
APPLICATION FOR ZONING RELIEF HISTORIC CONSERVATION BOARD PUBLIC HEARING STAFF REPORT

APPLICATION #: COA2022032/ ZH20210183
APPLICANT: New Republic Architecture
OWNER: Over-the-Rhine Community Housing
ADDRESS: **2000 Dunlap Street**
PARCELS: 009600050116
ZONING: Urban Mix - UM
OVERLAYS: Over-the-Rhine Historic District
COMMUNITY: Over-the-Rhine
REPORT DATE: January 6, 2022 (ORIGINAL)
June 17, 2022 (AMENDED)

Nature of Request:

The Applicant is requesting a Certificate of Appropriateness for new infill construction. The proposal includes a density variance to allow 44 units of congregate housing at 227 sf of lot area/unit and a rear yard setback of a zero lot line for a new construction project.

The applicant previously applied for Zoning Relief only at the January 24, 2022 HCB Hearing. The application was tabled and the applicant has now applied for the COA. Both requests are included in this Staff Report. The original case materials are available on the Historic Conservation Board website.

Zoning Relief Requested:

1. 1410-07- Development Regulations. Density. 700 sq of lot area/unit is required. The lot is 10,000 sf and 14 units are permitted. 44 are requested. **A variance to allow a density of 227 sf of lot area/unit is required.**
2. 1410-07- Development Regulations. Rear setback. A rear setback of 10 feet is required for residential projects. As a property is a square either street frontage can be considered the front lot line. As both the north and east property lines can be considered rear and both have a zero-lot line, **a 10 ft variance for the rear yard is required.**

Existing Conditions:

The project location is a surface parking lot at the corner of Dunlap and Henry Street.

Proposed Conditions:

1. Build a new 44-unit congregate housing with a partial zero lot line at the north, and zero lot line at the east, south and west.

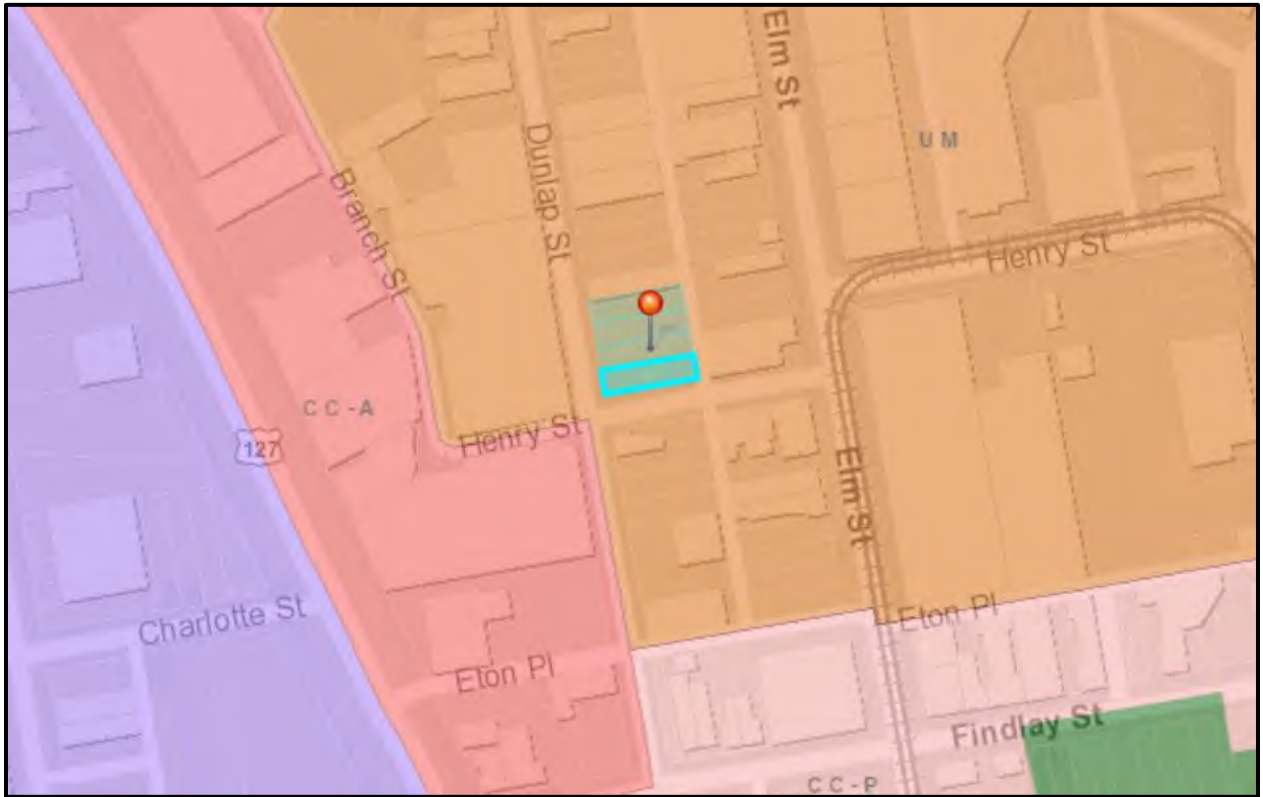


Figure 1: Map of 2000 Dunlap St. Cagis Maps. The site is outlined in blue.



Figure 2. Image of subject property. Image from Google.



Figure 3: Birds eye view of site. Google Imagery.

ZONING REVIEW

Applicable Zoning Code Sections:

Zoning District:	Section 1410	UM
Variance Request:	Section 1410	Development Regulations
Variance Authority:	Section 1445	
HCB authority:	Section 1435-05-4	
Overlays:	Section 1435	Historic Preservation
Historic District/Reg:	Over-the-Rhine District	
COA Standard:	Section 1435-09-2	COA; Standard of Review

ZONING REVIEW:

The applicant is requesting a variance related to setback and density for the site at 2000 Dunlap St. The determined use is Congregate Housing (see definition below) as the proposal for permanent supportive housing has individual dwelling units with communal dining facilities and support services, but the support services are not required as would

be with Transitional Housing. This use is permitted under the UM at a density of 1 unit per 700sf/lot area.

§ 1401-01-C19. - Congregate Housing.

Apartments and dwellings with communal dining facilities and services, such as housekeeping, organized social and recreational activities, transportation services and other support services appropriate for the residents.

As the property is 100ft x 100ft, the determination of what lot line, Henry St or Dunlap St lot line can be made by staff and the application in consultation. As the proposed massing provided has the parking and utility placement on the north face of the building, we have determined the north property line is the rear, the south property line along Henry Street is the front property line. The applicants are permitted by right to build at a zero-lot line along the alley and are therefore requesting a zero lot line at only a portion of the north property line.

Standards for Variances per Section 1435-05-4

- (a) *Is necessary and appropriate in the interest of historic conservation so as not to adversely affect the historic architectural or aesthetic integrity of the Historic District of Historic Asset; or*

The proposed work will fill a significant void in the urban fabric where a surface parking lot is currently located. Staff does not believe a building at 4 stories tall with zero lot lines as shown is in conflict with the Over the Rhine New Construction Guidelines as there are neighboring contributing buildings that are 3 stories tall and the Historic Conservation Guidelines state *“The height of new construction should not vary more than one story from adjacent contributing buildings. Most buildings in Over-the-Rhine are between two- and five-stories.”* The one-story buildings adjacent to the property at 2008 Dunlap and 2001 Elm are both non-contributing structures.

- (b) *Is necessary where the denial thereof would result in a deprivation of all economically viable uses of the property as viewed in its entirety. In making such a determination, the Historic Conservation Board may consider the factors set forth in Section 1435-09-2 (aa) to (ff).*

This has not been established by the applicants.

Standards for Variances per Section 1445-05-4

- (a) *Owing to special circumstances or conditions pertaining to a specific piece of property, the strict application of the provisions or requirements of this Code or the Land Development Code, as applicable, are unreasonable and would result in practical difficulties.*

A strict application of the code would only allow 14 residential dwelling units on this property. This strict application is contrary to the goals of creating more housing opportunities, especially Low-Income Housing opportunities to provide more diverse housing options within the city.

The applicant is also aiming to use LIHTC funding. This funding often requires a certain level of scale to be eligible and competitive for the funding allotment.

- (b) *The variance is necessary for the preservation and enjoyment of a substantial property right of the applicant possessed by owners of other properties in the same district or vicinity.*

The applicants are asking for the density allowance that is denser than other new construction LIHTC projects that have been approved, but not the densest new construction project that has been approved within the Over-the-Rhine Historic District. If the applicant was permitted to have the same density as the densest previously approved new construction LIHTC project, they would be permitted to have 40 units compared to 44 units requested. If they were permitted to have the same density allowed as the densest multi-family new construction project approved within the Over-the-Rhine Historic District, they would be permitted 54 units. This information is being provided for reference to comparable developments, LIHTC and market rate, the Zoning Code and variance standards do not distinguish density and relief regulations based on affordability.

Table 1. LIHTC New Construction Projects with approved Density from HCB

Address	Density approved lot area/unit	Density per code lot area/unit	Approved Date
1712 Logan St	517 sf	700 sf	11/8/21
1684 Central Av	312.5sf	700 sf	9/27/21
1602 Pleasant St	247 sf	700 sf	8/5/19
1617 Race St	366 sf	700 sf	8/5/19
1521 Vine St	321 sf	700 sf	9/23/19
1512 Republic St	283 sf	700 sf	8/5/19
1505 Vine St	458 sf	700 sf	3/25/19
528 E 12 th St	404 sf	700 sf	8/17/20
600 W 12 th St	426 sf	700 sf	8/17/20

Table 2. Market Rate New Construction Projects with by right per a PD Zone or HCB Density Variance

Address	Density approved lot area/unit	Density per code lot area/unit	Approved Date
1621 Logan St	187 sf	NA	PD approved 2/3/21
1617 Elm St	355 sf	NA	PD approved 2/3/21
1118 Sycamore St	261 sf	700 sf	10/8/18
1437 Elm St	466 sf	700 sf	9/25/17
1216-1218 Race St	324 sf	700 sf	8/28/17

The request is for 1 bedroom studio apartments. This totals 44 beds. The applicants would be allowed to have 14 units with multiple bedrooms each, as a dwelling unit is permitted to have one family. A family is defined as a person living

alone or two or more persons living together as a single housekeeping unit in a dwelling unit (Section 1401-F2- Family). Per the building code, a family is defined as no more than 5 unrelated people living together, so a 14-unit complex with 5 bedrooms each for a total of 70 bedrooms could be permitted by right.

As seen on the map on page 2 the applicants are asking for a similar setback allowance to adjacent properties. The majority of properties directly adjacent to the property have zero lot lines at the rear yard. As the applicant is only requesting a partial variance, staff finds this request reasonable considering the context of directly surrounding properties that have zero lot line development.

General Standards; Public Interest

Below is analysis of the consideration factors for all of the requested zoning actions, utilizing Section 1445-13, General Standards; Public Interest.

- a. **Zoning.** *The proposed work conforms to the underlying zone district regulations and is in harmony with the general purposes and intent of the Cincinnati Zoning Code.*
The underlying zoning is UM. The proposed density and rear setback do not conform to the base zoning.
- b. **Guidelines.** *The proposed work conforms to any guidelines adopted or approved by Council for the district in which the proposed work is located.*
The project is within Over-the-Rhine Historic District. The requested work for new construction is reviewed for conformance with the Historic District Guidelines below.
- c. **Plans.** *The proposed work conforms to a comprehensive plan, any applicable urban design or other plan officially adopted by Council, and any applicable community plan approved by the City Planning Commission.*

There are 4 plans within the last 20 years that are associated with this area: Mohawk Area Plan, Brewery District Master Plan, Plan Cincinnati, and the Over-the-Rhine Comprehensive Plan. Below is specific language from those plans with language highlighted that are pertinent to this specific request.

Mohawk Area Plan The proposed work conforms to the Mohawk Area Plan adopted in 2021. Below is the Housing Goal for the plan from page 39:

Housing

Goal: Develop Mohawk to be a diverse and inclusive district that contains neighborhood-specific housing for all income levels.

Strategy 1: Promote architecturally compatible and consistent housing infill.

- Encourage property owners to activate vacant units and prioritize filling residential units above street-level commercial spaces.

- Unify residential and business organizations to promote productive communication and apply for project funding.
- Require that residential infill, including but not limited to single and multi-family structures, remain consistent with the architectural and pedestrian-friendly character and density of Mohawk within and surrounding the Sohn-Mohawk Historic District.
- The development of new market-rate housing will not happen at the detriment of low-income residents.
- Encourage and welcome new development at all levels of the housing market and ensure long-term sustainability of enough affordable housing to house current residents.

In regard to setbacks in the Connectivity goal on page 33:

Connectivity

Goal: Develop Mohawk into a well-connected neighborhood that is safe and accessible for all modes of travel.

Strategy 1: Develop a walkable neighborhood business district/ entertainment district.

- Locate new buildings and structures with zero or minimal setbacks, where frontage is on or near sidewalks

The Brewery District Master Plan of 2013 states on page 54 the vision for the area is “To restore the area’s original character, we recommend that this area become a “Brewing Heritage Urban Center” zone. This area should continue allowing a wide range of uses. It should be developed as medium density, mixed use, pedestrian oriented area maintaining on-street parking throughout. No drive through facilities should be permitted. The focus should be on restoration. New construction should be a minimum of 2 stories, and not taller than 5 stories.”

Plan Cincinnati of 2012 in the Live Initiative has the following goal:

Provide a full spectrum of housing options, and improve housing quality and affordability.

- A. Provide quality healthy housing for all income levels.
- B. Incentivize housing options of varied sizes and types for residents at all stages of life.
- C. Evenly distribute housing that is affordable throughout the City.
- D. Affirmatively Further Fair Housing.

Over-the-Rhine Comprehensive Plan of 2002 has the following goals under housing:

Housing Goals and Key Recommendations

1. Encourage and welcome new investment at all income levels of the housing market and ensure the long-term sustainability of enough affordable housing to house current residents.

2. Provide appropriate housing-related services for all residents.

3. Protect, preserve and enhance the significant landmarks and areas of OTR's historical, architectural and cultural heritage without displacement.

- d. **Traffic.** *Streets or other means of access to the proposed development are suitable and adequate to carry anticipated traffic and will not overload the adjacent streets and the internal circulation system is properly designed.*

Parking is not required for developments within the Urban Parking Overlay Zone. Please see below under Adverse Effects for a more detailed discussion.

- e. **Buffering.** *Appropriate buffering is provided to protect adjacent uses or properties from light, noise and visual impacts.*

No buffering is required by zoning as the adjacent parcels are within the same zoning district and do not require buffering.

- f. **Landscaping.** *Landscaping meets the requirements of Chapter 1423, Landscaping and Buffer Yards.*

There are no landscaping or buffer yards required.

- g. **Hours of Operation.** *Operating hours of the venue are compatible with adjacent land uses and illustrated below.*

This is a residential project and hours of operation are not applicable.

