

**City of Cincinnati**

**DRAFT Application**

**U.S. Department of Housing and Urban Development  
Pathways to Removing Obstacles to Housing (PRO Housing)**

**DRAFT for Public Comment**

**September 27, 2024**

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**City of Cincinnati**  
**HUD PRO Housing Grant Application**

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**EXHIBIT A**  
**EXECUTIVE SUMMARY**  
**City of Cincinnati**

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## EXECUTIVE SUMMARY

The City of Cincinnati (City) is pleased to submit this Pathways to Removing Obstacles to Housing (Pro Housing) grant application to the U.S. Department of Housing and Urban Development (HUD). The proposed activities will strengthen existing efforts in the City of Cincinnati to remove barriers to affordable housing.

The City of Cincinnati's vision for this application is to address the racial and economic segregation in our community, driven in large part by a history of single-family zoning. This same issue has also driven an affordability crisis, as stand-alone single-family homes are the most expensive housing type to produce on a per unit basis and therefore are out of financial reach for a large portion of our residents. At one time in our City, small multi-unit residential properties were commonly developed and interspersed with single-family housing—providing a natural mix of affordability in any given neighborhood. However, due to a combination of government regulation and private market forces, this is no longer the case. Our strategy with this grant is to leverage zoning reform efforts by the City and to remove barriers for the private market to begin again producing this type of affordable “gentle density” housing product.

The City is proposing to utilize PRO Housing funds to support the following activities to address these barriers:

- **Design and Process Improvement for “Missing Middle Housing”:** The City will request for proposal (RFP) the contract for designing a duplex, a triplex, and a fourplex. After selecting the architect and design plans, the City will then own these blueprints and make them available to developers for free. The City will also develop a streamlined permitting process for these products.
- **Prototype Development:** The City will fund developers to implement these prototypes in the neighborhoods along the Connected Communities corridor, neighborhoods with acute affordable housing needs that have been identified through Connected Communities. These prototypes will be available to LMI renters and homebuyers, with some select market-rate units to cross-subsidize the LMI renters and homebuyers.
- **Increased Affordable Housing and Awareness:** Units that are constructed or rehabilitated will create wealth-building opportunities for low-to-moderate income individuals. The developed prototypes will provide “proof of concept” that these housing types can serve a vital role in the City of Cincinnati's efforts to address acute demand for affordable and market-rate housing, can build wealth for LMI homebuyers, and can also demonstrate to neighboring communities that these housing products can be incorporated into existing residential areas without disrupting the existing feel of the neighborhood.

The total project cost is \$2 million; the City will provide \$840,000 in leverage.

The City of Cincinnati's Office of Grant Administration will oversee the administration of this grant. Implementation of the proposed activities will be led by the Department of Community and Economic Development and the Department of City Planning and Engagement.

The City of Cincinnati appreciates HUD's consideration of this request for PRO Housing grant funding.

**EXHIBIT B**  
**THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS**  
**City of Cincinnati**

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## **THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS**

### **iii.d. Threshold Eligibility Requirements**

1. The City of Cincinnati does not have any outstanding charges, cause determinations, lawsuits, or letters of findings for civil rights matters listed in subparagraphs (1) – (5).
2. The City of Cincinnati’s application will be submitted in a timely manner.
3. The City of Cincinnati, as a unit of local government (02 City or Township Government), is an eligible applicant.
4. The City of Cincinnati is submitting only one application.

### **iii.e. Statutory and Regulatory Requirements Affecting Eligibility**

The City of Cincinnati is compliant with all requirements pertaining to Applicants of HUD’s Financial Assistance Programs and has the necessary processes and systems in place to comply with the Award Term.

### **iv.g. Other Submission Requirements**

The following items will be addressed in the narrative exhibits (where noted) and required forms will be uploaded to grants.gov. and posted publicly with the final application package.

1. Standard Application, Assurances, Certifications and Disclosures
  - Standard Form 424 (SF-424) Application for Federal Assistance (required form)
  - Assurances (HUD 424-B) (required form)
  - Applicant Disclosure Report Form 2880 (HUD 2880) (required form)
  - Affirmatively Furthering Fair Housing (See Exhibit B, V.A.1.b.iv)
2. Other Program Specific Requirements
  - Physical Accessibility: The City of Cincinnati has and will continue to comply with all applicable laws and regulations. The in-person meeting was held in a physically accessible space.
  - Environmental Review: As a CDBG entitlement community and HOME participating jurisdiction, the City of Cincinnati understands and will comply with 24 CFR part 58 for all activities funded by the PRO Housing Grant.
    - Federal Assistance Assurance (required form)
    - 424-CBW Budget Form (required form)
    - Certification Regarding Lobbying (required form)
    - Disclosure of Lobbying Activities (SF-LLL) (required form)

**EXHIBIT C  
NEED  
City of Cincinnati**

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## NEED

The City of Cincinnati is committed to identifying and overcoming local barriers to facilitate the increase in affordable housing production and preservation. In 2012, the Cincinnati Department of City Planning and Engagement (DCPE) released *Plan Cincinnati*, a three-year process that created a, community-centered vision to guide the future of Cincinnati. One of *Plan Cincinnati*'s goals is to provide a full spectrum of housing options and improve housing quality and affordability. The comprehensive plan serves as the foundation for the City of Cincinnati's affordable housing efforts. *Plan Cincinnati* also identified the need to target public funding for affordable housing to areas in need. From this observation, the Department of Community & Economic Development (DCED) established the Notice of Funding Availability (NOFA) loan program. In addition to administering the NOFA loan program, DCED partners with the Cincinnati Development Fund (CDF) to finance the production and preservation of affordable housing in Cincinnati.

Further investigation into barriers to affordable housing, the City of Cincinnati recognized how affordable housing can be impacted by public transportation. In the Spring of 2020, voters passed a transit levy that became known as Issue 7. The levy allowed for the implementation of the Reinventing Metro Plan, which would bring significant new investment in transit that would impact mobility and development in the city, including Cincinnati's first Bus Rapid Transit lines. The City of Cincinnati didn't stop there and in January 2020, passed Motion #202200163, which instructed City Administration to engage in a collaborative review of City housing incentives and zoning policies with the express purpose of identifying how current incentives either support or hinder the City priority of increased housing development, specifically mixed-income, workforce, and affordable housing developments. The City began pursuing a series of legislation modifications to the Zoning Code under the title of "Connected Communities." The Connected Communities initiative seeks to address and remove barriers caused by land use and zoning regulations identified in previous studies and engagement, with an explicit goal of managing and lowering overall housing costs by increasing housing supply. Connected Communities was adopted on June 5<sup>th</sup>, 2024, and went into effect on July 1<sup>st</sup>, 2024. The City of Cincinnati continues to advance the discussion around affordable housing and implementation of housing production and preservation by taking away barriers with newly enacted laws and regulations.

**i. Demonstrate your progress and commitment to overcoming local barriers to facilitate the increase of affordable housing production and preservation, primarily by having enacted improved laws and regulations.**

*Improved laws, regulations, or land use local policies*

The City of Cincinnati started its "Connected Communities" initiative in early 2022 to help overcome barriers in the Zoning Code to affordable housing production and preservation. In 2022, the City began outreach to community members, professional stakeholders who interact with Cincinnati's Zoning Code regularly, and other experts to identify problems and potential policy options. In 2023 and 2024, the City conducted a significant amount of research and held over 30 engagement events with over 2,000 participants (both in-person and online) to collaboratively and iteratively develop Zoning Code changes. The changes, which were passed by City Council on June 5<sup>th</sup>, 2024, and went into effect on July 1<sup>st</sup>, 2024, focused on increasing all types of housing in areas of activity. In the half mile (10-minute walk) around the City's two upcoming Bus Rapid Transit (BRT) routes on Reading Road and Hamilton Avenue, middle housing buildings (2-,3-,4- family units) are now allowed in all zones, all parking requirements

are eliminated, and in non-single-family zones there are no density restrictions and a 1-story height bonus. In the quarter mile (5-minute walk) around the City's 39 Neighborhood Business Districts (NBDs), middle housing buildings are now allowed, minimum parking requirements are eliminated for smaller projects and reduced for larger ones, and density restrictions are eliminated in the NBDs themselves. Citywide, rowhomes are now easier to build in multifamily zones and in the densest single-family zone, parking requirements are reduced, and a variety of smaller but important cleanup items of the Zoning Code are implemented to reduce common, smaller variances. Finally, all Low-Income Housing Tax Credit (LIHTC) projects citywide, regardless of the underlying zoning, now have no density restrictions, no parking requirements, and a 1-story height bonus.

