

**Honorable City Planning Commission  
Cincinnati, Ohio**

**ITEM 6  
June 6, 2025**

**SUBJECT:** A report and recommendation on a proposed Notwithstanding Ordinance permitting a parking facility at 515 Water Street in the Central Business District.

**GENERAL INFORMATION:**

Location: 515 Water Street, Cincinnati, OH 45202

Applicant: Hamilton County Board of Commissioners

Applicant's Address: 138 E Court Street #603, Cincinnati, OH 45202

**ATTACHMENTS:**

Provided in addition to this report are the following attachments:

- Exhibit A - Location Map
- Exhibit B – Proposed Site Plan
- Exhibit C – Application Information
- Exhibit D – Zoning Adjudication Letter

**BACKGROUND:**

On May 8, 2025, the Department of City Planning and Engagement received an application for a Notwithstanding Ordinance (NWO) from the Hamilton County Board of Commissioners requesting the construction of a temporary parking lot at 515 Water Street in the Central Business District, the location of which is shown in Exhibit A. The Hilltop Concrete Plant was formerly located on the site and moved to the Riverside neighborhood in early 2025. Paycor Stadium, The Banks, and Smale Riverfront Park are located to the east of the site.

The property is approximately 17.98 acres and consists of multiple parcels both east and west of the Clay Wade Bailey Bridge. The property is currently zoned Manufacturing General (MG), Manufacturing General – Transportation Corridor (MG-T), Riverfront Manufacturing (RF-M) and Riverfront Manufacturing – Transportation Corridor (RF-M-T). Additionally, the property is in a Federal Emergency Management Agency (FEMA) Flood Plain. A Notwithstanding Ordinance is being requested because parking facilities are not a permitted use in the RF-M and RF-M-T zoning districts. In addition, the Cincinnati Zoning Code has requirements to maintain vegetation along the Ohio River Bank Area, and for surface parking lots to meet certain landscaping and design standards. These standards relate to topics including adding perimeter and interior landscaping, tree requirements, wheel stops, fences and walls, lighting, access drive and maneuvering aisles, and the use of certain specific surface materials. As the current proposal does not meet multiple requirements of the Cincinnati Zoning Code, the Applicant is requesting a Notwithstanding Ordinance.

The proposed temporary parking lot will be created from reclaimed asphalt pavement to produce approximately 964 total parking spaces, and the site plan is shown in Exhibit B. In discussion with Staff, the Applicant noted the request is for temporary approval of a parking facility with a final site design to be informed by the ongoing update to The Banks Master Plan, which is expected to be completed in December of 2025. While they have indicated the parking lot is temporary, no timeline for removal has been committed to by the Applicant. Once the update to The Banks Master Plan is complete, it is expected that Planned Development (PD) #43, The Banks, will be amended to reflect the updated Master

Plan, and it is anticipated that this site will be included in the amendment.

The Applicant has submitted a building permit which is currently under review by all applicable city departments. The Notwithstanding Ordinance is applicable only to items within the Cincinnati Zoning Code. The Applicant will continue to work with all applicable departments to meet requirements and obtain permits.

**PROPOSED NOTWITHSTANDING ORDINANCE:**

The proposed language in the Notwithstanding Ordinance authorizes the construction and operation of the development notwithstanding the following sections of the Cincinnati Zoning Code:

**1. §1415-05: Land Use Regulations**

- a. Parking Facilities are a prohibited use in the RF-M and RF-M-T zoning districts.

**2. §1415-19: Ohio River Bank Area**

- a. Existing tree cover and vegetation must be preserved between the pool stage of the Ohio River and a line 50 feet inland from and congruent with the Markland Dam pool stage, except where new construction, floodproofing or docking facilities are necessary to achieve compliance with Chapter 1109, Flood Plain Management, of the Cincinnati Building Code, a U.S. Army Corps of Engineers permit, or where modified by the Zoning Administrator pursuant to Chapter 1423, Landscaping and Buffer Yards. Existing landscaping is not provided on plans.

**3. §1421-33: Fences and Walls**

- a. **Maximum Height:** In any front, corner side yard or corner rear yard the maximum height of any fence or wall or any combination thereof may not exceed four feet in Residential Districts and six feet in all other districts and may not exceed an opacity of 50 percent. (EXCEPTION: Fences and walls used as parking lot screening per § 1425- 27). In any interior side or rear yard, the maximum height may not exceed six feet and may be 100 percent opaque.
- b. **Entry Gateway.** An entry gateway, trellis or other entry structure may be permitted in the required front yard provided the maximum height and width do not exceed ten feet.

**4. §1421-39: Exterior Lighting**

- a. All exterior light sources on private property, including canopy, perimeter, and flood, must be energy-efficient, stationary and shielded or recessed within the roof canopy to ensure that all light is directed away from adjacent properties and public rights-of-way. The maximum height may not exceed 20 feet above grade.

**5. §1425-29: Surface Parking Lot Landscaping**

- a. Surface parking lots shall comply with the minimum landscaping and design requirements set forth in §1425-29, which include requirements for perimeter landscaping, trees, ground cover, and maintenance, among other requirements.

**6. §1425-31(b) Parking Lot Markings. Directional Arrows**

- a. One-way and two-way access ways into required parking facilities must be identified by directional arrows. Arrow and markings other than striping are not illustrated on the plans.

