

MEMORANDUM

TO: City Planning Commission

November 13, 1987

FROM: Martin Overhiser, Planning Director
Glenn Bowles, City Planner **GB**

SUBJECT: **Analysis of the C1A/R, C2A/R, and C2B/R Zoning Districts
in the Downtown Area**

On September 22, 1987 at its regular meeting, the City Planning Commission tabled action on The Pizza House Rezoning and Site Plan so staff could complete an analysis of the "/R" zoning districts in the downtown area.

In response to the City Planning Commission request, staff inventoried all C1A/R, C2A/R, and C2B/R zoning districts in the downtown area and has researched the history of zoning in the downtown. The results of these investigations are detailed below.

INVENTORY

C1A/R

Seventy parcels are zoned C1A/R with only 15 located in the Downtown Development Authority (DDA)/parking exempt district. The 15 DDA parcels contain 76 dwelling units (4.6 percent of the DDA total), 110 parking spaces (1.0 percent of the DDA total), 2.83 acres (1.4 percent of the DDA land area), and 97,312 square feet of gross building floor area (0.8 percent of the DDA building area).

The entire C1A/R area contains 9.46 acres, 310 dwelling units, and over 313,200 square feet of gross floor area. Over twice as much C1A/R land area is found outside as is found inside the DDA district. The district is centered south of South University along Willard and in the Packard/State commercial concentration. Exclusive apartment or residential use is found in 47 of the 70 C1A/R parcels.

Forsythe Park at the corner of Packard and Arch Streets consists of three parcels containing a total of 0.303 acres is zoned C1A/R.

C2A/R

All of the 109 properties of the C2A/R zoning district are found within the DDA/parking exempt district. The properties contain 640 dwelling units (38.4 percent of the DDA total), 814 parking spaces (7.6 percent of the DDA total), 22.2 acres (11.1 percent of the DDA land area), and 1,351,700 square feet of gross building floor area (11.6 percent of the DDA building area). Five parcels containing 0.84 acres are in public use. They are Liberty Plaza, the AATA Transfer Station and the Kempf House.

When the average floor area ratio (total building floor area divided by the parcel size) for the entire DDA district is compared to the entire C2A/R zoning district (1.39:1.33), the C2A/R district is nearly five percent more

dense. Nearly 45 percent or 49 properties in the C2A/R zoning district are used exclusively for residential or apartment use. On occupied parcels, floor area ratios (FAR) range 10.97 and 10.76 for the Tower Plaza and Maynard House properties respectively to less than one, but average just less than two. The typical building contains two stories with an occupied basement.

C2B/R

Like the C2A/R, the C2B/R zoning district is contained completely within the DDA/parking exempt district. The 186 parcels contain 144 dwelling units (8.6 percent of the DDA total), 2,258 parking spaces (21.1 percent of the DDA total), 32.6 acres (16.3 percent of the DDA land area, and 1,348,300 square feet of gross building floor area (11.6 percent of the DDA total). The total C2B/R floor area ratio is 80 percent of the total DDA floor area ratio.

Thirteen parcels in the C2B/R zoning district are publicly-owned. However, five of them (Ashley Plaza and the Packard/Main properties) are proposed to be sold to a private interest for the development of downtown housing. The remaining eight parcels (Washtenaw County office buildings-3, Farmers' Market-2, the Fourth and Catherine parking lot and the Community Dental Clinic-2) contain 2.50 acres.

The inventory for all three zoning districts is attached. Parcel maps locating the various zoning districts and a zoning district map demonstrating the relationships with the surrounding zoning districts are also attached.

ZONING DISTRICT COMPARISONS

C1A/R

The C1A/R serves as a transition or buffer zone of use between the campus-oriented commercial concentrations along South University Avenue (between Washtenaw Avenue and East University) and the Packard-State intersection and the surrounding multiple-family dwelling districts.

Residential densities in the C1A/R for parcels with residential uses is 35.9 dwelling units per acre (du/ac). The density allowable for residential density in the C1A/R zoning district seems to be the R4C/D level of 75 du/ac.

The C1A/R residential density in the South University area (28.5 du/ac) is less than the Packard-State area (38.6 du/ac).