Separately from Connected Communities, in June 2023 Accessory Dwelling Units (ADUs) were legalized in Cincinnati and were permitted to be built starting on October 2, 2023. Also commonly known as granny flats, ADUs are independent units with kitchens that provide more housing in single-family areas, while also creating a wealth-building opportunity for homeowners. In Cincinnati, ADUs can be detached or attached structures to the main house, be above or converted garages, or be in basements and attics.

The Connected Communities and ADU changes will make it easier to build more types of housing by-right in many areas of the City where it was not allowed previously. There will be fewer Zoning variances needed, which means fewer hearings, fewer delays, and more certainty for projects. That combination will result in more housing supply overall and reduced costs for developers, which extensive national research has shown to lead to lower costs to renters and homebuyers. Although these policies only went into effect recently, multiple projects are using the provisions in Connected Communities to build more housing with less parking, and five ADU applications have been received. While it will take time to see the full effects, these policies are starting to make an impact.

*Other recent actions taken to overcome barriers to facilitate the increase of affordable housing production and preservation*

- Notice of Funding Availability (NOFA)
  - DCED's NOFA loan program provides residential developers with various financing options for transformative housing projects that will make positive, visible impacts on our communities. As a public financing tool, NOFA leverages private financing to develop quality housing throughout the city. Through NOFA, DCED provides subordinated, fixed interest, long-term loans for up to forty percent (40%) of total project cost. Non-Low-Income Housing Tax Credit applicants must provide an equity commitment of at least five percent (5%) of total project cost to be eligible for NOFA.
  - Since 2015, DCED's NOFA has awarded \$44,584,959 to 67 affordable housing projects, providing approximately \$5 million of funding each year. In this nine-year span, 67 projects resulting in 2,245 affordable units have been financed through the NOFA loan program. Nearly three-quarters of these units, 1,636 or 73% of the total affordable units financed, are affordable at 60% Area Median Income (AMI). Approximately 11% of the affordable units financed through NOFA are affordable to

households at 80% and 9% are affordable at 50% AMI. The remaining units are affordable at 30% AMI (5% of units) and 120% AMI (1% of units).

- Affordable Housing Leverage Fund (AHLF)
  - In addition to administering the NOFA loan program, DCED partners with the Cincinnati Development Fund (CDF) to finance the production and preservation of affordable housing in Cincinnati. According to CDF's impact snapshot from September 2022 through August 2024, CDF's Affordable Housing Leverage Fund (AHLF) has made \$112,000,000 available for affordable housing production and preservation in the City of Cincinnati and Hamilton County. The City of Cincinnati's contributions to the AHLF consist of \$5,000,000 in ARPA funds, \$9,250,000 from the City's Affordable Housing Trust Fund (AHTF), and \$34,000,000 in borrowing capacity under HUD Section 108.
  - Since the City of Cincinnati made funds accessible through the AHTF in Quarter 4 of 2022, the source has devoted funds to seven affordable housing projects, resulting in the renovation and/or construction of 164 units of affordable housing. Two of these seven projects also received funding from DCED through the NOFA loan program. The AHTF funds made available to these projects are a mix of forgivable loans and repayable cash flow loans, totaling \$5,790,000. In total, these loans have devoted funds to 23 units at 30% AMI, 46 units at 31-50% AMI, 41 units at 51-60% AMI, and 37 units at 61-80% AMI.
- Lift Neighborhood Homebuyer Initiative (Lift-HI)
  - In addition to funding the construction and renovation of affordable housing units, the City also prioritized affordable home ownership.
- Property Tax Relief
  - As Cincinnati's neighborhoods continued to see growth and new investment, the City identified rising property taxes as a potential barrier to affordable homeownership.

**ii. Do you have acute need for affordable housing? What are your remaining affordable housing needs and how do you know?**

Among peer metros, Cincinnati ranks near the middle or bottoms on several key indicators of community well-being including racial income gap, food insecurity rate, childhood poverty rate, and life expectancy (Cincinnati Regional Chamber State of the Region, 2023). All of these indicators do relate to access to decent, safe, sanitary affordable housing and point to an acute need to develop and preserve affordable housing to improve community well-being.

*Affordable Housing Not Keeping Pace*

The City understands that there is a significant and urgent need for affordable housing in the region. Specifically, "Housing Affordability in Hamilton County," a report produced by the Community Building Institute in 2017 and supported by Local Initiatives Support Corporation (LISC) of Greater Cincinnati and Northern Kentucky, identified 40,000 households with incomes of 30% or less of Area Median Income (AMI) living in housing that was not affordable to them. Across all income levels, there were nearly 100,000 households that were cost burdened. In the City, approximately three-fourths of cost-burdened households are renters, and at the County level, about three-fifths are renters. At both the City and County levels, the overwhelming majority (about 75% for the County and 80% for the City) of cost-burdened households have an income of \$35,000 or less. Those proportions are almost identical when broken down by age,

with the greatest share of cost-burdened households comprised of residents ages 64 and under. Of those groups, the age band of 35 to 64 comprises the most significant share. According to the Urban Land Institute Cincinnati's 2023 Emerging Trends Report, Cincinnati housing prices have increased 35% since January 2020. Cincinnati has historically had a higher Housing Opportunity Index (HOI) score than the United States, but like much of the rest of the country, the Cincinnati MSA has experienced a sharp decline in housing affordability (<https://www.nahb.org/news-and-economics/housing-economics/indices/housing-opportunityindex>).

### *Insufficient Affordable Housing*

Cincinnati is an affordable area compared to many peer cities and regions, but that affordability is quickly disappearing. Building permits lag compared to peer cities, both in terms of residential units permitted, and unit permitted per 1,000 residents. While many peer metro areas saw housing values fall between May 2022 and May 2023, Cincinnati's Zillow Home Value Index (HVI) increased over 4%. Approximately 22% of residents in the Cincinnati region are severely housing cost-burdened, meaning they spend over 50% of their income on housing (Cincinnati Regional Chamber State of the Region, 2023).

By some measures, it may not appear Cincinnati and Hamilton County have an acute need for affordable housing as the region has remained relatively affordable, compared to other parts of the United States, for many years. However, Cincinnati and Hamilton County are facing unique pressures which threaten that affordability. Additionally, there are thousands of current residents who struggle to find and afford housing and meet their other needs and expenses. It is critical the City and County are proactive about growth and development now to ensure the area remains affordable and becomes more affordable for a more diverse and growing population. Only then can we uplift existing residents and welcome new ones.

