

TOWN CENTER LAND USE PLANNING AND ZONING ISSUE IDENTIFICATION

While a market study can help identify the *demand* for different land uses and in what amounts, physical and regulatory barriers may hinder the private market's ability to *supply* these uses and structures. Public intervention should help remove these barriers before attempting to fill the private sector's role in developing and providing these uses.

The public sector should remain aware of its role in developing and maintaining support for development in the public realm—such as road and utility infrastructure and civic spaces (to be explored elsewhere in this process). Such public investments provide limited returns if no one addresses these barriers and issues.

The issues identified fall into two sections:

- A. Physical Constraints
- B. Regulatory Barriers

A. Physical issues confining redevelopment opportunities in the town center:

Summary

The physical issues confining redevelopment relate to land ownership and development patterns. Such patterns emerge over time as property owners develop and redevelop land to meet changing market conditions, technologies, and land use preferences. Where land remains underutilized or completely vacant, several barriers to redevelopment may be the cause.

Issues

- Remnant parcels of small or irregular shape hinder land assembly and redevelopment.
 - CSX retains ownership of the land under the old spur off the Baltimore & Ohio rail line that ran across Grant Avenue to the old mill (now Mill Street Market). Despite the land's vacancy and absence of rail, it continues to bisect parcels in this area (see figure A.1.)

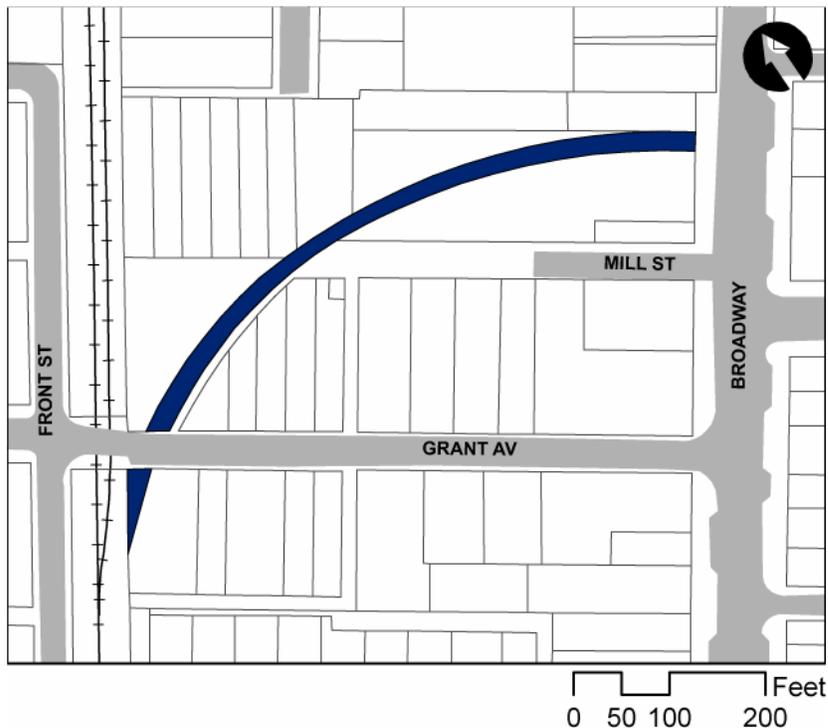


Figure A.1. The CSX parcel is only 0.2 vacant acres, but affects the use and development of surrounding parcels. Data source: Franklin County Auditor.

- William Foster Breck’s original plat of Grove City, dating back to 1852, south/east of Broadway (a.k.a. Harrisburg Pike and Ohio 3C Highway) originally oriented quarter-acre parcels along Park and Columbus Streets (see figure A.2.). Alleys grouped these parcels into one-acre squares (presumably to allow for convenient access to stables).



Figure A.2. The original plat of Grove City delineated long quarter-acre lots fronting Columbus and Park Streets.

Parcel owners re-subdivided the four blocks along Broadway to have the shorter, front lot line oriented to that commercial thoroughfare. While logical, this has left odd shaped and sized parcels along First Street (originally Alley No. 1) and Broadway-fronting lots with a variety of suboptimal, private rear access conditions. (See figure A.3.)

Grove City improved the alleys, making streets such as First Street, Cleveland Avenue, Jackson Street, and Civic Place, and leaving the original lots with inefficient double frontages. Some owners in the one-acre blocks took advantage of the new frontages to subdivide lots again. (Again, see figure A.3.)



Figure A.3. Property owners have subdivided lots within the original plat. Data source: Franklin County Auditor.

- Parcels with physical limitations (i.e. floodplain, real or perceived environmental contamination) discourage new investment and limit the range of development possibilities.
 - According to the preliminary DFIRM (Digital Flood Insurance Rate Maps) published by the Federal Emergency Management Agency (FEMA), six parcels in the study area along Cleveland Avenue between Broadway and Arbutus Avenue contain some portion of the 100-year floodplain. The 100-year floodplain covers the land to be inundated by a flood with a one percent chance of being equaled or exceeded in magnitude during a given year. Only two buildings are partly within the floodplain. This is an expansion of the floodplain, which did not include these buildings or parcels on the 1995 Flood Insurance Rate Maps (FIRM). (See figure A.4)

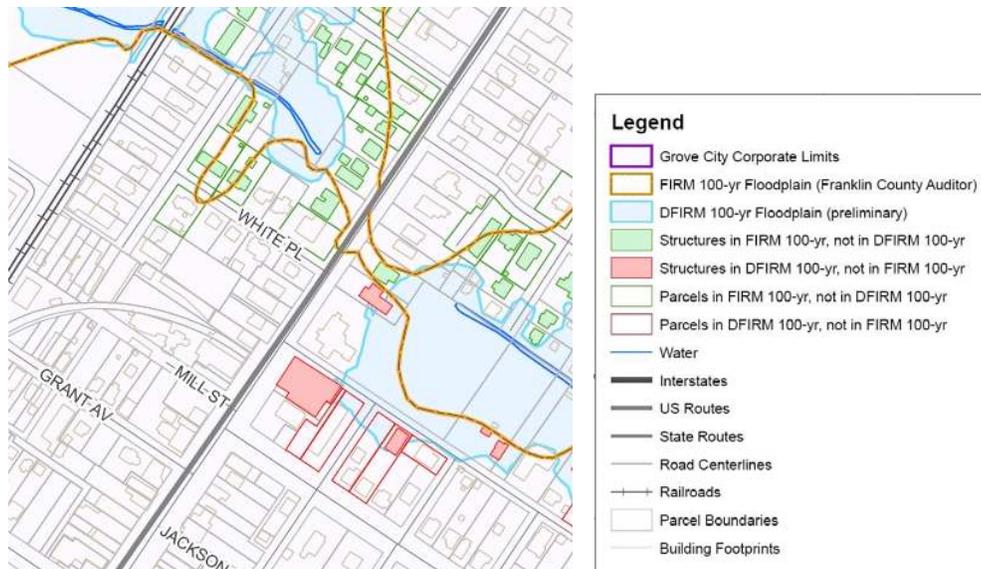


Figure A.4. The boundaries of the 100-year floodplain are about to change along the northern edge of the study area. Source: EMH&T/City of Grove City

- Short of individual Environmental Site Assessments (ESA), such as those done to ASTM (American Society for Testing and Materials) standards, one can make few substantive determinations about environmental contamination. These unknowns alone can inhibit redevelopment.

For example, the 1931 Sanborn Maps show filling stations at the southwest corner of Grove City Road and Broadway, the northwest corner of Park Street and Broadway, and the northeast corner of Columbus Street and Broadway. Filling stations may or may not indicate the presence of underground tanks. The city participated in the remediation and redevelopment of two of these locations, leaving only the former station at Columbus and Broadway with an auto-oriented use (see figure A.5). Existing development on these parcels appears to avoid old underground tank locations.

