

**DATE:** May 18, 2017

**TO:** Mayor Poe and Members of the City Commission

**VIA:** Anthony Lyons, City Manager  
Wendy Thomas, Director of Doing

**FROM:** Andrew Persons, Planner IV

**SUBJECT:** Land Development Code Update

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Executive Summary:

Land Development Code Update:

On September 30, 2015, the City Commission held a public hearing to approve the proposed update to the Land Development Code (Code) and its associated amendments. The Department of Doing and the City Attorney's Office have worked together to review and improve the Land Development Code throughout the ordinance drafting process. As a result of our collaboration, the proposed Code includes a number of small, yet impactful, improvements designed to enhance and facilitate the overall user experience. Whether the user is a homeowner looking for setbacks for a new house addition, an entrepreneur seeking to open a new business, or a professional engineer designing a new urban infill building, the Code has been refined in the following ways:

- New graphics to explain concepts and requirements
- New cross-referenced tables for easy comparisons across multiple zoning districts
- New How-to Guide (Article III)
- New zoning district names with more comprehensible titles (e.g. CCD to Downtown)
- Updated application submittal requirements to reflect use of technology
- Clear, concise language and replacement of jargon
- Removing duplicative Advisory Board procedural language previously adopted by the City Commission and contained within the boards' by-laws

Several critical revisions produce a more predictable and equitable development process within the City. These revisions include:

- Merging multiple appeals sections into one consolidated appeals process
- Creating performance based criteria for modifications or building height increases such as provision of affordable housing or public open space
- Providing a process for reestablishing nonconforming uses

Public Outreach:

As part of the ongoing public engagement process, the Department of Doing has either hosted or attended meetings with:

- Neighborhood residents in the Pleasant Street, Grove Street, and 5<sup>th</sup> Avenue neighborhoods
- University of Florida
- Joint Plan Board / Development Review Board public workshop
- Development and real estate community (Chamber, BANCf, and GACAR)
- Local news agencies (Gainesville Sun and WUFT)
- Other City departments (Public Works, GRU, and Code Enforcement)

The purpose of the meetings was to provide additional opportunities for input and feedback. Additionally, the City's Broadcast Services Division produced an informational video about the Land Development Code available for view on the City's website. The City has also created a press release and an informational brochure to share with citizens interested in this process.

#### Additional Considerations:

The Department of Doing is also involved in both the Urban Standards team and the Tree Ordinance Stakeholder Committee. These groups have been charged with investigating opportunities for flexible utility provision within the urban context and exploring innovative approaches to enhance the urban forest. We anticipate incorporating recommendations from both groups into the Code as the process continues.



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**TO: City Commission**

**DATE: May 6, 2014  
(Revised May 18, 2017)**

**FROM: Department of Doing**

**SUBJECT: Petition PB-14-41 TCH. City Plan Board. Amend the Land Development Regulations to update the Land Development Code to add new zoning districts, a revised list of uses, and associated regulations.**

### **Recommendation**

Staff recommends approval of Petition PB-14-41 TCH.

### **Discussion**

This amendment reorganizes, updates, and clarifies many of the existing zoning and development regulations in the Land Development Code. Many of the review and approval processes described within the code will also be streamlined as a part of the amendment. At the same time, this petition proposes to create ten new zoning districts (called urban zones) that are designed to apply within the areas around downtown Gainesville and the University of Florida. These new districts are also designed to replace the existing special area plans that serve as zoning overlays within these areas. Therefore, the proposed amendment will eliminate several existing zoning categories, as well as several special area plans that currently apply to properties within the City.

### **Background**

This petition was initiated at the direction of the City Commission. On May 2, 2011, the City issued a request for proposals for professional services to prepare an update to, and incorporate form-based code principals into, the City's Land Development Code. A consultant was selected and began to negotiate a scope of services and contract terms. On January 5, 2012, the City Commission directed staff to further clarify the initial scope of services to: 1) identify those areas of the City subject to application of a form-based code through provision of a map; 2) identify those Special Area Plans that are recommended to be eliminated and replaced by a form-based code; and, 3) identify areas of the existing Land Development Code that should be integrated with the form-based code in order to ensure the seamlessness of a final product. Staff then provided a map that encompassed: the special area plans around downtown and the University of Florida; the adjacent commercial corridors; the Urban Village area; the commercial center around the intersection of W. University Avenue and 34<sup>th</sup> Street; and the commercial center at the intersection of NW 23<sup>rd</sup> Avenue and 13<sup>th</sup> Street. The City Commission ultimately approved this map as part of the final scope of services and contract with LittleJohn Engineering.