### *Widespread Housing Cost Burden & Substandard Housing*

Regarding members of protected classes, the need is more extreme. The Urban League of Greater Southwest Ohio published "The State of Black Cincinnati in 2015," a report that illustrated the significant gap in housing choices and opportunity for Black residents in the region compared to White residents. In addition, the report revealed an emerging trend: the Black population is slowly leaving Cincinnati and moving to older suburbs in Hamilton County. The city lost 9,000 black residents between 2000 and 2010. The largest gains are seen in the northern Hamilton County jurisdictions of Colerain and Springfield townships, and the municipality of North College Hill. The movement of middle-class black families out of Cincinnati has led to greater concentrations of poverty in inner-city neighborhoods: 18 percent of Hamilton County residents are in poverty, and 30 percent of Cincinnati residents live in poverty. Public housing is primarily located in inner city neighborhoods, and more than 90 percent of Cincinnati Metropolitan Housing Authority (CMHA) residents are African American. Families unable to access the limited supply of subsidized housing are forced into aging and often substandard properties. Forty-three percent of residential housing in Cincinnati was built before 1939. The lack of affordable housing options leads to overcrowding, as poverty forces people to double up or house extended family members who otherwise would be homeless. While it is difficult to quantify the overcrowding because the additional people in these households are unauthorized, and the original tenants face eviction if the landlord finds out, this trend is having a specific

impact on the quality of life of Black residents in the region. People living in low-income, predominantly black city neighborhoods have shorter average life spans than residents of affluent, predominantly white communities. For example, the life expectancy in Avondale is 68.2 years, as opposed to 85.9 years in Mount Lookout. The overall city average is 76.7 years, according to data collected and analyzed by the Cincinnati Health Department. This disparity underscores the need for affordable housing options, especially for Black residents in the region.

**iii. What key barriers still exist and need to be addressed to produce and preserve more affordable housing?**

Cincinnati has a housing supply shortage; matched with increased demand that has led to higher housing costs and a deficit of affordable housing options for residents. The City of Cincinnati aims to address key barriers to activate and encourage proactive and targeted housing development, supporting quality and diverse housing options for a variety of income levels. Key barriers that Cincinnati is currently facing is zoning and land use controls, prohibitive building codes, permitting procedures and approval timing and predictability, availability of financing and subsidies for affordable housing, \_\_, and capacity building of local affordable housing developers and managers.

*Zoning and land use controls*

With the passage of the Connected Communities and ADUs policies, some of the most significant Zoning Code and land use barriers have been removed. However, because the policies are so new, further refinement will be needed as they are applied in real-world projects. Cincinnati's proposed project to create pre-approved building plans, and then to construct prototypes, will highlight what Zoning Code issues are still present, and which ones could be changed. These aspects could include minimum lot size and setback, which were not significantly changed in Connected Communities. Relatedly, Cincinnati's entire Zoning Code has not been rewritten since 2004. The City has set aside funding to start a Comprehensive Plan update in the next year, which will likely be followed by a completely new Zoning Code that builds upon Connected Communities. Any zoning and land use lessons learned as part of the proposed project will undoubtedly inform the upcoming additional zone changes.

*Prohibitive building codes*

Connected Communities did not make any changes to the current building code process. Therefore, Cincinnati's proposed PRO-Housing project will help to identify current barriers to building 2-, 3-, 4-family middle housing units presented by the building code.

**EXHIBIT D**  
**SOUNDNESS OF APPROACH**  
**City of Cincinnati**

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## **SOUNDNESS OF APPROACH PROPOSED ACTIVITIES**

A sound proposal will seek to enable increased production and preservation of affordable housing across a broad geographic scope over a sustained timeframe. Proposals must ensure that 51 percent of produced or preserved units directly benefit LMI individuals, except for certain new construction of housing activities wherein no less than 20 percent of the units must directly benefit LMI individuals. Proposals should also demonstrate the degree to which barrier removal will improve the production of market rate housing (and the potential indirect improvements in affordability generated through increased supply of market rate housing).

### **i. What is your vision?**

#### *Proposed Activities*

The primary goal of this proposal is to address the racial and economic segregation in our community, driven in large part by a history of single-family home zoning. The City of Cincinnati Department of Community and Economic Development (DCED) and Department of Planning have begun to identify and research vacant lots within city limits along the City's Connected Communities corridors. The City's Connected Communities corridors was established in a quarter mile (5-minute walk) around the City's 39 Neighborhood Business Districts (NBDs), in a half mile (10-minute walk) around the future Bus Rapid Transit lines, and the block face of 24/7 bus routes. The City then analyzed these lots for a standard size and specific zoning code to help establish a range of vacant lot sizes that could be used to create housing plan prototypes for duplexes, triplexes, and fourplexes along the Connect Communities corridors. With the leveraged funds, the City will contract with an architect to create these housing plan prototypes. The prototypes will receive all the necessary pre-approvals to maximize cost and time effectiveness for people who wish to build on these vacant lots. DCED also intends to use the funding to help subsidize pre-construction activities and site prep to ensure sites are shovel ready. Additional proposed activities the City is proposing is subsidizing a portion of construction costs to further incentivize the development of missing middle housing on vacant lots in those identified corridors.

Our proposed activities are aimed at removing barriers to affordable housing production and preservation, planning and policy activities to supporting affordable housing, development activities, infrastructure activities, and preservation activities.

- Removing barriers to affordable housing production and preservation
- Planning and policy activities to supporting affordable housing
- Development activities
- Infrastructure activities
- Preservation activities

The timeframe for this proposal is to start in Quarter 1 of 2025. Once the program is launched the City will disperse the funds to meet the timeliness requirement of the PRO Housing grant.

#### *Lessons Learned*

This proposal is a new proposal that the City of Cincinnati has not done previously. Despite not having a one for one the City has previously made efforts that had aided in creating this proposal such as the Notice of Funding Availability (NOFA) and Connected Communities.

## Advancing Planning Initiatives, Land Use Policies, & Community Assets

### ➤ Existing Planning Initiatives

#### *Connected Communities (Zoning)*

Cincinnati's proposal is a direct result of its latest planning and zoning initiative, Connected Communities. With a focus in a quarter mile around neighborhood business districts and a half mile around the two future BRT routes, Connected Communities allows middle housing (2-,3-,4- family buildings), lessen restrictions on density and height, and reduced or eliminated parking requirements. In addition, it adds a 1-story height bonus and removes density restrictions and parking requirements for all LIHTC projects citywide, which is critically important for streamlining subsidized affordable housing. Cincinnati's proposal is to create a set of pre-approved building plans for 2-,3,4-family homes based on an analysis of vacant buildable lots in the Connected Communities target areas. These pre-approved plans will help streamline the development and permitting process to get approved faster, especially since they will meet the new Connected Communities zoning standards with target areas near major transit lines and Cincinnati's 39 business districts.

#### *Plan Cincinnati (Comprehensive Land Use Plan)*

Both the City's proposal and Connected Communities are based on *Plan Cincinnati*, which is the City's Comprehensive Plan approved in 2012. *Plan Cincinnati* is broken up into "Initiative Areas", and the proposal and Connected Communities are consistent with many of these Initiative Areas and their corresponding Goals and Action Steps. A few relevant examples include consistency with *Plan Cincinnati's* Geographic Principle to "Focus revitalization on existing centers of activity" (pg. 86). They are also consistent with the Live Initiative Area Goal to "Provide a full spectrum of housing options and improve housing quality and affordability" (pg. 164) and the Action Step to "Increase mixed-use, compact walkable development throughout the basin and uptown, surrounding our centers of activity, and along transit corridors" (pg. 157). The proposal's focus on streamlining middle housing development in existing centers of activity and high-quality transit lines will provide needed housing for all in the areas identified in *Plan Cincinnati*.

### ➤ Climate Resilience

#### *Green Cincinnati Plan*

The proposal and Connected Communities are very consistent with the *Green Cincinnati Plan* (2023), specifically with the Mobility Focus Area Strategy to "Modify land use regulations to support development along transit corridors" (pg. 120). They are also consistent with Priority Actions to "Promote '15 Minute Neighborhoods' with mixed residential (including multi-family) and commercial zoning to increase transit connectivity as well as density and affordability" (pg. 121), and "Embrace zoning reform that increases density near transit, reduces or eliminates parking requirements across the City, and minimizes the use of surface parking lots" (pg. 121).