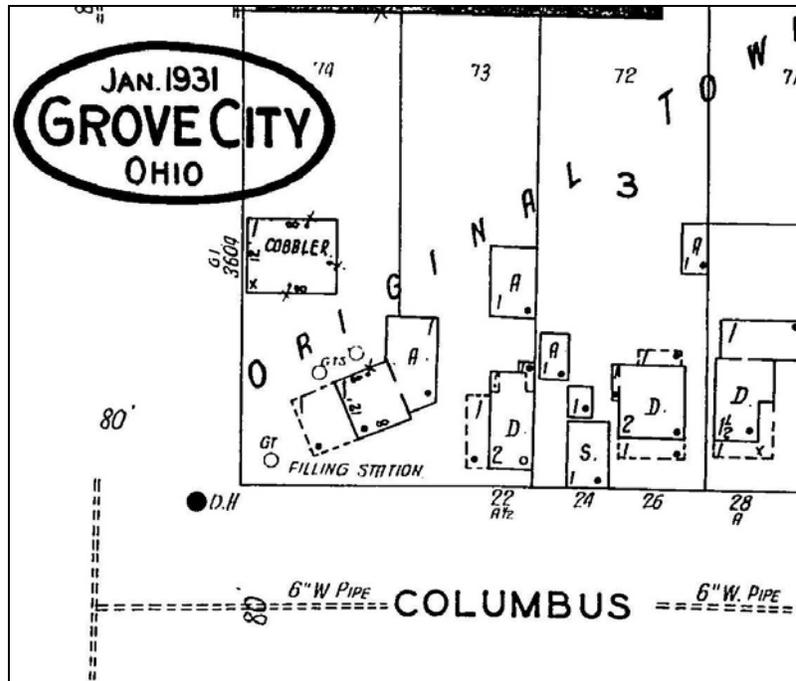


Figure A.5. One of three filling stations in the study area, as it was in 1931, occupied the northeast corner of Columbus and Broadway. Source: Sanborn Map Company, 1931

Former uses in the industrial zoning districts along the railroad tracks may also cause environmental contamination concern. cursory evidence from the historical Sanborn maps (1922 and 1931), originally compiled to help calculate fire insurance rates, suggests that uses in these periods took advantage of proximity to rail for delivery, storage, and wholesaling of various goods.

- In general, structures (and other property improvements) of economic value may become functionally obsolete as business practices and technologies change. For example, in the town center, the primary method of transporting certain goods and materials moved from rail to road, changing the role and value of structures along the railroad tracks. Even absent environmental contamination, certain structures or site layouts can become a liability if physical, regulatory, or financial barriers prevent the adaptation of these liabilities into new assets.
- Parcels held in reserve (by corporations, institutions, or governments) can not only inhibit development on said parcels, but also on other adjacent or proximal parcels by altering real estate market pricing and/or limiting area activity by holding these parcels vacant.
 - The City of Grove City controls 7.04 acres in the study area, not counting street/alley rights-of-way. That translates to 14.5% of the entire study area and 21.1% of the study area in parcels. The police department sits on 0.91 of those acres. City Hall sits on 1.19 acres. The old lumberyard is the largest holding at 2.42 acres. Grove City holds 0.82 acres as public parking for the town center businesses (not counting those associated with City Hall). 0.90 acres remain in reserve for ongoing facility needs.

Table A.1. Recent City Property Purchases

Formerly	Address	Acres
Huntington Bank	3378 Park Street	0.48
Bimco	3474-76 Park Street	0.42

- The library controls 1.60 acres on either side of Civic Place between First Street and Arbutus Avenue, adjacent to city holdings on First and Arbutus, outside the study area.

- Parcels held for speculation do not receive long-term capital improvements. Those in control of the property are not concerned with finding the highest and best use of their property. A use where rent or other revenue covers the carrying cost (taxes and maintenance) with minimal investment allows the owner to “bank” the property indefinitely—a wait-and-see approach.

There is no quantitative source of data to determine a real estate owner’s motives. A combination of maps and analyses may help.

- The improvement-to-land value (I/L) ratio is a rough indicator of underinvestment. If the building improvements on a parcel (total building value) are less than the land value ($I/L < 1$), then the parcel is likely underutilized. Figure A.6 maps this indicator. The lighter gray indicates an I/L ratio between 1 and 1.5.

Figure A.6. Improvement to Land Value Ratio (I/L)

Draft



Legend

Study Area

Building

Improvement to Land Value (I/L)

I/L = 0 (Vacant)

0 < I/L <= 1 (Underutilized)

1 < I/L <= 1.5 (Near Underutilized)

0 75 150 300 Feet

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Physical issues noted above, as well as other regulatory issues may not be reflected in the auditor's land value assessment. Some parcels indicated as underutilized hold parking for other uses (see figure A.7)—a regulatory issue to be discussed elsewhere.

