

**Honorable City Planning Commission  
Cincinnati, Ohio**

**June 4, 2021**

**SUBJECT:** A report and recommendation on proposed zoning text amendments to modify Title XIV, "Zoning Code of the City of Cincinnati," of the Cincinnati Municipal Code by amending the provisions of Section 1405-03, "Specific Purposes of Multi-Family Subdistricts," Section 1405-07, "Development Regulations," Section 1407-07, "Development Regulations," Section 1409-09, "Development Regulations," Section 1410-07, "Development Regulations," Section 1413-07, "Development Regulations," and Section 1415-09, "Development Regulations," to remove density limitations in certain zoning districts City-wide.

**EXHIBITS:**

Provided in addition to this report are:

- Exhibit A – Ordinance by Councilmember Liz Keating
- Exhibit B – Council report 202100478
- Exhibit C – Correspondence

**BACKGROUND:**

On May 7, 2021, the Department of City Planning received an Ordinance sponsored by Councilmember Liz Keating that would remove land area/unit (density) limitations in the zoning code to allow for construction of more housing within Multi-Family, Office, Commercial, Urban Mix, Manufacturing, and Riverfront zoning districts. The removal of these limitations is among the strategies the City Administration recommended for increasing the supply, availability, and affordability of housing within the City in a March 16, 2021 report to City Council. Upon receipt of this Ordinance, the Department of City Planning initiated the process for its consideration by the City Planning Commission and City Council.

The proposed ordinance only impacts zoning regulations that impose land area/unit (density) limitations. There are other forms of regulating density in the zoning code that this proposed ordinance does not impact—including use restrictions, building height, setbacks, Overlay Districts (Historic, Hillside, Urban Design), parking requirements, etc. Density in Single-Family zoning districts is not affected by this proposal, as density in these areas is primarily regulated by minimum lot size versus a land area/unit limitation.

The proposed changes are to:

*Section 1405-07 "Development Regulations – Multi-Family"*

- Removes the minimum lot size requirement of 2,500 square feet per residential unit for two and three-family dwellings in the Residential Mixed 1-3 Family (RMX) zoning district.
- Removes the minimum lot size requirement of 2,000 square feet per residential unit for two-family and multi-family dwellings in the Residential Multi-Family 2.0 (RM-2.0) zoning district.
- Removes the minimum lot size requirement of 1,200 square feet per residential unit for two-family and multi-family dwellings in the Residential Multi-Family 1.2 (RM-1.2) zoning district.
- Removes the minimum lot size requirement of 700 square feet per residential unit for two-family and multi-family dwellings in the Multi-Family 0.7 (RM-0.7) zoning district.

*Section 1407-07 "Development Regulations – Office Districts"*

- Removes the minimum lot size requirement of 1,200 square feet per residential unit in the Office Limited (OL) zoning district.
- Removes the minimum lot size requirement of 700 square feet per residential unit in Office General (OG) zoning district.

*Section 1409-09 “Development Regulations – Commercial Districts”*

- Removes the minimum lot size requirement of 700 square feet per residential unit (new construction) in all Commercial zoning districts.
- Removes the minimum lot size requirement of 500 square feet per residential unit (using an existing building) in all Commercial zoning districts.

*Section 1410-07 “Development Regulations – Urban Mix”*

- Removes the minimum lot size requirement of 700 square feet per residential unit.
- Removes the minimum lot size requirement of 700 square feet per residential unit for interior and exterior row houses.
- Removes the minimum lot size requirement of 2,000 square feet for “other uses.”

*Section 1413-07 “Development Regulations – Manufacturing Districts”*

- Removes the minimum lot size requirement of 2,000 square feet per dwelling unit in the Manufacturing Limited (ML) zoning district.

*Section 1415-09 “Development Regulations – Riverfront Districts”*

- Removes the minimum lot size requirement of 2,000 square feet per dwelling unit in the Riverfront Residential/Recreational (RF-R) zoning district.

A full list of proposed changes is attached in the Ordinance as Exhibit A.

**PUBLIC COMMENT:**

A public staff conference was held on May 25, 2021, via Zoom. Notice was sent to all active Community Councils and Community Development Corporations via email and regular mail on May 10, 2021 since this proposal would make text amendments to the Zoning Code, which is applied City-wide. Besides City staff, six people attended the public staff conference.

There were questions as to how this would affect more traditional neighborhoods outside of the urban core neighborhoods close to downtown since commercial and multi-family zoning districts could be built denser. There were also questions if this would incentivize demolishing older existing historic structures to build new building at a higher density. Many of these older buildings have little or no parking, so demolishing them would require current parking requirements to be met.

A Pendleton resident stated concerns of removing density requirements on top of Urban Parking Overlay District #1: Urban Core, which removed off-street parking requirements, would negatively impact Pendleton, where she stated street parking is full even for existing residents, not including commercial activity. She also stated that public parking garages are not convenient for Pendleton and are expensive. There were also questions about certain projects in Oakley and how those were approved and if they benefited from this proposal. There were also concerns from several attendees about notification and that there was not enough time for Community Councils to react.

Staff received a letter from the Northside Planning and Zoning Committee which is generally supportive of the proposed changes. Staff also received a letter from a Northside resident who is opposed to the changes.

**ANALYSIS:**

The existing land area/unit density regulations are an obstacle to creating high density housing and walkable, pedestrian-friendly, mixed-use environments. Additionally, the historic purpose for this type of density regulation

was to regulate development for public safety and health reasons—a concern that is now adequately addressed by modern building codes, fire codes, and other government regulation. Lifting these existing density requirements will simplify the approval process for the creation of dense housing developments, encouraging increased housing supply and promoting housing affordability.

Under existing regulations, the minimum density is based on the zoning district for new construction:

<b>Zoning District</b>	<b>Density Requirement for Multi-family</b>
Residential Mixed (RMX)	2,500 SF per unit/parcel area
Residential Multi-family 2.0 (RM-2.0)	2,000 SF per unit/parcel area
Residential Multi-family 1.2 (RM-1.2)	1,200 SF per unit/parcel area
Residential Multi-family 0.7 (RM-0.7)	700 SF per unit/parcel area
Office Limited	1,200 SF per unit/parcel area
Office General	700 SF per unit/parcel area
All Commercial Districts	700 SF per unit/parcel area (new) 500 SF per unit/parcel area (existing)
Urban Mix (UM)	700 SF per unit/parcel area
Manufacturing Limited (ML)	2,000 SF per unit/parcel area
Riverfront Residential/Recreational (RF-R)	2,000 SF per unit/parcel area