C2A/R

The C2A/R provides an area for high density residential development within the downtown core to encourage the orderly clustering and placement of high-rise housing between the two core commercial concentrations (South Main and South State Streets). Residential densities within the zoning district average 75.32 with a range of 622 du/ac in Tower Plaza to six du/ac for the apartments at 303 South Division Street, and are comparable to the R4C/D density of 75 du/ac referenced in the zoning regulations.

Six buildings exceed the maximum floor area ratio of 3 times the lot area without floor area premiums being provided. They are the Campus Inn, the Handicraft building, the Michigan Bell building, Tower Plaza, the 350 Thompson Street apartments, and the Maynard House. Only the Campus Inn and Tower Plaza provide any pedestrian plaza space.

C2B/R

The C2B/R serves as a buffer or transition in density and use between the downtown commercial core and the surrounding residential neighborhoods to the west and north by allowing higher floor area ratios in exchange for residential use. The district allows highway-oriented uses such as vehicle sales and service uses that were operating at the time of passage in 1966. Several old corner gasoline service stations and car dealerships in the commercial core area along Huron Street are now zoned C2B/R. The zoning district contains fewer residential units at a lower density than the other two downtown residential zoning districts, but contains a greater percentage of parking spaces. The C2A/R and the C2B/R contain nearly equivalent floor area, but the latter has a lower average floor area.

Only the retail/office buildings at 209 and 221 North Main Street, Tally Hall (Liberty Square) and the Danish News building exceed the maximum 3.00 FAR without providing premiums. Tally Hall provides an inner atrium but does not exceed the maximum 6.00 FAR.

Residential densities for C2B/R parcels with residential use average 28.37 du/ac with a range of over 60 in the Bilakos Block to five per acre for the residence at 415 North Main Street. The actual residential density of the zoning district is well above the 20 du/ac referenced in the C2B/R zoning regulations.

Difference Between the Downtown Commercial and the Commercial/Residential Zoning Districts

The following chart compares the six downtown zoning districts.

	<u>Maximum FAR</u>		<u>Setbacks</u>			<u>Maximum Height</u>	<u>Minimum Gross Lot Size/ Width</u>	<u>Maximum Residential Density</u>	<u>Minimum Residential Lot Size/ Width</u>
	<u>Without Premiums</u>	<u>With Premiums</u>	<u>Front</u>	<u>Window Wall</u>	<u>Abutting Residential</u>				
C1A	200%	400%	0	X	Yes	None	None	75 du/ac (unclear)	14,000 sqft/120 ft
C1A/R	300%	600%	10 ft*	X	Yes	None	None	75 du/ac (unclear)	14,000 sqft/120 ft
C2A	400%	600%	0	X	Yes	None	None	75 du/ac (R4C/D)	14,000 sqft/120 ft
C2A/R	300%	600%	10 ft*	X	Yes	None	None	75 du/ac (R4C/D)	14,000 sqft/120 ft
C2B	200%	200%	40 ft		Yes	60 ft	4,000 sqft/ 40 ft	20 du/ac (R4C)	8,500 sqft/60 ft
C2B/R	300%	600%	40 ft*	X	Yes	None	None	20 du/ac (R4C)	8,500 sqft/60 ft

- * When a building containing any residential use does not exceed five stories in height, the total square footage of the front, rear, and side yards shall not be less than 30 percent of the lot area.

As an inducement for new housing in the downtown, potential FARs were generally increased in exchange for an increased front yard setback. The C2A/R does not increase FARs over the C2A. All other aspects of the zoning districts including window wall setbacks, maximum heights, minimum lot size and width and residential density. The C2B/R eliminates the minimum gross lot size and width requirements. The original intent of the /R regulations was to provide incentives to provide amenities enhancing property values, provide greater public open space, and add to the quality of the general appearance of the downtown core.

HISTORIC BACKGROUND

Ann Arbor's first zoning ordinance was adopted by a 9-4 vote by the Common Council on September 4, 1923. The vote was changed to 12-1 after the zoning map was amended to change the zoning on the west side of North State Street between Huron and Ann Streets from "C" (Commercial) to "B" (Residential). The ordinance established four use districts within the City: "A" (Single-Family) Residential, "B" (Duplex and Rooming House) Residential, "C" Commercial, and "D" Industrial. The Ordinance was a classical pyramid arrangement with "A" uses allowed in all districts; "B" uses allowed in B, C and D; "C" allowed on in C and D; and "D" allowed only in its own district. The Ordinance was established for the public interest, health, comfort, convenience, preservation of the public peace, safety, morals, order, and public welfare of the City under the police powers of the City.