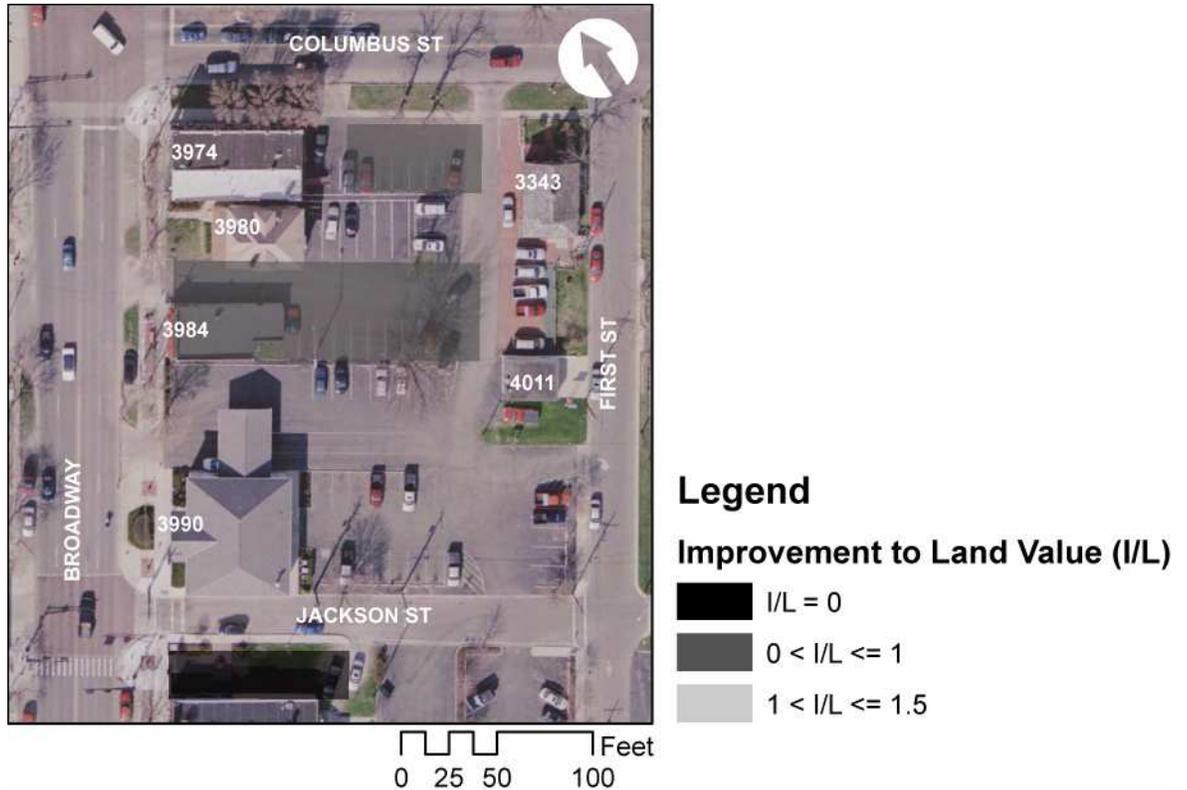


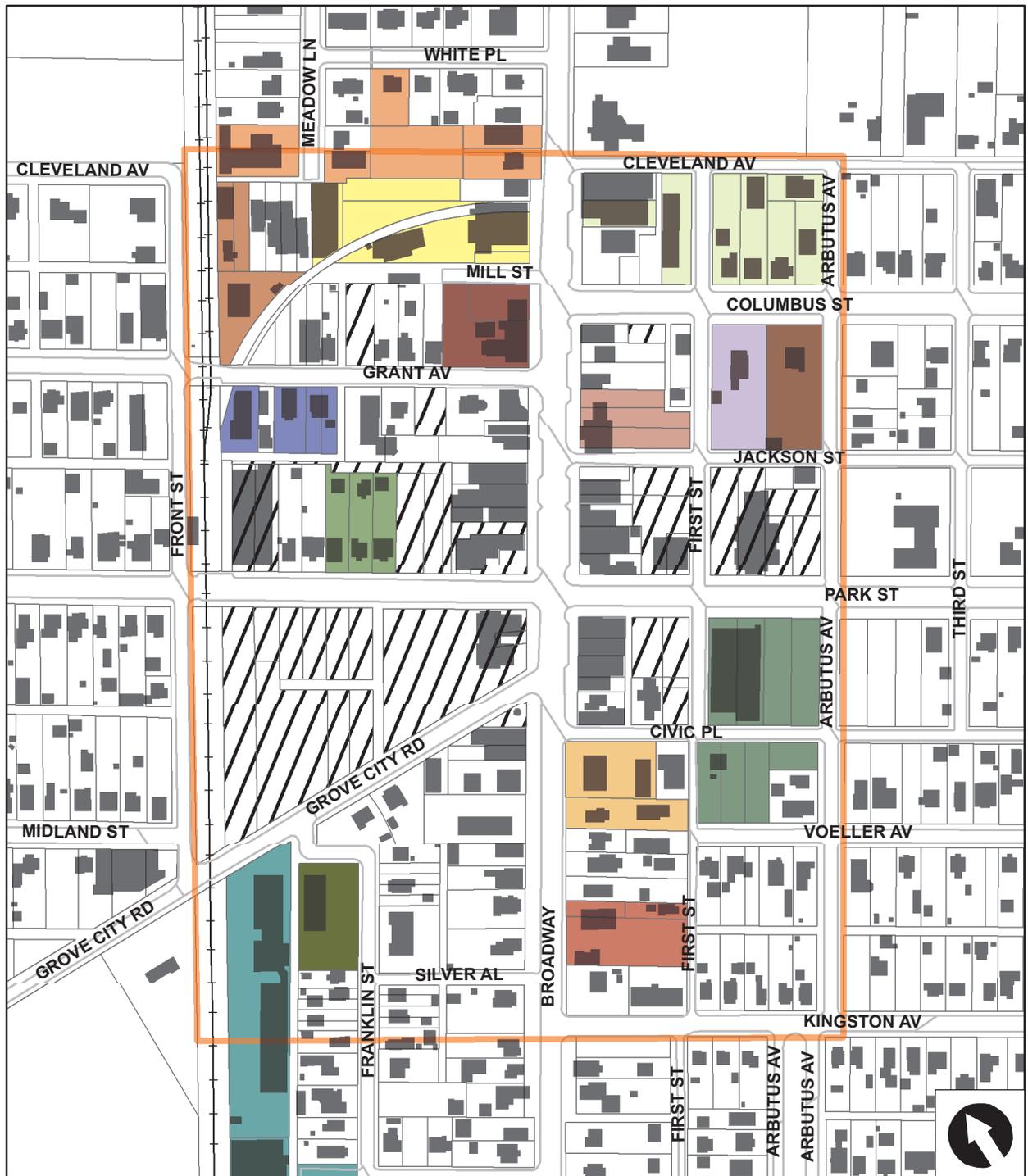
Figure A.7. One owner controls 3980 & 3984 Broadway, which may partially explain why the I/L ratio indicates the parcel as underutilized.

The land value of 3984 Broadway may exceed the building value, making the indicator show the parcel as underutilized. However, the property at 3980 enjoys some of the 3984 land value through the shared parking arrangement. Similarly, city controlled parcels used solely for public parking, such as the lot behind 3974 Broadway, lack major site improvements beyond pavement for parking cars, making the indicator show these parcels as underutilized. Businesses throughout the study area enjoy the value of this shared parking arrangement.

- Private land assembly can be a lengthy process. While attempting to assemble a holding large enough for a new project, existing uses and structures may not receive new investment or become underutilized. Again, intent is hard to determine. In the study area, 13 private landowners (11 non-residentially zoned) have assembled holdings greater than half an acre. Figure A.8 maps these parcels, along with those held by the city and the library.

Figure A.8. Large Landowners

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Legend

- | | | |
|------------------|--------------------------|------------|
| Buildings | D.G., R.G., B.G. (A) | Library |
| Study Area | D.G., R.G., B.G. (B) | City-Owned |
| L.J.A. | R.L.H. | |
| R.A.B. | B.L. or J.G.L. | |
| R.L.F. | Mill Street Market | |
| Fifth Third Bank | Peter Troost Monument Co | |
| R.T.G. | B.J.R. | |
| | K.M.S. | |
| | SWB LTD | |

0 75 150 300 Feet

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B. Regulatory issues confining redevelopment opportunities in the town center:

Summary

In general, the portions of the zoning code applicable in the town center:

- Narrow the options for adaptive new uses, including mixing of uses
- Make contextual form and lot coverage illegal or infeasible for new development through parking, yard, and lot coverage requirements
- May impact ongoing district vitality and role
- Contain conflicting regulatory layers with unclear purpose and intent

Issues

- Activity deadening and space-taking uses occupy the light industrial district (IND-1) along the railroad tracks (see figure B.1). Single- and two-family residential use non-conformities mix with warehouse and automotive service garages between the tracks and the commercial properties along Broadway. While of some economic value, these uses do not compliment the town center. Where proximity to the railroad track and former rail spur into the mill was an asset to industrial uses, other potential uses avoid the nuisance of noise and vibration.



Figure B.1. The light industrial district hosts activity deadening and space-taking uses with residential nonconformities.

Nuisance alone cannot explain the presence of these deadening and space-taking uses. They typically appear under the following conditions:¹

1. low concentrations of foot traffic
2. too little surrounding magnetism
3. no high-value competition for the space

The highest and best use for the area zoned IND-1 should take advantage of the foot traffic and magnetism generated by the town center commercial area along Broadway. However, the uses allowed in the IND-1 category exclude any of this potential high-value competition for the space, discouraging adaptive reuse and redevelopment.