Much of the City’s historic building stock has density in excess of currently permitted levels. For example, most residential buildings in Cincinnati’s oldest neighborhoods (Over-the-Rhine, West End, Lower Price Hill, Northside, Mount Auburn, Mount Adams, Walnut Hills, etc.) that were built in the late 1800s or early 1900s have a higher density than 500 square feet of land area per unit. Even in commercial districts, where rehabbing an existing building has the lowest density requirements at 500 square feet per unit/parcel area, many existing buildings still do not meet this requirement and require a density variance from the Zoning Hearing Examiner or extensive renovations will be required to the building to convert it to less units. These examples typically happen in older neighborhoods, where buildings were constructed before zoning requirements were in place. For example, the historic San Marco apartments in East Walnut Hills on the corner of Gilbert Avenue and Madison Road has 30 units for a residential density of 217.8 square feet of land area per unit. Many other units, such as the “four-plex” buildings throughout Cincinnati often do not meet minimum density requirements and would have to go through a variance process if they sit vacant for more than 365 days. Requirements for variances add time, cost, and uncertainty to the development process—creating a disincentive for development of housing. Further, allowing more units per building drives down the per unit development costs of housing development by allowing for economies of scale. Therefore, removal of land area/unit limitations both eliminates a disincentive and creates an incentive for housing production.

The proposed ordinance only impacts zoning regulations that impose land area/unit (density) limitations. There are other forms of regulating density in the Zoning Code that this proposed ordinance does not impact and still remain—including use restrictions, building height, setbacks, Overlay Districts (Historic, Hillside, Urban Design), parking requirements, etc. Density in Single-Family zoning districts is not affected by this proposal, as density in these areas is primarily regulated by minimum lot size and not a land area/unit limitation.

Removing land area/unit density limitations will encourage the development of denser housing projects, increasing housing supply and promoting housing affordability. Though there are still other regulations that impact density, the removal of land area/unit density limitations is an important step to increasing supply and make housing units more affordable in the City.

**CONSISTENCY WITH PLANS:**

The proposed text amendments are consistent with several areas of *Plan Cincinnati* (2012), including the vision of Thriving Re-Urbanization (p. 71), along with the Guiding Policy Principles to “Increase our Population” (p. 74), “Build on our Assets” (p. 75), and to “Be aggressive and strategic in future growth and development” (p. 77). A short-range strategy under the Live Initiative Area is to “Revise the City’s Building and Zoning Codes...with standards that emphasize traditional neighborhood development over suburban development” (p. 157) and the Sustain Initiative Area to “Develop changes to zoning regulations to remove barriers to the adaptive reuse of buildings” (p. 197).

A recommendation in the *Green Cincinnati Plan* (2018) is to “Encourage population density and transit-oriented development in appropriate locations through zoning and incentives” (p. 50).

The existing minimum density regulations emphasize suburban development patterns, obstruct the renovation and rehabilitation of existing buildings, and endanger the urban fabric and historic character of the city by lowering the desired density in this area, contrary to the recommendations of these plans and existing development patterns. Though these City and neighborhood plans also provide additional strategies to increase the number of affordable housing units within the City to ensure everyone has a place to live, increasing the allowable density is an important step to increasing affordability within the urban core.

**CONCLUSIONS:**

The proposed elimination of land area/unit density limitations for multi-family housing will remove a disincentive and create an incentive for development of dense housing projects by removing the need for density variances and leveraging economics of scale efficiencies to reduce the cost per unit of development. By encouraging an increase in supply of housing, this proposal will promote housing affordability. The proposed zoning regulations affect land area/unit (density) limitations; however, this proposal does not impact other forms of density regulation in the Cincinnati Zoning Code—including use restrictions, building height, setbacks, Overlay Districts (Historic, Hillside, Urban Design), parking requirements, etc. Further, density in Single-Family zoning districts is not affected by this proposal, as density in these areas is primarily regulated by minimum lot size and not a land area/unit limitation.

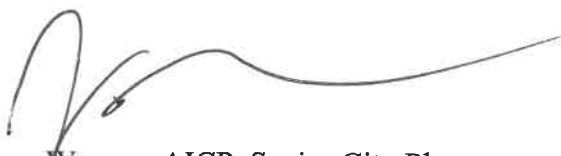
**RECOMMENDATION:**

The staff of the Department of City Planning recommends that the City Planning Commission take the following actions:

**APPROVE** the proposed zoning text amendments to modify Title XIV, “Zoning Code of the City of Cincinnati,” of the Cincinnati Municipal Code by amending the provisions of Section 1405-03, “Specific Purposes of Multi-Family Subdistricts,” Section 1405-07, “Development Regulations,” Section 1407-07, “Development Regulations,” Section 1409-09, “Development Regulations,” Section 1410-07, “Development Regulations,” Section 1413-07, “Development Regulations,” and Section 1415-09, “Development Regulations,” to remove density limitations in certain zoning districts City-wide.

Respectfully Submitted:

Approved:



James Weaver, AICP, Senior City Planner  
Department of City Planning



Katherine Keough-Jurs, AICP, Director  
Department of City Planning

**Date:** May 7, 2021

**To:** Councilmember Liz Keating  
**From:** Andrew Garth, City Solicitor *AWG*  
**Subject:** **Ordinance – Removal of Density Restrictions from Zoning Code**

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Transmitted herewith is an emergency ordinance captioned as follows:

**MODIFYING** Title XIV, “Zoning Code of the City of Cincinnati,” of the Cincinnati Municipal Code by **AMENDING** the provisions of Section 1405-03, “Specific Purposes of Multi-Family Subdistricts,” Section 1405-07, “Development Regulations,” Section 1407-07, “Development Regulations,” Section 1409-09, “Development Regulations,” Section 1410-07, “Development Regulations,” Section 1413-07, “Development Regulations,” and Section 1415-09, “Development Regulations,” to remove density limitations in certain zoning districts and thereby remove a barrier to the creation of housing within the city.

AWG/MEH/(lnk)  
Attachment  
336148



# City of Cincinnati

MEH

AWB

## An Ordinance No. \_\_\_\_\_

- 2021

**MODIFYING** Title XIV, “Zoning Code of the City of Cincinnati,” of the Cincinnati Municipal Code by **AMENDING** the provisions of Section 1405-03, “Specific Purposes of Multi-Family Subdistricts,” Section 1405-07, “Development Regulations,” Section 1407-07, “Development Regulations,” Section 1409-09, “Development Regulations,” Section 1410-07, “Development Regulations,” Section 1413-07, “Development Regulations,” and Section 1415-09, “Development Regulations,” to remove density limitations in certain zoning districts and thereby remove a barrier to the creation of housing within the city.