Between 1923 and 1930, the ordinance was amended seven times. Four of the changes being mapping amendments. Most were a more precise recognition of existing uses, but these amendments point out that an ambiguity existed 64 years ago concerning the ultimate activity allowed in the northwest portion of the DDA district. As has been pointed out in the 1987 version of the Downtown Plan, the ambiguity and debate continues today. Attached are a copy of the original ordinance and map illustrating use district changes between 1923 and 1929. All of the use district changes were in the downtown or directly adjacent to the district in this period.

In 1929, the first of a series of major revisions to the text of the ordinance were adopted by the Common Council. Several definitional amendments were made to the Code for "inner court", "height and length of court", "curb level", and the like that made the Ordinance more applicable to construction practices of the day and were probably reflective of the general experience of other cities in the country. For example, the concept of rear and side yard setbacks were introduced, as well as, height and residential density (dwelling units per square foot). No longer were the districts called "use" districts, but rather use, height and area districts. As the automobile became more common, different land uses were created to accommodate the motoring public. For example, no mention in 1923 of a gasoline or motor fuel filling station was made. In 1929 they were added.

The original use district map established three districts in the downtown. Residential "B" north of the South University frontage east of East University, the Community High block, the area north of Catherine west of Fourth, and the

Washington Street area east of Division. Commercial and Industrial "D" for Kerrytown and either side of the Ann Arbor Railroad tracks generally west of First Street and south of Packard extending to Ashley Street. The remaining parcels were zoned "C" Commercial except the University of Michigan Campus on the "Diag" block. In 1929, a local business use district was added so that what were shown as "C" along Chapin Street, the Brauer Building at Catherine and Fifth and South University Avenue, were changed to "C" Local Business and the former "C" Commercial district became the "D" Commercial district. The "D" district was found only in the downtown core area.

One should be aware that even into the mid-1930's, the Ann Arbor downtown was a manufacturing, wholesaling, and agricultural processing center for the general western Washtenaw County area. The concept of large modern grocery and department stores was only in its infancy. Most people bought fresh vegetables, used a blacksmith to make minor repairs, and still made most of their own clothes. Mail ordering was very popular. Kerrytown was a laundry and light manufacturing area. The downtown did not become a strong retailing center until the late 1940's.

Between September 1932 and January 1955, the number of use, height and area districts in the downtown area was expanded from four to nine by including a second local business district, two residential districts, and another industrial district. Motels were defined as well as self-service laundries, and junkyards. The Depression had its effects on land uses too. More people were doubling up in existing dwelling units. More types of higher density housing had to be defined. Junkyards were becoming a local concern and finally became regulated through the use, height, and area ordinance. Provisions for requiring off-street parking within certain districts were added to the ordinance in 1953.

Between 1932 and 1939, very few mapping or text amendments were passed. More significantly though during this time was the first official establishment of the Planning Commission which met for the first time on July 25, 1938. The Common Council had made the appointments on June 6, 1938. An early attempt to establish a planning commission had not been successful. Previously, the Common Council had handled all map and text amendments itself. A Board of Appeals was established in 1923 to hear any appeals of the decision of the Building Inspector. City Engineering processed all petitions since there was no Building Inspector. On June 3, 1939, the first City Planning Department employee was hired. Harold Spoden, a part-time draftsman, was retained to make mapping changes.

Between 1939 and 1956, nearly 30 amendments to the map and text of the Ordinance were approved. The attached map illustrates the map amendments and the attached time line plots the text amendments.

By the early 1960's (see the attached map), a downtown zoning district arrangement had evolved boundaries that closely follow the present zoning and DDA district boundaries. Two high-rise buildings were constructed in the early 1960's which radically changed the philosophy of the Zoning Ordinance. As a direct reaction to the University Towers, the Maynard House, and plans for the

Tower Plaza, the City commissioned the landscape architectural firm of Johnson, Johnson and Roy, Inc. of Ann Arbor to develop recommendations concerning high-rise development and parking for the Ann Arbor downtown. The resulting Central City High-Rise and Parking report was instrumental in making sweeping changes to the Zoning Ordinance in regard to floor area ratios, parking exemptions, and the placement of high-rise buildings in the downtown core area.

