

**SUBJECT:** A report and recommendation on proposed amendments to the Over-the-Rhine (OTR) Local Historic District guidelines in Over-the-Rhine, Pendleton, and Mt. Auburn.

**GENERAL INFORMATION:**

**Location:** Various addresses generally bounded by Central Parkway on the West and South, Reading Road and Sycamore Street on the East and West McMicken and Seitz Street on the North.

**Petitioners:** Over-the-Rhine Foundation, 1311 Vine Street, Cincinnati, OH 45202

**ATTACHMENTS:**

Provided in addition to this report are the following:

- A. Application submitted in 2020
- B. Over-the-Rhine New Construction Guidelines submitted by applicants in 2020
- C. Timeline of Engagement and Development in 2020
- D. Non-Contributing List Analysis dated 2020
- E. Amendments to Existing Guidelines by applicants dated 7/6/2020
- F. Comparison Chart between Existing Guidelines and Proposed in 2020
- G. Height Comparison Analysis Map dated 2020
- H. Staff Conference Attendance on 7/15/20
- I. Submitted Comments for 9/24/20 City Planning Commission meeting
- J. Department of Community and Economic Development comments submitted in September 2020
- K. Additional Comments post-Historic Conservation Board meeting in August 2020
- L. Revised Comparison Chart between Existing Guidelines and Proposed Guidelines 8/20/2020
- M. Historic Conservation Board Official Recommendation 8/25/2020
- N. Revised Comparison Chart between Existing Guidelines, Proposed Guidelines 9/24/20, Revised guidelines for 12/2/22
- O. Recommended changes on 11/18/22 submittal and new language for conditional approval
- P. Revised Monumental Building list proposed by staff 11/14/22
- Q. Revised Glossary list proposed by staff 11/14/22
- R. Comments - 2021 interviews, and written comments and testimony from 2020
- S. More recent correspondence for 12/2/22 City Planning Commission meeting

**BACKGROUND:**

The Over-the-Rhine Foundation (OTRF), a non-profit organization dedicated to the preservation of the Over-the-Rhine (OTR) neighborhood, began work in 2014 on a proposal to revise the Over-the-Rhine Local Historic District Conservation Guidelines to incorporate more detailed rules for new construction. The current guidelines were adopted in 2003 and have been utilized to guide development in the OTR Local Historic District since that time.

The OTRF submitted their initial proposal for revising the guidelines to the City in August of 2019. After their initial review, both City staff and external stakeholders raised concerns with the OTRF regarding the proposal's potential to materially impact development in the OTR Historic District. The OTRF then agreed to conduct additional stakeholder engagement in an attempt to refine and develop the guidelines to address those concerns.

Several additional meetings were held with City staff, and one additional meeting was held with City staff and external stakeholders, including developers, architects, and contractors. Following these meetings, the OTRF revised its original proposal; however, those revisions did not resolve many of the initial concerns raised by internal and external stakeholders, including the Department of Community and Economic Development and many developers and architectural firms that are active in redevelopment of OTR. The more prominent concerns are described below in the Public Comment section.

The OTRF's revised proposal was presented to the Historic Conservation Board (HCB) on August 3, 2020. In addition to written testimony, the HCB hearing included several parties speaking in favor of the application and multiple groups speaking against them. Following an extended discussion, the HCB recommended adoption of the proposal with certain conditions recommended by the City's Urban Conservator, including that further review and revision to the proposal occur (specifically regarding the provisions around height) prior to its submission to the City Planning Commission for consideration.

On September 24, 2020, the Cincinnati Planning Commission (CPC) reviewed a proposal to revise the Over-the-Rhine (OTR) Local Historic District Guidelines New Construction Section. This proposal was tabled with instruction for Planning staff to conduct additional community engagement prior to returning to the CPC with their revised proposal.

Staff started in January 2021, seeking to conduct Zoom interviews with every person who submitted comments in writing or testified at the September 24, 2020, City Planning Commission meeting. These interviews continued throughout 2021. The interviews included those who testified at the public staff conference held on 7/15/20, the collection of written comments, and people who testified at the CPC meeting on 9/24/20. Staff reached out to a total of approximately 50 people and interviewed 40. There were 13 architects, 10 developers, 15 property owners and 2 Non-Profits. Some people contacted did not return messages from staff requesting an interview. The goal of the interviews was to capture any additional thoughts each person may have had regarding the subject.