WHEREAS, in response to City Council’s desire to increase the supply and availability of housing that is affordable across a broad spectrum, the Administration has explored a number of strategies that would facilitate the production of housing in the city, which strategies are more particularly described in a March 16, 2021 report to the Council (item no. 202101105); and

WHEREAS, the Administration’s recommendations for increasing the housing supply include a recommendation to legislatively streamline housing production by, among other things, lifting density restrictions in certain targeted areas; and

WHEREAS, the Council hereby resolves to lift density restrictions in certain targeted areas to remove a barrier to the creation of housing in the city, consistent with its desire to increase the supply and availability of housing; and

WHEREAS, at its regularly scheduled meeting on \_\_\_\_\_, the City Planning Commission reviewed the proposed amendments to the zoning code and recommended their approval, finding them to be in the interest of the public’s health, safety, morals, and general welfare; and

WHEREAS, a committee of Council held a public hearing on the proposed text amendments following due and proper notice pursuant to Cincinnati Municipal Code Section 111-1, and the committee approved the proposed text amendments; and

WHEREAS, the text amendments are consistent with Plan Cincinnati (2012), including the “Live” goal to “provide a full spectrum of housing options, and improve housing quality and affordability” (p. 164); and

WHEREAS, the Council finds the proposed text amendments to be in the best interests of the City and the public’s health, safety, morals, and general welfare; now, therefore,

BE IT ORDAINED by the Council of the City of Cincinnati, State of Ohio:

Section 1. That Section 1405-03, “Specific Purposes of Multi-Family Subdistricts,” of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1405-03. - Specific Purposes of the Multi-Family Subdistricts.**

The specific purposes of the RM Residential Multi-family subdistricts are to create, maintain and enhance neighborhood residential areas with multi-family housing that are typically located near the city's major arterials and characterized by a mix of attached housing, small and large multi-unit buildings and community facilities, where appropriate. Future development will be primarily residential in character, although some small-scale public and non-residential uses on the ground floor in a mixed use building on an arterial street may be allowed with specific limitations. Four RM District subdistricts are established:

- (a) *RMX Residential Mixed*. This subdistrict is intended to create, maintain and enhance areas of the city that have a mix of lot sizes and house types at moderate intensities (one to three dwelling units). Existing multi-family buildings of four or more units are acknowledged but new construction is not permitted.
- (b) *RM-2.0 Multi-family*. This subdistrict is intended to provide for a medium density mix of residential housing predominantly duplexes and multi-family on lots that have already been platted. The scale of buildings is generally similar to a large single-family home on a small lot. Where land is assembled, the same scale should be maintained. ~~The minimum land area for every dwelling unit is 2,000 square feet.~~
- (c) *RM-1.2 Multi-family*. This subdistrict is intended to provide for mixed residential uses at moderately high densities. This is an intense district with an urban character. ~~The minimum land area for every dwelling unit is 1,200 square feet.~~
- (d) *RM-0.7 Multi-family*. This subdistrict is the most intense residential district and it will normally consist of tall multi-family or condominium structures. The character is intended to be urban and should be used where high intensity residential is needed to provide a residential base for important commercial areas. ~~The minimum land area for every dwelling unit is 700 square feet.~~

FIGURES 1405-03-A-D The following illustrations represent examples of the multi-family districts in this chapter:



*Figure 1405-03-A, B*



*Figure 1405-03-C, D*

Section 2. That existing Section 1405-03, “Specific Purposes of Multi-Family Subdistricts,” of the Cincinnati Municipal Code is hereby repealed.

Section 3. That Section 1405-07, “Development Regulations,” of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1405-07. - Development Regulations.**

Schedule 1405-07 below prescribes the development regulations for the RM Districts, including lot area for every unit, minimum lot width, setbacks and maximum height. Figure 1405-07 illustrates the setbacks for the RM Districts. Where an overlay district applies, the provisions of that district take precedence if there is conflict with the standards of this Section.

**Schedule 1405-07 Development Regulations - Residential Multi-family Districts**

Building Form and Location	Lot Area (sq. ft.)	Lot Area/Unit (sq. ft.)	Lot width (ft.)	Setbacks (ft.)			Maximum Height (ft.)
				Front Yard	Side Yard Min./Total	Rear Yard	
RMX single-family	2,500	—	25	20	0/5	20	35
RMX rowhouse exterior	2,500	—	—	20	0/5	20	35
RMX rowhouse interior	2,000	—	—	20	0/0	20	35
RMX two-family	5,000	2,500	25	20	3/6	20	35
RMX three-family	7,500	2,500	25	20	3/6	20	35



Exhibit A

RMX other			25	20	3/6	20	35
RM 2.0 single-family	2,000	—	25	20	0/5	20	35
RM 2.0 rowhouse exterior	2,500	—	—	20	0/5	20	35
RM 2.0 rowhouse interior	2,000	—	—	20	0/0	20	35
RM 2.0 two-family	4,000	2,000	25	20	3/6	20	35
RM 2.0 multi-family	—	2,000	—	20 <sup>1</sup>	5/17 <sup>3</sup>	35	45
RM 2.0 other			25	20 <sup>1</sup>	5/17 <sup>3</sup>	35	45
RM 1.2 single-family	2,000	—	25	20	0/5	20	35
RM 1.2 rowhouse exterior	2,000	—	—	20	0/5	20	35
RM 1.2 rowhouse interior	1,500	—	—	20	0/0	20	35
RM 1.2 two-family	2,400	1,200	25	20	3/6	20	35
RM 1.2 multi-family	—	1,200	—	20 <sup>2</sup>	5/17 <sup>3</sup>	30 <sup>2</sup>	-
RM 1.2 other				20 <sup>2</sup>	5/17 <sup>3</sup>	30 <sup>2</sup>	—
RM 0.7 single-family	2,000	—	25	5	0/5	20	35
RM 0.7 rowhouse exterior	2,000	—	—	5	0/5	20	35
RM 0.7 rowhouse interior	1,500	—	—	5	0/0	20	35

RM 0.7 two-family	2,000	700	25	5	0/5	20	35
RM 0.7 multi-family	—	700	—	5	0/5 <sup>4</sup>	25 <sup>2</sup>	—
RM 0.7 other				5	0/5 <sup>4</sup>	25 <sup>2</sup>	—

“Yes” means additional regulations apply.

Regulations	RMX	RM 2.0	RM 1.2	RM 0.7	Additional Regulations
<b>Vehicle Accommodation Driveways and Parking</b>					
Location of parking	Yes	Yes	Yes	Yes	See § 1425-17
Parking lot landscaping	Yes	Yes	Yes	Yes	See § 1425-31
Parking lot screening	Yes	Yes	Yes	Yes	See § 1425-29
Truck docks; loading and service areas	Yes	Yes	Yes	Yes	See § 1405-09
<b>Other Regulations</b>					
Buffering along district boundaries	Yes	Yes	Yes	Yes	See § 1423-13
Accessory structures	See Chapter 1421				
General site standards	See Chapter 1421				
Landscaping and buffer yards	See Chapter 1423				
Nonconforming uses and structures	See Chapter 1447				
Off-street parking and loading	See Chapter 1425				
Signs	See Chapter 1427				
Additional development regulations	See Chapter 1419				

<sup>1</sup> Additional 1-foot of setback for each 1-foot of building height above 35 feet.