Table B.1. Industries allowed in the Light Industry District (IND-1), §1135.09(b)(10)

Building Construction – General Contractors	Beverages
Construction Other Than Building Construction	Furniture and Fixtures
Construction – Special Trade Contractors	Printing, Publishing and Allied Industries
Courier Services, except by air	Professional, Scientific, and Controlling Instruments; Photographic and Optical Goods; Watches and Clocks
Public Warehousing and Storage	
Transportation Services	
Wholesale Trade	Miscellaneous Manufacturing Industries
Dairy Products	Dry Cleaning and Dyeing Plants
Bakery Products	Rug Cleaning and Repairing Plants
Candy and other Confectionery Products	Industrial Launderers
Chocolate and Cocoa Products	Research and Development, Physical and Biological: Commercial
Chewing Gum	
Salted Nuts and Seeds	Testing Laboratories

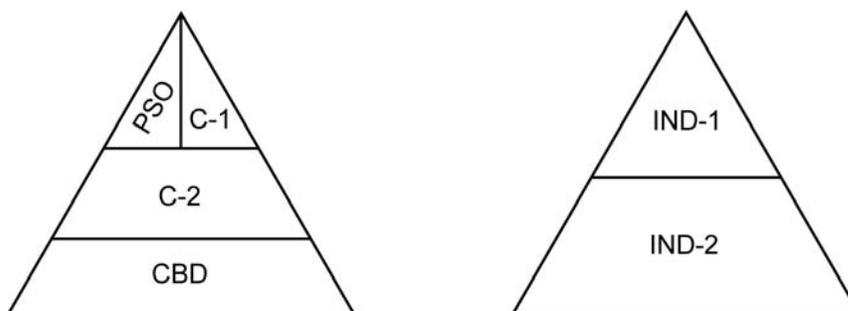


Figure B.2. Commercial and industrial zoning districts group uses into two cumulative/pyramid categories. Those below allow all the uses of the above categories (e.g. the uses listed in §1135.09(b)(10) for “Light Industry,” IND-1, are also allowed in the “Heavy Industry” category, IND-2).

Additionally, area requirements limit lot coverage (building floorplate as a percentage of lot area) in both IND-1 and IND-2 to 35 percent. Commercial districts allow 75 to 100 percent lot coverage.

The IND-2 (heavy industrial district) south of Grove City Road may suffer the same fate, though this zoning designation allows a broader range of uses by right.

¹ Jacobs, Jane. (1961). *The Death and Life of Great American Cities*, New York: Random House, p.231.

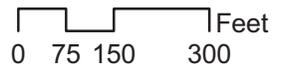
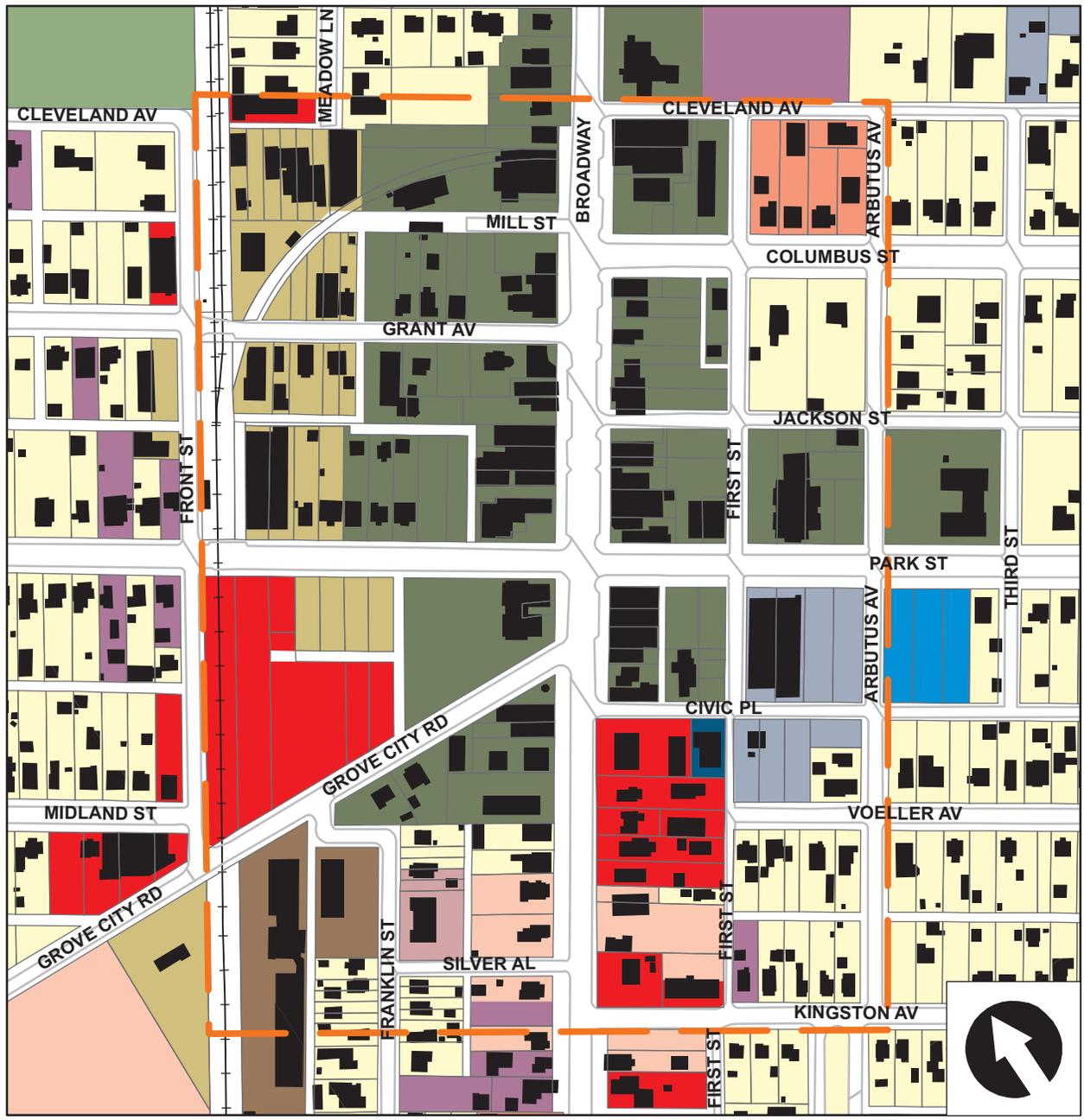
- Central Business District (CBD) zoning allows all uses allowed in the PSO (professional services), C-1 (service commercial), and C-2 (retail commercial) districts (see figure B.2). This district designation is only present in (or adjacent to) the study area (see figure B.3). Its boundaries roughly follow one of Grove City's community revitalization areas (CRA).

Despite this wide range of commercial uses, the same zoning regulations restrict mixing in residential—prescribing a limit of 50 percent of the building's floor area for residential uses. Additional regulations borrowed from the A-1 (apartment residential) district limit residential to eight dwelling units per acre.

Investors perceive this mix as risky because Fannie Mae (Federal National Mortgage Association) will not finance or back rental developments where more than 25 percent of the predicted rent will come from non-residential income.

Figure B.3. Study Area Zoning

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|------------|----------------------------------|-------------------------------|
| Study Area | Zoning | CBD Central Business District |
| Parcel | R-2 Single Family Residence | IND-1 Light Industry |
| Buildings | D-1 Double, Twin Singles, Duplex | IND-2 Heavy Industry |
| Roads | A-1 Multi Family | CF Community Facilities |
| Rail | PSO Professional Services | SD-1 Educational |
| | C-1 Service Commercial | SD-2 Service |
| | C-2 Retail Commercial | SD-3 Recreational |

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- The CBD allows for greater density through the zoning district’s generous area regulations. Required setbacks are not as deep; nominally, lot coverage (minus this setback) can reach 100 percent. Height restrictions are at 35 feet, like all other zoning districts (except OLR-Office Laboratory Research), but parking requirements will limit density, and thus height, in most cases.
 - Table B.2 compares some of Grove City’s parking requirements to the typical range of parking standards. In many cases, the requirements exceed the typical range.

Table B.2. Parking Requirements

Use	Standard ²		Grove City		Units
	Low	High	Low	High	
Retail	250	222.22	200*		sf/space
Office	2000	333.33	200*	150*	sf/space
Restaurant	200	40	50		sf/space
Industrial	2.78	0.63	3*	2	employees/space
Hotel	0.2	1.5	1		spaces/room
Residential (MF)	0.2	2	2.5*		spaces/DU

* - Parking requirement higher than standard generation factor range

Grove City exceeds even these typical standards, which are high relative to the town center setting. Parking standards are based on demand studies performed at single-use, suburban sites. These sites and demand studies do not reflect the geographic, demographic, and economic factors present in the town center that reduce parking demand.