In July 2022 the applicant submitted revisions to the design guidelines to the Urban Conservator. The Urban Conservator and Zoning Administrator met with the applicants on July 26, 2022, and detailed feedback/comments were sent with suggested new language. The applicant sent the same submission with no changes in October and the Urban Conservator and Zoning Administrator met with the applicant on October 20, 2022, sending comments again without further changes. The final submission was made on November 18, 2022, with no changes since the July 26, 2022, submission.

**EXISTING GUIDELINES, PROPOSED REVISIONS SUBMITTED BY APPLICANT 2020 AND CURRENT 2022 PROPOSED GUIDELINES BY APPLICANT WITH STAFF'S PROPOSED REVISIONS:**

**1) Storefronts Existing Guidelines:** The **existing guidelines** state that new storefronts should be similar to existing historic storefronts.

**Proposed 2020 revised guidelines** state that storefronts should feature the basic components of a storefront system, including a bulkhead, transom windows and display windows.

**Opponents** say that this would prevent them from designing a full height storefront glass and folding glass doors. This limits business's ability to have open air, indoor/outdoor dining, which may become the norm for bars and restaurants in the future.

**2022 Proposed Revised Guidelines:** Keep proposed 2020 language submitted by applicant (Attachment O).

**2) Setbacks Existing Guidelines:** The **existing guidelines** state that setbacks should be consistent with adjacent similar uses along the street.

**Proposed 2020 Revised Guidelines** state similar language.

**2022 Proposed Revised Guidelines: Reconciled** (Attachment O).

**3) Height Existing Guidelines:** The **existing guidelines** state that a new building can be one story higher or lower than adjacent buildings. Height is one of the most important elements of a building that can automatically make a building overpower and detract from neighboring contributing buildings. The current guideline provided limitations in both creating times when new construction would be too tall and overpower the neighboring buildings, but it has also provided times where new construction was limited because of buildings that were either taller or shorter than the majority of the buildings on a block.

**Proposed 2020 revised guidelines**

- (a) Using median height as the general goal removes the anomalies from the block and could allow for a taller building while also making sure new buildings are compatible in height and do not overpower the historically tallest building on the block.
- (b) Having an allowance for buildings along Central Parkway to be taller recognizes the reality that Central Parkway is a unique situation that always had a unique building pattern and history within the neighborhood. While the intention was to allow buildings along the East West portion of Central Parkway to also be taller, the current guideline does not read that way and historic staff does propose to amend the guideline on page 15 Guideline 09 to read
  - o Buildings on Central Parkway north of Liberty Street and on the East West portion of Central Parkways...

- (c) Allowing corner buildings to be taller while still limiting that it should be secondary to the tallest historic building on the block recognizes that corners were historically taller and anchors while still respecting the tallest historic building on a block.
- (d) Staff has done an analysis show in Attachment H of some major sites within the district that are vacant or non-contributing buildings that could be potential development sites. This is not a study of all developable sites, but was intended to see the impact of the proposed guidelines on major sites. In the analysis staff compared if the existing guidelines of one story above or below adjacent contributing buildings (i.e. the buildings directly neighboring on the same block face) what the allowable height would be versus what the allowable height would be in looking at the median height of the block face. With just a handful of exceptions the height for the majority of the sites studied would be either the same or higher under the proposed guidelines. In some calculations provided on the map there would be 17 sites of the 45 studied that would be allowed to have more stories than under the existing guidelines, 6 sites that would have fewer stories, and 22 that would remain the same as what would be allowed today.
- (e) The applicant has discussed the concerns regarding height with many community groups/developers and architects. While Historic Staff believes that what has been presented is appropriate, staff is supportive of continued dialogue and potential adjustments to the language prior to final approval given that what is presented is still consistent with preservation best practices. Historic Staff is also supportive of the limitation that new construction shouldn't be taller than or appear taller than historic contributing buildings as new construction should not overwhelm existing buildings. In the National Trust for Historic Preservation Publication "Regulating New Construction in Historic Districts" it states "*The height of the new construction should fall within the ranges seen for the block, and if there are varying heights among different building types, again the dimensions for the building type proposed should govern.*" Historic Staff supports this as a foundation/principle for a guideline for height and the specifics of how this is applied for a specific district can be detailed further in the guidelines for that district.