<sup>2</sup> Additional 1-foot of setback for each five feet of building height above 35 feet.

<sup>3</sup> Addition 0.5-foot of minimum side yard and 1-foot sum of side yard setback for each 1-foot of building height above 35 feet.

<sup>4</sup> Additional 1-foot of minimum side yard and 2-foot sum of side yard setback for each five feet of building height above 35 feet.

Exhibit A

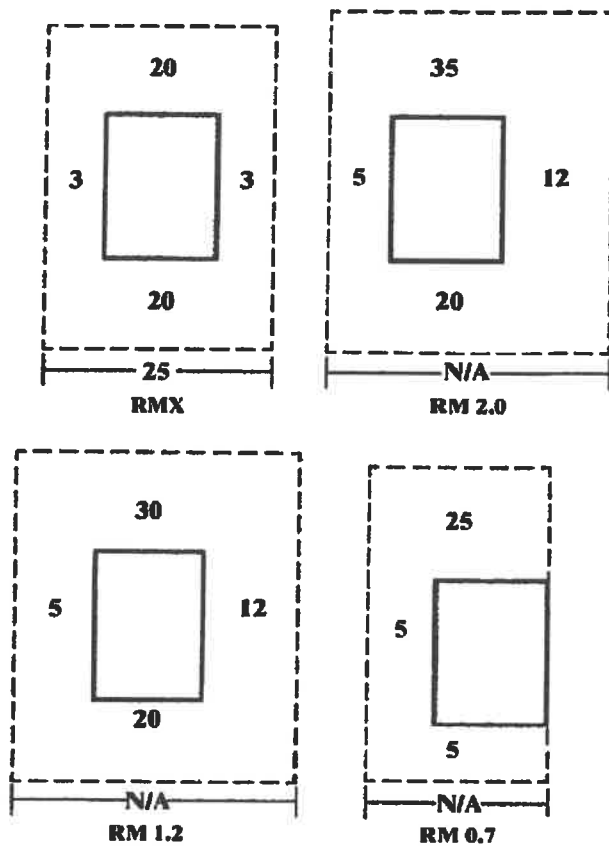


Figure 1405-07 Minimum Setbacks for Multi-Family Buildings 35 ft. in Height

Section 4. That existing Section 1405-07, "Development Regulations," of the Cincinnati Municipal Code is hereby repealed.

Section 5. That Section 1407-07, "Development Regulations," of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1407-07. - Development Regulations.**

Schedule 1407-07 prescribes the development regulations for O Office Districts, including ~~minimum lot area~~, maximum floor area ratio (FAR), maximum building height, minimum yards, driveways and parking and other standards that apply. Letter designations in the additional regulations column refer to regulations that follow Schedule 1407-07.

**Schedule 1407-07: Development Regulations - Office Districts**

Regulations	OL	OG	Additional Regulations
<b>Building Scale - Intensity of Use</b>			
Minimum lot area for every dwelling unit	1200	700	
Maximum gross floor area ratio	0.6	1.75	
<b>Building Form and Location</b>			
Maximum building height	45	100	
<b>Minimum yard (ft.)</b>			
Front	20	20	See § 1407-09
Side (minimum/total)	5/10	5/20	See § 1407-11
<b>Side rowhouse (minimum/total)</b>			
Exterior lot	0/5	—	
Interior lot	0/0	—	
Rear	20	20	See § 1407-13
<b>Vehicle Accommodation - Driveways and Parking</b>			
Driveway restrictions	Yes	Yes	See § 1407-15
Location of parking	Yes	Yes	See § 1425-15
Parking lot landscaping	Yes	Yes	See § 1425-29
Truck docks; loading and service areas	Yes	Yes	See § 1407-17
<b>Other Regulations</b>			
Buffering along district boundaries	Yes	Yes	See § 1423-13
Accessory uses and structures	See Chapter 1421		
General site standards	See Chapter 1421		
Landscaping and buffer yards	See Chapter 1423		
Nonconforming uses and structures	See Chapter 1447		
Off-street parking and loading	See Chapter 1425		
Signs	See Chapter 1427		
Additional development regulations	See Chapter 1419		

Section 6. That existing Section 1407-07, "Development Regulations," of the Cincinnati Municipal Code is hereby repealed.

Section 7. That Section 1409-09, "Development Regulations," of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1409-09. - Development Regulations.**

Schedule 1409-09 prescribes the development regulations for Commercial Districts, maximum building height, minimum setbacks, driveways and parking and other standards that apply. Yes means regulations apply.

**Schedule 1409-09: Development Regulations - Commercial Districts**

Regulations	CN-P	CN-M	CC-P	CC-M	CC-A	CG-A	Additional Regulations
<b>Building Scale-Intensity of Use</b>							
Minimum Lot Area	0	0	0	0	0	0	
<b>Building Form and Location</b>							
Maximum building height (ft.)	50	50	85	85	85	85	
Minimum building height (ft.)	15	15	15	15	15	15	
Minimum front yard setbacks (ft.)	0	0	0	0	0	0	
Maximum front yard setbacks (ft.)	0	12	0	12	—	—	See § 1409-19
Building placement requirements	Yes	Yes	Yes	Yes	No	No	See § 1409-17 and § 1409-21
Ground floor transparency standards	Yes	Yes	Yes	Yes	No	No	See § 1409-23
<b>Vehicle Accommodation - Driveways and Parking</b>							
Driveway restrictions	Yes	Yes	Yes	Yes	Yes	Yes	See § 1409-11
Drive-through facilities	Yes	Yes	Yes	Yes	Yes	Yes	See § 1409-13 and 1419-13
Location of parking	Yes	Yes	Yes	Yes	No	No	See § 1409-25
Parking lot landscaping	Yes	Yes	Yes	Yes	Yes	Yes	See § 1425-29
Truck docks; loading and service areas	Yes	Yes	Yes	Yes	Yes	Yes	See § 1409-15
<b>Other Regulations</b>							
Buffering along district boundaries	Yes	Yes	Yes	Yes	Yes	Yes	See § 1423-13
Accessory structures	See Chapter 1421						
General site standards	See Chapter 1421						

Landscaping and buffer yards	See Chapter 1423						
Nonconforming structures	See Chapter 1447						
Parking and loading	See Chapter 1425						
Signs	See Chapter 1427						
Additional development regulations	See Chapter 1419						
<b>Residential Regulations</b>							
<b>New residential only</b>							
<del>Lot area/unit (sq. ft.)</del>	700	700	700	700	700	700	
Front yard setback	0	0	0	0	0	0	
Interior side yard setback	0	0	0	0	0	0	
Corner side yard setback	0	0	0	0	0	0	
Rear yard setback	25	25	25	25	25	25	
<b>Residential development in existing buildings</b>							
<del>Lot area/unit (sq./ft.)</del>	500	500	500	500	500	500	

Section 8. That existing Section 1409-09, "Development Regulations," of the Cincinnati Municipal Code is hereby repealed.