**7. 1425-33(b): Additional Parking Lot Standards. Wheel Stops**

- a. All spaces must have wheel stops 2.5 feet from a fence, wall, or walkway unless this requirement is waived by the Zoning Administrator. No wheel stops are shown on the plans.
8. **1425-35: Access Drive and Maneuvering Aisles**
  - a. **Parking Access.** Where provided on the same lot as the principal use, the access drives must have a minimum width of eight feet and a maximum aggregate width of 20 feet.
  - b. **Requirement for Wider Driveway.** The City Engineer may require a wider driveway and driveway opening for a development.
9. **1425-37(b): Surfacing, Drainage and Grade of Parking and Loading Facilities. Surfacing**
  - a. **Regulations:** Parking areas, maneuvering aisles and loading spaces must be paved with asphalt, concrete, interlocking masonry pavers or surfaced with open honeycomb paving blocks which allow grass or ground cover to grow, except as otherwise authorized by the Zoning Administrator.

### **ANALYSIS:**

The Department of City Planning and Engagement has consistently taken a position to not support Notwithstanding Ordinances because they do not comply with the Cincinnati Zoning Code that the Department is charged with developing and enforcing. However, in this unique instance, the Department is recommending conditional approval. The Cincinnati Municipal Code Section 111-5 establishes certain factors for evaluation by the City Council committee that considers a Notwithstanding Ordinance application, and the Department will therefore provide input on the following factors. The City Planning Commission shall consider the following when making a recommendation on Notwithstanding Ordinances to City Council:

- 1) Whether the proposed application will not have an adverse effect on the character of the area or the public health, safety and welfare;

*The parking lot development standards are intended to mitigate potential adverse effects from parking lot development on surrounding properties. While a parking lot that is non-compliant with substantial elements of the zoning code could have adverse effects on the character of the area, if it is time limited while the Applicant works towards a future redevelopment more consistent with the Zoning Code regulations, adverse effects would be minimized due to the temporary nature of the use. Staff recommends the Notwithstanding Ordinance expire on March 1, 2026. Additionally, as the previous use of the site was Intensive High Impact Manufacturing, and the proposed use is a temporary parking lot, there is an inherent reduction in potential adverse effects to both character of the area and public health, safety, even though it does not meet the parking lot development standards.*

- 2) Whether the proposed application is consistent with the purposes of this code and the zoning district where the subject property is located including but not limited to:
  - (a) Providing a guide for the physical development of the city.  
*Not applicable to this application.*
  - (b) Preserving the character and quality of residential neighborhoods.  
*Not applicable to this application.*
  - (c) Fostering convenient, harmonious and workable relationships among land uses.

*The proposed use of this temporary facility is consistent with the surrounding uses. There are utility uses to the west, vacant industrial land, practice fields, and parking uses to the north, and a surface parking lot to the east. The Ohio River serves as the property's southern border.*

- (d) Achieving the arrangement of land uses described in the comprehensive plan for the development of the city as may have been adopted by council.

*The proposed Notwithstanding Ordinance is consistent with Plan Cincinnati (2012) (see "Consistency with Plan Cincinnati" for further information in this staff report).*

- (e) Promoting the economic stability of existing land uses and protecting them from intrusions by inharmonious or harmful land uses.

*The proposed temporary facility is consistent with adjacent properties.*

- (f) Providing opportunities for economic development and new housing for all segments of the community.

*This proposed temporary parking facility will provide parking for major events at Paycor Stadium and The Banks, from concerts to football games, over the next year. This parking will help to make those events easier to access by providing more readily available parking, which can help spur economic development.*

- (g) Creating pedestrian-friendly environments to reduce reliance on the automobile for travel.

*The proposed parking facility does not reduce reliance on the automobile for travel, and may increase it. However, as any relief provided by the Notwithstanding Ordinance is temporary, any future development would have to consider of a variety of factors, including creating pedestrian-friendly environments and reducing reliance on the automobile.*

- (h) Preventing excessive population densities and overcrowding of land or buildings.

*This proposal only provides space for parked vehicles and does not create excessive population densities.*

- (i) Ensuring the provision of adequate open space for light, air and fire safety.

*Not applicable to this application.*

- (j) Ensuring that development is compatible with the environment, particularly on the hillsides and along the riverfront.

*This proposal is compatible to the surrounding environment, including an adjacent surface parking lot to the east. It is anticipated that the subject property will be included in Planned Development #43, The Banks, within the coming year, finding that the proposed amendment is compatible.*

- (k) Promoting the conservation, protection, restoration and enhancement of the historic resources of the city.

*Not applicable to this application.*

- (l) Lessening congestion in the public streets by providing for off-street parking and loading areas for commercial vehicles.



*Not applicable to this application.*

- (m) Providing effective signage that is compatible with the surrounding urban environment.

*Not applicable to this application.*

- (n) Setting standards by which a nonconforming use may continue to function and to provide for the adaptive reuse of nonconforming buildings.