**Opponents** are concerned about the limitations on height preventing more density, which is crucial in developing affordable housing. Also, the average lot size in Over-the-Rhine is 25' wide by 85' to 100' deep. Building taller is the only way to create more square footage to meet the market demand for single-family homes.

#### **2022 Proposed Revised Guidelines**

Proposal is that any new construction can be as tall or as short as the tallest or shortest contributing building on the block. However, the applicants submitted a Monumental Building list that excludes taller contributing historic buildings from being included in a calculation for determining height in any block. That list has been revised by Historic staff deleting buildings that should not be on the list (Attachment O).

- 4) Balconies Existing Guidelines:** Currently the **existing new construction guidelines** don't explicitly address balconies. There is only one line in Site Improvements that states "metal balconies are not discouraged."

This does not give any framework of where they are appropriate. In general buildings in Over-the-Rhine are set to the street and the only projections from buildings are oriel windows, the natural undulation from sills and lintels, cornices, and signs. Although balconies are not common, they do exist in Over-the-Rhine, sometimes on the rear or side of a building. Fire escapes were later additions and are necessary for building egress and safety issues, however they are often used for outdoor space as well. It is understandable to want private outdoor spaces within a dense urban environment.

**Proposed 2020 revised guidelines** state how to sympathetically add in balconies and provide for outdoor space without sacrificing contextual development such as creating large voids in an otherwise solid plane along the street or large projections that are not part of the contextual fabric.

**Opponents** want the guidelines to provide for more flexibility when designing balconies on the front façade.

**2022 Proposed Revised Guidelines:** Reconciled to keep 2020 proposed language (Attachment O).

- 5) **Roof Decks Existing Guidelines** simply state that “Rooftop decks should not be highly visible from the principal façade.”

**Proposed 2020 revised guidelines** state that “rooftop decks and roof access enclosures must be no more than minimally visible from abutting streets, must not be highly visible from the public realm, and must minimize disturbance of roof top views from other buildings.”

The one element that Staff does have concern for is the statement regarding “must minimize disturbances of rooftop views from other buildings.” As the historic district has its foundation in that a designation is for the “public good” having a guideline that is specifically about a private dominion is problematic.

**Opponents** find this guideline confusing and overly restrictive. Well-designed decks should be visible as an architectural feature of the new building. The majority of new construction projects desire roof decks, with additional amenities and rooftop access enclosures.

**2022 Proposed Guidelines:** changed the “must” to a “should” (Attachment O).

- 6) **Vehicular Entrances Existing Guidelines** have no mention of vehicular entrances. Also, it is crucial to maintain the pedestrian friendly nature of Over-the-Rhine. Numerous curb cuts and cars pulling out across pedestrian sidewalks into the street is not safe.

**Proposed 2020 Revised Guidelines** A simple solution would be to say they are simply inappropriate and not permitted on front facades and side elevations.

**Opponents** say that is not practical to market a development that requires parking on the street or in a nearby garage. However, the reality is that the automobile is necessary and crucial to

marketing real estate in Over-the-Rhine. Even as there are not parking requirements within the district, parking is still desired.

The proposed guidelines do not dictate a style. There is no mention of a requirement or guideline regarding the need to be a specific style. Rather the guidelines outline the individual elements and characteristics of a building and how new construction should incorporate those patterns and characteristics to provide a compatible and sensitive design.

Providing a strong framework for compatible design helps to minimize negative impacts of new construction that would detract from the historic district. It helps to provide economic stability in property values to the existing property owners.

**Proposed 2022 Guidelines:** Accept the applicant’s proposed change (Attachment O).

**7) Use of the words “must” and “should” Existing Guidelines**

The word “must” is rarely used and the word “should” is preferred

**Proposed 2020 Revised Guidelines** excessively use the word “must” over “should”

**Proposed 2022 Guidelines** Historic staff has revised the use of “must” to “should” in many places throughout (Attachment O).

**HISTORIC CONSERVATION BOARD REVIEW PROCESS**

New infill construction requires review and approval by the Historic Conservation Board (HCB). In order to apply to the HCB, the applicant must first receive an adjudication letter from the Urban Conservator (UC). Applicants will typically submit preliminary building designs to the UC for an initial review. During this review the UC reviews the proposed infill against the Historic Conservation Guidelines for the district. If the UC feels that there are certain aspects of the project that do not comply with the guidelines, these concerns are communicated to the applicant to give them a chance to revise the drawings to better comply. Ultimately, after the initial review, the applicant may decide to make changes to the drawings, or they may elect to proceed to the HCB as is.