Section 9. That Section 1410-07, "Development Regulations," of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1410-07. - Development Regulations.**

Schedule 1410-07 below prescribes the development regulations for the UM district, including ~~lot area for every unit~~, minimum lot width, setbacks and maximum height. Where an overlay district applies, the provisions of that district take precedence if there is conflict with the standards of this Section.

**Schedule 1410-07 Development Regulations—Urban Mix District**

Building Form and Location				Setbacks (ft.)			
	Lot Area (sq. ft.)	<del>Lot Area/Unit (sq. ft.)</del>	Lot width (ft.)	Front Yard (Min./Max.)	Side Yard Min./Total	Rear Yard (Min.)	Maximum Height (ft.)
UM Residential	2,000	700	25	0/10	0/0	10	45

Exhibit A

UM Non-residential	2,000	0	25	0/0	0/0	10	45
<b>UM Rowhouse</b>							
Interior	1,500	700	25	0/10	0/0	10	45
Exterior	1,500	700	25	0/10	0/0	10	45
UM Other Use	2,000	2,000	25	0/0	0/0	10	45
<b>Regulations</b>			<b>UM</b>	<b>Additional Regulations</b>			

<b>Vehicle Accommodation—Driveways and Parking</b>		
Driveway Restrictions	NO	
Drive-Through Facilities	NO	
Required Parking	YES	See 1410-09
Location of Parking	YES	See 1425-15
Parking Lot Landscaping	NO	
Parking Lot Screening	YES	See 1425-27
Truck Dock; Loading; Service Areas	YES	See 1403-09
<b>Other Regulations</b>		
Buffering along District Boundaries	YES	See 1423-14
Accessory Structures	YES	See Chapter 1421
General Site Standards	YES	See Chapter 1421
Landscaping and Buffer Yards	YES	See Chapter 1423
Nonconforming Structures	YES	See Chapter 1447
Off Street Parking & Loading	YES	See Chapter 1425
Signs	YES	See Chapter 1427
Additional Development Regulations	YES	See Chapter 1419

“Yes” means additional regulations apply.

Section 10. That existing Section 1410-07, “Development Regulations,” of the Cincinnati Municipal Code is hereby repealed.

Section 11. That Section 1413-07, “Development Regulations,” of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1413-07. - Development Regulations.**

Schedule 1413-07 below prescribes the development regulations for M Manufacturing Districts, including minimum lot area, maximum height, minimum yards and other standards. Additional standards are included in Chapter 1419.

**Schedule 1413-07: Development Regulations - Manufacturing Districts**

Regulations	MA	ML	MG	ME	Additional Regulations
<b>Building Scale - Intensity of Use</b>					
Minimum Lot Area (sq. ft.)					
Residential Uses	20,000	4,000	—	—	
Non-residential Uses	20,000	0	0	0	
Land area for every dwelling unit	—	2,000	—	—	
<b>Building Form and Location</b>					
Maximum Building Height (ft.)	35	45	85	85	
Minimum Yard (ft.)					
Front Residential	40	20	0	0	
Front Non-Residential	25	20	0	0	
Side Residential (minimum/total)	10/20	3/12	0	0	
Side Non-Residential (minimum/total)	10/20	10/20	0	0	
Rear Residential	35	25	0	0	
Rear Non-Residential	20	10	0	0	
<b>Vehicle Accommodation - Driveways and Parking</b>					
Driveway Restrictions	Yes	Yes	Yes	Yes	See § 1413-09
Parking Lot Landscaping	Yes	Yes	Yes	Yes	See § 1425-29
Truck Docks; Loading and Service Areas	Yes	Yes	Yes	Yes	See § 1413-11
<b>Other Regulations</b>					
Buffering Along District Boundaries	Yes	Yes	Yes	Yes	See § 1423-13
Accessory Uses and Structures					See Chapter 1421
General Site Standards					See Chapter 1421
Landscaping and Buffer Yards					See Chapter 1423
Nonconforming Uses and Structures					See Chapter 1447
Off-Street Parking and Loading					See Chapter 1425
Signs					See Chapter 1427



Additional Development Regulations		See Chapter 1419
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Section 12. That existing Section 1413-07, "Development Regulations," of the Cincinnati Municipal Code is hereby repealed.

Section 13. That Section 1415-09, "Development Regulations," of the Cincinnati Municipal Code is hereby amended as follows:

**§ 1415-09. - Development Regulations.**

Schedule 1415-09 below prescribes the property development regulations for RF Riverfront Districts, including minimum lot area, maximum height, setback, parking and driveways and other standards. Additional standards are included in Chapter 1419, Additional Development Regulations.

**Schedule 1415-09: Development Regulations - Riverfront Districts**

Regulations	RF-R	RF-C	RF-M	Additional Regulations
<b>Building Scale - Intensity of Use</b>				
Minimum lot area (sq. ft.)	4,000	—	—	
Minimum lot area (sq. ft.) rowhouse	2,000	—	—	
<del>Minimum area for every dwelling unit</del>	<del>2,000</del>	—	—	
<b>Building Form and Location</b>				
Maximum building height (ft.)	35	100	—	See § 1415-11
Minimum yard (ft.)				
Front	10	25	20	
Side least width/sum	3/6	10/20	5/10	
Side rowhouse exterior, least width/sum	0/3	—	—	
Side rowhouse interior, least width/sum	0/0	—	—	
Rear	30	10	5	
Maximum building coverage (%)	60	70	80	See § 1415-13
<b>Vehicle Accommodation - Driveways and Parking</b>				
Parking lot landscaping	Yes	Yes	Yes	See § 1425-29
Truck docks; loading and service areas	Yes	Yes	Yes	See § 1415-15
<b>Other Standards</b>				
Buffering along district boundaries	Yes	Yes	Yes	See § 1415-17

Exhibit A

Ohio River bank area	Yes	Yes	Yes	See § 1415-19
Little Miami Riverfront area	Yes	Yes	Yes	See § 1415-21
Accessory uses and structures				See Chapter 1421
General site standards				See Chapter 1421
Landscaping and buffer yards				See Chapter 1423
Nonconforming uses and structures				See Chapter 1447
Off-street parking and loading				See Chapter 1425
Signs				See Chapter 1427
Additional development regulations				See Chapter 1419

Section 14. That existing Section 1415-09, "Development Regulations," of the Cincinnati Municipal Code is hereby repealed.