*Not applicable to this application.*

To be clear, the Department of City Planning and Engagement does not support a permanent parking lot that does not adhere to the Cincinnati Zoning Code's parking lot design standards. While the temporary parking lot will be helpful for concerts and the upcoming football season, there is an expectation that this site will be considered in the update to The Banks Master Plan and forthcoming amendment to PD #43. A temporary approval provides relief for parking overflow for both the football season and the time needed to finish the Master Plan, which is why Staff supports the expiration of the Notwithstanding Ordinance on March 1, 2026.

#### **PUBLIC COMMENT AND NOTIFICATION:**

Notice for the June 6, 2025, City Planning Commission meeting was sent to property owners within 400 feet of the subject property and the Downtown Residents Council. No comments have been received.

#### **CONSISTENCY WITH PLAN CINCINNATI (2012):**

The proposed Notwithstanding Ordinance is consistent with *Plan Cincinnati* (2012), specifically within the Compete Initiative Area. This proposed facility contributes to the goal to "Foster a climate conducive to growth, investment, stability and opportunity" (pg. 103) through the Strategy to "Grow our own" by focusing on retention, expansion and relocation of existing businesses" (pg. 104). This request is an important way to help support major events and businesses that occur at The Banks over the next year by using an otherwise vacant lot for parking.

#### **CONCLUSIONS:**

The Department of City Planning and Engagement has consistently taken the position to not support any Notwithstanding Ordinances for land use decisions because they do not comply with the zoning laws that the department is charged with developing and enforcing. Staff does not support a permanent parking lot that does not adhere to the Cincinnati Zoning Code's parking lot design standards. However, temporary approval for a parking lot provides parking relief for major events at Paycor Stadium and The Banks, and time for The Banks Master Plan to be completed. The proposal is consistent with surrounding land uses, many of which are already surface parking lots, vacant, or industrial, and the proposed use is lower intensity than the previous use of the site. Due to these reasons, staff supports a temporary Notwithstanding Ordinance that expires on March 1, 2026.

**RECOMMENDATION:**

Typically, the Department of City Planning and Engagement has taken the position to not support any Notwithstanding Ordinances for land use decisions because they do not comply with the zoning laws that the department is charged with developing and enforcing. In this unique situation, the staff of the Department of City Planning and Engagement recommends that the City Planning Commission take the following action:

**ADOPT** the Department of City Planning and Engagement findings and conclusions based on the fact that it will not have an adverse effect on the character of the area or the public health, safety and welfare and is consistent with the purposes of the Cincinnati Municipal Code Section 111-5 and zoning district(s); and

**APPROVE** the Notwithstanding Ordinance permitting the installation and operation of a parking facility at 515 Water Street in the Central Business District with the following conditions:

- a. That the Notwithstanding Ordinance is valid until March 1, 2026, after which point it will expire.
- b. That the proposed site plan substantially conforms to the site plan as submitted.
- c. That the City Manager and the appropriate City officials may order the removal of the temporary parking lot and the restoration of the Property, at no cost to the City: (i) upon finding that the County has failed to comply with one or more of the conditions contained herein; (ii) upon the County's vacation of the Property or abandonment of the parking lot.

Respectfully submitted:



Andrew Halt, AICP, PE, Senior City Planner  
Department of City Planning and Engagement

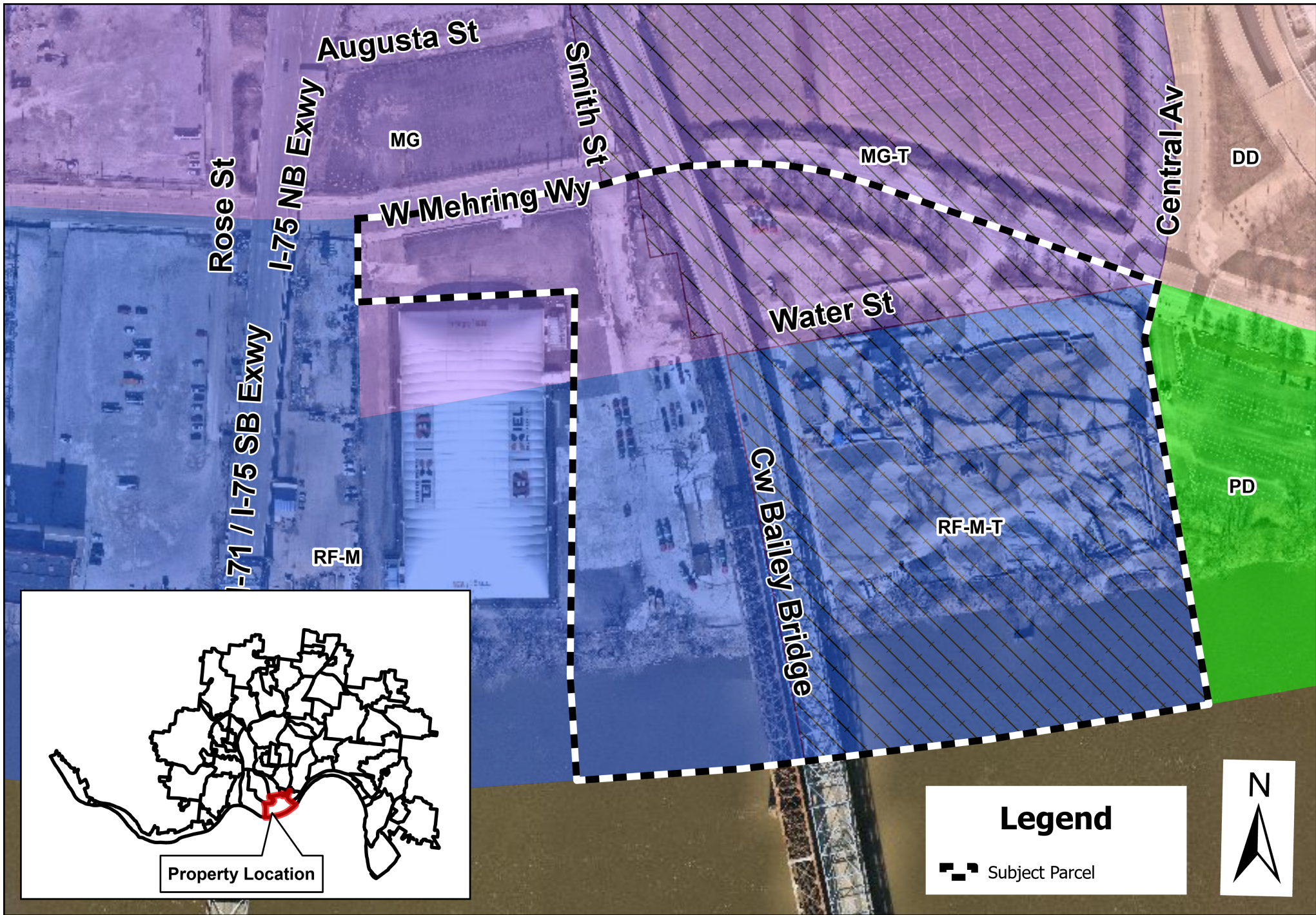
Approved:



Katherine Keough-Jurs, FAICP, Director  
Department of City Planning & Engagement

# A Proposed Notwithstanding Ordinance at 515 Water Street in the Central Business District

Exhibit A





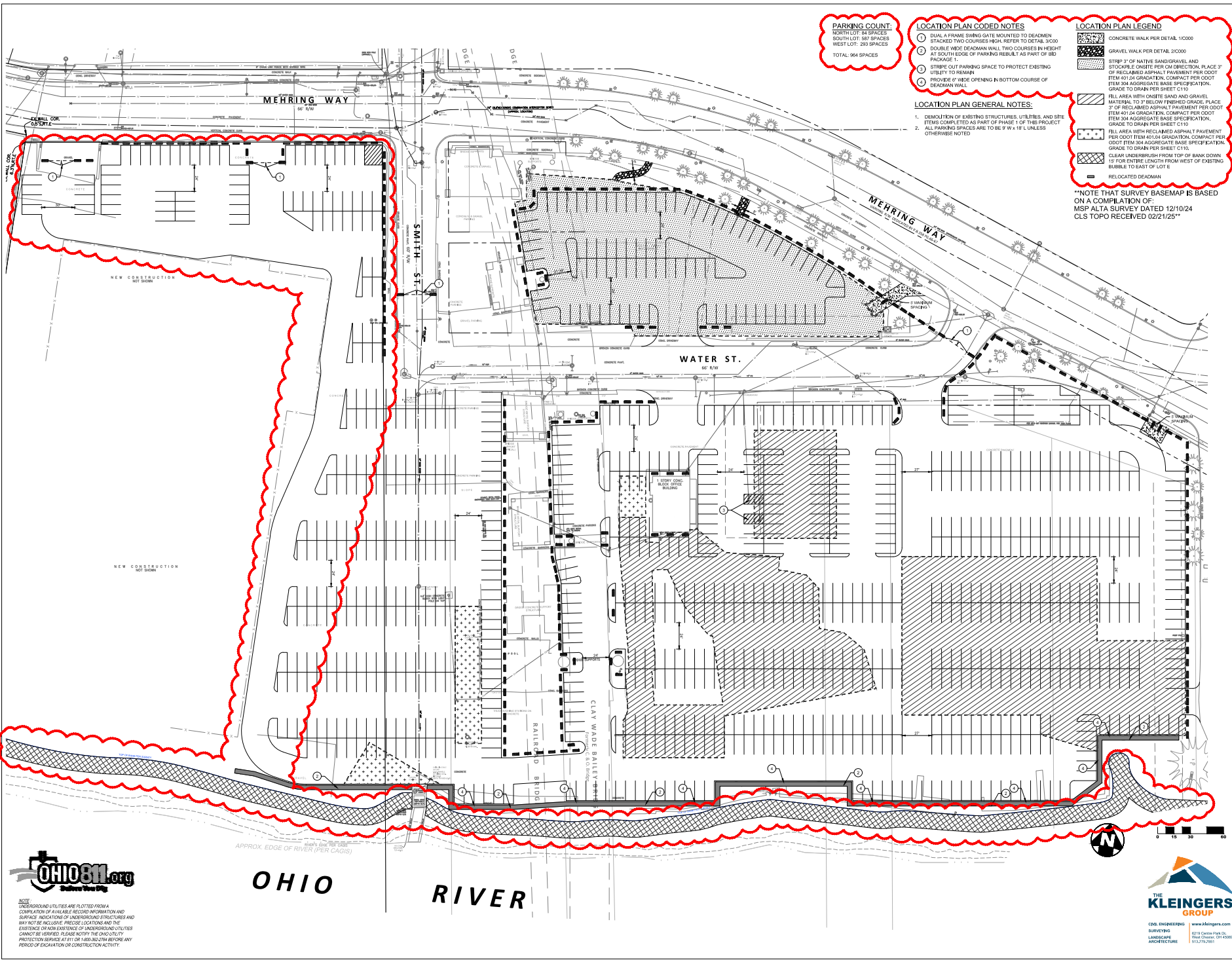
REVISIONS	DATE	DESCRIPTION
1	02/21/25	ISSUED FOR PERMIT
2	02/21/25	REVISED

DESIGNED BY	K. LAGRANGE
CHECKED BY	S. KORTE
IN CHARGE	S. KORTE

HILLTOP LOT

DRAWING TITLE  
LOCATION PLAN








JOB NUMBER	25041.00	DATE	04/11/2025
DRAWING NUMBER	C100		



**PARKING COUNT:**  
NORTH LOT: 84 SPACES  
SOUTH LOT: 87 SPACES  
WEST LOT: 283 SPACES  
TOTAL: 954 SPACES

- LOCATION PLAN CODED NOTES**
- 1 DUAL A FRAME SWING GATE MOUNTED TO DEADMAN STAKED TWO COURSES HIGH REFER TO DETAIL 31000
  - 2 DOUBLE WIDE DEADMAN WALL TWO COURSES IN HEIGHT AT SOUTH EDGE OF PARKING RESULT AS PART OF BID PACKAGE 1
  - 3 STRIP OUT PARKING SPACE TO PROTECT EXISTING UTILITY TO REMAIN
  - 4 PROVIDE 6" WIDE OPENING IN BOTTOM COURSE OF DEADMAN WALL

- LOCATION PLAN GENERAL NOTES:**
- 1. DEMOLITION OF EXISTING STRUCTURES, UTILITIES, AND SITE ITEMS COMPLETED AS PART OF PHASE 1 OF THIS PROJECT
  - 2. ALL PARKING SPACES ARE TO BE 9' W X 18' L UNLESS OTHERWISE NOTED

- LOCATION PLAN LEGEND**
-  CONCRETE WALK PER DETAIL 31000
  -  GRAVEL WALK PER DETAIL 31000