The consultant produced a complete first draft of the new Land Development Code in February of 2013. Since that time, City staff has been reviewing and revising the draft, and meeting with various stakeholders. The Planning and Development Services Department held numerous neighborhood workshops and other meetings with all property owners that would be affected by the associated rezoning to the new urban zones. The City Plan Board held 11 public hearings about the proposed code update between May 6<sup>th</sup> and December 3<sup>rd</sup>. As a result of those meetings, additional revisions were made to the proposed code. Subsequent to the City Plan Board meetings, the City Commission held 6 public hearings with significant input from the community.

This text amendment is associated with PB-14-40 CPA, which is an amendment to the Comprehensive Plan to create new land use categories that correspond with the proposed new zoning districts. It is also related to PB-14-42 LUC, which will change the land use designations on some areas of the Future Land Use Map, and PB-14-43 ZON, which will change the zoning districts for many properties within the identified areas. A complete list of all stakeholders meetings and neighborhood workshops, as well as detailed notes from the workshops, is included in the backup to the staff report for the associated rezoning.

### Summary of Major Revisions

The proposed new code includes elements of form-based code within limited areas of the City, but it is primarily an update and reorganization of the existing zoning districts and development standards. It is also accessible on the Land Development Code Update page on the City's website. Outlined and summarized here are some of the major revisions that are included in the proposed new Land Development Code:

- **Reorganization of code.** In order to improve the overall usability of the code, the regulations have been organized into new chapters, as follows (with a summary of what some chapters contain shown in parentheses):
  - Article I - Generally ~~General Provisions~~ (purpose, objectives, references to other documents, enforcement)
  - Article II – Definitions ~~and Rules of Construction~~
  - Article III - How-to Guide ~~Vested Rights, Nonconformities, and Concurrence Management~~ (review boards and committees, process for building permits, development review, zoning and land use amendments, special use permits, planned developments, street vacations, process for modification of standards, and appeal procedures)

- Article IV – Zoning ~~Review Authority and Procedures~~ (standards and uses for urban zones, residential zoning districts, non-residential zoning districts, and special districts, as well as the remaining overlay districts)
- Article V – Use Standards ~~District Regulations~~ (specific requirements for certain principal uses, accessory uses, and temporary uses)
- Article VI – Development Standards ~~Requirements for Specially Regulated Uses~~ (general development standards, stormwater management, transportation standards, subdivision design)
- Article VII – Parking and Loading ~~Development and Subdivision Design~~ (required parking amounts, and design requirements for off-street parking and structured parking)
- Article VIII - Protection of Resources ~~Parking and Loading Regulations~~ (landscaping and tree management, environmental overlays, regulated natural and archaeological resources, historic resource protection)
- Article IX – Signs ~~Resource and Environmental Management~~ (Sign regulations)
- Article X - Nonconformities and Vested Rights ~~Sign Regulations~~ (Nonconforming lots, structures, and use provisions, nonconforming use waiver certificate process, vested rights review)

On a smaller scale, much of the information contained within the new chapters of the code has been consolidated into table format for easier reference. For example, the allowed uses within all of the non-residential zoning districts are now included in one table, rather than as a separate list of uses for each district. Similarly, the notification requirements for the different types of public hearings are outlined within a single table.

- **Removal of zoning overlays.** The new code proposes to remove most of the existing special area plans, which currently act as zoning overlays to the base zoning districts of properties. The creation of the new urban zones makes this possible, since most of the existing form-based standards within the special area plans will be incorporated into these new zoning districts. The standards were also simplified and adjusted in order to meet the goals of the City related to development in the Innovation Square and Urban Village areas. Detailed standards for materials and architectural design were not carried over. A new emphasis was placed on creating an adequate ‘public realm’ along the street, with plenty of room for street trees and wide public sidewalks.