Section 15. That this ordinance shall take effect and be in force from and after the earliest period allowed by law.

Passed: \_\_\_\_\_, 2021

\_\_\_\_\_  
Mayor

Attest: \_\_\_\_\_  
Clerk

\_\_\_\_\_  
New language underscored. Deleted language indicated by strike through.

March 16, 2021

To: Mayor and Members of City Council  
From: Paula Boggs Muething, City Manager  
Subject: Affordable Housing: Recommendations

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**REFERENCE DOCUMENT #202100478**

Economic Growth and Zoning Committee at its meeting on February 3, 2021 referred the following item for review and report:

WE MOVE that the City Administration produce a report on affordable housing within the City of Cincinnati that includes, but is not limited to: Identification of building inventory currently in the Port Authority's Land Bank which may be suited for affordable housing. Methods for inclusion/equity in the transfer of property from the Land Bank to any individual or developer. Accounting of all current funds in the Affordable Housing Trust and identification of potential sources of additional funds.

**Summary and Context**

This report provides an overview of the role of the City in the production of affordable housing, information on the City's current activities, and recommendations on how the City can facilitate preserving and increasing the supply of affordable housing.

The term "affordable housing" encompasses a broad array of housing products—from lower cost housing primarily created by market forces to publicly funded or even publicly owned housing units. This term encompasses both single-family housing or multi-family housing and either rental or owner-occupied. The degree of affordability of a particular housing option is relative to an individual's or household's income—the general standard of affordability is that no more than thirty percent of a household's gross income should be committed to housing expenses.<sup>1</sup>

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<sup>1</sup> For renters, expenses include both rent and utilities. For homeowners, expenses include mortgage payments, property taxes, utilities, homeowner's insurance, and maintenance expenses.

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## Exhibit B

The price of housing in a particular market is driven by the basic economic forces of supply and demand.<sup>2</sup> Real estate prices are particularly affected by the cost of producing additional supply since housing development is resource-intensive, high-risk, and requires extensive, time consuming planning. There is a long history of local, state, and federal government intervention in the private housing market to achieve public policy goals, such as affordability; these steps have had mixed success.

Current market conditions in the City of Cincinnati regarding affordability are ever evolving and have been studied in-depth by multiple external groups. This report is not intended as a statement on current market conditions or a description of all City activities or policies that assist lower income households with housing, such as eviction prevention or job training programs. The purpose of this report is to contextualize current City activities in the housing market to facilitate production of new affordable housing and to recommend strategies for preserving and increasing housing affordability throughout the City.

### City's Role in New Affordable Housing Production and Current Programs

The City is not a developer and does not directly develop housing; therefore, all housing production in the City and all City efforts in this area are dependent upon a willing developer to invest resources in creating new units or rehabilitating existing housing units. These developers are primarily for-profit private parties, supplemented in our region by the activities of several non-profit developers and quasi-governmental entities, such as the Port of Greater Cincinnati Development Authority and the Cincinnati Metropolitan Housing Authority.

The City generally plays two roles in direct housing production: (1) regulatory and (2) providing incentives.

The City's regulatory function includes its role in administering and enforcing the State of Ohio building code and, as a home-rule municipality, in passing and enforcing a zoning code.

The current City programs that incentivize housing production focus on: (1) decreasing the costs of creating or operating housing, primarily through property tax exemptions, or (2) providing direct funding to subsidize the cost of producing new housing.

### Current Programs

The City Administration has previously reported and presented on current City programs that facilitate new affordable housing production. Accordingly, this section is a high-level overview of existing programs.

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<sup>2</sup> Glaeser, Edward and Gyourko, Joseph. 2018. "The Economic Implications of Housing Supply" *Journal of Economic Perspectives* 32(1): 3-30.

## Exhibit B

The City's activities to encourage and support affordable homeownership are detailed in a recent report dated 12/16/2020 (Item #202002025), filed in response to a motion from Councilmember Kearney. These activities include offering tax incentives or direct funding, with funding programs focused primarily on subsidizing repairs for homeowners, down-payment assistance for first-time homebuyers with an income at or below 80% of the area median income, or subsidizing projects developing single-family homes.

The City's primary program to fund affordable multi-family housing production is through NOFA – Notice of Funding Availability. Through this competitive program the City deploys available local and federal funding to developers in the form of loans or grants. This includes the deployment of available HOME and CDBG funding and any City capital funds appropriated for these purposes. In 2019 and 2020, this program facilitated the creation of over 700 units of affordable housing. The effectiveness of the NOFA program in creating new housing units is largely tied to the ability of developers to integrate and leverage the City's funding with other subsidy programs (such as the federal Low-Income Housing Tax Credits, state or federal New Markets Tax Credits, or state or federal historic tax credits). NOFA is cyclical and typically deploys funding through two application cycles each calendar year.

### **Recommendations**

Over the past seven months, the City Manager's office has reviewed financing options, engaged City partners, and benchmarked programs in other cities. As a result, we have developed the following recommendations for preserving and increasing housing affordability within the City.

#### **Recommendation: Create a Structure to Encourage Informed Public Discourse on Affordable Housing Development and the Strategic Deployment and Oversight of Available Public Funding**

At present, there are many perspectives in the public discourse about the best way to address the issue of affordable housing within the City. In order to promote a more formalized and informed public discussion of this issue and to generate a comprehensive strategy with public and private support, the City Administration recommends appointing a Housing Advisory Board pursuant to Cincinnati Municipal Code Chapter 209 and Ohio Revised Code Chapter 176. Under state and local law, this board is intended, among other purposes, to review and advise upon comprehensive plans for the preservation and development of affordable housing in the City. At present, the City of Cincinnati relies on the Community Development Advisory Board, known as CDAB, to serve as the City's housing advisory board for use as both the housing advisory board required for federal sources and as required under Ohio Revised Chapter 176.

The City Administration recommends separating the state law-based housing advisory board into a distinct board that would be solely focused on developing, in cooperation with the City Administration, comprehensive priorities for the

## Exhibit B

development and maintenance of affordable housing within the boundaries of the City and deployment of funding described herein. This separate board will have expertise in issues affecting housing development and affordability and can consider the broad range of resources and solutions available to address these issues as it develops priorities to meet the challenge. Once finalized, these priorities will be submitted to Council for approval and will inform the implementation of the programs described below.