- h. **Neighborhood Compatibility.** *The proposed work is compatible with the predominant or prevailing land use, building and structure patterns of the neighborhood surrounding the proposed development and will not have a material net cumulative adverse impact on the neighborhood.*

While the proposal is denser than other recently approved projects, there is at least one other new construction project that is denser and a few other that also have a double and triple density allowance on their sites.

The proposed use as a 4-story multi-family residential building is in keeping with the mixed-use area. Several multi-story, multi-family residential new construction projects have been approved within the surrounding blocks.

- i. **Proposed Zoning Amendments.** *The proposed work is consistent with any proposed amendment to the zoning code then under consideration by the City Planning Commission or Council.*

~~Ordinance 202101677 has been referred to City Planning Commission from Council. This ordinance would remove density requirements from many zoning~~

~~districts throughout Cincinnati, including the UM zoning. The proposed density would be approved by right with the approval of the proposed ordinance.~~

Ordinance 202101677 was not passed. There are currently no outstanding amendments under consideration by City Planning Commission or Council relevant to the proposed project.

- j. ***Adverse Effects.*** *Any adverse effect on the access to the property by fire, police, or other public services; access to light and air from adjoining properties; traffic conditions; or the development, usefulness or value of neighboring land and buildings.*

There have been no noted concerns regarding access to the property by fire, police or other public services from city agencies. As the proposed development is on a corner, there is ample access to the property for services.

1) Parking and Traffic Patterns

On September 19, 2018, City Council passed the Urban Parking Overlay Zone #1, which exempts all projects within the boundary of the overlay from parking requirements. This overlay became law on October 20, 2018. While the property would be exempt from parking requirements, the project is asking for an increase in residential density which does normally increase the anticipated parking demand, however as this is a proposed LIHTC project with the specific population of the homeless being served, car ownership is unlikely for most residents and therefore there will be very limited parking demand. Additionally, and uniquely within OTR, transit capacity and opportunities within walking distance for jobs, goods and services should, in actuality, minimize the parking demand given the more urban context.

Concerns have also been brought up that increased traffic and parking as well as street closures during construction would provide a disruption to current businesses within the vicinity. Construction parking is not regulated through the zoning code. Any closure of the right of way would be required to get a permit through the Department of Transportation Engineering.

2) Trash and Utility Management

When an increase in density is requested for a property, providing adequate trash and utility management within the building or on the property is necessary as to not create a collection of trash receptacles on public right of ways, either on streets or on alleys. The proposal has a dumpster enclosure on site to provide adequate trash collection for the property.

Other concerns noted as potential adverse effects in public comments both written and at the pre-hearing:

3) Lack of Outdoor space

The base zoning, UM, only requires a 10 ft setback on a property, and this is not required to be an outdoor space for gathering. If the required 10 ft rear yard was required, it would have 1000 sf of open area on the property if all other portions of the lot were building coverage. The proposal has 500 sf of area within a courtyard and approximately 2000sf non-building area on the property. The property is providing more than 2 times the require open space on the property.

4) The area is entertainment/commercial not residential, and the area is mostly single/two family residential uses

As noted above, the proposed use is classified as congregate housing. While the prevalent land use may be something other than multi-family, the zoning of Urban Mix allows residential uses including multi-family, congregate housing and transitional housing.

- k. ***Blight.*** *The elimination or avoidance of blight.*
This property is not a blighted building but is a surface parking lot.
- l. ***Economic Benefits.*** *The promotion of the Cincinnati economy.*
This management and owner of the property and development is a non-profit. As a proposed congregate housing project that aims at reducing homelessness, the proposal will support the Cincinnati economy through providing an opportunity for residents to gain housing security.
- m. ***Job Creation.*** *The creation of jobs both permanently and during construction.*
The proposed project will create temporary jobs during construction and will provide permanent jobs as staff/management of the multi-family building.
- n. ***Tax Valuation.*** *Any increase in the real property tax duplicate.*
The new construction costs of \$8 million will increase the property value of the property.
- o. ***Private Benefits.*** *The economic and other private benefits to the owner or applicant.*
The owner of the property will have a benefit to redeveloping the property and creating an income stream to help support the mission of creating more affordable housing within Cincinnati.
- p. ***Public Benefits.*** *The public peace, health, safety or general welfare.*
The overall project is creating more Low-Income housing opportunities as well as having a specific goal of helping to provide housing security for the homeless population in Cincinnati.

CERTIFICATE OF APPROPRIATENESS REVIEW FOR NEW CONSTRUCTION

Staff is supportive of the design and feels that the design substantially conforms to the Historic Conservation District Guidelines. The applicant has provided a narrative. Staff agrees with their narrative and has the additional comments/analysis below.

NEW CONSTRUCTION

The Over-the-Rhine Historic Conservation Design Guidelines give direction to both staff and an applicant on how to design and review proposed developments. When designing infill developments, context and existing surrounding buildings are the main guiding principles of reference. Typically, the context that we consider the most when looking at appropriate infill design is the block on which the parcel is located and especially adjacent properties.

A. Intent and General Guidelines

1. New construction is allowed on vacant sites in Over-the-Rhine, because gaps due to demolition weaken the streetscape and the overall character of the district. New construction can improve both the physical quality and economic vitality of the neighborhood.

The lot is currently a surface parking lot.

2. New construction should be well-designed but should not replicate the existing buildings. The exceptional quality of the existing buildings in the district provides an outstanding framework for new construction.

This infill development does not replicate the existing buildings and has a design and detailing that is based on the fabric of the neighborhood while being modern in style.

3. The Historic Conservation Board's review of new construction will focus on the design compatibility with the surrounding contributing structures. The appropriateness of design solutions will be based on balancing the programmatic needs of the applicant with how well the design relates to the neighboring buildings and to the intent of these guidelines. New design proposals should pay particular attention to composition, materials, openings, rhythm, scale, proportion and height.

Staff details the compatibility of the project with the guidelines and surrounding buildings below in the specific guidelines.

4. The new construction guidelines for this district will be used to judge the compatibility of new work. The specific site and programmatic needs of each project will be taken into consideration.

Staff details the compatibility of the project with the guidelines and surrounding buildings below in the specific guidelines.

B. Specific Guidelines

1. Composition: New buildings should respond to the traditional subdivisions found on historic property: a base, a middle and a top. Most buildings in Over-the-Rhine are built

of brick with the principal facade parallel to the street it faces. The most important features of buildings in Over-the-Rhine are the arrangement of openings on the principal facade and an overall vertical emphasis of the whole design. Each building provides its own variations, but collectively they share many basic features.

Base: *New buildings should have a well-defined base. Within the district most buildings have a base that is distinguishable from the rest of the building. This is accomplished through a change of materials, a change of scale, and/or a lintel or other type of horizontal banding. In larger buildings the original base may include more than the first floor.*

While the building is a residential building, the design still incorporates a strong base through the use of different materials and colors, with the base being a light gray brick on the first floor topped with a cast stone belt course.

Middle: *Details on new buildings should relate to the detailing of adjacent or nearby buildings. Buildings in the district often incorporate architectural details such as changes in plane or changes in materials on their upper floors. Decorative, horizontal bands indicating the floor lines, sill heights or lintel heights should not overpower the vertical emphasis of the design.*

The middle is defined by a red/orange brick with individual and paired window openings in horizontal and vertical alignment. Around the windows there is both a change of materials and a change of plane. The façades also feature recessed areas that break up the façade.

Top: *New construction must employ a strong element that terminates the uppermost part of the building. Distinctive elements in the architecture of Over-the-Rhine are elaborate projecting cornices, decorative parapets and the expressive use of materials.*

The majority of the building is topped with a darker brick soldier course and a heavy coping material that provides differentiation from the middle in the form of a cornice.

2. Roofs: *Roofs for new construction should be similar to roofs of adjacent and nearby buildings of similar size and use. In the district, buildings of three or more stories generally have low-pitched shed roofs that are not visible above the principal facade. Smaller buildings in the district typically have simple gable roofs on which the gables are perpendicular to the principal facade. Institutional buildings in Over-the-Rhine have a variety of roof shapes, including dormers, multiple gables, hip roofs and towers. Roofs in this district have little or no overhang.*

The roof is a fairly flat roof with a slight pitch for drainage. The roof is not visible from the street.

3. Window Openings: *Window openings are extremely important in this district. The openings of new buildings should be related to the size and placement of openings found*

on historic structures of similar use in the district. In residential buildings, window openings are typically found individually rather than in pairs or grouped. The openings are taller and wider (typically in a proportion of 2:1), window sash are set back from the wall surface, and openings have some form of definition, such as lintels, sills or decorative surrounds. Window openings, which are typically aligned vertically, usually occupy between 20% and 50% of the principal facade. In commercial, industrial and institutional buildings, windows are often grouped within a single opening. These building types may also use a combination of window sash, including double-hung, awning and hopper. If muntins are used in new window sash, they must provide true divided lights. Within the individual opening, window sashes are usually divided into two or more lights. In all cases the glass must be clear; tinted or reflective glass is not acceptable. Also, roll down shutters and metal bar systems installed on the exterior of the building that cover door and window openings are not appropriate.

The window patterning is similar on the two street facades. The rear north elevation is not highly visible from the street and provides simpler detailing, but still provides punched openings.

- The windows are taller than they are wide. Even when the windows are in pairs, the individual window within those groupings are taller than they are wide.
- The windows on the street faces have definition to them through a change in material from the red/orange brick to a dark brick that provides a frame around each window column. Verticality is accentuated in the paired window openings through dark brick borders and metal paneling between windows.
- The windows are recessed from the face of the building.
- The windows are all aligned vertically and horizontally.

4. Storefronts: *New storefronts should relate to the characteristics of existing storefronts on historic buildings. Storefronts in the district are typically taller than individual upper floors; framed by piers and/or columns and have a lintel separating them from the upper floors; are divided into bays which increases their verticality and provides a pedestrian scale and proportion; and have large, fixed expanses of clear (not tinted or reflective) glass. As with rehabilitated original storefronts, roll down shutters and metal bar systems installed on the exterior of the building are not appropriate elements for new storefronts. The storefront lintels are 12 to 18 feet above grade; the windowsill height is between 18 inches and 3 feet above grade; and storefront windows are set back from the structural elements approximately 12 inches*

As this is a residential building, the storefront treatment is minimal; however, the corner of the building along Henry and Dunlap does feature a storefront system at the main entry vestibule, which wraps around the corner. The storefront is recessed slightly from the main facade. The storefront is divided into bays with clear glass from nearly floor to ceiling. A canopy wraps the corner covering the recessed storefront. A storefront location at the corner of the two intersecting streets is appropriate.

5. Setback: *Setback is an important issue in a dense urban area such as Over-the-Rhine. The setback for new construction should be consistent with the buildings of similar use on adjacent and nearby sites. In Over-the-Rhine, most commercial buildings are built up to the property line. Some residential property, especially detached buildings, has shallow setbacks but retain an "edge" at the property line with a fence. Some larger institutional buildings such as schools, churches and public buildings are setback from the street to provide public space and to add to their monumentality. In most cases new construction on corner sites should be built up to the edge of both outside property lines.*

The property has a zero-lot line setback on all street facades with only slight recesses to break up the building mass. A courtyard and small parking area is on the north side of the site fronting Dunlap Street. Setbacks are compatible with the surrounding development.

6. Rhythm: *New buildings should incorporate design features, such as window groupings, articulation of wall surfaces, and decorative elements such as columns or piers in an effort to maintain the rhythm that already exists in the district. New construction should avoid creating long unrelieved expanses of wall along the street by maintaining the rhythm of bays found on the district. Most buildings in Over-the-Rhine are relatively narrow, 25 to 50 feet in width. A building facade typically displays vertical subdivisions that establish a visual rhythm. In dense commercial areas such as Vine Street, there are no setbacks, creating a solid wall along the street. This wall is articulated by the individual buildings, which in turn are divided by window groupings, changes in wall planes and decorative elements such as pilasters, columns or piers.*

The building is approximately 100 feet wide along each street face, however a rhythm has been provided that breaks up the façade with the vertical columns around the windows as well as the recesses along each façade. The Dunlap façade is 66.6' in width at the street, with the remaining massing set back to provide the parking and courtyard area.

7. Emphasis: *New residential and mixed-use construction should have a vertical emphasis, because in Over-the-Rhine buildings are taller than they are wide, window openings are tall and narrow, and storefronts have slender columns, which emphasize verticality. Commercial and industrial buildings, which may have an overall horizontal emphasis, often incorporate vertical elements, such as pilasters or vertically oriented openings.*

The building is approximately 100 feet wide along each street face, and while the building is wider than it is tall there are many elements that help to provide a vertical emphasis including:

- Vertically oriented windows.
- Vertical window columns and a frame around the window columns.
- Recessed portions of the façade that extend up the entire façade creating a vertical column.

8. Height: *The height of new construction should not vary more than one story from adjacent contributing buildings. Most buildings in Over-the-Rhine are between two- and five-stories.*

The building is 4 stories tall. Buildings adjacent to the subject property are 2 one-story non-contributing buildings. Contributing buildings in the immediate vicinity vary between 2 and 3 stories, including the buildings south across Henry Street at 1923 Dunlap and 1923 Elm St (both 3 stories), and the building west across Dunlap at 2013 Dunlap (2-3 stories). One block south, the building at 1908 Dunlap is 5 stories. It should also be noted that the building that formerly occupied this site was 4 stories in height. Due to the lack of immediately adjacent contributing buildings, and the context of the buildings in the vicinity, Staff feels the 4-story height is appropriate.

9. Materials: *New construction should use materials that are found on the historic buildings in Over-the-Rhine. Clearly the dominant material in Over-the-Rhine is brick, but other materials such as limestone, sandstone, cast-iron, slate, wood and sheet metal are important as well. Materials such as stucco, synthetic stucco and plastic are not appropriate and should not be considered as exposed finish materials for new construction in this district.*

The building materials are all appropriate. The main building material is brick. Different color bricks are used to provide ornamentation, window surrounds, and vertical orientation. There are metal panels above and below paired window openings used as an accent material. The contemporary brick used at the base has a rougher texture and visual composition that provides a stone-like quality to the base.

Other Considerations:

Prehearing Results: The initial prehearing occurred on September 8, 2021 – The applicant and their team were present. 12 members from the public were on the call. The second prehearing occurred on June 8, 2022.

Comments Provided to Staff: Nineteen (19) letters/emails of opposition were submitted for the original submission regarding the original Zoning Relief application. One letter is signed by multiple adjacent property owners. Eighteen (18) letters of support were submitted during the initial review period.

For the current proposal, an additional forty-two (42) letters of support and twenty-two (22) letters of opposition were received prior to the written submission deadline, including one petition.

The letters of opposition include the Over-the-Rhine Community Council submitting a letter of opposition to the proposed project, noting that while the Board of Trustees recommended support of the project, the full membership voted against the Board's

recommendation with a vote of 30 in favor to 34 in opposition at the April 25, 2022 meeting.

Community Outreach: While staff always encourages any outreach or community engagement, per the process for application of Zoning Relief in the zoning code, it is not required that an applicant contact or have community engagement to apply.