  -  STRIP 3" OF NATIVE SAND/GRAVEL AND STOCKPILE ON SITE PER CM DIRECTION. PLACE 3" OF RECLAIMED ASPHALT PAVEMENT PER DOT ITEM 401.04 GRADATION, COMPACT PER DOT ITEM 304 AGGREGATE BASE SPECIFICATION. GRADE TO DRAIN PER SHEET C110
  -  FILL AREA WITH ON SITE SAND AND GRAVEL MATERIAL. TO 3" BELOW FINISHED GRADE. PLACE 3" OF RECLAIMED ASPHALT PAVEMENT PER DOT ITEM 401.04 GRADATION, COMPACT PER DOT ITEM 304 AGGREGATE BASE SPECIFICATION. GRADE TO DRAIN PER SHEET C110
  -  FILL AREA WITH RECLAIMED ASPHALT PAVEMENT PER DOT ITEM 401.04 GRADATION, COMPACT PER DOT ITEM 304 AGGREGATE BASE SPECIFICATION. GRADE TO DRAIN PER SHEET C110
  -  CLEAR UNDERBUSH FROM TOP OF BANK DOWN 15' FOR ENTIRE LENGTH FROM WEST OF EXISTING BUBBLE TO EAST OF LOT E
  -  RELOCATED DEADMAN

**\*\*NOTE THAT SURVEY BASEMAP IS BASED ON A COMPILED OF:**  
MSP ALTA SURVEY DATED 12/10/24  
CLS TOPO RECEIVED 02/21/25"



NOTES:  
UNDERGROUND UTILITIES ARE PLOTTED FROM A COMPILED OF AVAILABLE RECORD INFORMATION AND SURFACE INDICATIONS OF UNDERGROUND STRUCTURES AND MAY NOT BE EXACT. PRECISE LOCATIONS AND THE EXISTENCE OR NON-EXISTENCE OF UNDERGROUND UTILITIES CANNOT BE VERIFIED. PLEASE NOTIFY THE OHIO UTILITY PROTECTION SERVICE AT 811 OR 800.486.1111 BEFORE ANY PERIOD OF EXCAVATION OR CONSTRUCTION ACTIVITY.