The proposed urban zones follow the previous example of the UMU-2 revisions. They will incorporate common design elements from the special area plans, and will update and standardize the approach to regulating those elements. Those common design

elements include: the use of build-to lines rather than front setbacks; location of parking to the side or rear of buildings; no minimum parking or reduced parking requirements; building entrances that face the street; minimum glazing on building fronts; and minimum building articulation. Some of the special area plans also include detailed architectural standards, but those will not be included within the urban zones. The following special area plans will be removed from the code:

- College Park
  - University Heights
  - Traditional City
  - Southeast Gainesville Renaissance Initiative (SEGRI)
  - SW 13<sup>th</sup> Street
  - Central Corridors
  - Corporate Park
  - NW 39<sup>th</sup> Avenue
- **Creation of new urban zones.** Ten new zoning districts will be created with the proposed revisions to the Land Development Code. These districts are based on the concept of form-based zoning and the ‘transect’.


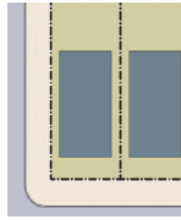
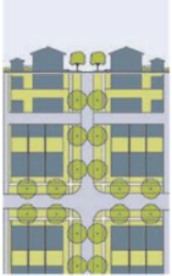
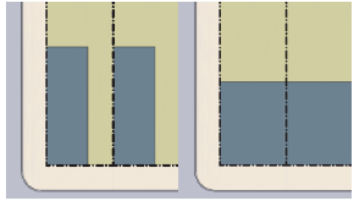


Figure 1: Transect example

The transect describes the transition of character within the city from suburban to urban. In the same way, zoning should identify the different characteristics (both existing and potential) within different parts of a city. The existing special area plans within the code are actually form-based zoning, and the proposed new urban zones will simply replace those plans with a more unified approach. Form-based zoning districts are usually distinguished by the following:

- Less focus on separation of land uses (screening, buffering, large setbacks)
- More focus on the physical form of development (site layout and building design)
- Emphasis on design of the streetscape (landscaping, sidewalks, building frontage)

The new urban zones include limits on density and intensity, setbacks, and other dimensional standards, but they also address urban design principles such as building and parking location, building orientation, building articulation, and design of the streetscape. The proposed zones are not as detailed as some form-based zoning districts might be. They do not prescribe building typologies, design of architectural components, or use of certain materials.

	ZONE DESCRIPTION	INTENDED	Figure 2: Urban Zones 1-5
	<b>Urban Zone 1</b> Consists of predominantly low to medium density residential areas, adjacent to higher intensity zones where neighborhood services and mixed use are permitted.	 <p style="text-align: center;"><i>Edge</i></p>	the center of the lot with setbacks on all sides. The front yard is intended to be visually continuous with the yards of adjacent buildings.
	<b>Urban Zones 2 - 5</b> Consists of a wide range of residential building types. Higher number zones provide for the integration of offices and neighborhood services within an increasingly urban fabric. Setbacks and landscaping are variable. Streets with curbs and sidewalks define medium-sized blocks.	 <p style="text-align: center;"><i>Side</i>      <i>Front</i></p>	Buildings typically occupy one side of the lot leaving a setback to the other side to allow for access or privacy. In many instances, the building occupies the entire lot frontage. A shallow frontage setback defines a more urban condition.

The new urban zones are listed below, with brief snapshot descriptions of each. The complete descriptions and standards for these districts are included in Article IV of the proposed Land Development Code.

**Urban Zone 1 T-3** – 3 stories; 8 units/acre residential density; allows single-family development and some civic uses

**Urban Zone 2 T-4R** – 3 stories; 15 units/acre residential density; allows single-family, attached dwellings, small-scale multiple family, and some civic uses

**Urban Zone 3 T-4MF** – 3 stories; 20 units/acre residential density; allows single-family; attached dwellings. Multiple-family.