The applicant has begun community outreach to the Over-the-Rhine Community Council Economic Development and Housing Committee and has committed to engaging with the OTRCC throughout the design process prior to coming back for an application for a Certificate of Appropriateness. The dates below relate to the community engagement completed by the applicants to date:

- November 22, 2021 – Sent email to OTR Community Council President and informed him of the project and asked to present before Executive Board
- December 13, 2021 – Attended and Presented to OTR Comm. Council Executive Board of Trustees (presentation attached)
- January 4, 2022 – Attended and Presented to OTR Comm. Council Economic Development and Housing Committee (presentation attached)
- January 5, 2022 – Attended and Presented at HCB Staff Pre-Hearing
- January 10, 2022 - Attended and Answered Questions at OTR Comm. Council Executive Board of Trustees
- March 1, 2022 – OTRCC Economic Development and Housing Committee
- March 14, 2022 – OTRCC Board of Trustees
- March 28, 2022 – OTRCC Full Council Meeting
- April 5, 2022 – OTRCC Economic Development and Housing Committee
- April 11, 2022 – OTRCC Board of Trustees
- April 25, 2022 – OTRCC Full Council Meeting
- June 8, 2022 – Attended and Presented at HCB Staff Pre-Hearing

Per the applicant's original submission prior to the March 1, 2022 presentation: "In addition to the dates above we intend to continue community engagement throughout the design and massing of the project in advance of the future Certificate of Appropriateness application. We are working directly with the Community Council to schedule these and the tentative date for the first design charrette is March 1, 2022."

Project timeline: Construction is expected to begin Spring 2023 and it would be operational in Spring of 2024.

Recommendation:

Staff recommends the Historic Conservation Board take the following actions:

I. ZONING RELIEF

The following recommendations are proposed for the project proposed at 2000 Dunlap Street per the drawings submitted by New Republic dated 4.5.2022:

- A. **1410-07: APPROVE- Variance** to allow proposed density of 227 sf of land area/unit for a unit count of 44 units:
- B. **1410-07: APPROVE- Variance** of 10 feet for a zero-lot line on a portion of the lot, per plans submitted by New Republic Architecture dated 4.5.2022
- C. **FINDING:** The Board makes this determination that per Section 1435-05-4:
 - 1. Such relief from the literal implication of the Zoning Code will not be materially detrimental to the public health, safety and welfare or injurious to property within the district or vicinity where property is located.
 - 2. The project is part of a Low-Income Housing Tax Credit Project and the applicants have sufficiently demonstrated that the extra units are needed to make the project economically feasible.
 - 3. Low Income and Affordable Housing are a stated goal in the Over-the-Rhine Comprehensive Plan of 2002, Plan Cincinnati, and the Mohawk Area Plan of 2021.

II. CERTIFICATE OF APPROPRIATENESS

The following recommendations are proposed for the project proposed at 2000 Dunlap Street per the drawings submitted by New Republic dated 4.5.2022:

- A. **APPROVE** the application for a Certificate of Appropriateness for a single-family home at 1413 Elm Street per the plans submitted by Kenneth R. Bowerman Architect, Inc. dated 05.06.2022 with the following conditions:
 - 1. The building permits must be issued within two years of the decision date or the Certificate of Appropriateness shall expire.
- B. **FINDING:** The Board makes this determination per Section 1435-09-2:
 - 1. That the property owner has demonstrated by credible evidence that the proposal substantially conforms to the applicable conservation guidelines.

Historic Conservation Board

Hearing Application

II Centennial Plaza
805 Central Avenue, Suite 500
Cincinnati, Ohio 45202
Monday- Friday 7:30 am- 4 pm
513-352-1559

[Click any red field for additional information.](#)

Section 1. SUBJECT PROPERTY

ADDRESS 2000 Dunlap Street, Cincinnati, Ohio, 45214 **COMMUNITY** Over-the-Rhine
PARCEL ID(S) 096-0005-0116, 096-0005-0117, 096-0005-0118, 096-0005-0119 **HILLSIDE DISTRICT:** ☐ Yes ☐ No
BASE ZONING CLASSIFICATION Urban Mix (UM) District **ZONING OVERLAY (if applicable)** Urban Parking Overlay
HISTORIC DISTRICT: Over-the-Rhine Historic District
☒ **Non-Residential Project** ☐ **Residential Project (RCO) One -, Two -, and Three- Family Dwelling**

Section 2. APPLICANT

NAME Suder LLC CONTACT PERSON (if legal entity) Sean S. Suder, Esq.
ADDRESS 455 Delta Avenue, Suite 203 CITY Cincinnati STATE Ohio ZIP 45226
EMAIL sean@ssuder.com RELATIONSHIP TO OWNER (if not owner) Attorney
TELEPHONE 513-694-7501

Section 3. OWNER

NAME Over-the-Rhine Community Housing ("OTRCH") CONTACT PERSON (if legal entity) Ben Eilerman
ADDRESS 114 West 14th Street CITY Cincinnati STATE Ohio ZIP 45202
EMAIL beilerman@otrch.org RELATIONSHIP TO OWNER (if not owner) _____
TELEPHONE 513-381-1171 ext. 119

Section 4. NATURE OF CERTIFICATE OF APPROPRIATENESS REQUESTED

- ☐ A certificate of appropriateness is NOT being requested. Proceed to Section 5, or select all that apply
- ☒ New Construction ☐ Alteration ☐ Demolition

BRIEF DESCRIPTION OF PROJECT (Do not write "see attached" or leave blank.)

OTRCH requests a certificate of appropriateness ("COA") for new construction of four-stories of congregate housing on the lot at 2000 Dunlap Street.

Section 5. NATURE OF ZONING RELIEF REQUESTED

- ☐ Zoning relief is NOT being requested, or select all that apply:
- ☒ Variance ☐ Special Exception ☐ Conditional Use ☐ Use Variance
☐ Expansion or Substitution of Non Conforming Use ☐ Hillside Overlay District Permission
☐ Urban Design Overlay District Permission ☐ DD District Phased Development Approval

BRIEF DESCRIPTION OF ZONING RELIEF REQUESTED (Do not write "see attached" or leave blank.)

Through the architectural firm New Republic Architecture, OTRCH has previously applied for density and rear setback variances, which the Board continued in case number COA2021066. Through the law firm Suder LLC, OTRCH now brings this COA application. OTRCH respectfully asks that the Board consolidate the variance application with this COA application and consider the applications together. New Republic Architecture and Suder LLC will both be representing OTRCH on these applications moving forward.

Section 6. SIGNATURE.

I certify that all statements and documents that I provide with reference to this application are accurate, complete, and true to the best of my knowledge and belief. I further acknowledge that my application shall be deemed incomplete for my failure to timely comply with any requirement of this application, which non-compliance may result in delays in the scheduling and resolution of my application.

Print Name Sean S. Suder Signature  Date 5/12/22 / /

Section 7. DOCUMENTATION SUBMISSION REQUIREMENTS.

Important Information: An application will not be deemed complete until all required documents listed below have been submitted and the application fee is paid in full. All transactions must be completed by 4:00pm. No exceptions. Applicants are strongly encouraged to submit as early as possible to allow time for review and revisions. Partial applications cannot be processed. Failure to submit a complete application prior to 4:00pm on a deadline date will result in delays to the assigned hearing date.

☒	Submit two (2) paper copies collated, single sided and bound together of all the documents listed below, <u>AND</u> one (1) digital copy in PDF format of all the documents listed below.
☒	Historic Conservation Board hearing application; pages 1-2 only. The instruction pages should not be included in your submission.
☒	Adjudication Letter <u>AND</u> worksheet issued by the Department of City Planning & Engagement – Urban Conservator’s Office. Provide all documents requested on the worksheet.
☒	A written statement explaining how the proposed project meets the applicable Historic Conservation Guidelines and, if requested, Zoning relief. Separate instructions for preparing this statement are attached. If you fail to follow the instructions for your type of request(s), your application may be denied.
☐	Applications requesting development permission in a Hillside Overlay District must meet the additional requirements found in <u>Cincinnati Municipal Code 1433-15</u> . Please ensure your application meets these requirements.
☒	All documents (forms, letters, etc.) must be formatted to 8.5x11. Font no smaller than size 11. Plans or drawings may be formatted to 11x17 or 12x18, but no larger sizes will be accepted.
☒	Accurate drawings, plans or surveys (including a graphic scale) of <u>existing and proposed</u> project showing parcel lines, boundaries, dimensions, areas, topography, and frontage of the property involved, as well as the location and dimensions of all primary and accessory structures from the nearest property lines. Provide all parcels and structures adjacent to the site. When landscaping is required by the zoning code, a landscaping plan must be provided.
☒	Detailed information (such as drawings, elevations with measurements, specifications) fully depicting the exterior and/or interior appearance of the <u>existing and proposed</u> project, including parking and access, exterior lighting, landscaping, signs, roof and floor plans involved in the application. Provide labeled photographs of <u>existing</u> conditions of all sides/directions of the structure/property.
☒	<u>The Hamilton County Auditor’s record showing ownership of the property.</u> If the Hamilton County Auditor’s official records do not list the applicant or owner as the owner of the property, please provide a lease, contract to purchase, or other agreement demonstrating the applicant or owner’s legal basis to seek the relief requested.
☒	A list of witnesses, expert witnesses, or legal counsel who you expect to testify at the hearing on this application. Please provide names and email addresses.
☒	Other documents or information you intend to introduce at the hearing on this application.
☒	A non-refundable application fee - a check made payable to “City of Cincinnati.”

To help avoid delays, it is strongly suggested that you present your application to neighboring property owners and any interested neighborhood community groups prior to the hearing on your application. This will give you a prior opportunity to address your neighbors’ concerns or objections and can facilitate the approval of your application.

INSTRUCTIONS FOR APPLICATIONS REQUESTING A CERTIFICATE OF APPROPRIATENESS

Applicants requesting a Certificate of Appropriateness must demonstrate through credible testimony, documentary evidence or written statements how their proposed project meets the standards outlined in **Cincinnati Municipal Code 1435-09-2 AND local Historic Conservation Guidelines.** Applications that are not supported by testimony, documentary evidence or written statements are subject to disapproval.

As required by the application, applicants must provide a written statement explaining how their proposed project meets the applicable Historic Conservation Guidelines.

1435-09-2. The Board may approve or approve with conditions an application for a Certificate of Appropriateness when it finds either:

(a) That the property owner has demonstrated by credible evidence that the proposal substantially conforms to the applicable conservation guidelines;

Or

(b) That the property owner has demonstrated by credible evidence that the property owner will suffer economic hardship if the certificate of appropriateness is not approved.

In determining whether the property owner has demonstrated an economic hardship for purposes of (b) above, the Historic Conservation Board shall consider all of the following factors:

(i) Will all economically viable use of the property be deprived without approval of a Certificate of Appropriateness;

(ii) Will the reasonable investment-backed expectations of the property owner be maintained without approval of a Certificate of Appropriateness;

and (iii) Whether the economic hardship was created or exacerbated by the property owner.

In evaluating the above factors for economic hardship, the Historic Conservation Board may consider any or all of the following:

(aa) A property's current level of economic return; (bb) Any listing of property for sale or rent, price asked, and offers received, if any, within the previous two years, including testimony and relevant documents; (cc) The feasibility of alternative uses for the property that could earn a reasonable economic return; (dd) Any evidence of self-created hardship through deliberate neglect or inadequate maintenance of the property; (ee) Knowledge of landmark designation or potential designation at time of acquisition; and/or (ff) Economic incentives and/or funding available to the applicant through federal, state, city, or private programs.

Additionally, the City of Cincinnati Department of Planning and Engagement's website offers links to **local Historic Conservation Guidelines**. The website is <https://www.cincinnati-oh.gov/planning/historic-conservation/local-conservation-guidelines/>.

Sean S. Suder, Esq.
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Cincinnati, Ohio 45226
513.694.7501 (d)
513.235.3470 (c)
sean@ssuder.com

May 12, 2022

VIA HAND AND EMAIL DELIVERY (*Kassandra.Maynes@cincinnati-oh.gov*)

City of Cincinnati Historic Conservation Board
c/o Kassandra Maynes
805 Central Avenue, 5th Floor
Cincinnati, Ohio 45202

Re: New Construction at 2000 Dunlap Street, Cincinnati, Ohio 45214 (the “Property”)

Hon. Historic Conservation Board:

On behalf of Over-the-Rhine Community Housing (“OTRCH”), this letter is in support of OTRCH’s application for a certificate of appropriateness (“COA”) for new construction at the above-referenced Property and OTRCH’s application for variances on the Property, which is currently pending before this Board.

I. Overview of the Applications

The Property is located at the northeast corner of Dunlap Street and Henry Street in the Over-the-Rhine neighborhood of Cincinnati. A map of the area is attached as Exhibit A. The Property is zoned as Urban Mix (“UM”); it is also within a Parking Overlay District and the Over-the-Rhine Historic District. The Property is currently used as a parking lot, as shown in more detail in the Current Site Conditions marked as Exhibit B. Pictures of the surrounding streetscape are marked as Exhibit C.

OTRCH plans to construct a four-story, 44-unit residential building (the “Building”) on the Property to provide permanent supportive housing to chronically homeless people in Cincinnati. A site plan for the Building proposes is attached as Exhibit D, illustrating a timeless design that will complement the distinct character of the Over-the-Rhine Historic District.¹ In addition to individual apartments, the building would include office space for employees as well as common areas for the tenants to eat, study, recreate, do laundry, socialize, and talk with counselors and other care providers. The Building is proposed to be built to the lot lines, except on the northeast corner of the lot where there would be a small parking area and enclosed outdoor courtyard.

¹ Snapshots of Exhibit D are included in this letter as visual aids.

The City has already determined that OTRCH's intended use of the Property constitutes "congregate housing," as defined in § 1401-01-C19 of Cincinnati Zoning Code ("CZC"): "Apartments and dwellings with communal dining facilities and services, such as housekeeping, organized social and recreational activities, transportation services and other support services appropriate for the residents." This use is permitted by right in the UM District pursuant to CZC § 1410-5, as the City has confirmed in the Zoning Verification letter attached as Exhibit E.

OTRCH has previously applied for variances under CZC § 1445-15 from the UM District's density and setback regulations.² At its regularly scheduled meeting on January 24, 2022, the Board reviewed OTRCH's variance application, which City Staff recommended for approval. The Board continued the hearing until OTRCH filed for a COA. Now that OTRCH has applied for a COA under CZC § 1435-09-2, OTRCH respectfully requests that the Board resume consideration of the variance application in conjunction with the COA application.

For the reasons more fully set forth herein, the Board should approve both the COA and the variances because OTRCH has met every legal requirement necessary for both applications.

II. Conformity with Guidelines

The Board should approve the application for a COA under CZC 1435-09-2(a) because, as explained below, the proposed building substantially conforms to the Over-the-Rhine Historic District Conservation Guidelines for New Construction (the "Guidelines").