The Housing Advisory Board is appointed by the Mayor with consent from Council, and, as set forth in state law and in the municipal code, would include representation from the following groups:

- Institutions that lend money for housing;
- Nonprofit builders and developers of housing;
- For-profit builders and developers of housing;
- For-profit builders and developers of rental housing;
- Real estate brokers licensed under Ohio Revised Code Chapter 4735;
- Other persons with professional knowledge regarding local housing needs and fair housing issues;
- Residents of Cincinnati that could receive housing assistance from the City;
- The Cincinnati Metropolitan Housing Authority;
- City Councilmembers;
- Additional groups or individuals that are necessary to provide balanced advice on housing plans and programs.

### **Recommendation: Formalize Finance and Development Partnerships into Structured Programming**

Urban redevelopment projects face many challenges. Large urban development sites are often difficult to assemble and costly to acquire; intensive site work, demolition, or environmental remediation may be required; developers must navigate complex regulatory frameworks and approval processes; and some projects will face community opposition. These factors result in higher development costs. To be financially feasible, a project's revenue must support the higher costs of development. Accordingly, in the City of Cincinnati, many market-rate development projects are not financially feasible without some level of subsidy.

Lowering rents or sale prices in order to increase housing affordability reduces the amount of revenue that a project produces. This introduces a further challenge to developing an affordable housing product. To make affordable housing projects financially feasible, this reduced revenue must be accounted for with additional equity or debt financing to subsidize the development costs. Given these conditions, addressing today's affordable housing needs requires government intervention and subsidy.

## Exhibit B

The two industry professional groups most critical for improving housing production are financiers and developers. Many effective partner organizations already exist in our region in these areas—including but not limited to the Cincinnati Development Fund, LIISC, and the Port of Greater Cincinnati Development Authority. The City Administration recommends formalizing partnerships with existing organizations and creating programming to achieve two goals: (1) to increase available financing tools to encourage the production of new housing units and the preservation of existing affordable housing units and (2) to increase capacity within the development industry for production of housing units.

From the financing perspective, the City Administration recommends establishing a partnership with a local CDFI<sup>3</sup> for deployment of the funding described below. The program structure would focus on providing low-cost financing and direct subsidy to facilitate the development of affordable housing.

- 1) Section 108 Loan Pool – The City would pursue a Section 108 Loan from the United States Department of Housing and Urban Redevelopment under the Community Development Block Grant program in a minimum amount of \$20 million to fund a loan pool for financing the acquisition and rehabilitation costs of residential properties where the developer/borrower will make between 51% and 100% of the units available to low to moderate income individuals. The loan pool would be structured to provide loans with favorable interest rates to encourage the private market, non-profit or for-profit organizations, to utilize this financing to acquire, rehabilitate, and preserve already existing housing units. As a requirement of the loan, a restrictive covenant would be placed on the property securing the long-term maintenance of the units as affordable.
- 2) Affordable Housing Trust Fund – The City would pursue consolidation of all local funding currently earmarked for affordable housing into a fund that will be utilized to provide loans—including, when feasible and appropriate, forgivable loans—to provide for flexible local financing and subsidy for affordable housing projects. To increase overall impact, program parameters would ensure that the fund could leverage other sources of funding for affordable housing projects, including private funding, federal and state tax credit programs, etc. Any principal repaid on the primary loans will be recycled for new projects. The forgivable loans would be similar to grants, but would provide enhanced accountability and would only be forgiven once certain affordability benchmarks are satisfied. City funding sources would include all funds that have been committed to the Affordable Housing Trust Fund and any additional sources appropriated by Council for this purpose. As described below, this local public investment would be utilized to raise as much private funding as possible to supplement and leverage public resources.

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<sup>3</sup> Community Development Finance Institution.

## Exhibit B

As described above, all housing development that occurs in the City is dependent upon a willing and effective developer. To make a material impact on housing affordability, our City needs increased capacity in both for-profit and non-profit housing developers. To begin this process, the City Administration recommends establishing a program with the Port of Greater Cincinnati Development Authority, including its affiliated organizations the Landbank and the Homestead Urban Redevelopment Corporation. This program would focus on the goal of building development capacity in community development corporations and similar community-based development organizations.

These community-based development entities play a critical role in both completing development projects in their neighborhood but also facilitating larger development projects being undertaken by other developers, providing a bridge between for-profit developers and residents. These organizations also function to balance community concerns and feedback with project viability, creating successful projects with community support. All City neighborhoods deserve the benefits provided by a community-based development organization, so this program will work to provide those benefits where organizations do not currently exist. In areas where we already have excellent community-based development organizations, this program will seek to increase capacity.

The City Administration recommends development of additional programming in this area to address targeted housing development capacity needs, based on feedback and input from the Housing Advisory Board.

Throughout these proposed programs, there will be an emphasis on participation by minority-owned and women-owned business enterprises to increase capacity and access to opportunity for these organizations.

### **Recommendation: Leverage City Investment to Fundraise from Private Parties**

While government subsidy is critical to addressing affordable housing needs, government alone cannot solve this societal issue. To increase overall funding, the City Administration recommends a strategy of consolidating all available City funding in order to leverage the public investment to attract private funding. The consolidated fund would be deployed, as described above, through the Affordable Housing Trust Fund programmatic structure for provision of loans to provide flexible local financing and subsidy for affordable housing projects.

To accomplish this purpose, the City Administration recommends formalizing a fundraising campaign with financing partner(s), members of the Housing Advisory Board, and other key public and private organizations.

### **Recommendation: Legislatively Streamline Housing Production**

Regulatory costs increase the overall cost of housing development and can often serve as a barrier to market entry for small or less-experienced developers—in both



## Exhibit B

instances constraining the production of additional housing supply. Over the years, regulations have been enacted on a one-off basis and often without providing the legislative body with a clear picture of the impacts on overall development costs. Given the increasing need for all housing products, the City Administration recommends a concentrated effort to reduce portions of the regulatory framework that can serve as an impediment to housing production. This process would include amendments to the zoning code to streamline approvals, re-alignment of staff involved in regulation of housing production, and removal of other barriers to housing development. This focused realignment of the City's regulatory functions would reduce costs and the timelines associated with producing additional housing supply.

The City Administration does not recommend as a strategy for production of affordable housing the maintenance of existing or creation of new regulatory barriers to housing production—such as inclusionary zoning regulations. Research shows that, even in the strongest of markets, inclusionary zoning is ineffective at producing material amounts of affordable housing. Some evidence suggests that it may contribute to higher overall housing prices and reduced construction of new units.<sup>4</sup> Cincinnati is not a leading housing market and city officials must be cognizant of regulations that will suppress market participation. Reducing regulatory barriers to development while providing additional resources to proactively assist the development of affordable housing, as described above, balances the local market realities with housing needs to materially increase affordable housing units.