**Urban Zone 4 T-4OR** – 3 stories; 20 units/acre residential density; allows single-family, multiple-family, office, some civic uses, schools, and restaurants and personal services by special use permit

**Urban Zone 5 T-4RMU** – 4 stories; 75 unit/acre residential density; allows single-family, multiple-family; and very limited accessory office uses

**Urban Zone 6 T-4M1** – 4 stories (up to 5 with bonuses); 50 units/acre (60 with SUP); multiple-family, office, retail, restaurants, personal services, most civic uses

**Urban Zone 7 T-4C** – 4 stories (up to 6 with bonuses); 50 units/acre (60 with SUP); auto-oriented uses, office, retail, multi-family, personal services, restaurants

**Urban Zone 8 T-4M2** – 5 stories (up to 6 with bonuses); 60 units/acre (80 with SUP); multiple-family, office, retail, restaurants, personal services, auto-oriented

uses, light industrial, civic uses

**Urban Zone 9 T-5** – 6 stories (up to 8 with bonuses); 100 units/acre (125 with SUP); multiple-family, office, retail, restaurants, personal services, light industrial, civic

**Downtown T-6** – 12 stories (up to 14 with bonuses); 150 units/acre (175 with SUP); multiple-family, office, retail, restaurants, personal services, light industrial, civic

With the creation of the ten new urban zones, the following existing zoning districts will no longer be needed:

- RH-1: 8-43 units/acre residential high-density district
- RH-2: 8-100 units/acre residential high-density district
- CCD: Up to 150 units/acre central city district
- UMU-1: Up to 75 units/acre urban mixed use district
- UMU-2: Up to 100 units/acre urban mixed use district

These districts will be removed from the code, since the areas where they apply today will be covered by the urban zones under the proposed new zoning map (see related Petition PB-14-43 ZON).

- **Process improvements.** There are several process changes covered within the proposed code that are designed to reduce the time and expense required for review and approval, without sacrificing the end results. The most significant is that the Board of Adjustment will be eliminated, and its current roles will be assigned to the Development Review Board (DRB). This will mean that variances from setbacks for single-family homes will be considered by the DRB. This should be a natural transition, since the approval criteria for variances are similar to those for modifications for development plans, which the DRB currently reviews and approves.

Efforts have been made in the code to reduce the need for special use permits where they are not necessary, since this is an additional expense and review process for applicants. In some of these instances where special use permits are no longer required, specific standards have been included in the code that must be met in lieu of the more subjective special use permit criteria. For example, drive-through facilities will be regulated in terms of preferred site design and limitations on the number of lanes. When these specific standards are met, there is no reason to require the additional time, scrutiny and expense that is involved with a special use permit.

Within the urban zones, limited development modifications (Article III) will allow some flexibility for creative design while still providing a compensating public benefit through the provision of additional sidewalk area, landscaping, window glazing, etc. These modifications are similar to the various waivers and exceptions that may be granted within the special area plans today, but with a more consolidated approach to review and approval. Additional relief from the Land Development Code requirements would be reviewed as a variance under the proposed code pursuant to the variance review criteria.



Also within the urban zones, the size thresholds for board review for developments have been revised (Article III). The thresholds that rely on number of residential units or amount of building square footage will be replaced by a more qualitative approach to determining when board review is necessary. If all of the design and compatibility standards are met, then a development may proceed with an administrative approval. If there is a request to vary from the specific requirements of the code, then a board approval is required. The code specifies which modifications can be approved by staff and which will require a development to obtain a board approval.

- Simplified regulation of uses.** One major goal of the new code is to remove reliance on the Standard Industrial Classification (SIC) system of regulating uses, by grouping uses into broader categories and defining them within the Land Development Code. Currently, the regulation of uses in the City of Gainesville relies upon a separate SIC Manual from 1987. This manual is out of date and is unnecessarily complex in terms of identifying and classifying uses. The proposed code will group uses into categories, such as “retail sales” or “office”.