After the complete Certificate of Appropriateness (COA) application is officially submitted to and accepted by the Law Department, it is scheduled for a future HCB agenda. UC Staff then reviews the full application and prepares a Staff Report with a recommendation for the HCB. The staff recommendation is based on substantial compliance with the Conservation Guidelines. Staff recommendations are typically for approval, approval with conditions, or denial. At the hearing, the UC presents the project and summarizes the Staff Report, findings and recommendations. The HCB then may ask specific questions of Staff and/or the applicants, and also hears any testimony provided by members of the public before ultimately making their decision.

Per Section 1435-09-2 of the Cincinnati Zoning Code, in order to approve a project, the HCB must find that the project substantially conforms to the Conservation Guidelines, or that the property owner has demonstrated by credible evidence that the property owner will suffer economic hardship if the COA is not approved. Decisions of the HCB are appealable to the Zoning Board of Appeals (ZBA).

Per Section 1449-17, the Zoning Board of Appeals may find that the order, adjudication, or decision is illegal, arbitrary, capricious, unreasonable, or unsupported by the preponderance of substantial, reliable, and probative evidence on the whole record. Consistent with its findings, the board may affirm, reverse, vacate, or modify the order, adjudication, or decision, or remand the cause to the officer or body appealed from with instructions to enter an order, adjudication, or decision consistent with the findings or opinion of the Board.

**PUBLIC COMMENTS:**

In addition to engagement prior to submission, a joint public staff conference with the City's Historic Conservation Office and the Department of City Planning and Engagement was held on July 15, 2020, to receive public feedback concerning the OTRF's proposal. It was held in-person in City Hall's City Council Chambers, and there was also a virtual option for attendees to participate via Zoom. Notices were sent to property owners within the boundary of the OTR Local Historic District, the OTR Foundation, Pendleton Community Council, Mt. Auburn Community Council and the Over-the-Rhine Community Council.

The OTRF and proponents of the proposed revised guidelines focused their comments on the goal of preserving the historic fabric of OTR and ensuring that new construction in the district will enhance the built environment. Additionally, they believe the proposed guidelines provide additional clarity to the existing guidelines and are sufficiently flexible.

However, several groups challenged this position and raised serious questions over the appropriateness and economic impact of the proposed revised guidelines in 2020. They included developers and numerous design and architecture professionals that are all active and heavily involved in the redevelopment and preservation of OTR: 3CDC, The Model Group, Inc., Urban Sites, GBBN, and Platte Architecture and Design, New Republic Architecture, Northpoint Group, and Cincinnati Development Fund.

Since 2020 the applicants have met with many of these groups to discuss and better understand their comments and concerns and made some revisions as a result. On 10/20/22 3CDC submitted a letter not objecting to the proposed guidelines, but not directly providing support. In addition, Model Group and Urban Sites also submitted letters recently not objecting to the proposed guidelines, but not directly providing support (Attachment T). City staff has not received written communication on the current submittal from other developers or architects that commented in 2020. The City's Department of Community and Economic Development (DCED) voiced concerns at the proposed guidelines as originally submitted in 2020. DCED has not provided comment on the most recent submittal. DCED's primary concerns ranged from the comprehensive to the specific.

More comprehensive DCED concerns raised in 2020 included the following:

- That new guidelines would increase development costs, which would make it harder for smaller and minority-owned developers to work in OTR and will increase City-subsidy required to support projects;

- That new guidelines would result in reduced density, which would negatively impact the development of affordable housing, housing affordability in a general sense, and the economic base available to support neighborhood businesses;
- That new guidelines would unintentionally encourage “faux historic” development, undermining the integrity of the OTR historic district;
- That the new guidelines were too strict and prescriptive or formulaic, preventing flexibility in meeting challenging development problems, reducing creativity in new building design, and undermining the discretion of the Historic Conservation Board members; and
- That due to the far-ranging nature of the shifts proposed in the new guidelines and the potential impacts that much more stakeholder engagement was necessary.