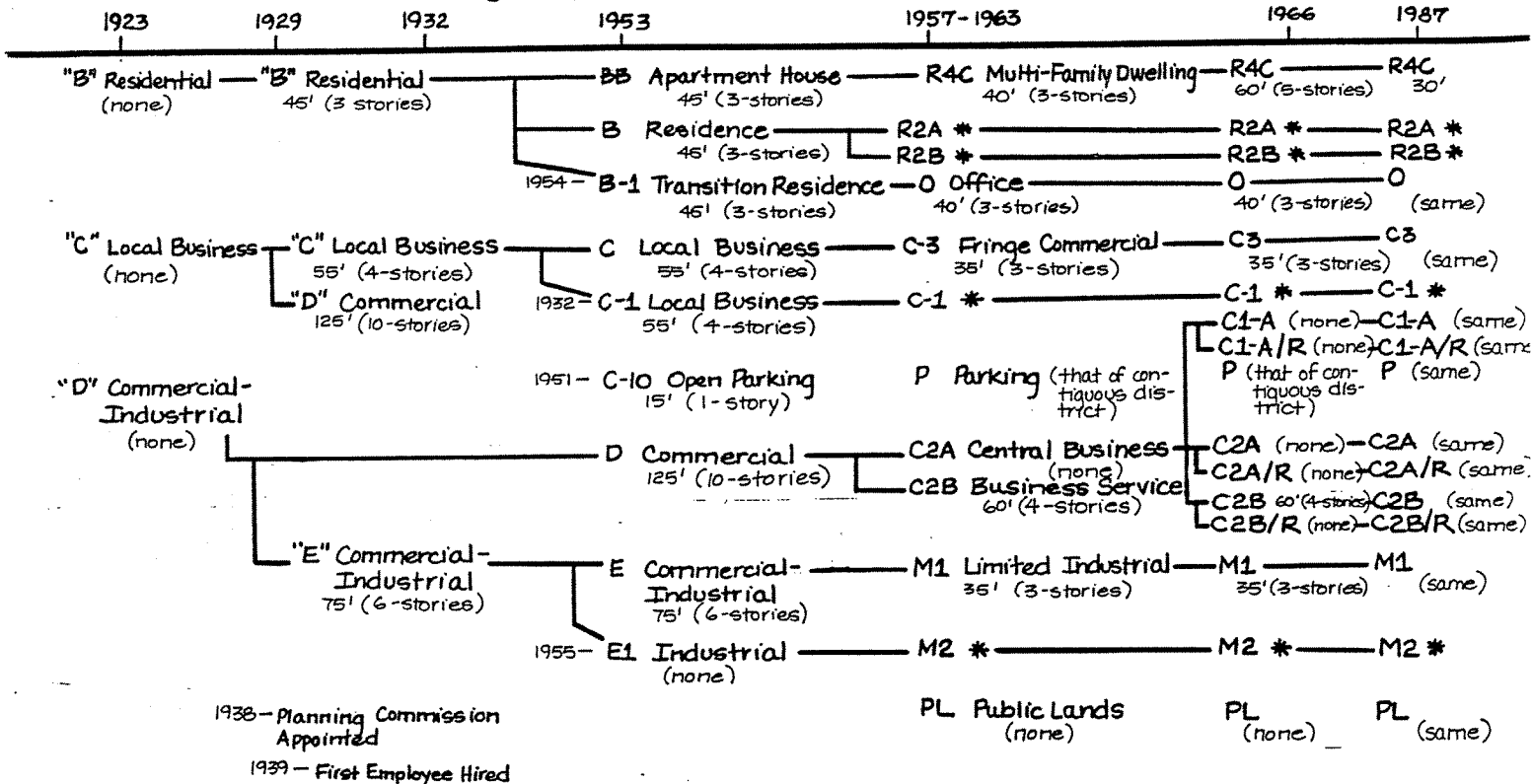
Before this effort, the City had amended its Zoning Ordinance on January 14, 1963 which codified the Ordinance and added a table of contents, an index and reference maps in the same document. This was the culmination of a seven-year effort to overhaul the entire Zoning Ordinance.