1. Infill Construction

The Guidelines allow for infill construction on vacant sites to reduce gaps that weaken the streetscape.³ Filling in those gaps between buildings, such as the one that currently exists at the Property, will "improve the physical quality and economic quality of the neighborhood."⁴ The proposed Building will enhance the streetscape of Henry and Dunlap Streets, provide new housing opportunities to reduce homelessness, and increase the number of stable, healthy residents who can contribute to the Cincinnati economy.

2. No Replication

The Guidelines provide that new construction should complement but not replicate existing buildings.⁵ The proposed building, which was designed by Over-the-Rhine-based New Republic Architecture, is unique, incorporating materials and features from existing neighborhood buildings while fashioning a new form that does not exist anywhere else in the neighborhood.

² Application #ZH20210183.

³ Guidelines at § A(1).

⁴ *Id.*

⁵ *Id.* at § A(2).

3. *Composition.*

As required by the Guidelines,⁶ the Building has a well-defined base, middle, and top, and has an overall vertical emphasis. The first floor is taller than the other floors, so as to set the first floor apart visually from the rest of the Building. On much of the Building, the line between the first and second floor is also marked by a change in materials, with the first floor being comprised of a distinctive light gray brick to contrast with the upper floors. The second, third, and fourth floors all feature tall window openings in vertical bays that pull the eye upward. Some of the vertical bays are outlined in a dark brick border from second to fourth floor; creating vertical elements to break up the elevations. Across the entire top of the Building is a bold cornice that clearly marks the vertical termination point.



4. *Roofs.*

The Guidelines provide those roofs should be similar to adjacent buildings and have little or no overhang.⁷ As with nearly all the nearby and adjacent structures, the Building's roof would have no overhang and would not be visible above the principal façade.

5. *Window Openings.*

In accordance with the Guidelines, clear windows occupy a significant proportion of the Building's façade and are taller than they are wide. Most are double-hung windows. The grouping of the windows acknowledges the historic placement of windows in other historic industrial and residential buildings in the neighborhood, including for example, the Perseverance residential project on Vine Street, the Dunlap Flats residential project at 1908 Dunlap Street, the property located at 1915 Elm Street, and the property located at 2070 Elm Street.



6. *Storefronts.*

Although the Building is not used for retail, the front entrance at southwest corner of the Building is evocative of a historic storefront. As previously stated, the ground floor is taller than the upper floors; the metal roof over the entrance further separates the entrance from the upper floors. The entrance also has large, fixed, glass windows framed by pilasters that increase

⁶ *Id.* at § B(1).

⁷ *Id.* at § B(2).

verticality and provide a pedestrian scale. Although the “Storefront” section of the Guidelines is inapplicable, the Building conforms with it nonetheless.⁸



7. *Setback.*

The Guidelines clearly state that “[i]n most cases new construction on corner sites should be built up to the edge of both outside property lines.”⁹ Being located on the corner of Henry and Dunlap Streets, OTRCH plans to build to the lot lines. Additionally, the building that previously stood on this Property was built to the lot lines, and, therefore, the proposed zero lot line building is in keeping with the historic building fabric of the Property. (See below for a picture of the building that previously stood on the Property).



8. *Rhythm.*

The Guidelines state that “[n]ew buildings should incorporate design features, such as window groupings, articulation of wall surfaces, and decorative elements such as columns or piers in an effort to maintain the rhythm that already exists in the district.”¹⁰ Although the entire lot is only 100 feet wide on each side, the Building breaks up its façades with purposeful material changes and window placement. Consider the south and west elevations, which will be most

⁸ *Id.* at B(4).

⁹ *Id.* at B(5).

¹⁰ *Id.* at B(6).

visible to passersby. The west elevation has three distinct sections, broken up by alternating contrasting brick courses.



The south elevation has fewer material changes but features a large proportion of windows grouped in vertical bays that direct the eye upward rather than horizontally.



All elevations purposely include a mix of window groupings, with the paired windows serving to separate the walls into smaller lengths and provide a steady rhythm for the viewer.

9. *Emphasis.*

The Guidelines provide that “[n]ew residential and mixed-use construction should have a vertical emphasis.”¹¹ As explained herein, the Building breaks up the horizontality of its façades with numerous vertical elements. The tripartite base, middle, and top draw attention upward, as so do the plentiful windows which are narrow in shape and point up. The materials changes also serve to orient the Building vertically by breaking up the façade into smaller sections.

10. *Height.*

The Guidelines provide that new construction should not vary by more than one story from adjacent contributing buildings.¹² The structures nearest the Property—2008 Dunlap and 2001 Elm—are non-contributing buildings. The nearest structures which are contributing are those 1926 Henry, 2007 Dunlap, and 2009 Elm, all of which are three-story buildings. Because the Building would be four stories, it conforms with Guidelines with respect to height and falls in the normal range of Over-the-Rhine buildings: “between two and five-stories.” Additionally, the building that previously stood on this Property was four stories and, therefore, the proposed four-story building is in keeping with the historic building fabric of the Property. (See below for a picture of the building that previously stood on the Property).



11. *Materials.*

The dominant material for the Building is brick, in keeping with the character of the district. Accent materials include metal, stone, and cementitious siding. Although the latter is likely not present on historic buildings, it has the same appearance as wood and will stand up better to the elements. Thus, the Building’s materials are in keeping with the appearance of the district’s existing historic buildings.¹³

¹¹ *Id.* at B(7).

¹² *Id.* at B(8).

¹³ *Id.* at B(9).

III. Variances

In addition to this COA application, OTRCH has previously applied for two variances from the UM District's Development Regulations in CZC 1410-07. First, the UM District only allows for 14 units by right on the Property, which is unreasonable in a neighborhood as dense and populated as Over-the-Rhine. OTRCH, therefore, requests a variance to build and operate 44 units to make the Building financially viable and provide much needed housing in the City. Second, the UM District requires a 10-foot rear setback from which OTRCH requests a variance to build to the rear lot line of the Property.

Included in the Board's packet for case number #ZH20210183 is a written statement by OTRCH in support of the variances along with a staff report from the Urban Conservator recommending approval of the variances. In addition to the thorough reasoning in OTRCH's statement and the staff report, OTRCH hereby provides the following supplemental justification for the variances.

1. *Practical Difficulties.*

An area variance is appropriate when, "[o]wing to special circumstances or conditions pertaining to a specific piece of property, the strict application of the provisions or requirements of this Code or the Land Development Code, as applicable, are unreasonable and would result in practical difficulties."¹⁴ In assessing practical difficulties, courts use the balancing test from *Duncan v. Middlefield*.¹⁵ The so-called "Duncan Factors" include the following considerations, none of which is controlling on its own:

- (1) whether the property in question will yield a reasonable return or whether there can be any beneficial use of the property without the variance;
- (2) whether the variance is substantial;
- (3) whether the essential character of the neighborhood would be substantially altered or whether adjoining properties would suffer a substantial detriment as a result of the variance;
- (4) whether the variance would adversely affect the delivery of governmental services (e.g., water, sewer, garbage);
- (5) whether the property owner purchased the property with knowledge of the zoning restriction;
- (6) whether the property owner's predicament feasibly can be obviated through some method other than a variance;
- (7) whether the spirit and intent behind the zoning requirement would be observed and substantial justice done by granting the variance.¹⁶

With respect to the Property and the proposed Building, each of the *Duncan* Factors weighs toward granting the variances.

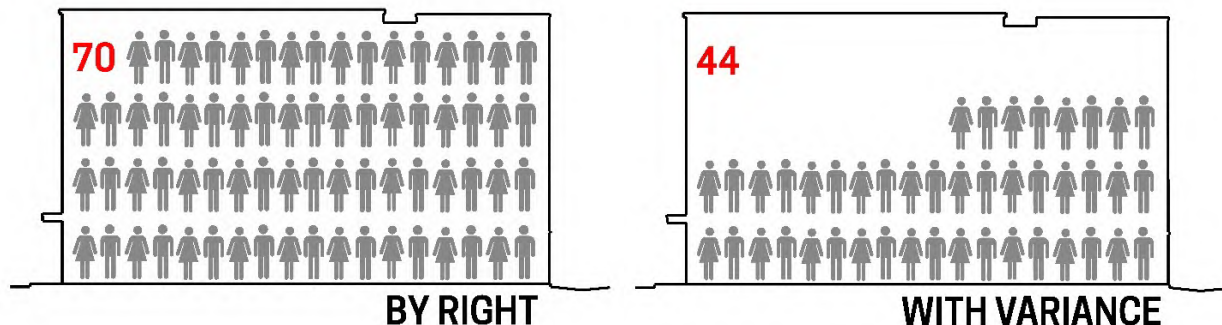
¹⁴ CZC § 1445-15(a).

¹⁵ 23 Ohio St.3d 83, 491 N.E.2d 692 (1986).

¹⁶ *Duncan*, 23 Ohio St.3d at 86.

First, the UM District’s density and setback regulations are entirely unreasonable for as dense a neighborhood as Over-the-Rhine and prevent OTRCH from yielding a reasonable return on a use that is expressly called for in relevant planning documents. The Mohawk Area Plan, the Brewery District Plan, Plan Cincinnati, and the Over-the-Rhine Comprehensive Plan all call for diverse housing opportunities, especially affordable housing that can serve lower income persons. The Building will further this goal, but OTRCH needs Low Income Housing Tax Credits (“LIHTC”) to make the project financially viable. Obtaining LIHTC depends on building at a scale not possible under the UM District’s regulations as written. Variances of the density and setback requirements are therefore necessary for OTRCH to yield a reasonable return on the Building and provided much needed housing in the City.

Existing density maximums, such as those applicable to the Property, are artificially low and create unnecessary constraints on housing supply in the City. Further, density regulations are intended to address overcrowding, yet they only address the number of units on a property rather than the number of people residing on a Property. For example, under the existing applicable 14 dwelling unit per acre density maximum, 14 units of any size or number of bedrooms could be constructed on the Property. There could be an average of four persons in a unit, or 64 people residing on the Property as a matter of right. OTRCH is proposing 44 units on the Property, each accommodating one resident. Further, a hotel is permitted as of right on the Property; a use that would be much more intensive than 44 apartment units. As such, the proposed number of people living on the Property, 44, is far less than what could be permitted by right. Please see the below illustrations of this point, which are also attached as Exhibits H and I.



Second, the variances for which OTRCH has applied are not substantial. Building to the lot lines is not an extraordinary request; in fact, the Guidelines require that infill construction on corner lots should be built to the lot lines. And as the staff report pointed out, the Board has granted much larger density variances to other properties: “If they were permitted to have the same density allowed as the densest multi-family new construction project approved within the Over-the-Rhine Historic District, they would be permitted 54 units.” Thus, OTRCH’s request for 44 units is not a substantial departure from the UM District’s Development Regulations.

Third, the variances would not alter the essential character of or have an adverse impact on the neighborhood. Again, the Guidelines require zero-lot line setbacks; thus, the setback variance would help preserve the neighborhood character. Neither would increased density adversely affect the neighborhood, as the Mohawk Area is already in keeping with Over-the-Rhine’s character as

a very dense neighborhood. (Some of the neighbors argue that the Building would change the neighborhood by the nature of its use. This argument is misguided: the presence of congregate housing is not new in the Mohawk Area, as Logan Towers is less than 2 blocks away from the Property. And even if congregate housing was not present, the use is permitted by right: changes to the essential character under *Duncan* should refer to the relief actually requested, *i.e.* the setback and density variances.)

Fourth, the variances will have no adverse effect on the delivery of government services. The staff report identified no such risk. While some neighbors allege that building to the lot line could hinder first responders from accessing Colby Alley, this is unlikely. North and south of the Property, existing structures already abut Colby Alley at the lot line. Further, Colby Alley is quite narrow; in an emergency situation, first responders would likely use Dunlap or Elm to access a property in trouble.

Fifth, OTRCH acquired the Property before the UM District was in place. Race Street Tenant Association bought the Property in 1992; OTRCH merged with the Association in 2006; and the UM District took effect in 2007. Thus, OTRCH had vested rights in the Property prior to the setback and density regulations at issue here.

Sixth and seventh, while OTRCH might be able to yield a reasonable return on the Property by pursuing some other use, substantial justice requires granting the variance. OTRCH is looking to carry out the work that all relevant planning documents request: more housing, and more affordable housing. The specific regulations of the CZC are aimed at carrying out the City's planning goals. Fairness demands that the Board accommodate OTRCH's attempts to carry out an important planning objective. To the extent that a literal interpretation of the CZC would prevent OTRCH from helping achieve the City's goals, practical difficulties exist sufficient to justify variances.

2. Preservation of a Property Right Enjoyed by Others.

An area variance is also appropriate where it is "necessary for the preservation and enjoyment of a substantial property right of the applicant possessed by owners of other properties in the same district or vicinity." There is direct precedent throughout Over-the-Rhine for multi-family building of this size and density. As OTRCH cannot practicably enjoy its right to use the Property for congregate housing under the existing UM District Development Regulations, the Board should grant the requested variances.

3. Neighbors' Ad Hominem Attacks on the Chronically Homeless.

The Board's packet also includes letters from a few neighboring property owners that significantly confuse the issues and improperly focus on the types of persons for which the Building is being developed. The Board must focus on what is being constructed rather than who it is being constructed for and must disregard those arguments.

First and foremost, the primary motivation of many of the neighbors in opposition appears to be excluding the people OTRCH intends to house: the chronically homeless and most vulnerable in Cincinnati. One letter in opposition cites the number of bars in the area, alleging that the

Building's residents will not be able to handle the "temptation." Another states that the Building "would kill the current vibe." Yet another letter suggests that "providing housing for the homeless population" at the Property could "potentially increase health and safety concerns for the existing residents and visitors." Most of the opposition contends that some housing is needed for the chronically homeless, just not on the Property. Make no mistake, if OTRCH was proposing to lease this same Building at market rate to young professionals, these same neighbors would be cheering for the variances.

This sort of blatant NIMBY-ism ("not in my back yard") that focuses on the person rather than the use is prohibited by both state and federal law, and the Board should reject any such appeal based on who might live in the Building. The First District Court of Appeals has held that "zoning laws may regulate the use of the land, not the identity of the users."¹⁷ Further, OTRCH's intended residents at the Property are protected as disabled persons under the Federal Fair Housing Act,¹⁸ the Ohio Fair Housing Act,¹⁹ Title II of the Americans with Disabilities Act,²⁰ and Section 504 of the Rehabilitation Act.²¹ Those statutes not only prohibit the Board from discriminating against the likely residents in considering these applications, but they also impose an affirmative duty to provide reasonable accommodations—including making exceptions to zoning and land use regulations. Thus, even if the Board finds that OTRCH has not met its burden for the COA or the variances, the Board should nonetheless approve the applications as reasonable accommodations for OTRCH's intended residents to use and enjoy housing at the Property.