**Table V - 1: Permitted Uses within Transects.**

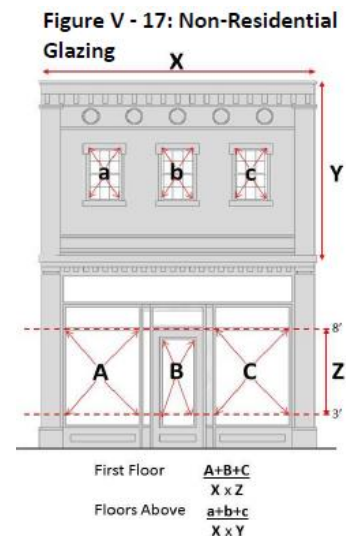
	Use Standards	U1	U2	U3	U4	U5	U6	U7	U8	U9	DT
<b>RESIDENTIAL</b>											
Single-family house		P	P	P	P	P	P	P	P	P	P
Attached dwellings (up to 6 attached units)		-	P	P	P	P	P	P	P	P	P
Multi-family, small-scale (2-4 units per building)		-	P	P	P	P	P	P	P	P	P
Multi-family dwelling		-	-	P	P	P	P	P	P	P	P
Accessory dwelling unit	30-5.33	-	P	P	P	P	P	P	P	-	-
Adult day care home	30-5.2	P	P	P	P	P	P	P	P	P	P
Community residential homes (up to 6 residents)	30-5.6	P	P	P	P	P	P	P	P	-	-
Community residential homes (more than 6 residents)	30-5.6	-	-	P	P	P	P	P	P	P	-
Dormitory (small)	30-5.8	-	P	P	P	P	P	P	P	P	P
Dormitory (large)	30-5.8	-	-	P	P	P	P	P	P	P	P
Family child care home	30-5.10	P	P	P	P	P	P	P	P	P	-

**Figure 3: Example of new use table**

Uses that are different in terms of potential impacts or compatibility are broken out from the larger category and regulated separately (e.g. “medical office”, which has a greater traffic impact and higher parking requirement than most other types of offices). This new approach will eliminate the need to cross-reference a separate document, will simplify the review process for zoning compliance and should reduce instances where a use is

inadvertently prohibited within a district. In addition, consolidated tables are included with the new code (Article IV) allowing a user to compare uses across multiple zoning districts.

- Standardized regulatory approaches.** Currently within the Land Development Code there are similar requirements that have slightly different approaches for regulation, and the new code will seek to standardize those. For example, in some cases the current code requires a minimum amount of glazing on buildings, but there are at least three different ways to measure the required percentage of glazing on a building face. Similarly, buildings are required to be placed at build-to lines in several different special area plans or zoning districts, but the build-to line is sometimes measured from the street curb and sometimes measured from the front property line. This leads to confusion between applicants, reviewers, and the public with regards to implementation of these standards.



- More clarity and flexibility for auto-oriented uses.** Currently, some auto-oriented uses are prohibited or restricted within the special area plans around downtown and the university with specific review and design criteria for these uses contained within the Comprehensive Plan. For example, gas stations are prohibited in College Park, University Heights, Traditional City and SEGRI special area plans, and are allowed but limited in size within Central Corridors. The new code proposes to relocate design standards from the Comprehensive Plan and incorporate them into Article V – Use Standards for these auto-oriented uses. This way all standards related to the design or scale of the use will be located in one place. Within some urban zones, certain auto-oriented uses will still be prohibited - gas stations are not permitted in the Downtown or Urban Zone 9 districts.

The code proposes replacing the existing special use permit approval process for drive-throughs and gas stations with 3 or fewer pumps (6 fueling positions) with specific design criteria intended to yield the preferred site design outlined in code. For larger scale gas stations with 4-6 pumps (8-12 fueling positions) a special use permit will continue to be a requirement to ensure the more intensive facility is fully compatible with the surrounding area. The proposed regulatory framework in the code will ensure that the review and approval process for these uses is more transparent, reduces reliance on special use permits, and ensures that they facilities are designed and scaled according to their context.

- Parking standards.** The proposed code preserves many of the existing parking provisions contained within the Special Area Plans. The parking requirements for scooter parking spaces have been expanded to respond to demand for scooter facilities within the urban area. The code provides additional flexibility by permitting the installation of public bike share facilities in lieu of providing a portion of the required bike spaces required by code and scooter spaces in lieu of motorcycle parking.

