

March 10, 2022

City of Cincinnati Council

Equitable Growth and Housing Committee

Re: Proposed ordinance to modify Title XIV, "Zoning Code of the City of Cincinnati," of the Cincinnati Municipal Code

To All Committee Members,

We are writing on behalf of the Linwood Community Council to advise you that we do not support the passage of the ordinance to modify Title XIV, "Zoning Code of the City of Cincinnati," of the Cincinnati Municipal Code, to reduce or remove density limitations in certain zoning districts; meaning, citywide, universally imposed, and in practice, removal of any minimum requirement for interior dwelling density which Cincinnati zoning currently has. If this ordinance is passed, it would seem that the only controls remaining, would be those of pure practicality and safety, imposed by other City agencies such as DOTE, MSD, CFD and EMS, with the Zoning Dept. having abdicated its oversight in this regard.

As per the *Linwood 2002 Neighborhood Plan*, our Linwood Community Council supports these goals:

*We want a say in how our neighborhood is formed.

*More *homeownership*: 45% of Linwood housing is rental property. (*2010 Census*).

*An emphasis on affordability and maintaining diversity, as property becomes available.

*We want to make sure our residents are not displaced.

Plan Cincinnati 2012 refers to Linwood as an "existing industrial area"; we do not have "Neighborhood Centers" or "Centers of Activity". Additionally, the *Plan* describes it as "underserved" acknowledging the needs of residents to have better transportation options and more walkability.

Linwood has many zoning codes being considered for the proposed change; an important one is **Manufacturing Limited (ML)** which makes up **45% of the neighborhood**. (<https://data.cincinnati-oh.gov/dataset/Cincinnati-Zoning-Designation/qqqp-qw2p>) Currently, it has many other options for land uses, including types of dwellings from "single family" to "multi-family". Also, in addition to being in the **75% of Linwood located west of the Little Miami River, in the floodplain**, (*Linwood 2002 Neighborhood Plan*) this code, **ML**, is in particularly isolated spots below Eastern Avenue. It is singularly inappropriate for having density of population without adequate accommodation for either public OR private transportation; the Linwood portion of the Eastern Corridor Project is still just a plan, and the area has no basic amenities, such as a grocery store, within walkable reach.

In April, 2021, the Linwood Community Council voted against a proposed planned development to place a rental apartment complex with upwards of 80 units in that **ML** area. The City Planning

Commission did not approve that project. The project would have offered “market rate” rental properties, thereby skewing the population of Linwood toward a majority of renters vs. residents.

Other examples of our zoning districts, which stand to be affected by this change are:

CC-P: Commercial Community - Pedestrian

CC-A: Commercial Community - Auto-oriented

CG-A: Commercial General - Auto-oriented

RF-R: Riverfront Residential

Any proposed construction considering these, should take into consideration that Linwood is lacking the “Centers” described above. Any pedestrian friendly retail commercial density (**CC-P**) would have to be very clearly understood, so that it can thrive. Our “ipso facto” Main St., is Eastern Ave. which is a truck route (State Route 50) and has very limited Metro service.

Another aspect of residential density in Linwood has to be the consideration of its function as the primary gateway to a very large swath (**35%- see citation above**) of **Parks and Recreational (PR)**: Lunken and Otto Armleder Recreational Facilities and Parks; and even further out to the entertainment venues in California, Ohio. Increased automobile traffic and on street parking concerns accompanying residential density should not be allowed to impede access to the tax payer funded common spaces which everyone visits. Also, it would turn surrounding city streets in the area, into “cut throughs”, to bypass congestion.

To conclude, a final, universal concern for all of our Cincinnati neighborhoods is each one’s individual style. One of the best suggestions mentioned in inter-Community Council discussions, has been that the City Planning Dept., working with *Plan Cincinnati 2012*, take into consideration each neighborhood’s individual plan. As things stand, developers aggressively practice land acquisition, and property by property, impose their ideas, time tables, and price structures, irrespective of the neighborhoods’ plans for themselves. If this Committee does recommend going forward with this proposal, it should first choose one (1) or two (2) willing neighborhoods as participants for an overarching ten (10) year study.

Thank you for considering our opinion on this very important juncture in the remaking of our city.

Sincerely,

Anthony J. Russo

President

The Linwood Community Council