Second, several of the neighbors in opposition suggest that OTRCH's use is not permitted in the UM District. City staff has already determined that the Building qualifies as congregate housing, a use permitted by right. References to "transitional housing" are misplaced. The CZC defines "transitional housing" as "housing designed to assist persons in obtaining skills necessary for living in permanent housing."²² These are terms of art in the world of affordable housing: the Department of Housing and Urban Development defines "transitional housing" and "permanent supportive housing" as entirely separate things.²³ The Board should therefore resist calls for a use variance and other baseless arguments aimed at preventing OTRCH from exercising its right to use the Property for congregate housing.

Third, some of the opponents argue that the Building will cause traffic congestion and have an adverse impact on the neighborhood's parking. The fact of the matter is that almost none of OTRCH's residents will own a car, and the site plan calls for just two parking spots for cars. Employees and residents will largely walk, bike, or use public transit. The idea that the Building might cause some massive influx of cars simply has no basis in the actual plans that OTRCH has proposed. And although the Property is currently used for a parking lot, OTRCH has no obligation to provide parking for the neighborhood. To the contrary, the Property is exempt from all parking requirements by nature of being in the Parking Overlay District.

¹⁷ *Phillips Supply Co. v. Cincinnati Zoning Bd. of Appeals*, 2014-Ohio-3203, 17 N.E.3d 1, ¶ 14 (1st Dist.).

¹⁸ 42 U.S.C. § 3604(f)(3)(A)-(B).

¹⁹ R.C. 4112.02(H)(18)(a), (19).

²⁰ 42 U.S.C. § 12132.

²¹ 29 U.S.C. § 794.

²² CZC § 1401-01-T.

²³ 24 CFR § 578.3.

IV. Conclusion

In summary, OTRCH has applied for and met the requirements for a COA, for a setback variance, and for a density variance. Thus, OTRCH respectfully asks that the Board approve the COA and the variances requested for the Property. Thank you for your consideration.

Sincerely,

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

Sean S. Suder

Counsel for Over-the-Rhine Community Housing

c: Mary Burke Rivers
Ben Eilerman
Ashley Finke
Andy Hutzell

EXHIBIT LIST

Exhibit A: Context Map

Exhibit B: Current Site Conditions

Exhibit C: Current Streetscape

Exhibit D: Site Plan

Exhibit E: Zoning Verification Letter

Exhibit F: Adjudication Letter and Worksheet

Exhibit G: Hamilton County Auditor's Property Report

Exhibit H: Illustration of 70 Residents Allowed by Right

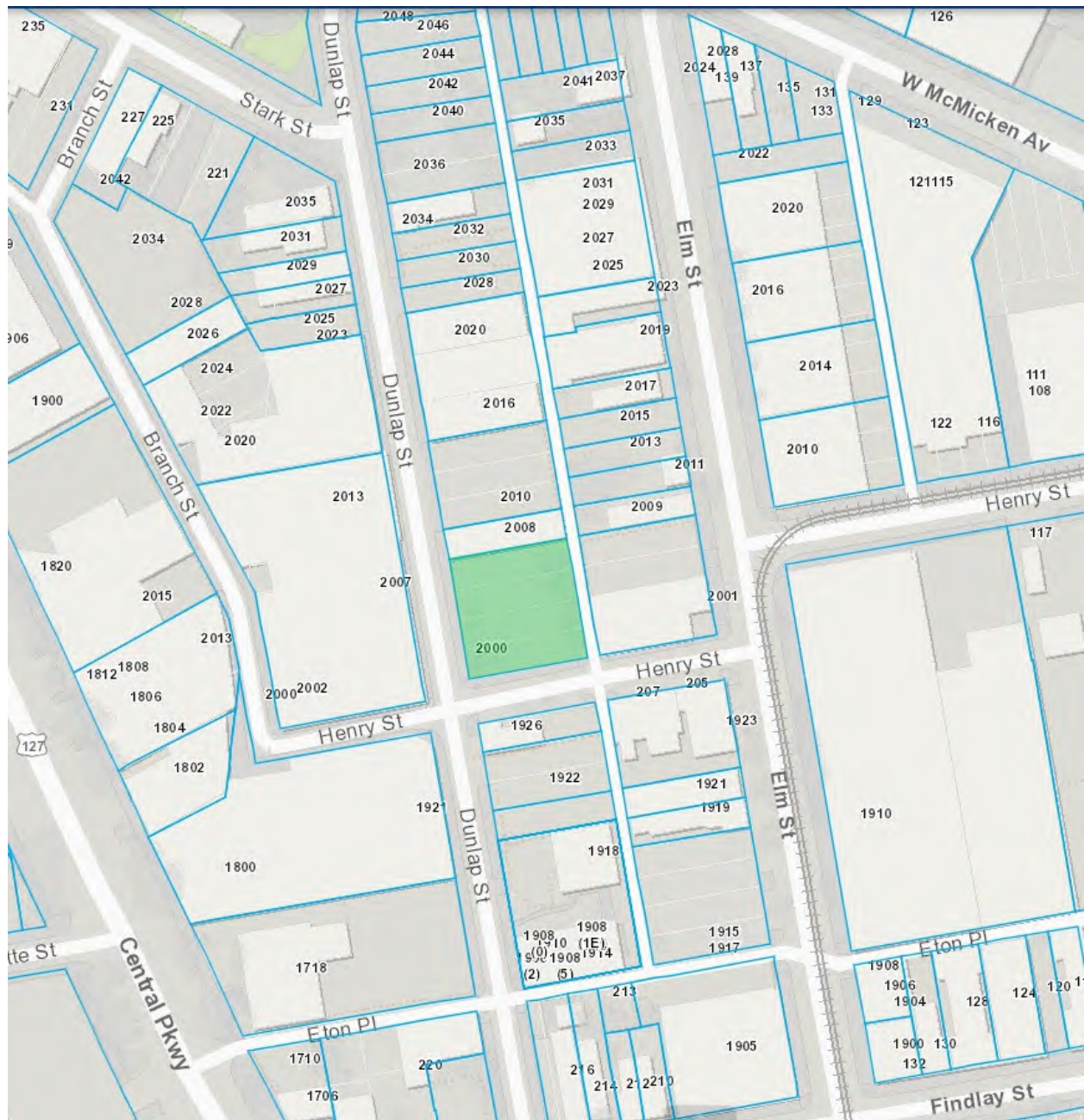
Exhibit I: Illustration of 44 Residents with a Variance

Exhibit J: List of Witnesses and Legal Counsel

**EXHIBIT
A**

CONTEXT MAP

(from CAGIS)



**EXHIBIT
B**

CURRENT SITE CONDITIONS

(Taken from CAGIS)



**EXHIBIT
C**

STREETSCAPE CONTEXT

(Photos taken from Google Street View)



The corner of Henry Street and Dunlap Street, facing northeast toward the subject property currently used as a parking lot.



Dunlap Street, facing north: F.L. Emmert Company's building at 2007 Dunlap on the left, and the non-contributing building at 2008 Dunlap on the right.



Dunlap Street north of the subject property, facing south toward the subject property: F.L. Emmert Company’s building at 2007 Dunlap on the right and Cincinnati Industrial Auctioneers, Inc.’s building at 2020 Dunlap on the left.



Dunlap Street north of the subject property, facing south toward the subject property: residential buildings on either side from 2077 to 2036 Dunlap.



Dunlap Street, facing south of the subject property: the Dunlap Cafe at 2008 Dunlap on the left, and Delhi Foods building at 1800 Central Parkway on the right.



Dunlap Street facing south: a residential building at 1909 Dunlap on the right, and Bartlett & Weigle Co., LPA at 220 Findlay on the right.



Dunlap Street facing south towards Findlay Street: a residential building at 216 Findlay on the left.



Henry Street, facing east: the subject property on the left, and the Dunlap Cafe at 1926 Dunlap on the right.



Henry Street, facing west toward the subject property: a residential building at 1923 Elm on the left and a non-contributing building on the right at 2001 Elm.



Henry Street, facing west toward Branch Street: the Delhi Foods building at 1800 Central Parkway on the left, and the F.L. Emmert Company building at 2007 Dunlap on the right.

EXHIBIT
D

ARCHITECTURAL SITE PLAN



SITE PLAN
A00

DUNLAP LIHTC
PERMANENT SUPPORTIVE HOUSING
NEW CONSTRUCTION

DUNLAP+HENRY PSH
2000 DUNLAP ST
CINCINNATI, OH 45214
APRIL 5, 2022
NR PROJECT NUMBER: 21-084

NEW REPUBLIC
architecture
OTRCH
COMMUNITY HOUSING

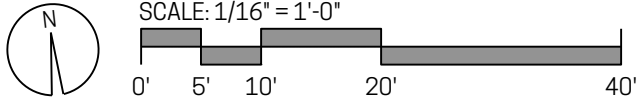


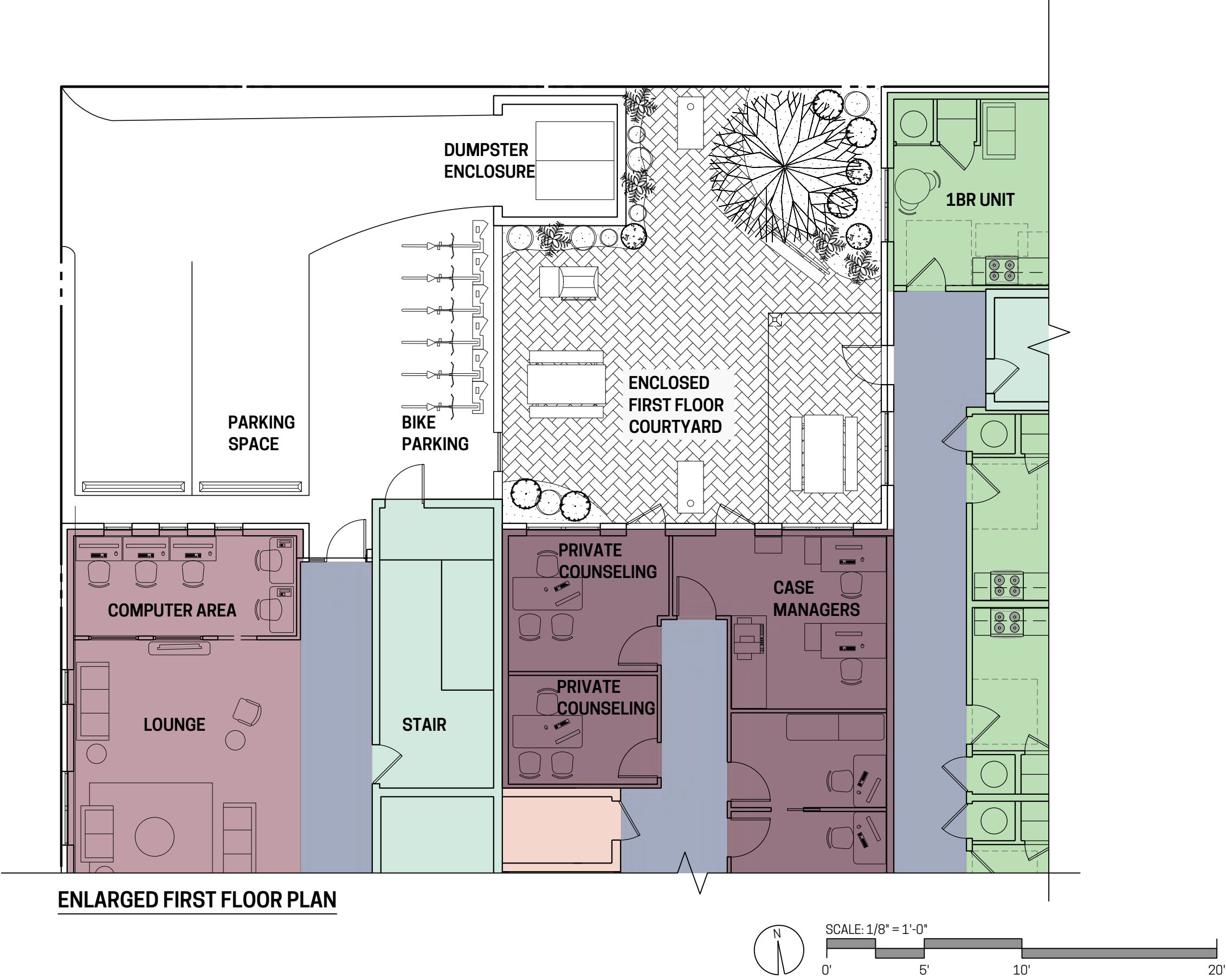
FIRST FLOOR PLAN

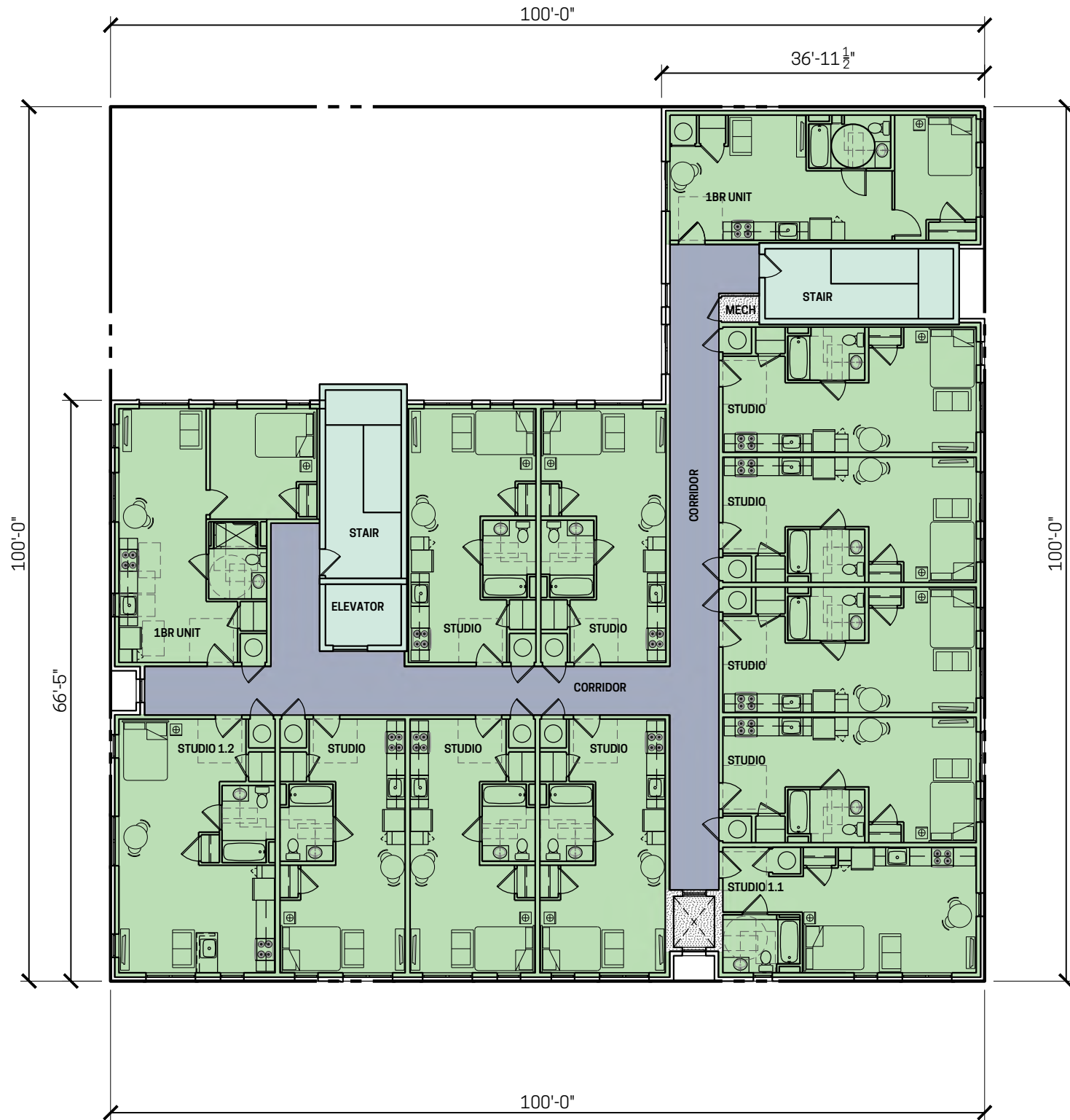
GENERAL NOTES
A. PROGRAM CALCULATIONS ARE BASED ON SQUARE FOOTAGES DERIVED FROM THE HATCHED AREAS NOTED BELOW.