In order to better understand the intent of the complete revision to the Zoning Ordinance in 1963 and the reaction to the new downtown regulations which culminated with substantiate revisions being adopted in 1966, a graphic description of the changes in types and number of downtown zoning districts and their regulation of height, setback and density is displayed below.

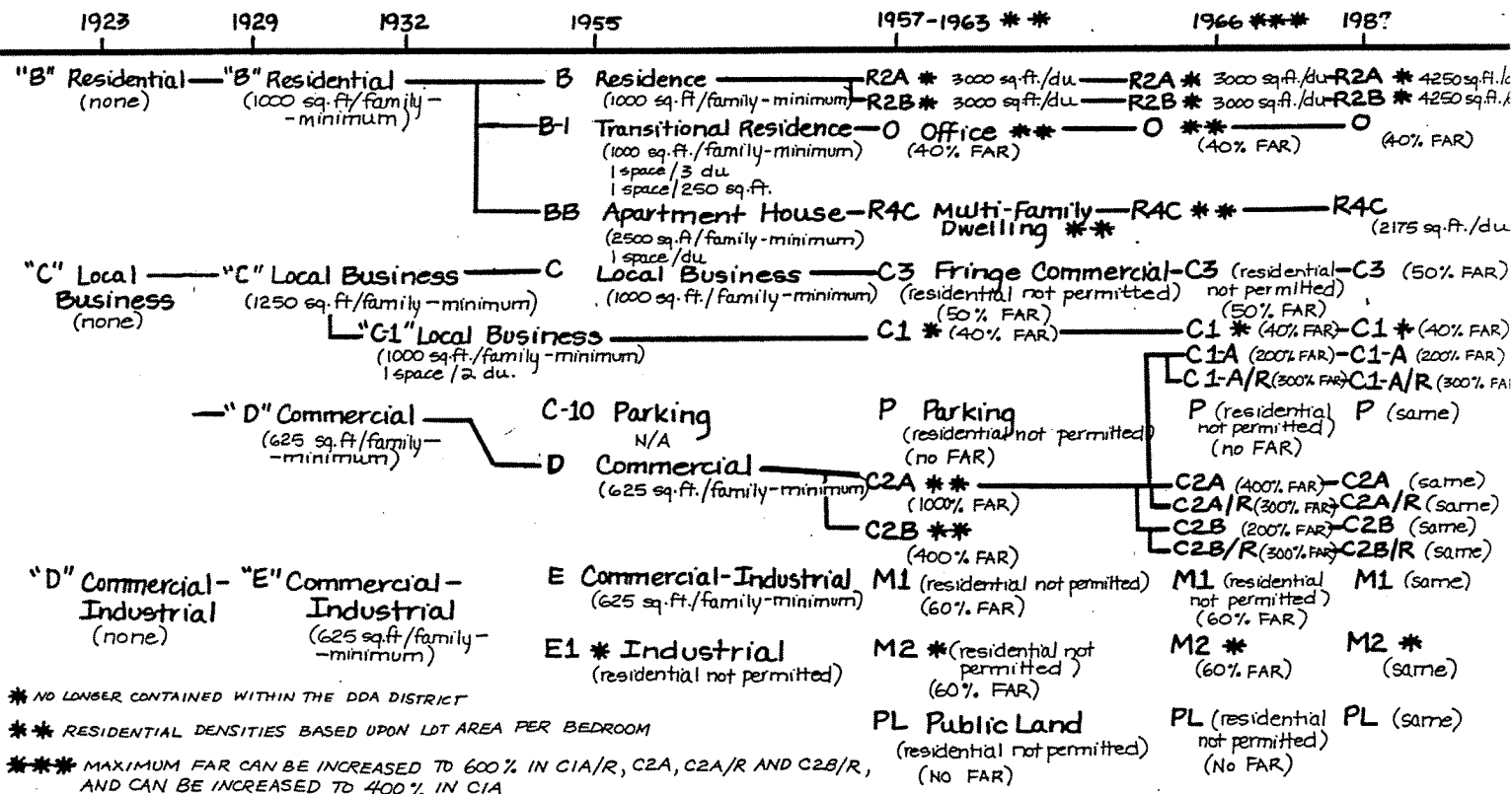
DOWNTOWN ZONING			FRONT SETBACKS			
1923	1929	1932	1957-1963	1963	1966	1987
"B" Residential (25 feet)	"B" Residential (inner/outer court)		B Residence (25 feet)	R2A * R2B *	R2A * R2B *	R2A * R2B *
			B-1 Transitional Residence (25 feet)	O Office (25 feet)	O (25 feet)	O (same)
			BB Apartment House (25 feet)	R4C Multi-Family Dwelling (15 feet)	R4C (15 feet)	R4C (25 feet)
"C" Local Business (10 feet)	"C" Local Business (inner/outer court)		C (inner/outer court)	C3 Fringe Commercial (40 feet)	C3-4 (0 feet)	C3 (same)
	C-1 Local Business		C-1 (inner/outer court)	C-1 *	C1 * C1-A (none) C1-A/R (10 feet)	C-1 * C1-A (same) C1-A/R (same)
	"D" Commercial (inner/outer court)		C-10 Parking (none)	P Parking (none)	P (none)	P (same)
			D Commercial (inner/outer court)	C2A (none)	C2A (none)	C2A (same)
				C2B (none)	C2A/R (10 feet)	C2A/R (same)
"D" Commercial- Industrial (none)	"E" Commercial- Industrial (inner/outer court)		E Commercial-Industrial (inner/outer court)	M1 (30% up to 40%)	C2B (20 feet) C2B/R (10 feet)	C2B (40 feet) C2B/R (40 feet)
			E1 * Industrial (25 % of frontage)	M2 *	M1 (30% up to 40%)	M1 (same)
				PL Public Land (none)	M2 * PL (none)	M2 * PL (same)