**Section 30-4.15. Parking Requirements.**

**A. Parking amounts.**

Transect	Min Vehicle Spaces		Min Bicycle Spaces		Min Scooter Spaces
	Nonresidential Use	Residential Use	Nonresidential Use	Residential Use	
DT	-	-	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	1 per 6 bedrooms
U9	-	-	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	1 per 6 bedrooms
U8	-	-	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	1 per 6 bedrooms
U7	-	1 per 3 bedrooms	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	1 per 6 bedrooms
U6	-	1 per 3 bedrooms	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	1 per 6 bedrooms
U5	-	1 per 3 bedrooms	1 per 2000 sq.ft. of GFA	1 per 3 bedrooms	-
U4	Per parking code				
U3					
U2					
U1					

- Development compatibility standard.** There are areas around downtown that are appropriate for higher density and intensity development, and this is reflected by the existing zoning and by the proposed new urban zones. At the same time, there are many nearby single-family neighborhoods and historic districts that should continue to be protected by the City's land use, zoning and development regulations. Therefore, compatibility between these neighborhoods and adjacent high-density and intensity development needs to be addressed within the new Land Development Code. One of the primary concerns from neighborhoods is the presence of much taller buildings adjacent to their one- or two-story single-family dwellings. The existing code includes a variety of compatibility provisions, but does not provide a standard approach to limiting building heights adjacent to single-family zoning or historic districts. The UMU-2 district does include a height limits map and standard that limits building heights where they are adjacent to the University Heights North or South Historic Districts. The new Land Development Code proposes a similar approach to building height compatibility, by restricting new development to a maximum of three or four stories in some areas where it is within 100' of single-family zoning or historic districts (see development compatibility provisions in Article IV).



**Figure 2: Height Compatibility Flat Roof Example**

Within the Power District, the maximum height is set at 3 stories where adjacent to the Southeast Historic District. The heights would then step back 15' each subsequent story up to the maximum height of 6 stories allowed within the Power District. The City Commission also included a maximum height of three stories within the Pleasant Street Historic District.

*C. Building height and massing.*

Within 100' of the Following Districts:	Max Building Height	
Single-Family Zoning	<div>3 stories and 36'</div> <ul style="list-style-type: none"><li>Measured to the roof peak with a hip, gable, mansard or similar roof where the 3<sup>rd</sup> floor is above the roof line, or</li><li>Measured to the top plate of the 3<sup>rd</sup> floor with a flat or similar roof.</li></ul>	Building facades shall not exceed 60' unless a substantial volume break is provided, such as a volume recess with a minimum 10' depth.
U1		
Historic District (except University Heights-South)		
University Heights-South Historic District	<div>4 stories and 60'</div> <ul style="list-style-type: none"><li>Measured to the top plate of the 4<sup>th</sup> floor.</li></ul>	
Within the Following Districts:	Max Building Height	
Pleasant Street Historic District	3 stories and 36'	
Power District	6 stories, but 3 stories when adjacent to residential zoning, with a step-back of 15' per additional building story up to max permitted.	

- Height bonus system.** The existing code allows for increases in building heights within some districts. The new code proposes to incentivize certain components of development through a bonus system, which will allow for additional stories (Article IV). The bonuses may be granted for the provision of usable open space, preservation of heritage trees, inclusion of structured parking in the development, provision of transit support facilities, provision of affordable housing, or with the voluntary undergrounding or relocation of

utility lines. This system will create a more equitable and predictable process for granting additional building height while creating additional public benefit and help meet the goals of the Comprehensive Plan.

Another benefit of this system is that it will provide a standard of measurement for allowing for height increases, rather than granting height bonuses on a case-by-case basis through the fairly subjective special use permit criteria. Height bonuses will not be permitted in locations where height compatibility restrictions apply.

- **Non-conforming uses.** Within the City, non-conforming uses exist today. The current code significantly limits the ability of non-conforming uses to make improvements to the property or buildings associated with that use.

Frequently these existing or

discontinued nonconforming uses are small stores or other traditional neighborhood retail uses that were rezoned to residential or multi-family as part of a citywide administrative zoning. In most cases, the existing zoning does not allow commercial uses and as a result these uses have been deemed nonconforming and are either “grandfathered” or in case of uses that were discontinued for a period of time, unable to continue. Additionally, structures like small stores or warehouses are being assessed as commercial buildings by the property appraiser and pay commercial utility rates despite the limitations on the use of the property.