1. **KEY**

- RESIDENTIAL
- MAJOR VERTICAL PENETRATIONS
- COMMON CIRCULATION
- DEDICATED PROGRAM
- COMMON PUBLIC
- SUPPORT







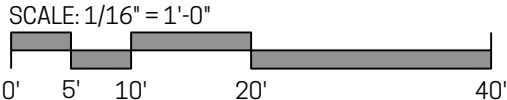
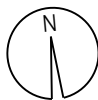
SECOND FLOOR PLAN (THIRD and FOURTH FLOORS SIMILAR)

GENERAL NOTES

A. PROGRAM CALCULATIONS ARE BASED ON SQUARE FOOTAGES DERIVED FROM THE HATCHED AREAS NOTED BELOW.

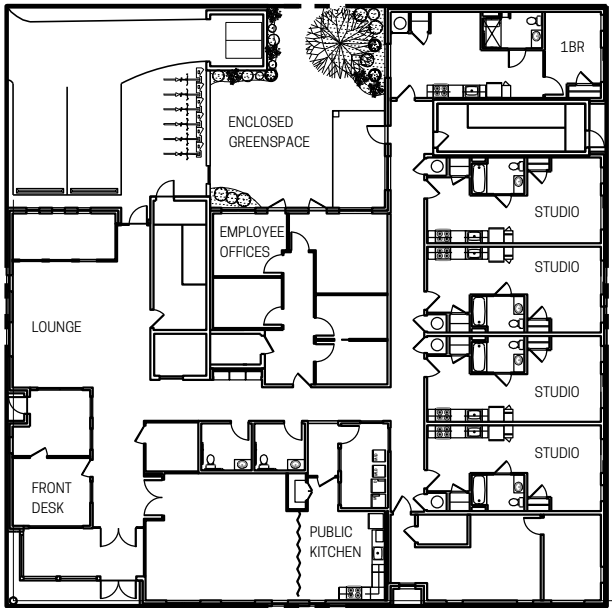
1. KEY

- RESIDENTIAL
- MAJOR VERTICAL PENETRATIONS
- COMMON CIRCULATION
- DEDICATED PROGRAM
- COMMON PUBLIC
- SUPPORT

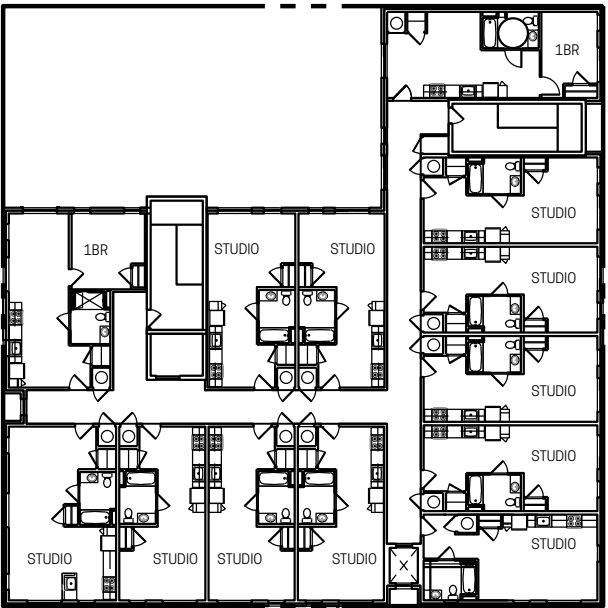




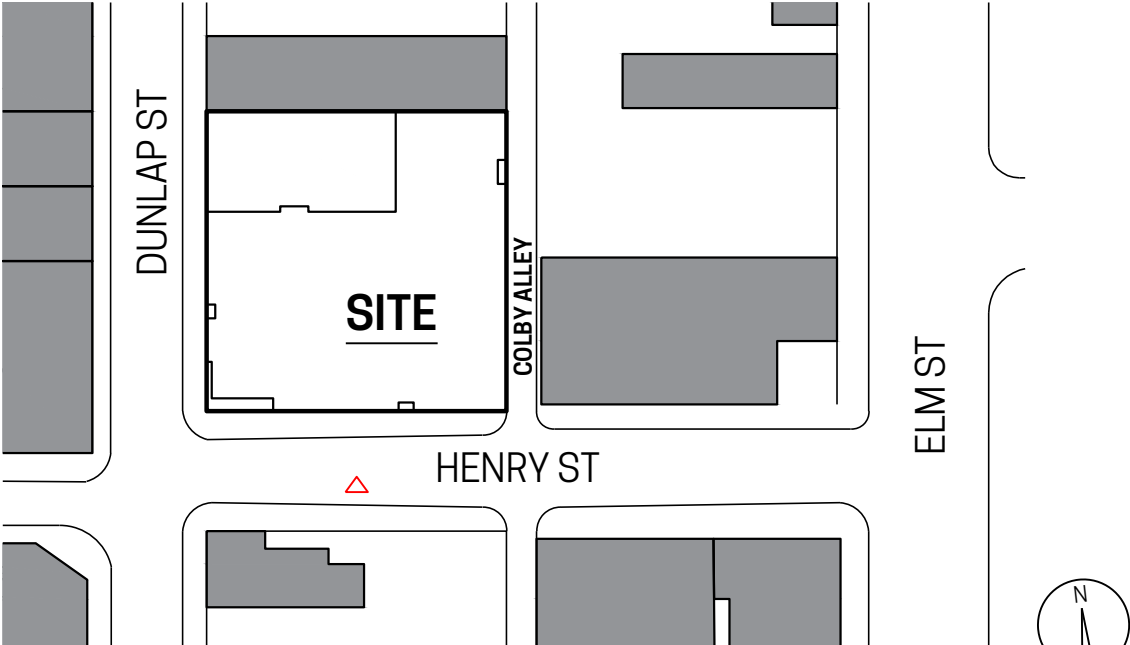
SOUTH ELEVATION SCALE: 1/8" = 1'-0"



FIRST FLOOR PLAN SCALE: 1/32" = 1'-0"



TYPICAL FLOOR PLAN SCALE: 1/32" = 1'-0"



SITE PLAN & KEY PLAN SCALE: 1/64" = 1'-0"



DUNLAP+HENRY PSH
2000 DUNLAP ST
CINCINNATI, OH 45214
APRIL 5, 2022
NR PROJECT NUMBER: 21-084

DUNLAP LIHTC
PERMANENT SUPPORTIVE HOUSING
NEW CONSTRUCTION

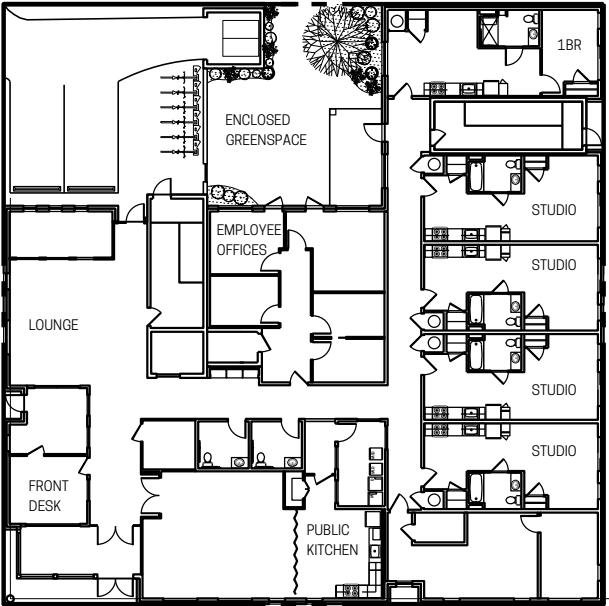
BUILDING
ELEVATIONS

A21

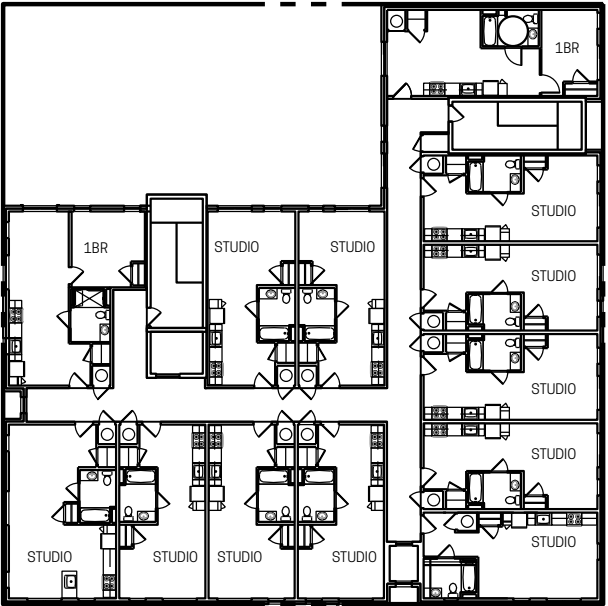
NEW REPUBLIC
architecture
OTRCH
COMMUNITY HOUSING



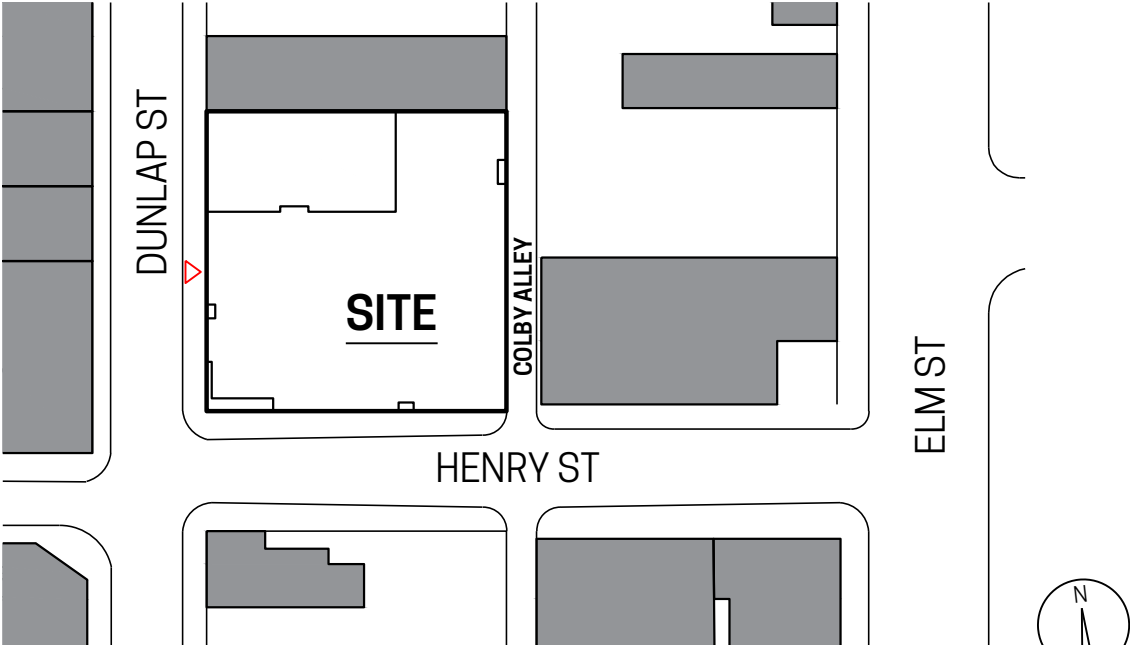
WEST ELEVATION SCALE: 1/8" = 1'-0"



FIRST FLOOR PLAN SCALE: 1/32" = 1'-0"



TYPICAL FLOOR PLAN SCALE: 1/32" = 1'-0"



SITE PLAN & KEY PLAN SCALE: 1/64" = 1'-0"

DUNLAP+HENRY PSH
2000 DUNLAP ST
CINCINNATI, OH 45214
APRIL 5, 2022
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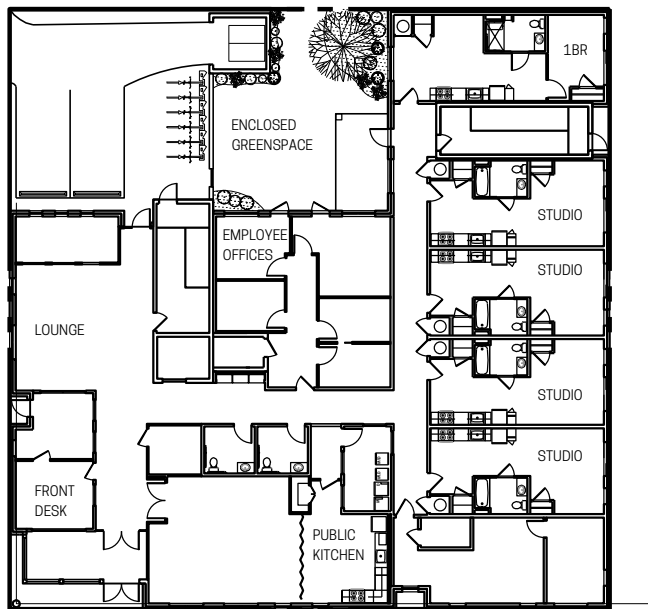
DUNLAP LIHTC
PERMANENT SUPPORTIVE HOUSING
NEW CONSTRUCTION