* NO LONGER CONTAINED WITHIN THE DOWNTOWN DEVELOPMENT AUTHORITY DISTRICT

BUILDING HEIGHT



DENSITY



* NO LONGER CONTAINED WITHIN THE DDA DISTRICT

** RESIDENTIAL DENSITIES BASED UPON LOT AREA PER BEDROOM

*** MAXIMUM FAR CAN BE INCREASED TO 600% IN C1A/R, C2A, C2A/R AND C2B/R, AND CAN BE INCREASED TO 400% IN C1A

The 1957 to 1963 Ordinance revisions establish the basic Ordinance text and format that is used today. The existing zoning maps are derived from this effort. This last generation of Ordinance first established the concept of Floor Area Ratio and modified parking requirements in the zoning ordinance that were first added in 1953. The 1963 Ordinance was also unique in that it digressed from the historic use of pyramid zoning by not allowing residential use in the fringe commercial (C3), parking (P), public lands (PL), and the industrial (M) zoning districts. Public lands were first segregated from other zoning districts at this time. The adoption of the 1963 Zoning Ordinance corresponded closely to the publication of "A Guide to Action - The Ann Arbor Central Area" in December, 1962.

A second downtown study was commissioned in 1965 as a "continuing refinement and implementation of A Guide to Action." The Central City High-Rise and Parking, recommendations served as the basis for the downtown zoning revisions adopted in 1966. The joint committee formed to evaluate the condition of downtown zoning regulations felt that more precise standards and parking exemptions were needed. The Ordinance revisions:

- 1) Established the concept of floor area premiums. In exchange for pedestrian-oriented plazas and atriums, the developer is allowed to exceed the established FAR maximums. It is interesting to note that the original concept of the roof plaza premium was for a plaza on top of a parking structure where the "surface area is designed to provide usable space and landscape elements for the building occupants and an interesting surface viewable from surrounding buildings."
- 2) Rezoned the South University retail area from C2A (Central Business District) to C1A (Local Business District) so that the area could more properly relate to its physical surroundings.
- 3) Created new residential districts in the downtown to provide general areas for high density residential development and to encourage the orderly clustering and placement of high-rise housing with commercial on the first two floors. Essentially portions of the two downtown commercial districts (C2A and C2B) and the newly-proposed C1A would be given the residential designation /R. Residential use was proposed to be then eliminated from the standard downtown commercial zoning district (C1A, C2A, and C2B). However, residential use was never removed by right from the downtown.

The /R downtown residential districts would require a ten-foot front yard. To encourage residential development in the /R districts, increases in FAR were provided.

- 4) Window wall setbacks were established above the second floor where windows are required by building code.
- 5) Land use was exempted from the provisions of Chapter 59 (Off-Street Parking Ordinance) except for residential use. Different parking exempt zones were established within the downtown area, each with slightly differing degrees of exemption.