The City Administration will present legislation and internal updates to implement this recommendation, including but not limited to legislation focused on lifting parking requirements and density restrictions in targeted areas; amending the administrative code to realign development focused city staff and improve operations; allowing more as-of-right housing development options, including accessory dwelling units; clarifying variance standards; pre-approvals of certain affordable housing incentives, such as CRA incentives for projects that meet certain affordable housing benchmarks; and adjustments to clarify and streamline other development regulations, including hillside overlays and setback regulations.

### **Conclusion**

The production of housing is a complex and expensive undertaking; however, increased production of all housing, affordable projects to market-rate, is critical to addressing the need for increased housing affordability. To facilitate increased supply, the City Administration is recommending a multi-pronged approach that focuses on building a cohesive strategy to be executed through partnerships and structured programs. Public investment will be utilized to attract private investment in order to expand impact and the City will take steps to streamline the regulatory framework that constricts supply. Deploying these recommendations will leverage

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<sup>4</sup> Freeman, Lance and Schuetz, Jenny. 2017. "Producing Affordable Housing in Rising Markets: What Works?" *Cityscape: A Journal of Policy Development and Research* 19(1): 225-227.

Exhibit B

limited public resources and encourage private investment, meaningfully advancing the goal of materially increasing housing affordability throughout Cincinnati.



24 May 2021

James Weaver, Senior City Planner  
805 Central Ave  
Cincinnati, Ohio 45202

Mr. Weaver,

In response to the notice sent regarding "Proposed Removal of Density Restrictions from the Cincinnati Zoning Code," the Chair of the Planning and Zoning Committee solicited comments from Committee members for your consideration. Comments are as follow.

*"This is very, very good. These density limitations are a serious problem when it comes to affordability. And they make it really hard for small developments to happen. Basically, under the current regime, only folks who can amass large numbers of contiguous parcels are able to develop anything in these districts. This should help us take a step toward encouraging more of the "missing middle" type housing. Smaller apartment buildings, duplexes, triplexes, etc. The city should take this further and consider reducing or eliminating parking minimums, setbacks, etc. that have a similar effect of reducing the housing supply. We should also look at allowing duplexes, triplexes, small apartment buildings, and ADUs in our current single-family zone. We have these housing types spread throughout the neighborhood but most are illegal to build today."*

*"I think increased density in theory. I become concerned with 3 and 4 story structures being built adjacent to single family homes in traditional low-rise areas. Ideally these developments can infill areas left where larger commercial, retail, and manufacturing has left the neighborhood. These developments can then restore a street edge (similar to what the Apple Street Senior Living building will do). One big issue with increased density with apartments and condos is the demands it puts on greenspace. Many of the residents of these places must seek out outdoor spaces for recreation. There has to be a way to require enlarging and increasing outdoor space in the form of parks and public spaces alongside the increase in density. The proposed amendments appear to eliminate the minimum lot sizes in districts altogether. It seems safer to me to just find what an optimal reduction in the minimum lot size is and then amend the number."*


*"I'm generally supportive of the changes as needing a minimum amount of lot square footage per unit incentivizes buying up lots of adjacent parcels to create a sprawling apartment building due to small lot sizes and irregular lot shapes which unnecessarily decreases the number of units that can be built."*

*"I support removing the limitations. During the recent discussions of the failed ballot effort around affordable housing, it occurred to me that loosening density and use restrictions to allow for more multi-unit and mixed use development is the best way to do achieve more affordable housing and more amenities as neighborhoods densify, all without a controversial budget allocations."*

Exhibit C



If you have any questions about these comments, feel free to contact me.



Jason Schneider, AIA  
Chair, Planning and Zoning Committee  
[planning@northsidecouncil.com](mailto:planning@northsidecouncil.com)

CC: Becky Smolenski-Finnigan

**Weaver, James**

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**From:** Jim Albers <jalbers@earthlink.net>  
**Sent:** Monday, May 24, 2021 9:13 AM  
**To:** Weaver, James  
**Cc:** planning@northsidecouncil.com; president@northsidecouncil.com  
**Subject:** [External Email] Proposal to modify Title XIV, Zoning Code of the City of Cincinnati of the Cincinnati Municipal Code

External Email Communication

24 May 2021

James Weaver, Senior City Planner

Department of Planning, City of Cincinnati

Re: Proposal to modify Title XIV, "Zoning Code of the City of Cincinnati," of the Cincinnati Municipal Code by amending the provisions of Section 1405-03, Section 1405-07, Section 1407-07, Section 1409-09, Section 1410-07, Section 1413-07, and Section 1415-09

Mr. Weaver,

I'm a 27 year City of Cincinnati Northside resident and homeowner, a member of the Northside Community Council and a new member of the Planning and Zoning committee. I'm submitting comments in opposition to the proposed elimination of zoning density requirements in the above referenced sections for the following reasons.

First, I'm opposed to eliminating zoning provisions that can help to regulate the pace and cost of neighborhood/community change that otherwise would be driven by market forces unconcerned the residents needs or the character and/or values of the community. Northside, long known as a racially and socioeconomic diverse community, has lost much of that diversity during the past 10 – 20 years as rents and housing prices have dramatically increased.

According to the Northside Housing Research Institute, (February 2021), between 2010-2019, median gross rent and home value, respectively, increased by 40% and 43%. while median household income increased 53%.

Second, eliminating density requirements to allow developers to build more smaller units can reduce construction costs, but does not necessarily result in an increase in affordable units that can sustain a diverse racial and socioeconomic neighborhood. Market forces will not meet the housing needs, for example, of a lower-wage service sector workers and their families.

Smaller units do not beget affordable housing, as small studio and one-bedroom apartments in new multi-family residences in Northside currently rent from \$800+ to \$1300 per month, respectively, exceeding the 30% AMI of a large section of the Cincinnati workforce.

Third, I believe the period allowed for comment is inadequate and the city administration has not adequately

Exhibit C

solicited the input of communities in this rush to change the zoning density requirements.

Finally, minority and working class residents have been uprooted and/or priced out of the new and renovated housing in neighborhoods where were born, because we have a housing market driven almost exclusively by the profit motive. Eliminating zoning requirements can only exacerbate this process. We need a commitment to stabilize communities impacted by anarchic market forces, not add government assistance to those forces. We need to recognize that affordable housing is a right and can only be met with the necessary public investment.

Respectfully,

James Albers

4312 Langland Street

Cincinnati, OH 45223

[jalbers@earthlink.net](mailto:jalbers@earthlink.net)