BUILDING
ELEVATIONS
A21

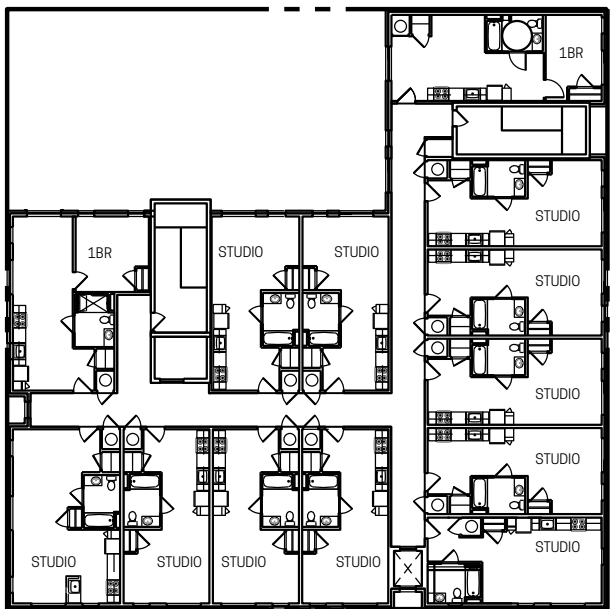
NEW REPUBLIC
architecture
OTRCH
COMMUNITY HOUSING



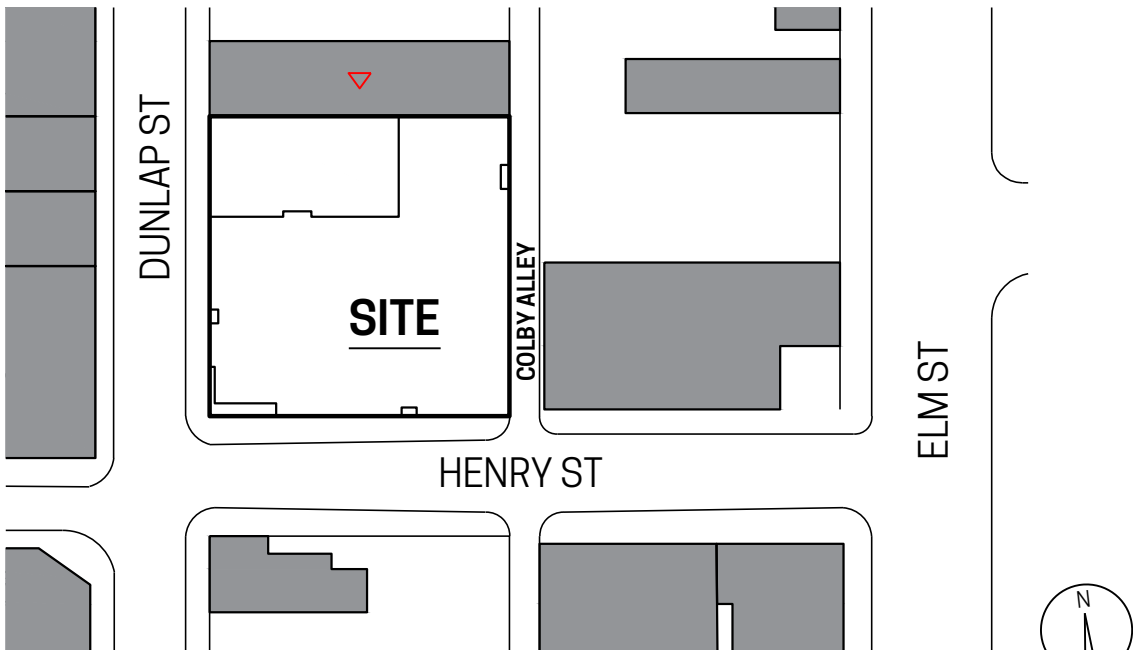
NORTH ELEVATION SCALE: 1/8" = 1'-0"



FIRST FLOOR PLAN SCALE: 1/32" = 1'-0"



TYPICAL FLOOR PLAN SCALE: 1/32" = 1'-0"



SITE PLAN & KEY PLAN SCALE: 1/64" = 1'-0"



DUNLAP+HENRY PSH
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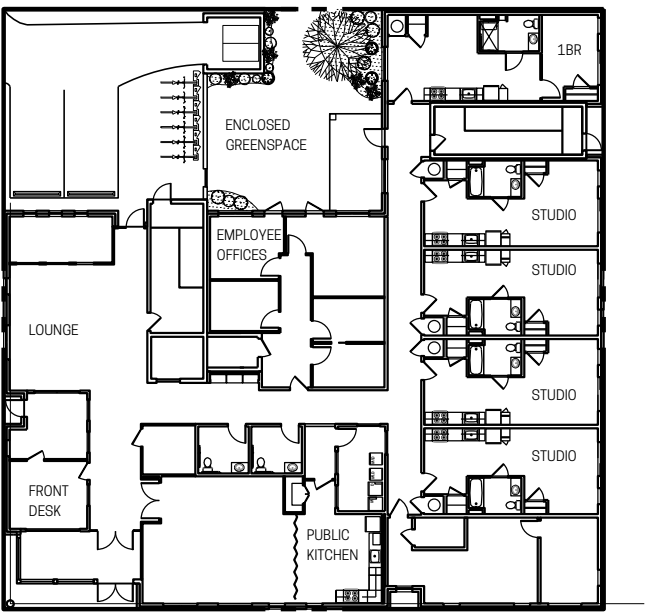
DUNLAP LIHTC
PERMANENT SUPPORTIVE HOUSING
NEW CONSTRUCTION

BUILDING
ELEVATIONS
A21

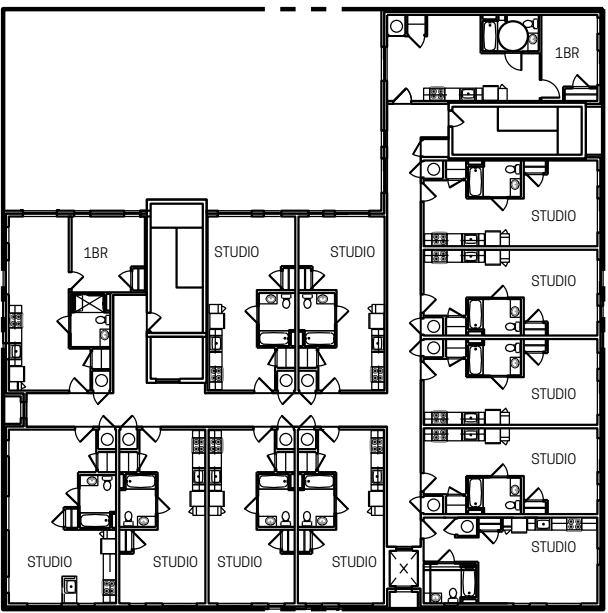
NEW REPUBLIC
architecture
OTRCH
COMMUNITY HOUSING



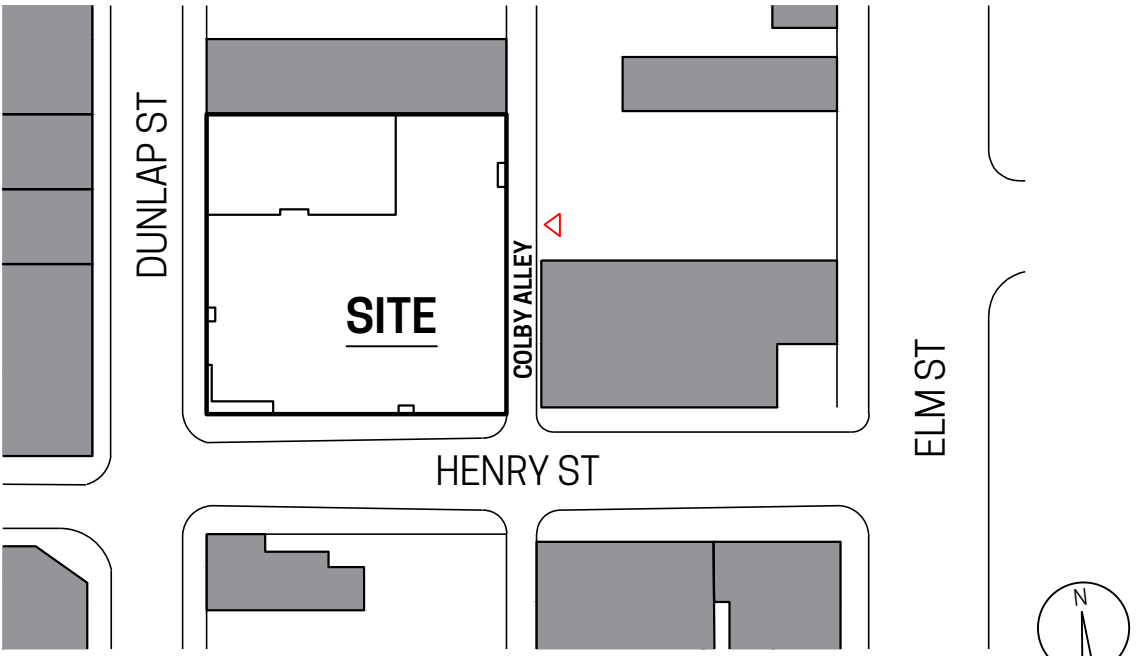
EAST ELEVATION SCALE: 1/8" = 1'-0"



FIRST FLOOR PLAN SCALE: 1/32" = 1'-0"

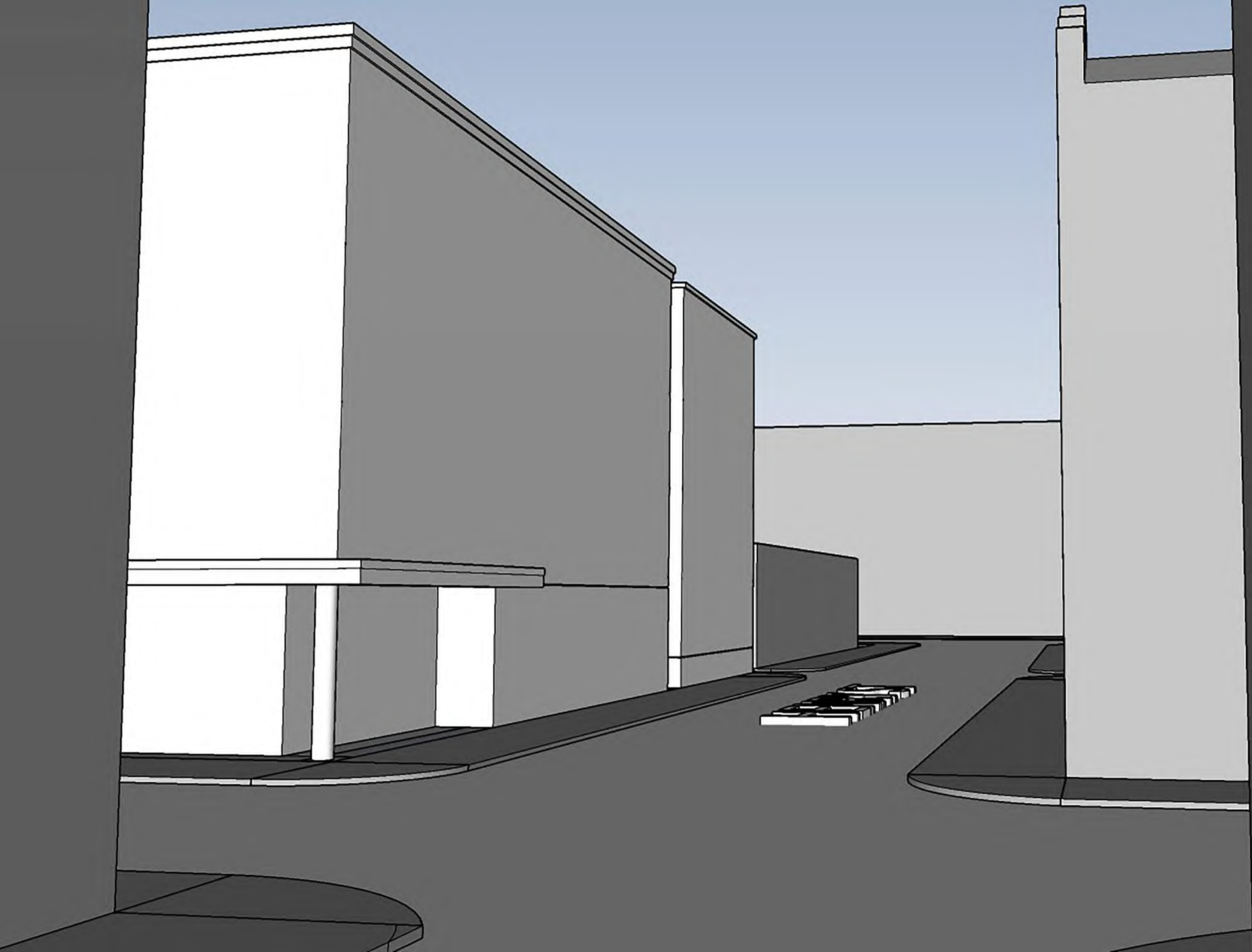


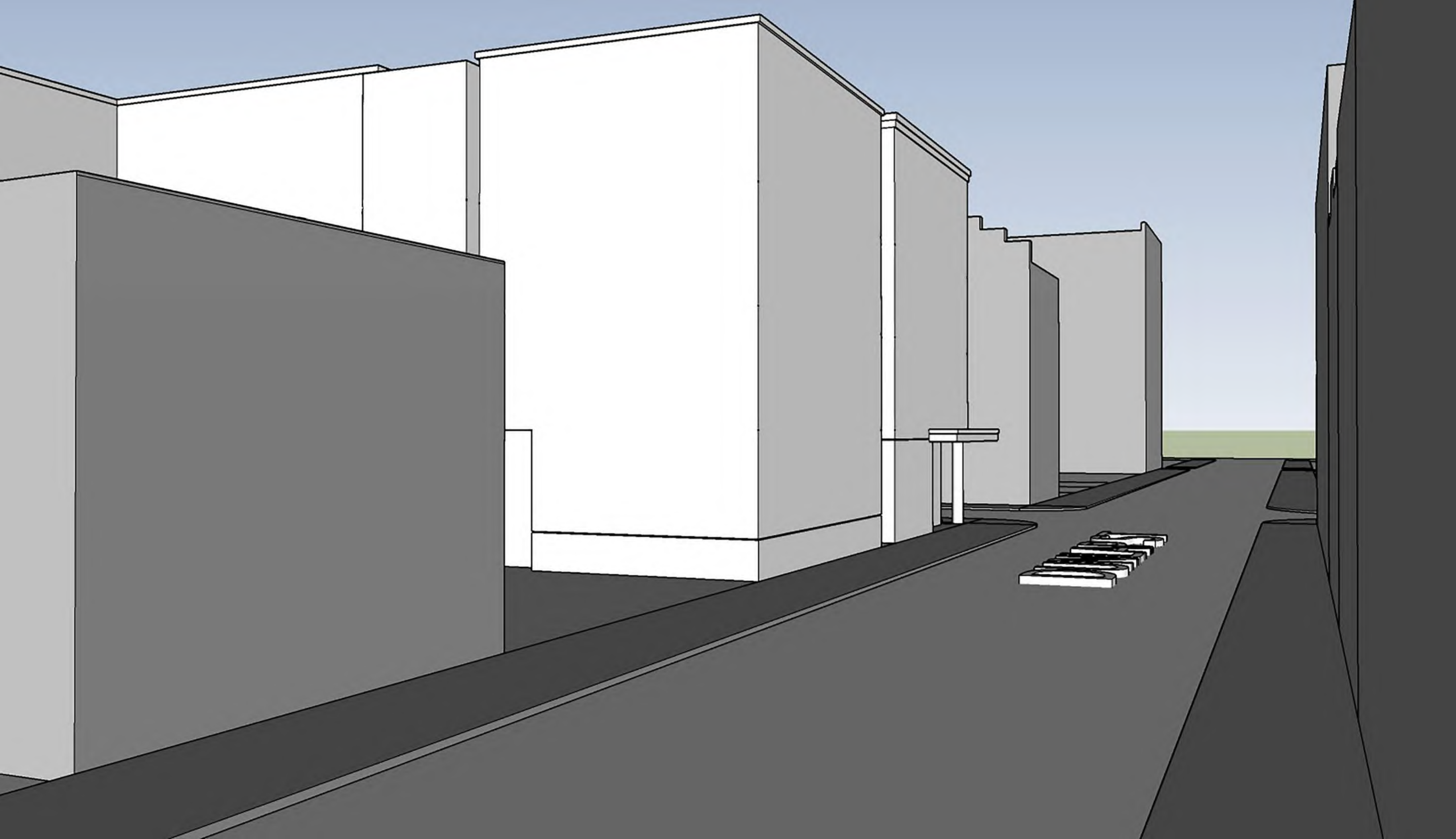
TYPICAL FLOOR PLAN SCALE: 1/32" = 1'-0"