- The average parking space takes up 320 to 350 square feet (sf), including the space itself, access, and circulation. Landscaping requirements, added for stormwater and aesthetic purposes, add to this total. For some commercial uses in Grove City that results in twice as much space for automobiles as for buildings.
- Table B.3 shows the nominal density restrictions in the zoning code for several of the commercial zoning districts represented in the study area. These restrictions are nominal, in name only, because on-site parking provision will reduce the floor-to-area ratio (FAR) possible.

While the code allows for off-site provision of parking spaces (§1135.12(c)), the burden of proof falls to the applicant. This may allow public parking to offset the total requirement. The code prescribes no standards by which the Planning Commission is to approve the off-site facilities (or track those counting public spaces against their requirement); it explicitly excludes on-street parking to meet the parking standards. Similarly, §1137.06 allows joint use of some parking facilities between day and night uses with administrative approval. Property owners with existing parking non-conformities have little incentive to lease/share parking with new construction or expansion anyway.

² Adapted from ULI--the Urban Land Institute and NPA--the National Parking Association. (2000). *The Dimensions of Parking*. Fourth Edition. Washington, D.C.: ULI--the Urban Land Institute.

Table B.3. Nominal Density Restrictions

District	Lot Coverage (percent)	Max. Building Height (stories)	Max. FAR (based on coverage & height)
PSO	75%	3	2.25
C-1, C-2	75%	3	2.25
CBD	100%	3	3

Table B.4 estimates the impact parking requirements can have on density. The calculations do not include setbacks (front and parking) or side yards, with a conservative estimate of 350 sf required per parking space. The estimate also assumes that all parking will take place on-site, at grade.

Table B.4. Example Density Restrictions from Parking Regulations

District	Stories			Estimated Max. FAR (based on parking requirement and height)			
	1	2	3	1	2	3	
	Retail/Office Parking Req. (sf/space)	Resulting	Max. Lot Coverage				
PSO	150	30.00%	19.35%	13.64%	0.30	0.39	0.41
C-1, C-2	200	36.36%	25.00%	17.91%	0.36	0.50	0.54
CBD	200	36.36%	25.00%	17.91%	0.36	0.50	0.54

Two or three floors may be cost inefficient for smaller lots and building footprints. Therefore the highest feasible floor-to-area ratio may be at one story, well below the kind of lot coverage that provides a typical town center context. Few large land assemblies in the study area will afford the economies of scale necessary to escape these conditions.

- Grove City’s zoning districts lack purpose or intent statements. The district regulations prescribe standards and other restrictions without describing the goal or goals of such regulations. In short, such purpose and intent statements explain the reasons for the regulations and can provide clear grounds for defensibility in the case of legal challenges.

Absent these explanations, one can surmise:

- Grove City’s code employs a use-based, Euclidean system of zoning categories (named after Euclid, Ohio, where zoning was first defended in the US Supreme Court). Organized around these separate uses, the zoning districts carry area, height, and performance regulations.
- Euclidean zoning’s basis is the separation of uses for the orderly development of large districts, with the presumption that use uniformity prevents nuisance conflicts. Grove City’s town center did not develop this way.

As figure B.1 previously showed, Grove City has exclusive but cumulative categories regulating and separating commercial and industrial uses. It has 11 residential district categories and another 8 exclusive categories regulating medical, office, educational, community, recreational, and other uses.

- Grove City's town center, plus much of the area in and around the study area, pre-dates the 1975 adoption of the zoning code and district categories (see figure B.4). Spot zoning, that is, granting a single parcel a use classification different from and inconsistent with the surrounding area, occurred on existing parcels to match the appropriate use designation—creating instant area and form non-conformities.

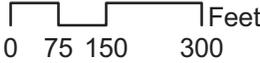
The zoning code regulates the ongoing use and/or expansion of these non-conformities, but wields little control over these parcels unless substantive redevelopment occurs. Figure B.5 illustrates the impact of such town center spot zoning on the yard and setback requirements for new development as an example. Even allowing for no side or rear yard setbacks within zoning districts (hypothetically possible if under common ownership and developed as one building, but unlikely), regulations restrict the building envelope. In some cases the restrictions would be so severe that the Board of Zoning Appeals (BZA) could grant an area variance for the hardship.

Note in figure B.5 that the CBD offers the most generous and uniform yard requirements (almost none at all), though the standard 50 foot setback off “the public road” centerline proves onerous when applied to all public roads.

Figure B.5 only shows one example. This spot zoning creates other area non-conformities, including parking and lot coverage. In short, developing a project in the town center that is contextual with the non-conformities is illegal. The regulations ignore reality; property owners must negotiate for their rights.

- When this spot zoning did not occur, other zoning district map decisions created use-based non-conformities that persist to this day, such as the residences in the light industrial district along the tracks (noted in figure B.1).

Figure B.4. Structures Pre-Date Zoning Code **Draft**

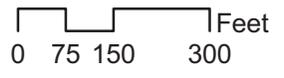
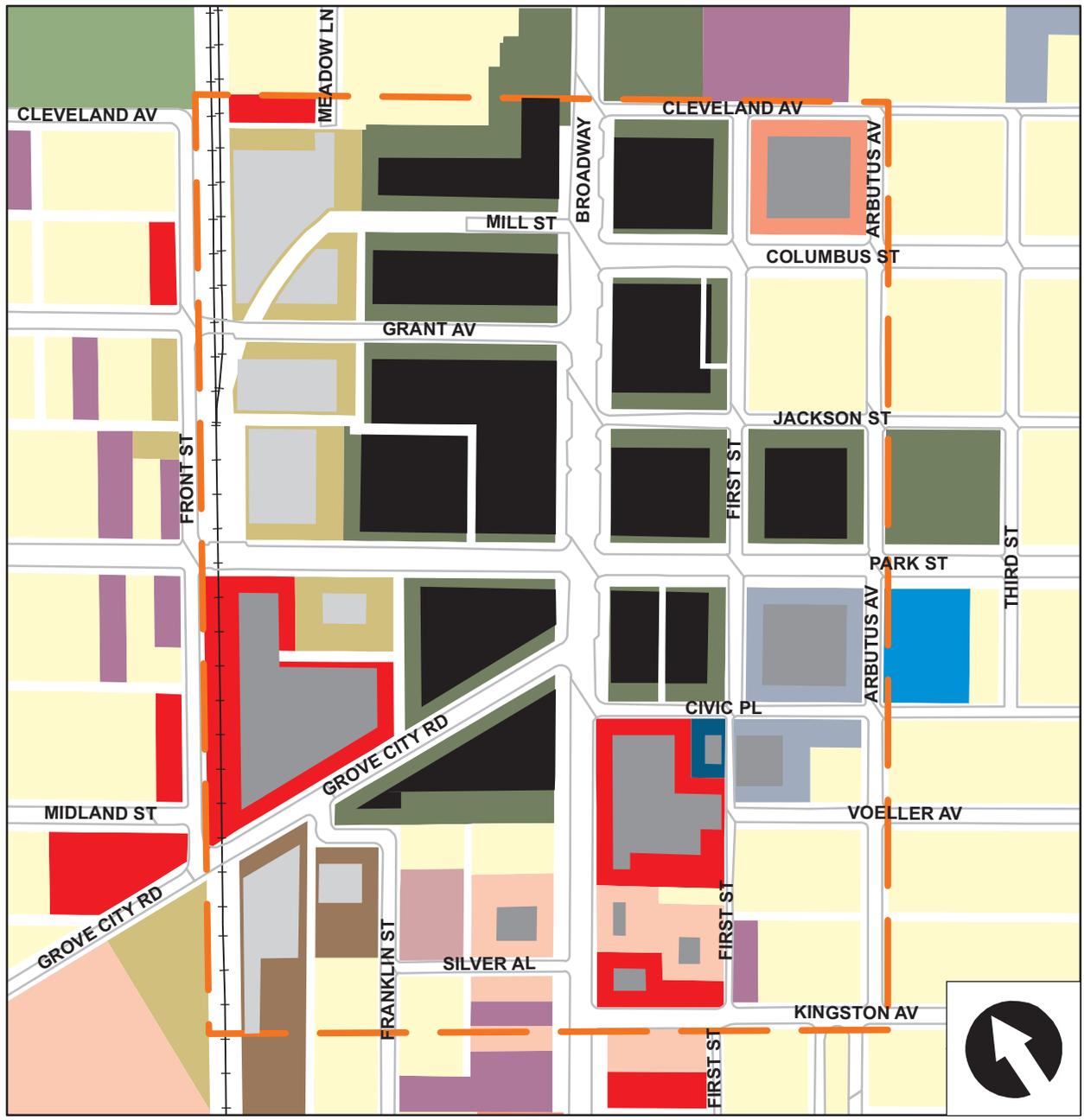


