives dedicated to the passage of these protections for Africatown residents are keenly interested in how Planning Staff and the Planning Commission and the City Council will choose to interpret these elements. MEJAC's belief is that thorough analysis and stringent, compliant recommendations with respect to the Enhanced Buffer Zones, landscaping, and parking requirements area all triggered by any potential activity on the site. While a Subdivision Application is nothing more than a paperwork consolidation, there appears to already be land disturbance on property that is beyond the footprint of the previous aggregate distributor activities conducted by Vulcan Materials.
  
- Unresolved Easement and Rights-Of-Way Questions
  - In their Sub App, the Applicant admits a lack of due diligence with respect to the property's easements, rights-of-way, and title searches.
  - Due to repeat localized flooding that has had catastrophic local impacts, nearby residents are deeply concerned with the archaic drainage ditch on the Applicant's property. This may be a City of Mobile stormwater easement, but it is not described clearly. The purposes of providing for robust public participation in these sorts of decisions aren't simply to act as a release valve for frustrated residents or competing business interests. Resolving the historic lack of enforcement, lack of clarity, lack of responsibility for public infrastructure of past administrations, deliberately or accidentally, is also a meaningful role to play for community based organizations like ours to assist the City's deliberative bodies in their roles in cleaning up the messiness of yesterday's legal authorities. The question of whether the City of Mobile holds any recorded stormwater easements across any of the seven parcels proposed to be consolidated into Lot A is important to community interests to further the resourcing of mitigation of localized flooding impacts.

- The Sub App also shows the 100ft Terminal Railroad easement, but the documentation provided for this isn't signed by the Applicant. It references a "Daniel Scott Lang" as a member of "AA Transmissions LLC". While presumably long since passed along to subsequent owners, chain-of-custody isn't clear and must be resolved through appropriate documentation before the Commission can proceed with granting the Sub App. Additionally, due to the nature of the interests of the Africatown community in these parcels in particular, described as "Parks and open space" in the Africatown Neighborhood Plan and incorporated into the Africatown Connections Blueway Place of Baptisms and related alternative development proposals, the community is interested in this clarity.
- The lack of Chin Street being depicted on the preliminary plat raises a bevy of easement and right-of-way compliance questions that cannot be adequately resolved until it is included.
- The Planning Commission simply shouldn't proceed with such an inadequate plat. The Commission simply shouldn't approve a Subdivision Application for property which they cannot reliably discern ownership. The Commission may not even be legally allowed to proceed without certainty.

#### **Residents Have Documented Site Work**

Nearby residents have recorded the Applicant proceeding to move dirt and build on adjacent properties that are not in the historic footprint of the "Outdoor Storage" land use previously conducted by Vulcan Materials. Have Land Disturbance Permit or Construction Permits been issued? Were Africatown Overlay requirements appropriately considered in that deliberative process? We have questions and concerns about the order of operations regarding these things. For all the reasons above, we would be delighted to be corrected about the construction activities on the site.

For these reasons, MEJAC feels the Applicant's Sub App fails to justify adoption and must be held over for clarity before approval.

Thank you for your consideration of our request. We look forward to working with the Applicant and the Commission as the Subdivision Application request proceeds.