Some of the specific concerns raised were:

- The extensive use of the word “must” versus “should,” as compared to their typical use in historic district guidelines;
- The proposed height regulations were too strict and would negatively impact the economic feasibility of projects;
- The need for flexibility in building storefronts;
- The need to permit greater setbacks on upper floors to allow for structures to be built at greater heights without negatively impacting the view from the street level; and
- The need to allow for greater flexibility in permitting balconies, roof decks, and vehicular entrances in order to meet modern needs and trends. Commercial properties such as office buildings, bars/restaurants and hotels could be prevented from having any type of rooftop deck, garden, bar, restaurant, etc.

### **THE ROLE OF THE CITY PLANNING COMMISSION:**

The City Planning Commission’s consideration of the OTRF’s proposal should be comprehensive. While the Historic Conservation Board narrowly focuses on proposed guidelines’ effectiveness at preserving historic districts and structures, the law prescribes a broader review for the City Planning Commission that considers not only the preservation of historic districts and structures but also planning and economic development considerations. Specifically, Cincinnati Municipal Code (CMC) Section 1435-07-2-B provides that the City Planning Commission shall consider all of the following factors in making its recommendation to the City Council:

In making a determination, the City Planning Commission shall consider all of the following factors:

- (1) The relationship of the proposed revised OTR New Construction Guidelines to the comprehensive plans of the city and of the community in which the proposed Historic Guidelines apply; and

*The revised guidelines are consistent with Plan Cincinnati (2012). In the Sustain Initiative Area, a Goal recommends to “preserve our natural and built environment” and “preserve our built history with new development incentives and regulatory measures” (pages 193-194).*

*The revised guidelines as proposed also are partially consistent with the Over-the-Rhine Comprehensive Plan (2002) in that the design guidelines for the locally designated OTR Local Historic District “provide a framework for continual revitalization” (page 32). However, they go too far in the area of height and rooftop amenities restrictions, the use of the words “must” and*



*“should” and the arbitrary list of Monumental buildings. Staff has suggested alternative language.*

- (2) The effect of the proposed amendments on the surrounding areas and economic development plans of the city; and

*The revised guidelines as proposed could inhibit the revitalization of the area and may have a negative impact on the community and economic development plans of the city unless staff’s suggested revisions are made.*

- (3) Such other planning and historic preservation considerations as may be relevant to the proposed designation.

*The revised guidelines as proposed may not assist in the redevelopment of the Over-the-Rhine Local Historic District by promoting overly restrictive infill construction within the historic district and the Over-the-Rhine community unless staff’s suggested revisions are made.*

**CONSISTENCY WITH PLANS:**

These amendments to the Over-the-Rhine Local Historic District New Construction Guidelines in OTR is consistent with *Plan Cincinnati* (2012) in the Sustain Initiative Area, a Goal recommends to “preserve our natural and built environment” and “preserve our built history with new development incentives and regulatory measures” (pages 193-194).

This designation also is partially consistent with the *Over-the-Rhine Comprehensive Plan* (2002) in that the design guidelines for the locally designated OTR Historic District “provide a framework for continual revitalization” (page 32). However, they go too far in the area of height and rooftop amenities restrictions, the use of the words “must” and “should” and the arbitrary list of monumental buildings which can be reconciled with staff’s suggested revisions.

**ANALYSIS:**

Since 2020, the applicants have made some changes to the proposed guidelines and City Planning Staff is grateful to the applicants for the extensive time and energy they spent engaging with stakeholders and reconsidering certain elements of their submittal. Overall, Staff feels that the proposed Infill Guidelines provide value to the historic review process, especially through the use of graphic representations of the guidelines within the final document. However, the final set of revisions submitted by the applicant did not incorporate some of Staff’s recommended revisions. For instance, Staff still has serious concerns regarding the proposed guidelines for application requirements related to building height, roof top amenities, and with portions of the proposed text, primarily in the prevalence of the use of “must” and the complexity of the language. A glossary of historic and architectural terms for use when reading through the proposed guidelines, which is new in 2022, was provided by the applicant and Historic Staff has proposed a revised list (Attachment Q).