### ➤ Transportation Planning

The proposal closely aligns with the region's *Reinventing Metro* public transportation plan. In 2020, the citizens of Hamilton County (which encompasses the City of Cincinnati) passed Issue 7, which included a sales tax levy of 0.8% to increase funding to the Southwest Ohio Regional Transit Authority (SORTA), which operates Metro. This funding allowed Metro to

broadly improve bus service, including expanded 24-7 service hours along major routes and investment in two new Bus Rapid Transit (BRT) lines that will open in the coming years along Reading Road and Hamilton Avenue. Cincinnati's transit system is also one of the few in the US to increase ridership over pre-pandemic levels, and the new investment is only in the early stages. Finally, *Reinventing Metro* and the proposal are also consistent with *Plan Cincinnati's* Connect Initiative Area Goal to "Develop an efficient multi-modal transportation system that supports neighborhood livability" (pg. 129), particularly the Strategy to "Expand options for non-automotive travel" (pg. 130) and the Action Step to "Offer a comprehensive transportation system that emphasizes public transit" (pg. 131). The proposal will support public transit by encouraging densification and ridership around improved bus lines through streamlining the building of 2-,3-,4- family housing in those areas.

➤ Population Growth and Jobs

2020 marked the first census year that Cincinnati saw population growth in over 70 years, with a 4.2% increase of over 12,000 new residents since 2010. Over that same period, the supply of housing did not grow at the same rate, and most neighborhoods actually lost housing. This imbalance of supply and demand has caused housing costs to rise much faster than inflation, with Cincinnati seeing some of the highest housing cost increases in the country in recent years. This proposal will help address those problems through the faster creation of 2-,3-,4-family buildings in many neighborhoods throughout the city, and help manage future population growth. Additionally, the target areas of this proposal are along major transit routes or within walking distance of the two largest job centers in the region, which are Cincinnati's Central Business District (which is home to major corporate offices such as Kroger and P&G) and Uptown (which has University of Cincinnati, multiple major regional hospitals, and the Zoo). Adding more attainable housing near transit routes will help more people to reach more jobs, which can help increase their pay and job stability.

Environmental Risks

The Department of Community and Economic Development works closely with the Office of Environment and Sustainable to evaluate development projects when developers apply for assistance from the City. For all development projects in the City of Cincinnati a developer is required to conduct a Phase 1 Environmental Assessment of the property they plan to develop on. If a Phase 1 Assessment results in additional testing a Phase 2 Environmental Assessment will be required of the developer.

Roadblocks to Implementation

The implementation of this proposal will face roadblocks such as developer capacity and interest and application of Connect Communities legislation.

- Developer Capacity & Interest

Building duplexes, triplexes, and fourplexes are financially difficult due to \_\_\_.

Additionally, Cincinnati faces a lack of capacity in middle housing production resulting in a lack of interest from developers. Despite these challenges the proposal has accounted for these by getting developers engaged early in the process and by helping relieve the financial burden. Implementation of this proposal relieves developers' burden through the choice of pre-approved architectural plans, assistance in getting the site ready for

construction, and a construction subsidy to help aid in their effort to increase the housing supply for the City of Cincinnati.

- **Application of Connect Communities**

Connected Communities was recently passed on June 5, 2024. While there has not been a rush to enact this legislation, developers have started to engage with the city to take advantage of what the legislation has to offer. Throughout the process of Connected Communities, the community was heavily involved, and extensive community engagement was conducted. As a result, this legislation encompasses the needs and wants of the community. By continuing to connect with the community and those involved in development this proposal will be able collect feedback to improve processes and policies.

## **ii. What is your geographic scope?**

This proposal targets vacant properties within the Connected Communities' designations (B, MH, and T). These designations were established around Cincinnati's NBDs and major transit investments. The B designation, or "Neighborhood Business District" designation, was given to properties that fall within an NBD. Properties with the MH designation, or "Middle Housing" designation, were identified by creating a quarter-mile buffer around each NBD. Any property that touched the boundary fell within the MH designation. Properties received the T designation, or "Transportation Corridor" designation, if they fell within a major corridor. The Tier 1 major corridors follow the future BRT routes along Hamilton Avenue and Reading Road, extending to a half-mile buffer on either side of the routes. Any property that fell within this buffer received the T designation. Additionally, four Tier 2 major corridors were identified: Glenway Avenue, Harrison Avenue, Gilbert Avenue, and Madison Road. Any property adjacent to the Tier 2 corridors was given a T designation. That being said, if the underlying zoning of a property was Downtown Development (DD), Park and Recreation (PR), Institutional Residential (IR), or Planned Development (PR), none of the three Connected Communities designations were applied, either because the zoning districts already complied with the changes or the rules of those districts were not intended to be altered through this initiative.

## **iii. Who are your key stakeholders? How are you engaging them?**

The City of Cincinnati has a history of community-based planning such as Plan Cincinnati (2012), Green Cincinnati (2023), and Connected Communities (2024). Each of these were introduced to members of Cincinnati's communities for input and collaboration. Plan Cincinnati took over two years of developing with numerous opportunities to participate such as Steering Committees, Working Groups, Open Houses, and other community events. Plan Cincinnati places a strong emphasis on ensuring that all community members have quality housing options. One of the Live Initiative goals is to provide a full spectrum of housing options and improve housing quality and affordability, which the City's proposal works toward by offering high-quality, low-cost opportunities to middle housing and integrate these housing types throughout Cincinnati.

From Cincinnati's extensive engagement for Connected Communities, feedback from stakeholders and community members was solicited through both a survey and a series of in person and virtual events. In total, there were 34 events that involved 2,250+ participants over two years of engagement, in addition to over 28,000 visits to the Connected Communities

website. In the survey, participants were asked about which housing types they wanted to see more of in the City. 63% support building duplexes citywide, with triplexes and fourplexes following close behind at 58%. The City's proposal would directly reflect community desires to see more 2-, 3-, and 4-family units built. In-person community engagement also supports the City's proposal, with over 87% of participants saying they want some form of middle housing around neighborhood business districts and corridors. The City of Cincinnati continues to prioritize engaging stakeholder groups to assess the needs and desires of Cincinnati's future.

As the City of Cincinnati has continued to make strides toward addressing barriers to affordable housing, the City has cultivated a robust relationship with its stakeholders, including elected officials, local architects and developers, Community Development Corporations, housing advocates, and other organizations like SORTA and the Cincinnati USA Regional Chamber. For this proposal the City of Cincinnati has connected with Homebase, Urban Land Institute, The Port Authority, Cincinnati Development Fund, Hamilton County, Cincinnati USA Regional Chamber, and Cincinnati Go METRO to support this proposal. Each of these organizations is in support of the goals of this proposal and has submitted a support letter to aid in getting this PRO Housing Grant. It is the goal that the City receives this grant so that we can continue to remove barriers to affordable housing and increase Cincinnati's housing stock.

#### Key Stakeholders & Outreach

The key stakeholders for this proposal include elected officials, local architects and developers, Community Development Corporations (CDC), and housing advocates. The outreach conducted in developing this proposal is tied to the outreach done for the City's Connected Communities outreach. During the community engagement of Connected Communities this proposal was introduced. Over the two years of connecting with neighborhoods throughout Cincinnati the City was able to gather input from those who participated in creating this proposal. Additionally, the City of Cincinnati applied for the PRO Housing Grant in 2023 but did not receive it. During which time Connected Communities was passed allowing for this proposal to expand to the corridors established by Connected Communities. This allowed the City to expand its geographic scope and serve more residents of the city. Since then, the City has reached back out to key stakeholders to engage them in the PRO Housing 2024 submittal. As part of community outreach and grant requirements a public hearing was held to solicit feedback on the City's proposed PRO Housing application on September 25, 2024. A public notice was also published in the local newspaper (Cincinnati Enquirer) and on the City's website. Prior to the public hearing the Department of Community and Economic Development did additional outreach to local developers to get their feedback on this proposal. These developers were contacted with a summary of the proposal and an ask for them to attend the public hearing. Reaching out to these developers allows insight into opinions and expertise on development in Cincinnati. The City of Cincinnati will continue to engage with key stakeholders for this proposal throughout the process to get buy-in and suggestions for improvements.