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- Buildings Pre-Date Zoning Code (1975)
- Built Since Zoning Code
- No Data

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Figure B.5. Max. Non-Res. Building Envelope **Draft**



Legend

Max. Building Envelope	Zoning	
Max. Lot Coverage		
35%	R-2 Single Family Residence	CBD Central Business District
75%	D-1 Double, Twin Singles, Duplex	IND-1 Light Industry
100%	A-1 Multi Family	IND-2 Heavy Industry
Study Area	PSO Professional Services	CF Community Facilities
Roads	C-1 Service Commercial	SD-1 Educational
Rail	C-2 Retail Commercial	SD-2 Service
		SD-3 Recreational

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- Small scale redevelopment and reinvestment remains restricted (as explained above). Private land assembly is lengthy and risky. Even with adequate market motivation, the study area may be frozen in place, unable to adapt to trends already restructuring our economy and lives.
 - The value of non-conformities (parking/area, use, structure, and landscaping) may exceed the replacement value, discouraging redevelopment. It may not make economic sense for a property owner to absorb the difference between the two through redevelopment. Table B.5 explores the possible trade off to meet additional lot coverage and parking requirements.

Table B.5. Redevelopment Tradeoff

Keep Existing	Replace
Assuming	Assuming
\$10 per sf per year revenue 2,300 sf 30 years 2% discount rate per year \$30,000 renovation investment	\$16 per sf per year revenue 1,200 sf 30 years 2% discount rate per year \$156,000 construction investment
Net Present Value (NPV)	NPV
\$475,606	\$268,639
Loss: \$475,606 - 268,639 = \$206,967	

- At face value, freezing a district in place does not sound bad. However, this is handicapping, not preservation. Preservation would require the town center either be subsidized like a museum, or be allowed to accommodate viable uses now and into the future. Without such an ongoing investment stream, the district may simply wear out. Such blind “preservation” keeps everything: bad or good, conforming or non-conforming, historical or not.
- The town center needs both new and old buildings to get the kind of diverse mix of uses and users that support ongoing district vitality and adaptability. As outlined by Jane Jacobs:³

New buildings:

- Require higher rents to cover the costs of new construction
- House well established, high turnover, standardized, and/or heavily subsidized operations

Old buildings:

- Can offer lower rents for fully amortized (paid for) buildings, for example
- Are the only affordable place for some ordinary and convenient enterprises
- Can house new ideas or business models (affordability reduces risk)

³ Jacobs, p.187-90.

- The Central Business District (CBD) zoning category and surrounding study area is not Grove City’s Central Business District.
 - Table B.6 and figure B.6 show that there is more commercially-zoned land within a half mile of the study area than there is in the study area.

Table B.6. General Zoning In and Near Study Area

Zoning	Study Area Acreage	Quarter-Mile Radius Acreage	Half-Mile Radius Acreage	Mile Radius Acreage
Residential	5.15	47.50	207.48	817.68
Commercial	<u>20.29</u>	31.17	<u>60.26</u>	136.37
Industrial	5.20	7.22	37.34	217.87
Other	1.75	4.76	101.11	361.20
Total	32.39	90.64	406.19	1,533.12

- There are few differences between the CBD and C-2 (Retail Commercial) zoning categories. Figure B.7 shows the competing commercial areas within Grove City. The area at Southwest Boulevard and Broadway falls within another Community Revitalization Area (CRA)—the same incentive that is in place for much of the CBD.
- Commercial zoning along Broadway, between the study area and Southwest Boulevard, directly competes with the town center. Formerly a residential corridor, PSO (professional services) and C-1 (service commercial) zoning has allowed housing unit conversion or replacement with commercial structures to occur on a piecemeal basis in direct conflict with the stated purpose of the Historic Preservation Area (HPA).

The Americans with Disabilities Act (ADA) and the provision of parking may prevent the complete conversion of this corridor to commercial uses, complicating the simple adaptation of a residential structure to a commercial use.

Additionally, lending practices complicate the sale of a single-family residence within a commercial zoning district because the use is non-conforming. Financing may be contingent on a rezoning.

Figures B.8 and B.9 show the land use and zoning of this corridor, respectively. Both maps indicate the parcels where these use-based non-conformities exist, as well as the parcels where dwellings now house commercial uses.