In order to address this issue, the code includes a new process for reestablishing nonconforming uses to their previous operations through a publicly noticed hearing by

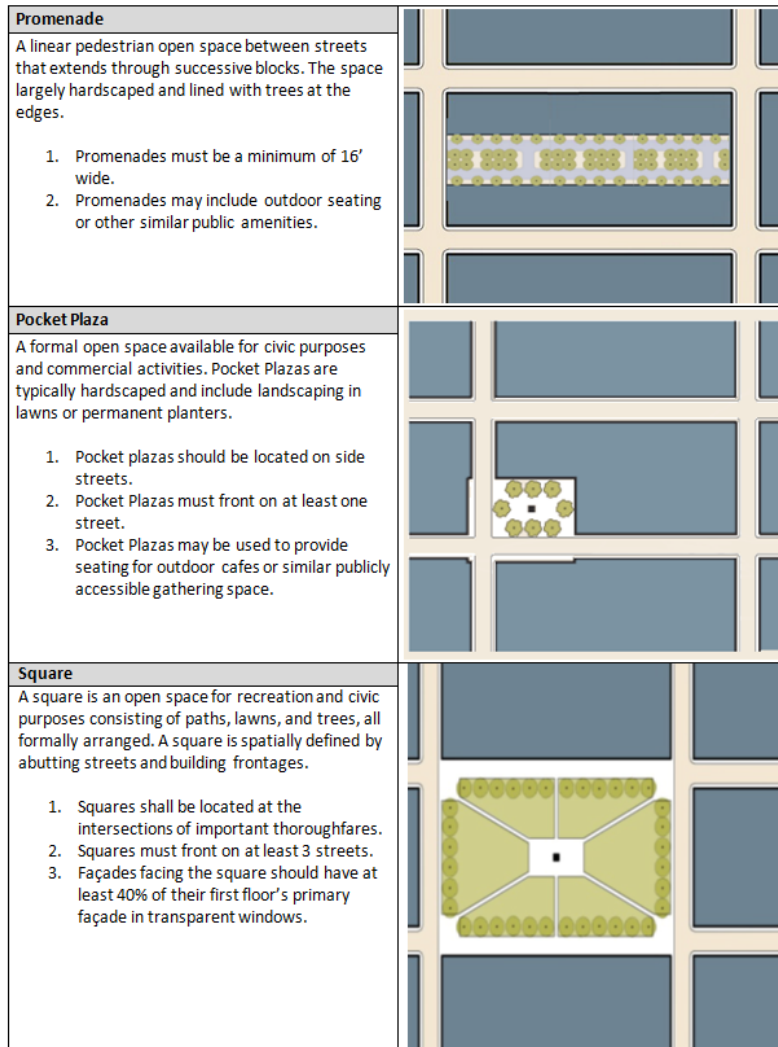


Figure 4: Examples of public open space

the appropriate reviewing board. Additionally, existing “grandfathered” uses will have more flexibility to make site and building improvements under the new code. Currently, these uses are limited to only making minor safety improvements. As a result of this policy, these uses can suffer from lack of investment.

- **Removal of redundant regulations.** Some requirements in the Land Development Code that are covered by other regulatory documents are proposed to be removed. For example, Section 30-338(5) in the existing Land Development Code specifies building separation requirements for different zoning districts, while the Florida Building Code has its own requirements for separation between buildings based on construction type and access and other considerations. The City of Gainesville Engineering, Design and Construction Manual, enforced by the Public Works Department, includes many technical criteria related to development. Therefore, some development standards (particularly for parking, access, and stormwater) have been removed from the proposed new code, since they are covered by the Engineering, Design and Construction Manual.

### **Impact on Affordable Housing**

The proposed text amendment will create several new zoning districts that will allow for relatively high-density residential and a mixture of housing types, which should increase opportunities to provide affordable housing wherever these new districts are applied. Additionally, new affordable housing provisions have been added to the proposed building height bonus system which are intended to help incentivize provision of affordable housing particularly within the urban core of the City.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'A. Persons', with a long horizontal flourish extending to the right.

Andrew Persons, AICP, LEED GA  
Planner IV