#### Actions to Solicit Input & Incorporation of Solicited Input

This proposal originated from the input from Cincinnati residents, business owners, community leaders, and professionals that participated in community engagement for Connected Communities. Engagement started in 2022 to identify the problem within our zoning code that needed addressing. The feedback from the 2023 events directly informed the strategy, scale, and

direction of the policy proposals. The 2024 events were meant to hear feedback on the proposal and refine specific elements of the proposed policies (Connected Communities Engagement Report).

Several engagements were held with professional stakeholders, a group of roughly 60 individuals who work locally in Cincinnati in market rate and affordable housing development, architecture and design, transportation and pedestrian safety, business district revitalization, and funding, advocacy and non-profit work. There was a total of five sessions with this group that provided specific insight into barriers and concerns within the zoning code and housing. As a result of this, professional stakeholder engagement for Connected Communities specifically asked for feedback on this proposal. Specifically, about middle housing, stakeholders expressed support for a pattern book that includes designs for ADUs and 2-, 3-, and 4-family buildings, noting that a pattern book would make middle housing development more feasible. As seen in Figure 1. Market for Middle Housing Typologies, stakeholders identified different middle housing typologies that there is a market for in Cincinnati. Additionally, Figure 2. Need for Middle Housing, identified areas developers desired to create middle housing near. These include proximity to neighborhood business districts (NBD), proximity to transit, and citywide.

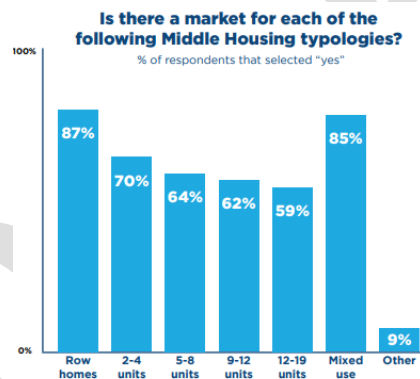


Figure 1. Market for Middle Housing Typologies

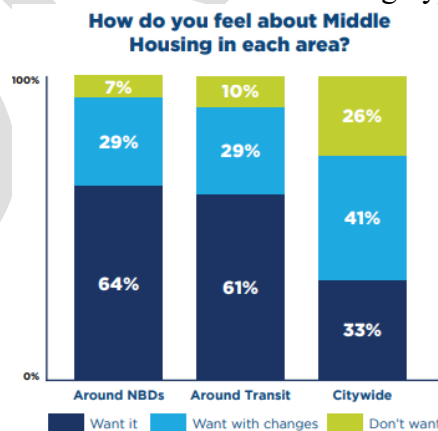


Figure 2. Need for Middle Housing

Furthermore, a public hearing was held to solicit feedback on the City’s proposed PRO Housing application on October 12, 2023. A public notice was also published in the local newspaper (Cincinnati Enquirer) and on the City’s website.

**iv. How does your proposal align with requirements to affirmatively further fair housing?**

Removing Barriers

This proposal will eliminate barriers including the cost to commission designs and blueprints, design approval, and time for administrative processes and will make development in all places more efficient. By making the construction of affordable housing more accessible through the availability of pattern books for multi-family development, developers will be positioned to apply those designs across the City. Currently, zoning that prohibits multi-family housing without a Planned Unit Development hearing presents a significant barrier of entry for protected class populations to live in the most resourced areas of the City. Paired with the difficulty of acquiring plans to build affordable multifamily units, these barriers limit development. The pattern book will ease these restrictions, expanding the opportunity for more units of affordable housing to be built in all parts of the City – expanding access to the most resourced places. Additionally, the administrative pre-approvals built into these plans will offer an expedited process for developers, significantly reducing the resistance in the pre-construction phase of the development project.

According to the 2019 Cincinnati Fair Housing Assessment, the periphery of the City and County is the most segregated, with the Black population comprising less than 5% of the total population. Interviews with members of protected classes suggest several impediments to living in those areas: being steered away from units, being shown fewer and low-quality units, and experiencing an outsized number of police complaints. Current residents of the most segregated communities cite a lack of turnover as a barrier of entry to new residents. The availability of pattern books would directly address this concern. Residents of these communities could more efficiently build these types of units, expanding access to these communities to a greater diversity of households.

Removing Barriers

Barriers that would promote desegregation are:

- Reforming zoning to allow mixed income communities.
  - Connected Communities recently passed allowing for 2-, 3-, and 4-family buildings to be permitted in the city. This promotes desegregation by diversifying the types of homes allowed in communities, allowing for localities to make them more racially and economically inclusive. Zoning modifications like lowering minimum home- and lot-size requirements, permitting duplexes and triplexes, allowing apartments in more locations, and/or minimizing discretionary review processes help achieve this (Habitat for Humanity).
- Building and preserving affordable housing in communities of opportunity.
  - Zoning reforms are necessary but often insufficient alone — it is imperative that the City continues to increase investments in affordable homes in non-segregated communities. This proposal helps incentivize mixed-income housing developments and makes public land in well-resourced neighborhoods available at low cost for intentionally affordable homes.

Approaching Housing Needs of Protected Classes

This plan has been informed by the research, engagement, and input that have gone into various plans, assessments, and reports at every scale – from the neighborhood level to the regional level. These documents have illustrated a great need for affordable housing across the entire region but

especially within the City and for members of protected classes. This proposal takes engagement into direct account, presenting a tool for the neighborhood to use to actualize progress toward its identified housing goals. In a greater sense, affordable housing has become a top priority for the City administration and the City voters. Demands for changes have risen exponentially in recent years, and this plan addresses those calls for change by providing a paved path forward.

#### Local Fair Housing Plans

The 2019 Fair Housing Assessment details many fair housing issues: (1) racial segregation, (2) lack of access to affordable housing, (3) lack of affordable housing in opportunity areas, (4) lack of public transit, (5) poor property conditions, (6) lack of housing and support services for protected classes, and (7) discriminatory lending practices.

This proposal – paired with the City’s additional, related policies – tackles these issues. For example, the proposal most directly addresses the lack of affordable housing by financing the construction of affordable development that will bring the proposal’s planning component to fruition in neighborhoods like Avondale. Relatedly, streamlining the administrative approval processes would decrease the barrier to entry in opportunity areas, from a cost standpoint but also from a risk standpoint. If these plans are preapproved, developers can speed up their development process, saving time and resources and also providing much-needed housing in a diversity of neighborhoods.

#### Risk of Displacement

This proposal is an anti-displacement measure. The development of more units, of all types, will lessen pressures on the housing market through increased supply to meet increased demand. Additionally, by focusing on small-scale multifamily housing, the City is working to incentivize the type of development that allows seniors to age in place, that allows homeowners to collect additional income to pay for necessary home repairs or other life necessities. Making pattern books available to the public and development makes it less risky and less expensive to develop more affordable units, and more accessible units thereby increasing housing options for vulnerable residents.