CDR: ENGINEERING  
LANDSCAPE ARCHITECTURE  
www.kleingers.com  
1015 West Main St., Suite 200  
West Chester, OH 45380  
610.771.1981

# Notwithstanding Ordinance Application

Project Information	
<b>Application Name</b>	Hilltop Temporary Parking Lot
<b>Address</b>	515 Water St, Cincinnati, OH 45203
<b>Parcel No.</b>	014700060072
<b>Current Zone(s)</b>	Manufacturing General (MG) Manufacturing General – Transportation Corridor (MG-T) Riverfront Manufacturing (RF-M) Riverfront Manufacturing – Transportation Corridor (RF-M-T)
<b>Proposed Zone(s)</b>	Notwithstanding Zone
<b>Property Area</b>	17.98 acres
<b>Current Use</b>	Concrete Plant
<b>Present Use</b>	Temporary Parking Lot
Applicant Information	
<b>Applicant</b>	Phil Beck, Hamilton County
<b>Applicant Address</b>	138 East Court Street, Room 603, Cincinnati, OH 45202
<b>Applicant E-mail</b>	<a href="mailto:phil.beck@hamiltoncountyohio.gov">phil.beck@hamiltoncountyohio.gov</a>
<b>Applicant Phone</b>	513-240-6580



**Date:** 5/23/2025

**Location:** 515 Water Street

**Plan No.:** 2025P03960

**Zoning District:** Riverfront Manufacturing (RF-M), Riverfront Manufacturing Transportation Corridor (RF-M-T), Manufacturing General (MG), and Manufacturing General Transportation Corridor (MG-T)

Kye Buchhalter  
2495 Langdon Farm Road  
Cincinnati, OH 45237

Mr. Buchhalter:

I have received and reviewed the subject project for compliance with the Zoning Code of the City of Cincinnati, and it is being delayed for the following reasons.

The following additional information is needed to complete a full zoning review:

- Parcel consolidation or a contiguous land covenant is required to develop a parking facility across parcel lines. CAGIS shows multiple parcel lines. Final proposed parcel configuration is needed to complete a final zoning analysis.
- Based on CAGIS maps, there appears to be right-of-way running parallel to Water Street off of Smith Street that would need to be vacated or other permission granted for the incorporation of a portion of it into a parking facility.
- Plans provided with the building permit applications do not clearly show parcel lines and further clarification is needed on what is within the right-of-way and what is on private property, particularly for any landscaping analysis.
- **1415-19: Ohio River Bank Area.** Existing tree cover and vegetation must be preserved between the pool stage of the Ohio River and a line 50 feet inland from and congruent with the Markland Dam pool stage, except where new construction, floodproofing or docking facilities are necessary to achieve compliance with Chapter 1109, Flood Plain Management, of the Cincinnati Building Code, a U.S. Army Corps of Engineers permit, or where modified by the Zoning Administrator pursuant to Chapter 1423, Landscaping and Buffer Yards.

*Existing landscaping is not shown on the provided plans and there is not enough information to review compliance. Plans note "clear underbrush from top of bank down 15' for entire length from west of existing bubble to east of lot E" and "contractor to remove trees and clear areas as necessary" which appear inconsistent with this requirement. Please clarify on the site plan if any existing tree cover or vegetation is being removed from the pool stage of the Ohio River and line 50 ft. inland from and congruent with the Markland Dam pool stage.*

- **1421-39: Exterior Lighting.** All exterior light sources on private property, including canopy, perimeter, and flood, must be energy-efficient, stationary and shielded or

recessed within the roof canopy to ensure that all light is directed away from adjacent properties and public rights-of-way. The maximum height may not exceed 20 feet above grade.

*Proposed light poles are 20'5" above grade but fixtures appear to be mounted no more than 20' above grade throughout the site. Please confirm this is correct and that the fixtures are energy efficient.*

- **1421-33: Fences and Walls.**

(b) **Maximum Height.** In any front, corner side yard or corner rear yard the maximum height of any fence or wall or any combination thereof may not exceed four feet in Residential Districts and six feet in all other districts and may not exceed an opacity of 50 percent. (EXCEPTION: Fences and walls used as parking lot screening per [§ 1425-27](#)). In any interior side or rear yard, the maximum height may not exceed six feet and may be 100 percent opaque.

(c) **Entry Gateway.** An entry gateway, trellis or other entry structure may be permitted in the required front yard provided the maximum height and width do not exceed ten feet.

*Please provide details of gates and deadman barricades for review.*

- **1425-35: Access Drive and Maneuvering Aisles.**

a) **Parking Access.** Where provided on the same lot as the principal use, the access drives must have a minimum width of eight feet and a maximum aggregate width of 20 feet.

c) **Requirement for Wider Driveway.** The City Engineer may require a wider driveway and driveway opening for a development.

*Please provide details of curb cut width for review.*

Zoning Relief is required based on review of provided permit drawings:

1. **1415-05: Land Use Regulations.** Parking Facilities are a prohibited use in the RF-M and RF-M-T Zoning Districts.

*A Use Variance is required for the proposed use.*

2. **1425-29: Surface Parking Lot Landscaping.** Surface parking lots shall comply with the minimum landscaping and design requirements set forth below.

**No Landscaping Plan has been provided.**

(a) **General Landscaping Requirements.**

1. **Perimeter Landscaping.** Surface parking lots shall provide a landscape buffer area separating the parking facility from adjoining streets. The buffer area shall be located within a six-inch-high, poured-in-place concrete curb, landscaped with plant material, and measure at least eight feet in width in CC-A and CG-A zoning districts and five feet in width in all other zoning districts. The buffer area shall not be paved except for approved walkways, bikeways, driveways, and other approved amenities or site elements. A perimeter landscape area of at least three feet in width is required for perimeter areas not adjoining streets.

2. **Trees.** Surface parking lots shall provide at least one tree per ten parking spaces, including one canopy tree per 25 linear feet dispersed throughout the entirety of the perimeter landscape buffer area.