This third generation of downtown zoning regulations seemed to be a direct reaction to the construction of the Maynard House in 1962, to University Towers built in 1965 and plans developing for Tower Plaza built from 1967 to 1969.

Many existing non-residential buildings were made nonconforming as a result of the 1966 Ordinance revisions in the newly-created C1A/R, C2A/R, and C2B/R zoning districts. Because of this, Section 5:88 was added to allow existing non-residential uses or structures, or the abutting site of expansion to be registered as a development of record. Essentially, the City recognized the nonconformity and allowed it to exist indefinitely. The attached map plots each of the developments of record in the downtown /R zones.

Several other amendments revised the Zoning Ordinance text since January 10, 1966. The revisions that directly affect the Downtown districts are:

- a) August 14, 1967 - established window wall setbacks in the C1A/R, C2A, C2A/R and C2B/R zoning districts.
- b) October 30, 1967 - set minimum front yard setbacks in the P (Parking District).
- c) July 15, 1968 - technical text amendment providing a direct reference from Schedule of Area, height and Placement Regulations to Section 5:67.
- d) January 20, 1969 - Technical adjustment to window wall provisions.
- e) March 16, 1970 - Revisions to definitions of street, structure, lot, usable open space, distance between buildings, removed residential uses as permitted uses in the O (Office District), removed the provision that the P (Parking District) may act as a buffer between residential and commercial or industrial uses.
- f) November 15, 1971 - the official copy of the Zoning Ordinance, certified by the City Clerk, shall be kept in the Planning Department. R4C/D added as a principle permitted use in the C2A/R, C2B and C2B/R zoning districts.
- g) September 8, 1980 - revised permitted uses in all districts and established the existing multiple-family dwelling densities.
- h) August 3, 1981 - established a 40-foot front yard setback for the C2B and C2B/R districts and 75-foot front and rear setbacks and a 50-foot side setback in the P district.
- i) March 4, 1985 - technical amendment that allows a building setback based on the average setback of nearby buildings in the C2B and C2B/R districts and residential uses in the C2B/R districts must comply with the R4C area, height, placement and density regulations.

j) July, 1987 - revision to the parking ordinance.

CONCLUSIONS

C1A/R

Derived from the C2A (Core Commercial District), the C1A/R attempts to form a transition between the South University Campus commercial and the surrounding multiple-family neighborhood. The district also seems to recognize the existence of office and retail uses in a few of the structures and the future need to expand retail floor area in the South University area. The perceived issues in the C1A/R are:

- 1) The relationship of the ten-foot front setback requirement and the transition between campus commercial and the R4C multiple-family dwelling district.
- 2) Several (four buildings) are exempted from the front yard setback requirements and effectively cut the C1A/R South University area in two.
- 3) Is there a need to extend retail uses to Willard Street?
- 4) Is there a need for front yard setbacks?
- 5) The ensurance of residential use in new developments.
- 6) The confusion in the dual use of FAR and dwelling units per acre in limiting development density.
- 7) The marketing of new residential buildings would require on-site parking, yet none is legally required if premiums are not exceeded.
- 8) Several tax parcels are used exclusively for parking.
- 9) Forsythe Park at the corner of Arch and Packard is zoned C1A/R.
- 10) Residential density in the C1A/R is 38 du/acre.
- 11) Illegal front yard parking is widespread.

C2A/R

Development of Record registration in 1966 effectively rezoned 30 percent of the C2A/R zoning district back to C2A. There does not seem to be an incentive to use the C2A/R district to develop high-rise housing because of the front yard setback and lower premium FAR requirements. The Huron Street corridor is intended to be a high intensity development corridor according to the proposed Downtown Plan and the adopted Downtown Conservation and Development Strategy. However, an interface with the Perry School R4C neighborhood to the south and the fact that several buildings to the north in the Old Fourth Ward and Division Street Historical District are located in the C2A/R district must be taken into account.

The simultaneous application of the FAR and dwelling units per acre density regulations is confusing. The average housing density in the C2A/R district area is 75 du/acre, that of the maximum density in the R4C/D (Downtown Multiple-Family Housing District).

As with the C1A/R district, parking is the exclusive use on many single parcels not zoned P (Parking District) and several public land parcels are not zoned PL (Public Land District). Illegal front yard parking is an issue along Division and Thompson Streets.