Figure B.6. Mile Context Zoning

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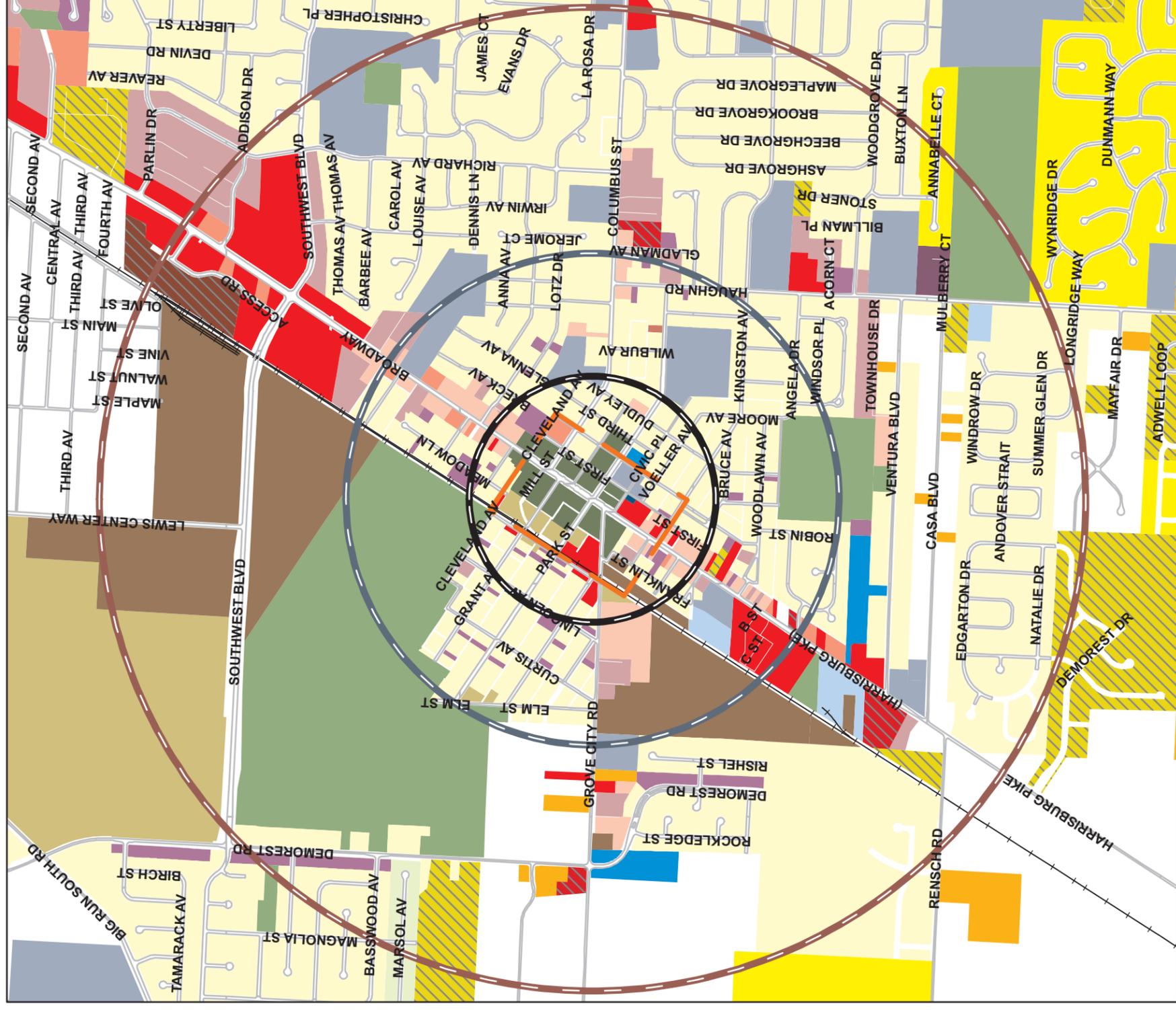
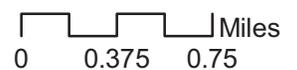
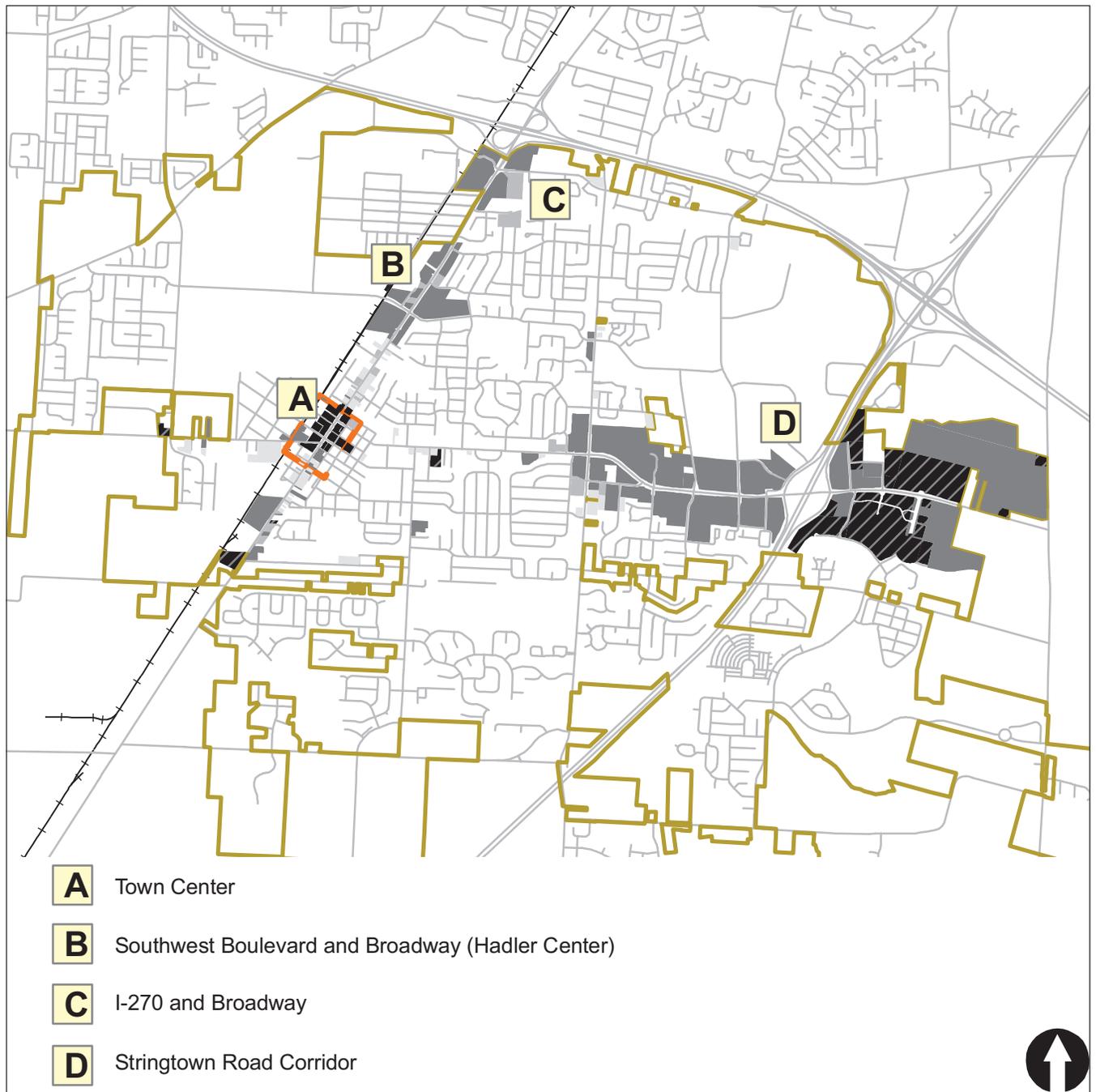


Figure B.7. Grove City Commercial Areas

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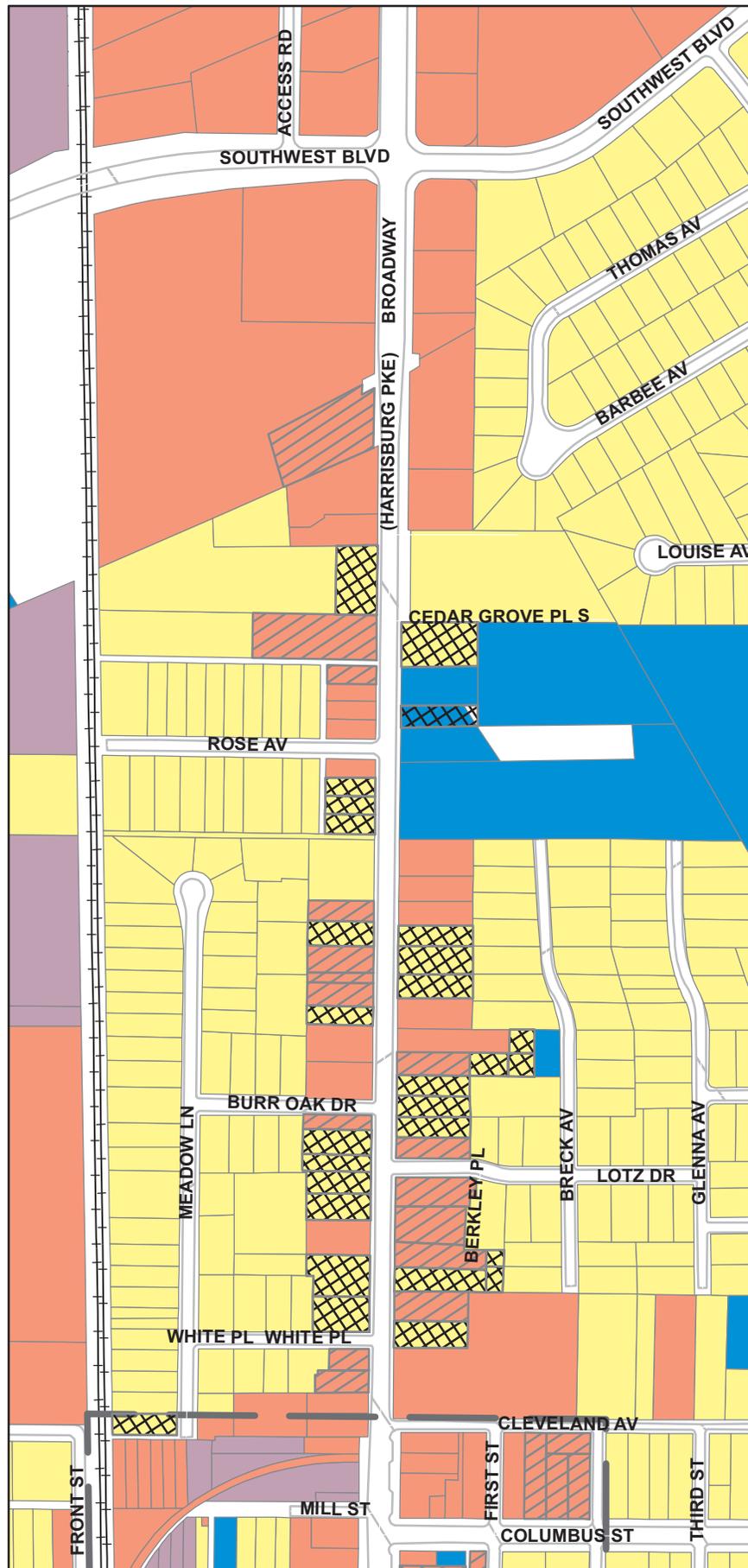