All trees shall have a minimum size at the time of planting as follows:

- (a) Two-inch caliper for a deciduous tree;
  - (b) Four-foot height for a conifer or evergreen tree.
3. *Ground Cover.* Ground cover shall be installed appropriate to the surface conditions of the area. Grass is the default landscaping material.
  4. *Lighting and Walkways.* Lighting fixtures and walkways are permitted within all islands and perimeter areas.
  5. *Maintenance.* All required plantings must be permanently maintained in good growing condition and replaced with new plant materials when necessary to ensure continued compliance with applicable landscaping requirements.
- (b) *Facilities Larger than One-Quarter Acre.* Surface parking lots larger than one-quarter acre (i.e., 10,890 square feet) shall conform to the following additional standards:
- (1) No parking area within a surface parking lot shall exceed one-quarter acre (i.e., 10,890 square feet) in size. To conform to this requirement, larger parking areas shall be divided into smaller parking areas by one or more landscape islands or peninsulas contained within and dispersed throughout the interior of the parking lot.
  - (2) Interior landscaped islands and peninsulas shall contain plant material and plant-based ground cover within six-inch-high, poured-in-place concrete curbs, and at least one of every four trees required by subsection (a)(2) shall be located within the interior landscaped islands and peninsulas.
  - (3) Landscaped islands and peninsulas need not be uniformly spaced but shall provide a minimum separation of fifteen feet between smaller parking areas.
- (c) *Existing Surface Parking Lots.* Surface parking lots established prior to the effective date of this zoning amendment must comply with the requirements of this section upon demolition of a principal structure for which the lot served as an accessory use or the redevelopment or expansion of existing site ground coverage (including buildings, accessory uses or structures, parking and outdoor storage areas) of thirty percent or more.

*A **Special Exception** for the proposed Parking Lot Landscaping is required.*

3. **1425-31(b): Parking Lot Markings. Directional Arrows.** One-way and two-way access ways into required parking facilities must be identified by directional arrows. Any two-way access located at any angle other than 90 degrees to a street must be marked with a traffic separation stripe throughout the length of the access; this requirement does not extend to aisles.  
*Arrows and markings other than striping are not illustrated on the plans. A **Variance** is required to not provide directional arrows.*
4. **1425-33(b): Additional Parking Lot Standards. Wheel Stops.** All spaces must have wheel stops 2.5 feet from a fence, wall, or walkway unless this requirement is waived by the Zoning Administrator.



*No wheel stops are shown on the plans. A **Variance** is required to not provide wheel stops.*

5. **1425-37(b): Surfacing, Drainage and Grade of Parking and Loading Facilities.**  
**Surfacing.** Parking areas, maneuvering aisles and loading spaces must be paved with asphalt, concrete, interlocking masonry pavers or surfaced with open honeycomb paving blocks which allow grass or ground cover to grow, except as otherwise authorized by the Zoning Administrator.  
*Reclaimed asphalt pavement is proposed.*

We understand you have already submitted an application for a Notwithstanding Ordinance with the City Planning Commission. If you have any questions regarding your application please contact Andrew Halt at 513-352-4854.

You may also contact me at the information listed below with zoning questions, concerns or to make an appointment.

Sincerely,



Emily Ahouse  
Zoning Administrator  
(p): 513-352-4793  
(e): [emily.ahouse@cincinnati-oh.gov](mailto:emily.ahouse@cincinnati-oh.gov)



Outlook

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**[External Email] Surface Parking Lot at The Banks Comment**

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**From** Joseph M <jmak2222@gmail.com>**Date** Mon 6/2/2025 12:23 PM**To** Halt, Andrew <andrew.halt@cincinnati-oh.gov>

You don't often get email from jmak2222@gmail.com. [Learn why this is important](#)

**External Email Communication**

Hi,

I wanted to write to you today regarding the proposed 964 space surface parking lot downtown near The Banks, a plan which I'm strongly against. This proposal does not comply with exist zoning which bans parking facilities, and will set the tone and momentum for the use of this land moving forward. I'm of the mindset that downtown space like this should be set aside for rebuilding dense, walkable, and desirable places in Cincinnati. Building more room for cars on the other hand will only generate more traffic, make the vicinity less pedestrian friendly, and worsen congestion and air quality.

Sincerely,  
Joe Mak

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**[External Email] The Banks - Surface Parking Lot**

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**From** Joe Ottolino <ottolinoj@gmail.com>  
**Date** Sun 6/1/2025 2:26 PM  
**To** Halt, Andrew <andrew.halt@cincinnati-oh.gov>

You don't often get email from ottolinoj@gmail.com. [Learn why this is important](#)

**External Email Communication**

Hello Mr. Halt,

I am writing to you since I cannot attend the commission meeting this Friday 6/6.

I strongly disapprove of adding additional surface parking lots to The Banks. From my understanding, there is no timeline for removing the nearly 1000 parking spaces proposed. Adding this much surface parking without a set deadline would set the tone for future development at The Banks.

This is an area of downtown that should be developed with people-centric infrastructure in mind. We need increased housing density and areas that feel welcoming for people to walk around and explore, as well as integrating The Banks more seamlessly into the downtown urban fabric.