C2B/R

Again, several publicly-owned parcels are not zoned PL and nine parcels with parking as its exclusive use are not zoned P. The C2B/R district was established as a transition between the C2A core commercial and the surrounding R4C multiple-family neighborhoods and accommodate many formerly-existing highway-oriented uses such as car dealerships and car repair and service stations. All of these uses have disappeared from the downtown core.

The Development of Record exempted nearly a third of the C2B/R land area and nearly one-half of the building floor area. Section 5:61(4) make the Development of Record contradictory and confusing in the C2B/R district. The 40-foot setback requirement is excessive in the downtown area.

Furthermore, the use of both dwelling units per acre and the FAR to control density can be confusing. The residential density in the C2B/R district is 28 du/ac (R4D maximum density is 25 du/ac). R4C/D and R4D front yard setback (25 feet) and minimum lot size are not compatible with the downtown situation.

PROPOSALS

C1A/R

For the City Planning Commission immediate consideration, staff would recommend that the C1A (Campus Commercial District) boundary be extended to include all parcels on the west side of Church Street within the Downtown Development Authority district. This would include 618 (The Pizza House), 620, and 624 Church Street.

Furthermore, 621 Church Street and all the Developments of Record should also be zoned C1A as should Bell's Pizza at 716 Packard Street. Forsythe park should be zoned PL.

All C1A/R-zoned property along Willard, Forest, Church and East University should be zoned R4C/D (Downtown Multiple-Family Dwelling District) to better serve as a transition in density between the downtown and the R4C-zoned neighborhood. Front yard setbacks required should be revised to allow an averaging of existing setbacks within the block face and minimum lot sizes should be lowered to 5,800 square feet. Parking regulations should be more strictly administered. This would bring most of the properties into compliance and would not allow any significant expansion of residential densities because of the existing dwelling unit per acre density and 1.5 spaces per unit parking regulations. This higher density residential zoning change would be offered in exchange for no commercial or office expansion in the existing residential structures. The existing office use in 621 Forest can continue as a home occupation and the mall (824 square feet) restaurant at 627 East University could continue as a nonconforming use.

The C1A/R does still make sense along Washtenaw Avenue where the setbacks should be maintained as an entry corridor into the downtown and the University of Michigan Central Campus.

Other residential uses zoned C1A/R in the Packard/State area should be zoned R4C/D with the understanding that front setback regulations will be revised to allow averaging and the minimum lot area be reduced to 5,800 square feet. The properties with predominately commercial or office use should be rezoned to C1B.

C2A/R

This district does not seem to serve the original purpose for which it was intended. All Development of Record-registered properties and all other non-residential and non-public parcels should be rezoned to C2A (Core Commercial District). This would include the Maynard House block, Tower Plaza, and the Huron, Washington and Liberty Streets frontages. The block bounded by Liberty, Division, Thompson and William needs to be studied in detail to establish a future land use policy. All City-owned parcels presently zoned C2A/R should be rezoned to PL.

All William and all Division and Thompson Streets frontage south of Liberty Street not already mentioned should be rezoned to R4C/D that will more closely reflect existing use and densities and will not increase residential densities. This will affect a density transition from the downtown core into the Perry School R4C neighborhood.

C2B/R

All C2B/R-zoned parcels east of North Fifth Street and South of Ann Street should be rezoned to C2A (Core Commercial) because the former uses established and the present uses are no longer in use. All publicly-owned parcels presently zoned C2B/R should be rezoned to PL.

Because of the contradictory nature and confusion involved with the Development of Record in the C2B/R district, the balance of the district should be rezoned back to C2B with the exception of the Kingsley frontage east of North Main Street to R4D.

The existing C2B downtown zoning district front yard setback should be revised to allow an averaging of the block face not to exceed 25 feet.

GB/jsj/m

Attachments: Zoning Ordinance of 1923
Zoning Ordinance of 1929
Zoning Ordinance of 1932
Map of Use District Changes Between 1923 and 1966
Time Line of Text Amendments to Zoning Ordinance
Land Use Maps for Each "/R" Zoning District - 11/87
Spreadsheet Inventory for Each "/R" Zoning District - 11/87
Map of Residentially-Zoned Properties (/R)
Map of Development of Record Parcels in the Downtown - 11/87