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- | | | | |
|--|-------------------------------|--|------------|
| | CBD Central Business District | | Grove City |
| | C-2 Retail Commercial | | Study Area |
| | C-1 Service Commercial | | Roads |
| | PSO Professional Services | | Rail |
| | PUD-C Planned Unit Dev. Comm. | | |

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Figure B.8. General Land Use Along Broadway



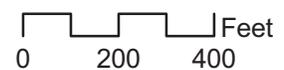
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-  Non-Comm. Use in Comm. Zone
-  Study Area
-  Dwelling used as Office/Retail

General Land Use

-  Residential
-  Commercial
-  Exempt
-  Industrial
-  Roads
-  Rail

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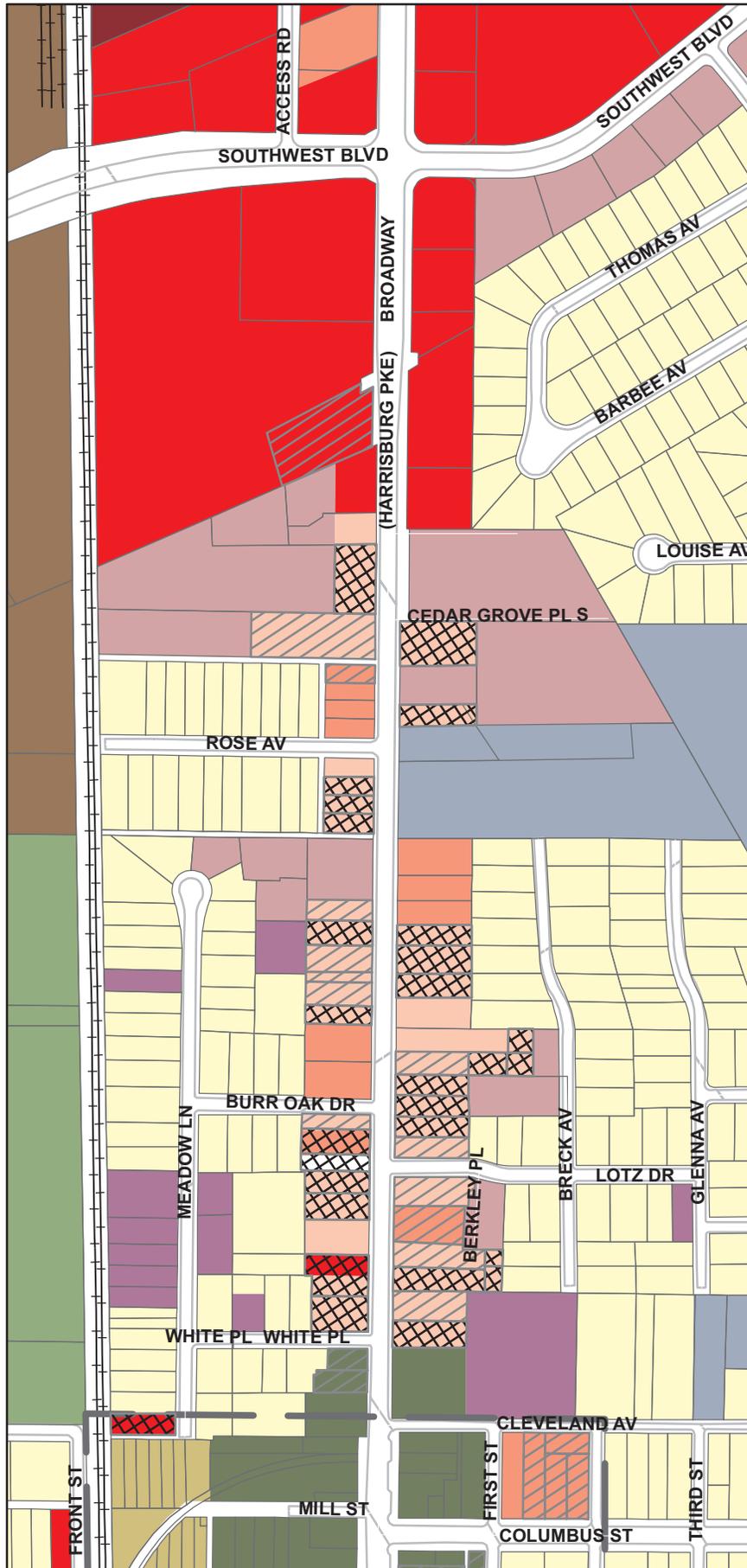
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Lincoln Street Studio
architects & planners

Figure B.9. Zoning Along Broadway

Draft



Legend

- Non-Comm. Use in Comm. Zone
- Study Area
- Dwelling used as Office/Retail
- Parcel
- Roads
- Rail

Zoning

- R-2 Single Family Residence
- D-1 Double, Twin Singles, Duplex
- A-1 Multi Family
- PSO Professional Services
- C-1 Service Commercial
- C-2 Retail Commercial
- CBD Central Business District
- IND-1 Light Industry
- IND-2 Heavy Industry
- PUD-I Planned Unit Dev. Ind.
- SD-1 Educational
- SD-3 Recreational



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April 7, 2008



- Similar to the situation along Broadway, north of the study area, there are other conflicts with the Historic Preservation Area’s (HPA) stated purpose. For example, the light industry zoning district along Park Street has non-conforming residences (across from City Hall and the old lumberyard site). This map designation suggests that the policy intent was to eventually see these parcels house a conforming, industrial use. In direct conflict, the HPA overlay intends to preserve these structures.

The HPA covers three corridors—Broadway, Park Street, and Columbus Street—not a unified district (see figure B.10). The purpose statement admits that it covers “various period structures,” but also references a singular “distinctive character” to protect (see §1138.01 of the zoning code). Because this character is not described, one cannot determine whether there are structures outside these corridors that share the character; there are certainly adjacent structures of the same periods missed in the boundary description.

Figure B.10. Historic Preservation Area

Draft



1 inch equals 0.125 miles

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