#### Disabilities and Supportive Services

This proposal addresses the need for middle housing that is needed in communities lacking housing stock and affordability. Currently, 43% of residential housing in Cincinnati was built before 1939. The aging housing stock presents a significant challenge to the region as a whole and to protected classes as specific groups are particularly affected by it. According to the AARP Discovering and Developing Middle Housing, middle housing provides size and affordability options for people of all ages, specifically older adults looking to downsize. Seniors will benefit directly from an increase in the number of affordable units available. This group often struggles to meet the demands of maintaining single-family homes, and as a result, aging in place becomes particularly challenging. However, if 2-, 3-, and 4-unit developments are more readily accessible to developers that seek to construct a greater diversity of units across a greater portion of the City, seniors could experience an influx in housing options in areas close to single-family housing units where they might currently live *or* in areas close to public transportation (24-hour bus lines) that would increase their mobility and expand their access to health and wellness services.

Persons with disabilities represent the group that is most greatly dispersed across the city. This is often due to a desire and/or need to live close to familiar surroundings and support networks, such as family. By eliminating some of the barriers developers face when developing affordable housing projects across the area, at least some members of this protected class will benefit from development – wherever it occurs. Although it is illegal for a landlord to neglect making improvements for disabled residents, members of this protected class report inadequate living spaces and relay that landlords often cite cost as the barrier to making required changes. In recent times, the City has prioritized the construction of ADA-compliant housing projects. When evaluating applications from developers for this proposal, there will be an emphasis on serving people with disabilities and those aging in place. Developers will have the opportunity to earn more points when constructing units that are compliant with the Americans with Disabilities Act (ADA) and accessibility requirements under the Fair Housing Act. The tax abatement program incentivizes these updates, allowing extensions for such projects. Additionally, the City of Cincinnati has made this a priority for our NOFA program and intends to uphold this priority for this proposal. Furthermore, the City has more clearly defined “visitability” standards for public projects and has strengthened the language in City contracts around ADA-compliance.

#### Equitable Educational Resources

The Connected Communities process involved significant engagement from people around Cincinnati as there were 34 events that involved 2,250+ participants over two years, in addition to over 28,000 visits to the Connected Communities website. Deliberate outreach was made to historically underserved communities through pop-up events, online materials that could be accessed at any time, and separate meetings with leaders of important minority organizations such as the Urban League, and churches. Throughout our engagement, we found that middle housing (2-,3-,4 family buildings) was very popular overall, especially near transit and Neighborhood Business Districts (NBDs). Only 11% of participants did not want middle housing within half-mile of transit corridors, and only 6% did not want middle housing within a quarter-mile of NBDs. Additionally, when surveyed about the type of housing they wanted citywide, the most popular with respondents was a 2-family building (63%) with 3-family (58%) and 4-family (58%) not far behind. Single-family homes had some of the lowest levels of support at 49% wanting more of it citywide.

#### **v. What are your budget and timeline proposals?**

##### Budget

The City of Cincinnati is requesting \$2 million dollars for this proposal. Cost estimates are based on a combination of DCED’s analysis of recent applications for financial incentives and “rules of thumb” as established in conjunction with the City’s development consultant, Grow America. These estimates also forecast for future cost increases, as construction pricing continues to increase and can be subject to significant changes based on market conditions. The budget for this proposal include staffing, consultants, and contractors. The rationale behind each of these categories is based on previous programs the City has administered such as the NOFA program and the Lift Neighborhood Homebuyer Initiative (“Lift-HI”) program. The City of Cincinnati has broken down each of the categories by responsibility to provide transparency into cost effectiveness, industry standards, and scope of work.

- *Staffing*  
The Department of City Planning and Engagement and Department of Community and Economic Development will be most deeply involved in carrying out the grant activities. However, staff across departments will be involved in various aspects of the proposed activities throughout the grant lifecycle. The rate per hour as listed in the 424W budget worksheet is based on averages of actual salaries for current staff in the various roles.
- *Consultants*
  - Environmental Site Assessment Consultants: The City will procure a firm to complete an Environmental Site Assessment Phase I, and Phase II if necessary, in accordance with ASTM standards. It is estimated that each Phase I will take two to three weeks to complete and cost approximately \$3,000. It is estimated that each Phase II will take approximately four to six weeks and cost approximately \$10,000.
  - Inspecting Architects: The City will procure a licensed architectural firm to provide inspection services throughout the construction period of the prototypes. Previous City contracts for these services have typically ranged from \$11,000 to \$22,000 for a 12-to-24-month construction period. The City estimates each contract will cost \$15,000 to cover an estimated 12-to-18-month construction period.
  - Geotechnical Consultant: The City will procure a firm to provide geotechnical reports for the prototype sites as part of pre-development due diligence. It is estimated each report will take four weeks to complete and cost approximately \$2,000
- *Contractors*
  - Homebuilders/Construction Contractors: The City will procure firm(s) to construct the prototype developments. Prevailing wage rates for the contractor(s) and subcontractors may apply. The City contracts will include contractor overhead and profit, as built into the Construction Costs budget outlined below and in the 424W budget worksheet
- *Construction*  
Overall the City estimates the total development costs of each unit will be approximately \$450,000. If awarded the full funding requested, the City could construct the housing typologies developed through an award process.

### Measuring Success

The City's proposal is very scalable. While the goal is to create design plans and construction documents and a subsidy for constructing the prototypes of a two-family, a three-family, and a four-family, the City has the flexibility to shift the development activities based on the level of funding awarded. A 50% reduction to the request grant award would mean that fewer prototypes would be constructed but designs and construction documents for each proposed housing type would still be created through the leverage funds indicated in this proposal.

### Schedule of Proposed Activities

The timeframe for implementation is as follows:

- Year 1: Design & Architecture Plans
- Years 2-4: Prototype development and Construction
- Year 5: Permitting Process Improvements

**EXHIBIT E**  
**CAPACITY**  
**City of Cincinnati**

DRAFT

## **CAPACITY**

### **i. What capacity do you have?**

The Office of Grant Administration (OGA) will lead implementation of the funded activities and provide grant management. OGA is housed within the City Manager's Office and manages the oversight of all federal grants received by the City, including CDBG funds.

The City of Cincinnati (particularly the Office of Grant Administration and the Department of Community and Economic Development) possesses extensive experience managing project performance, fiscal compliance, and internal controls of federally funded projects, including CDBG- and other HUD-funded projects.

The City of Cincinnati has extensive experience partnering with subrecipients, contractors, community stakeholders, and other government agencies on community development projects funded with CDBG and other HUD funds. Staff within the Office of Grant Administration and the Department of Community and Economic Development routinely oversee contracts and manage projects.

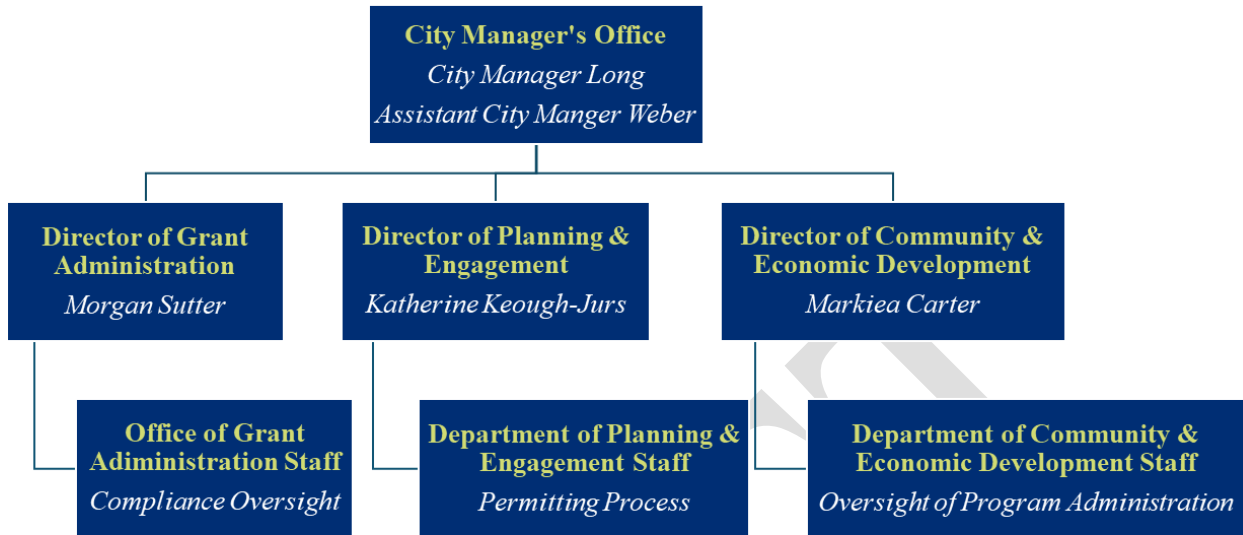
City of Cincinnati staff in the Office of Grant Administration, the Department of Community and Economic Development, and the Department of City Planning and Engagement contributed to the drafting of this application.