*Height*

Regarding height, in general, Staff finds the proposed height guidelines very specific and possibly difficult for the layperson to comprehend and would likely make development more costly and difficult for applicants. Historic Conservation Staff does not have the capacity to survey entire block faces, which would put this on the applicant. In cases where proposed heights are close to maximums based on context, applicants will need to survey entire block faces at a minimum and include them in elevation

drawings. In some cases, this would extend to additional block faces as well. Conforming with a specific measure on height instead of compatibility doesn't allow for evaluation of setback minimally visible additional height, or the different visual impact of different roof forms. As noted above, Staff finds the existing language to be defensible, produce compatible outcomes, and easy to understand and would not recommend changes to the way height is reviewed. Some changes they considered were particularly in the area of height, by recommending that any new construction can be as tall or as short as the tallest or shortest contributing building on the block. However, the applicants submitted a Monumental Building list that excludes taller contributing historic buildings from being included in a calculation for determining height in any particular block. The list has been updated by Historic Staff proposing removing some significant taller historic buildings so they can be used for calculated height in their respective blocks where those buildings exist (Attachment P).

#### *Specific Language of Must and Should*

The use of "must" indicates that applicants must comply with the standard in all circumstances and is used heavily throughout the document. In a district as large and varied as Over-the-Rhine, Staff feels that it is important for the Historic Conservation Board (HCB) to analyze projects based on their specific merits, and the immediate surrounding historic context. Staff has concerns that the prevalence of "must" will inhibit the HCB's ability to ensure site-specific compatible development. The applicants have stated that it is their intention that the HCB should never approve a project against a "must", but the applicant would have the option to appeal the HCB decision to the Zoning Board of Appeals (ZBA). Staff feels that the HCB is in a better position to make a determination of compatibility on historic projects than the ZBA. The use of "should" instead of "must" would allow greater flexibility on a case-by-case basis without requiring the additional time and expense of requiring an appeal to the ZBA (Attachment P).

The City Planning Commission must additionally consider how the proposed revised guidelines would fit comprehensively into the framework of *Plan Cincinnati* and overall development in Cincinnati, including, among other things, the long-term impacts on economic development, neighborhood sustainability, and housing affordability and equity. These concerns are embodied in the Live Goal to "provide quality healthy housing for all incomes levels" and to "develop additional incentives for inclusion of affordable units in new-construction rental properties" (pp. 165-166), and the Sustain Action Step to "incentivize development that involves the community at the outset of a project through faster review and permitting" (p.197).

Overall, Staff feels that the proposed Infill Guidelines provide value to the historic review process, especially through the use of graphic representations of the guidelines within the final document. Staff does, however, have serious concerns with portions of the proposed text, primarily in the prevalence of the use of "must" and the complexity of the language and application requirements related to building height.

The use of "must" indicates that applicants must comply with this standard in all circumstances and is used heavily throughout the document. In a district as large and varied as Over-the-Rhine, Staff feels that it is important for the Historic Conservation Board (HCB) to analyze projects based on their specific merits, and the immediate surrounding historic context. Staff has concerns that the prevalence of "must" will inhibit the HCB's ability to ensure site-specific compatible development. The applicants have stated that it is their intention that the HCB should never approve a project against a "must", but the applicant would have the option to appeal the HCB decision to the Zoning Board of Appeals (ZBA). Staff feels

that the HCB is in a better position to make a determination of compatibility on historic projects than the ZBA. The use of “should” instead of “must” would allow greater flexibility on a case-by-case basis without requiring the additional time and expense of requiring an appeal to the ZBA.

The recommendation below covers provisionally approving the New Construction Infill Guidelines with staff’s revisions, the revised Monumental Building list and the revised Glossary List with the condition that all of these revisions come back to Planning Commission for final approval.

**RECOMMENDATION:**

The staff of the Department of City Planning and Engagement recommends that the City Planning Commission take the following action:

**PROVISIONALLY APPROVE** the proposed New Construction Infill Guidelines on the condition that staff for the Department of City Planning and Engagement prepare and present the following documents to the City Planning Commission for final approval:

- a. A set of New Construction Infill Guidelines that incorporates the staff’s proposed revisions reflected on Attachment O (Recommended Changes on 11/18/2022 submittal and new language for conditional approval), Attachment P (Revised Monumental Building List), and Attachment Q (Revised Glossary List); and
- b. A set of the existing Over-the-Rhine Local Historic District Guidelines modified to address guidelines that are obsolete or will be inconsistent with the New Construction Infill Guidelines upon their adoption.

Respectfully submitted:

Approved:



Caroline Hardy Kellam, Senior City Planner  
Department of City Planning and Engagement

Katherine Keough-Jurs, FAICP, Director  
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