I urge you to look back at pictures of The Banks 30 years ago. This was an area filled with surface parking lots, and blocked off from the rest of downtown by the interstate highway. This was an area that people simply commuted in and out of for sporting events; nobody wants to remain after a game to spend time exploring 0.5 square miles of asphalt.

My fear with adding this much parking is that it would encourage more car-centric infrastructure in the future, which would ultimately make The Banks less of a pleasant area to live and more so a destination for commuters.

Thank you for your time,  
Joseph Ottolino  
Over-the-Rhine

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**[External Email] Public comment regarding the proposed surface parking lot at 515 Water Street**

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**From** Riley Owens <m.riley.owens@gmail.com>

**Date** Sun 6/1/2025 12:35 PM

**To** Halt, Andrew <andrew.halt@cincinnati-oh.gov>

**External Email Communication**

Hi Andrew,

My name is Riley Owens and I am a resident of Cincinnati contacting you to express my total opposition to the proposed surface parking lot at 515 Water Street in Downtown Cincinnati, which would add nearly 1000 new spaces.

Making such large additions of car-centric infrastructure will only invite new traffic and guarantee more congestion, especially during the large events at The Banks.

I am concerned by the 'temporary' lot because the applicant has presented no timeline for its removal. I fear that, by the expiration of the ordinance, an excuse for an extension or infeasibility of its removal will crop up. At the absolute minimum, the planning commission should not approve this without a binding, enforceable timeline for the lot's removal. The report appears to rely heavily on 'anticipations' and 'expectations' that The Banks master plan will include the lot and plan a different purpose, but I am hesitant to place unearned confidence in a development that is struggling to match its original vision, with partially-completed lots that have sat unfinished for years.

Granting a notwithstanding ordinance that flouts the ban on parking facilities under the current zoning establishes a terrible precedent. It sets the tone and momentum for the lot's land use moving forward, which will only make it more difficult to reimagine the space as anything better than a destination for cars. At the very least, we must not make a problem worse. The downtown and Queensgate neighborhoods, which have historically been significantly razed by surface parking lots, parking garages, and light industrial space, deserve investments that are more ambitious than a surface parking lot banned by existing zoning that The Banks *might* include in their master plan and *might* transform into something better.

I understand that the area is already an auto-centric one. But when we finally decide we want it to be anything better, the city's proposed action now will only make that transformation more difficult. We are selling debt to the future to avoid any personal responsibility for visionary leadership.

I look forward to following this development, and greatly appreciate your continued public service to the future of our Cincinnati.

Thanks,



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**[External Email] Strong Opposition to Proposed Surface Parking Lot Near The Banks**

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**From** Jonathan Hay <jonathandhay@gmail.com>

**Date** Tue 6/3/2025 7:10 AM

**To** Halt, Andrew <andrew.halt@cincinnati-oh.gov>

You don't often get email from jonathandhay@gmail.com. [Learn why this is important](#)

**External Email Communication**

Dear Mr. Halt,

I am writing to express my strong opposition to the proposed "temporary" surface parking lot near The Banks, which would add approximately 964 parking spaces to downtown Cincinnati. I work downtown and have an interest in it becoming more vibrant and livable. I'm supportive of new amenities and not additional surface lots.

This proposal is deeply troubling for several reasons:

1. **Incompatible with Existing Zoning:** The application requires a "notwithstanding" ordinance because it directly conflicts with existing zoning regulations that rightly ban new parking facilities in this area. These regulations exist to guide responsible and sustainable land use, and circumventing them undermines our city's planning principles.
2. **No Defined End Date:** The project is labeled as "temporary," but the Board of Commissioners has not committed to a timeline for removal. History shows that temporary lots too often become permanent, locking in poor land use decisions for generations.
3. **Negative Long-Term Impacts:** Approving this lot will shape the site's identity and function for years to come, likely deterring better development options such as housing, retail, public green space, or mixed-use projects. Once built, it will be much harder to repurpose the land for something more beneficial to the community.
4. **Environmental and Traffic Concerns:** Encouraging more car traffic into downtown will only worsen congestion, reduce pedestrian safety, and contribute to poorer air quality at a time when we should be prioritizing climate resilience and equitable transportation options.

Cincinnati deserves better. This land is too valuable to be wasted on a surface lot that prioritizes cars over people, especially in such a vibrant and evolving part of our city.

I urge the Planning Commission to reject this application and instead support development that aligns with our city's goals for smart growth, sustainability, and livability.

Sincerely,

Jon Hay

322 Tusculum Ave, Cincinnati OH 45226

CENTRAL RAILROAD CO OF  
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KOKOMO IN 46903-0554

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ELEVATED RAILROAD  
500 WATER ST  
JACKSONVILLE FL 32202

HAMILTON COUNTY COMMRS  
BOARD OF  
3 EAST 4TH ST  
CINCINNATI OH 45202

CINCINNATI DOCK PROPERTIES  
INC  
603 W PETE ROSE WY  
CINCINNATI OH 45202

DUKE ENERGY OHIO INC C/O TAX  
DEPARTMENT  
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STATE OF OHIO  
505 S STATE ROUTE 741  
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CINCINNATI DOCK PROPERTIES  
INC  
P O BOX 8099  
CINCINNATI OH 45208

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