The City of Cincinnati is committed to affirmatively furthering fair housing. The City of Cincinnati and Hamilton County jointly prepared an Analysis of Impediments to Fair Housing in 2019 that analyzed racial and ethnic data to determine if disparities exist in residents of Cincinnati's access to fair housing. One of the recommendations from that analysis emphasized the potential disparate impact that single-family land use regulations have on low-income, protected class residents. Though these regulations prohibit multifamily development, the City's proposal aims to address those barriers through the use of gentle density housing to reduce disparate impact on residents who belong to protected classes.

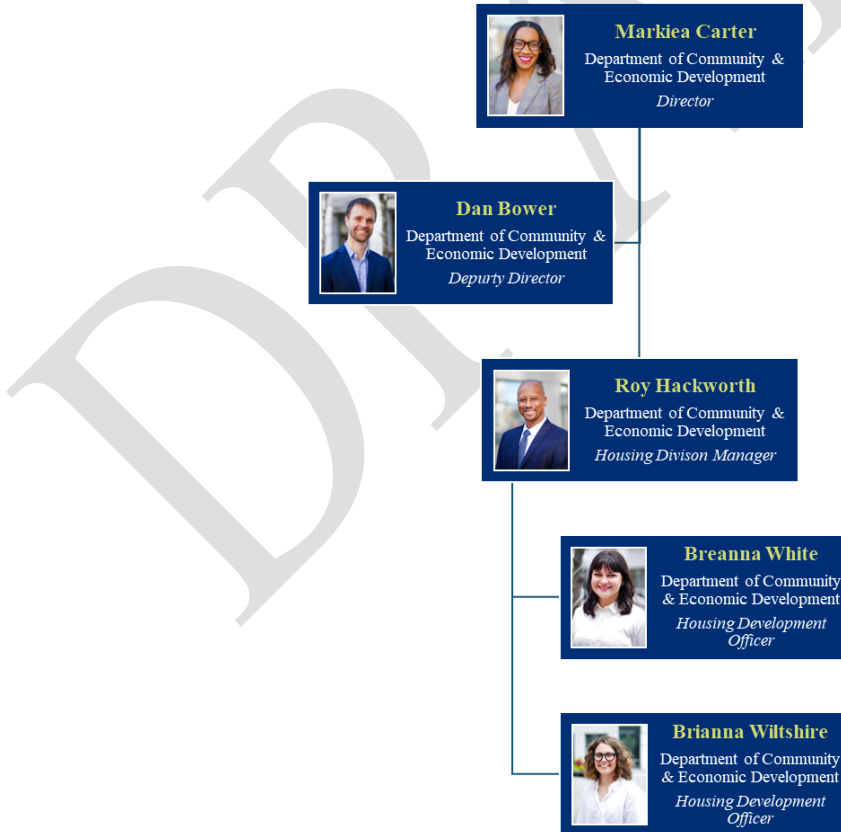
### **ii. What is your staffing plan?**

The organization chart below identifies names and positions of key management for proposed PRO Housing activities.

## PRO Housing Activities – Key Management



## Department of Community and Economic Development – Proposed Program Administrators



In addition to the key management identified in the chart above the following information provides the roles and responsibilities of each staff member that will be working on the PRO Housing Grant if awarded.

- Director: The Directors of Grant Administration, DCED, and City Planning will be involved as representatives for their respective departments throughout the grant life cycle and will also provide strategic guidance to staff for implementation of the grant activities.
- Deputy Director
- Division Manager: Division Managers across departments will review staff work and may assist staff with troubleshooting. DCED and City Planning staff are most likely to be involved, but other departments will be involved.
- Development Officer/Senior Development Officer: DCED staff will be involved in the application review for the proposed program. DCED staff will be most significantly involved in the review of development contractor proposals and managing the development process, including conducting pre-development due diligence, preparing contracts, attending construction walkthroughs, and processing invoices. It is estimated that two staff members will be involved.
- City Planner/Senior City Planner: City Planning staff will be involved in the review of design proposals, work with selected firm(s) to finalize designs and blueprints, and review of development contractor proposals. It is estimated that two staff members will be involved. City Planning staff will also complete the local Environmental Review for the program and for each prototype development.
- Contract Compliance Specialist: DEI staff will be involved in the review of development contractor proposals and monitoring the development process. Staff will monitor for compliance with prevailing wage, if applicable, and subcontractor payments.
- Accountant/Senior Accountant/Supervising Accountant: DCED staff will review and process construction invoices for payment. It is estimated there will be up to 18 invoices for each of the prototype developments.
- Buyer/Senior Buyer/Supervising Buyer: The Office of Procurement staff will assist in the preparation of the program and RFQ for homebuilder/contractors.
- Real Estate Specialist/Senior Real Estate Specialist/Real Estate Manager: Real Estate staff will shepherd the appraisal and coordinated review process, providing the fair market value of properties for prototype development, and soliciting feedback from City departments on necessary steps for projects to move forward.
- Assistance City Solicitor/Senior Assistant City Solicitor: The Law Department staff will be responsible for drafting contracts with the firms selected through the program and construction contractor RFQ process. Deliverables may also include an property documents to be recorded, such as restrictive covenants.
- The Office of Grant Administration's Community Development Administrators will provide compliance oversight throughout the lifecycle of the grant.
- Environmental Safety Specialist/Senior Environmental Safety Specialist: The Office of Environment and Sustainability staff will review the Environmental Site Assessment Phase I, and Phase II if necessary, for each prototype development site as part of the City's local Environmental Review process

**EXHIBIT F  
LEVERAGE  
City of Cincinnati**

DRAFT

**LEVERAGE**

**i. Are you leveraging other funding or non-financial contributions?**

The City of Cincinnati is requesting \$2 million in PRO Housing grant funds and is providing \$840,000 in leverage through the following sources:

- \$1,245,668 of City of Cincinnati staff time and travel costs
- \$840,000 in Connected Communities dollars to support PRO Housing development activities

Please refer to the attached budget spreadsheets for further details. City of Cincinnati leverage documents and commitment letters are in process and will be finalized before submission on 10/15/2024.

**Table 1: Scoring for Leveraged Funding**

Leverage commitments as percent of grant funds requested	Points awarded
50 percent and above	10
Between 40.00 and 49.99 percent	8
Between 30.00 and 39.99 percent	6
Between 20.00 and 29.99 percent	4
Between 10.00 and 19.99 percent	2
Below 10.00 percent	0

**EXHIBIT G**  
**LONG-TERM EFFECT**  
**City of Cincinnati**

DRAFT

## **LONG-TERM EFFECT**

### **i. What permanent, long-term effects will your proposal have? What outcomes do you expect?**

#### *Intended Achievements Upon Completion*

Full funding and execution of this proposal would result in three completed outcomes: (1) the creation of a pattern book for 2-to-4-unit developments, (2) built-in, streamlined, preapproved permitting and construction processes, and (3) the construction of the units from the pattern book in targeted areas.

#### *Barriers*

Though initiatives to increase density often face “NIMBY-ism,” the nature of the prototypes will provide a gentle density increase that is more likely to appeal to a wider variety of stakeholders than larger-scale developments. Through development of duplex, triplex, and fourplex prototypes, the City intends to provide proof of concept for these gentle density housing types. With increased community awareness of these gentle density options, the goal is to encourage developers and neighborhoods to become advocates for these housing types across the City.

#### *Affordability and Proximity to Amenities*

While the plan books will provide a model for 2-to-4 unit construction throughout the City, the prototype(s) of this housing will be built in areas identified as opportunity “nexuses.” Specifically, the pilot will prioritize areas close to job and activity centers that are also well served by public transportation (as measured by proximity to 24-hour bus lines) and experiencing increased housing costs more rapidly than other areas. The pilot neighborhoods will be along the Connected Communities corridor. Once in operation, that route would connect the neighborhoods to downtown jobs and amenities.

#### *Model for Other Communities*

While the emphasis on the creation of a plan book to increase density through 2-to-4 unit construction stems from the priorities articulated by Cincinnati residents through the planning and public engagement processes, this type of construction can be applied to a diverse type of zoning designations. As single-family zoning comes under increasing public scrutiny across the country, zoning restrictions are likely to continue to relax in a way that would likely favor this type of gentle density development. Because the plan book would be available to developers for free to build anywhere in the region, the nature of the proposal is intended to be adaptable and applicable to the entire geographic project scope. By design, the resource is intended to be replicable in ways that are responsive and attentive to hyper-local needs, characteristics, and visions.

The second component of the proposal, to build a model of this type of unit development along the Connected Communities corridor, is intended to serve as a prototype for developers and neighborhoods. By executing the design in this target area, the proposal showcases how the concepts in the draw book can tangibly exist and, more importantly, how their benefit is experienced directly by the residents and indirectly by the entire area (as opportunity is extended, enjoyed, and multiplied).

Promoting Resiliency

In compliance with HUD program requirements, any projects funded for development using PRO Housing funding will be subject to an environmental review process to determine that the proposed project does not negatively impact the environment or have an adverse environmental or health effect on residents. The City of Cincinnati's staff has significant experience with implementing HUD-funded affordable housing programs and will ensure all development projects funded comply with environmental requirements.

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**Attachment A**  
**SUMMARY OF PUBLIC COMMENTS**  
**City of Cincinnati**

DRAFT

**SUMMARY OF PUBLIC COMMENTS**

The City of Cincinnati received no public comments in response to the posted PRO Housing application and associated public hearing that was held on September 25, 2024.

DRAFT

**Attachment B**  
**CERTIFICATION OF COMPLIANCE WITH NOFO PUBLIC PARTICIPATION**  
**City of Cincinnati**

DRAFT

# CERTIFICATION OF COMPLIANCE WITH NOFO PUBLIC PARTICIPATION

## i. Public Hearing Posting

**From:** Luebkehan, Kate <kate.luebkehan@cincinnati-oh.gov>  
**Sent on:** Thursday, September 5, 2024 6:56:26 PM  
**To:**  
**CC:** White, Breanna <breanna.white@cincinnati-oh.gov>  
**Subject:** NOTICE OF PUBLIC HEARING: Pro Housing Grant Program 9/25/24

**Follow up:** Follow up  
**Start date:** Tuesday, September 10, 2024 12:00:00 AM  
**Due date:** Tuesday, September 10, 2024 12:00:00 AM

### NOTICE Public Hearing

A public hearing of the City of Cincinnati Department of Community and Economic Development ("DCED") is scheduled for Wednesday, September 25<sup>th</sup> from 5-7pm. This meeting will be conducted in person at 805 Central Ave, Suite 700, Cincinnati, Ohio 45202 in Griesel Room A&B. The purpose of the meeting is to receive public comment on a proposed application for the HUD administered PRO Housing Grant Program. Please feel free to attend as well as forward this information to anyone who may be interested.

If you have any questions regarding the grant or hearing, contact DCED Housing Development Officer, Breanna White, at [breanna.white@cincinnati-oh.gov](mailto:breanna.white@cincinnati-oh.gov)

###

**Kate Luebkehan** | Communications Lead  
City of Cincinnati | Department of Community & Economic Development (DCED)  
Two Centennial Plaza | 805 Central Avenue, Suite 700 | Cincinnati, OH 45202  
513-352-3756 | [kate.luebkehan@cincinnati-oh.gov](mailto:kate.luebkehan@cincinnati-oh.gov)  
Website [LinkedIn](#) [Twitter](#) [Facebook](#) [Instagram](#)

## ii. Public Hearing

- o PowerPoint for Public Hearing



# PRO Housing – HUD Grant Program

An overview of the PRO Housing Grant Opportunity and the City's application.



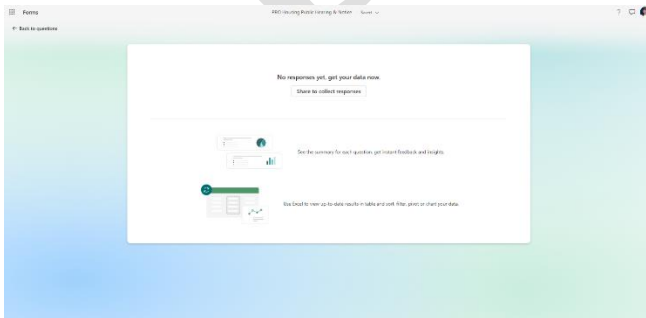
- o Sign-in Sheet for Public Hearing

### DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT – PRO HOUSING GRANT PUBLIC HEARING

ORGANIZATION	TIME	EVENT DATE	LOCATION
City of Cincinnati - DCED	5PM - 7PM	9/25/2024	805 Central Ave, Suite 700, Cincinnati OH 45202

NO	NAME	PHONE	EMAIL
1	Breanna White	_____	_____
2	Brianna Witshire	_____	_____
3	Kyle Gibbs	_____	_____
4		_____	_____
5		_____	_____
6		_____	_____

- o Public Comment Results



**Attachment C**  
**ADVANCING RACIAL EQUITY NARRATIVE**  
**City of Cincinnati**

DRAFT

## **ADVANCING RACIAL EQUITY NARRATIVE**

In 2023, Cincinnati City Council established the Office of Equity within the city government. The purpose of the office is to actively promote and embed equity, equality, and inclusiveness in all aspects of city governance and operations. Dismantling system barriers that hinder economic freedom, including the freedom to have reliable housing, is at the core of the city's work.

Cincinnati and Hamilton County Ohio have acknowledged their legacies of racist housing policies, redlining, and gentrification. Proactive housing stability interventions, such as eviction prevention services, are a step in the direction of rectifying those past wrongs.

This project will support the gathering of valuable data, guided by a national expert, on the households served with limited representation and ongoing representation in eviction court proceedings. These findings will be used to advance racial equity by informing policy and best practices, matching resources where they are most needed.

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**Attachment D**  
**AFFIRMATIVE MARKETING AND OUTREACH NARRATIVE**  
**City of Cincinnati**

DRAFT

## **AFFIRMATIVE MARKETING AND OUTREACH NARRATIVE**

The City of Cincinnati is committed to affirmatively furthering fair housing. The City of Cincinnati and Hamilton County jointly prepared an Analysis of Impediments to Fair Housing in 2019 that analyzed racial and ethnic data to determine if disparities exist in residents of Cincinnati's access to fair housing. One of the recommendations from that analysis emphasized the potential disparate impact that single-family land use regulations have on low-income, protected class residents. Though these regulations prohibit multifamily development, the City's proposal aims to address those barriers through the use of gentle density housing to reduce disparate impact on residents who belong to protected classes.

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