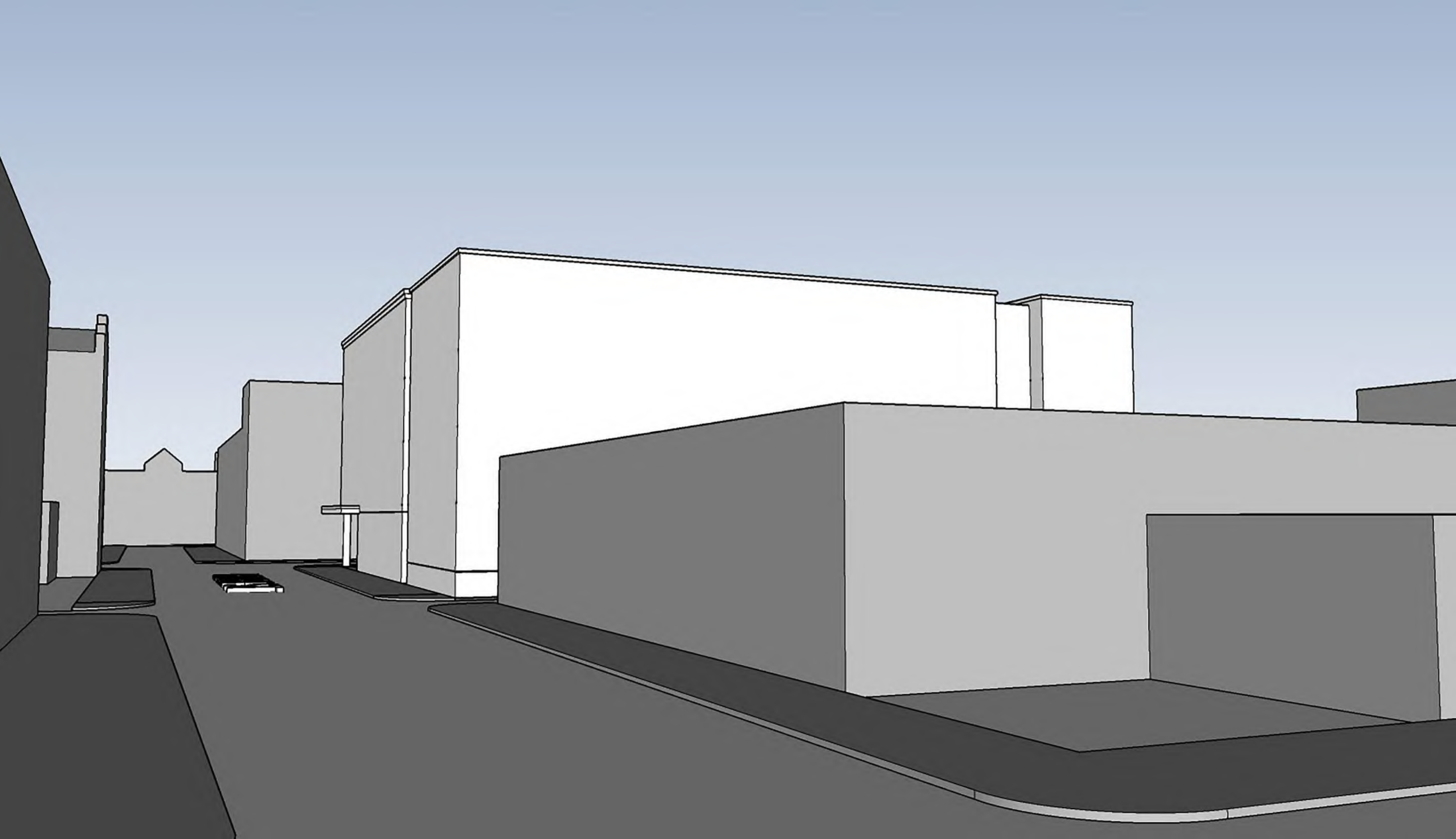


SITE PLAN & KEY PLAN SCALE: 1/64" = 1'-0"



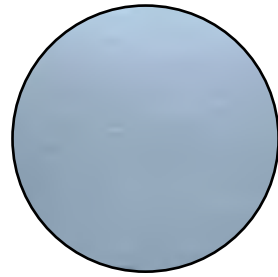




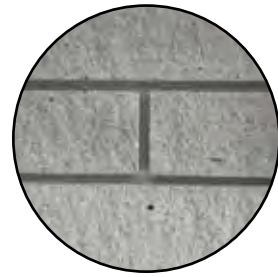




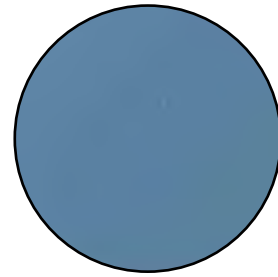
DUNLAP + HENRY PERMANENT SUPPORTIVE HOUSING
2000 DUNLAP STREET
CINCINNATI, OH 45214
APRIL 15, 2022
NR PROJECT NUMBER: 21-084



Smooth Blue-Gray cementitious siding (or similar)



Arriscraft_Contemporary Brick (or similar)



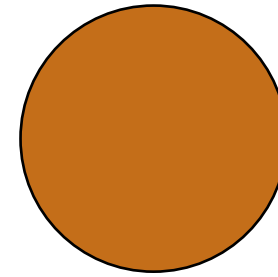
Blue-Gray metal panel (or similar)



Belden_Napier Blend Velour



Belden_Carbon Black Smooth



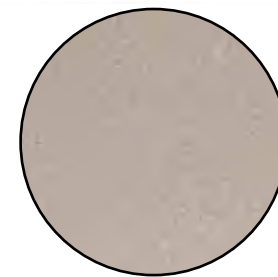
Orange Metal Panel (or similar)



DUNLAP STREET (WEST) ELEVATION



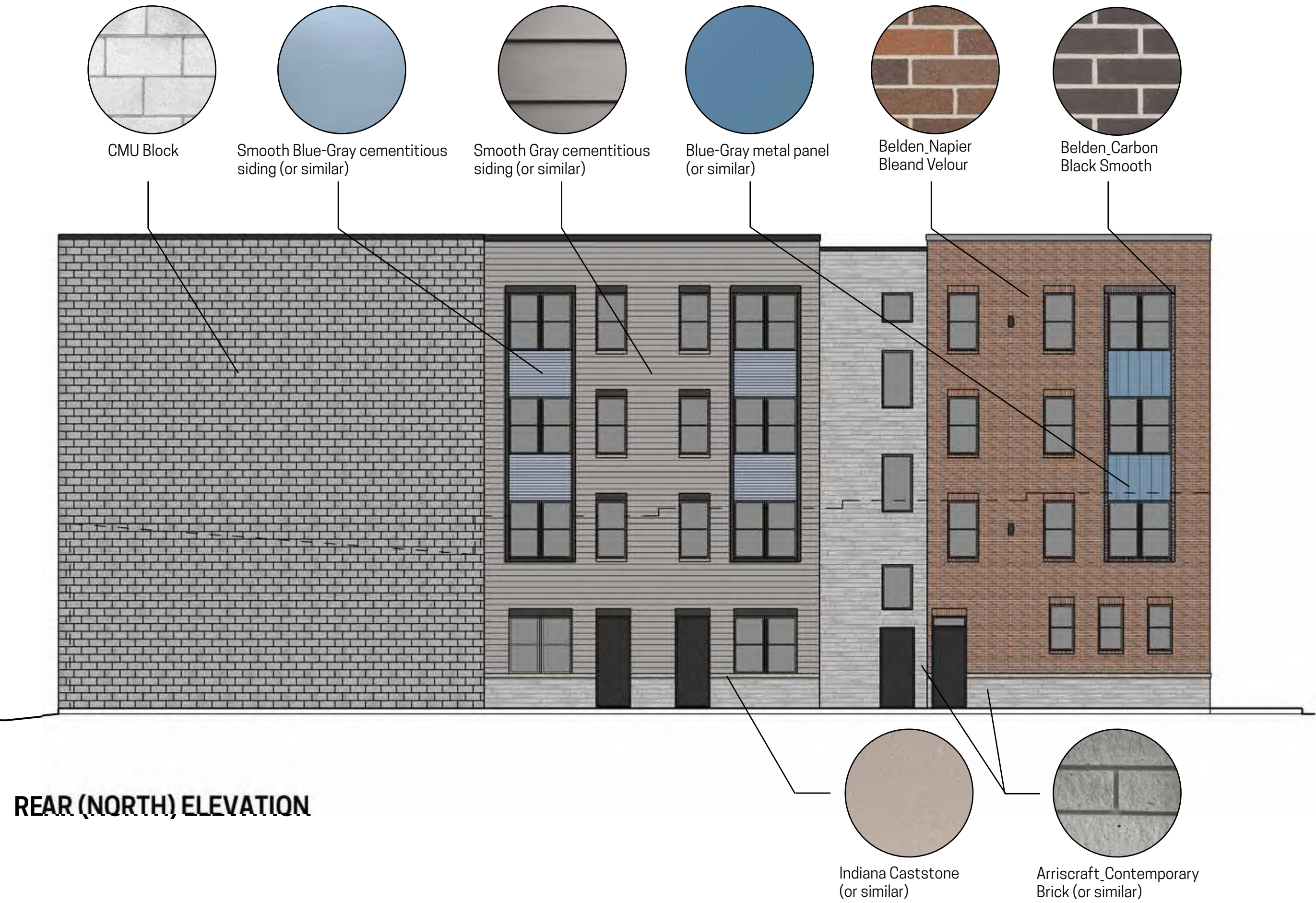
Smooth Gray cementitious siding (or similar)



Indiana Caststone (or similar)

IF DISPLAYED AT 11"x17"

SCALE: 1/8" = 1'-0"



REAR (NORTH) ELEVATION

DUNLAP + HENRY PERMANENT SUPPORTIVE HOUSING

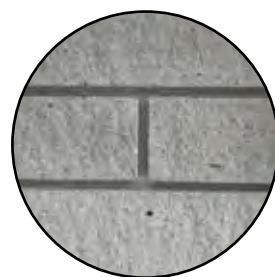
2000 DUNLAP STREET
CINCINNATI, OH 45214
APRIL 15, 2022
NR PROJECT NUMBER: 21-084



Belden_Napier
Blend Velour



Smooth Gray cementitious
siding (or similar)



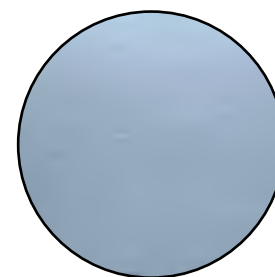
Arriscraft_Contemporary
Brick (or similar)



Indiana Caststone
(or similar)



Belden_Carbon
Black Smooth



Smooth Blue-Gray cementitious
siding (or similar)



ALLEY (EAST) ELEVATION

IF DISPLAYED AT 11"x17"

SCALE: 1/8" = 1'-0"

NEW REPUBLIC
architecture

OTRCH
COMMUNITY HOUSING

DUNLAP + HENRY PERMANENT SUPPORTIVE HOUSING

2000 DUNLAP STREET
CINCINNATI, OH 45214
APRIL 15, 2022
NR PROJECT NUMBER: 21-084

EXHIBIT E



November 24, 2021

BEN EILERMAN
114 W 14TH ST
CINTI, OH 45202

SUBJECT: Record Number: ZV21000409
..... Parcel: 009600050116
 Address: 2000 DUNLAP ST
 Zoning District: UM
 Request: ZONING VERIFICATION LETTER

Dear BEN EILERMAN

I have received and reviewed your request for zoning verification of 2000 Dunlap Street (parcels 096-0005-0116, 096-0005-0117, 096-0005-0118, and 096-0005-0119) The subject property is located in the UM (Urban Mix) Zoning District as described in Chapter 1410 of the Cincinnati Zoning Code. The UM Zoning District is intended to provide a balance of uses and amenities fostering a vital economic, livable and cultural area and enhance its urban and aesthetic qualities.

The subject property is also located in the Over-the-Rhine Local Historic Overlay District. Per § 1435, no one shall make an alteration or undertake a demolition, or receive any permit to do so, in an Historic District without first obtaining a Certificate of Appropriateness from the Historic Conservation Board or the Urban Conservator (§ 1435-09). The property is also located in an Urban Parking Overlay. Per Section 1425-04 and Ordinance 293-2018, the "Required Parking Spaces" for the district do not apply within the Overlay area; therefore, no parking is required for the subject property.

Congregate Housing is defined in the Zoning Code as "Apartments and dwellings with communal dining facilities and services, such as housekeeping, organized social and recreational activities, transportation services and other support services appropriate for the residents." Congregate Housing is a permitted use in the UM District.

No outstanding zoning violations were identified on the subject property.

November 24, 2021

Please note: The Zoning Code and zoning maps are subject to change. All projects are subject to the zoning requirements at the time of the building permit application or when the use is established on the premises. The purpose of this letter is to verify the zoning district as it pertains to the subject property and the current use of that property. It does not address other zoning issues, specific building code issues or requirements from other agencies that may be applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "DOUG OWEN". The signature is fluid and cursive, with a large initial "D" and "O".

Doug Owen
Zoning Plans Examiner

ADJUDICATION/DENIAL LETTER

Date: April 15, 2022

Location: 2000 Dunlap St

Request: COA (infill)

Zoning District: UM/ OTR Historic District

The City of Cincinnati appreciates receiving your information regarding your proposed project. The purpose of this letter is to inform you that your proposed project requires a Certificate of Appropriateness and Zoning Relief from the Historic Conservation Board as it is within a local historic district. The Application for Zoning Relief has already been submitted. This is a supplemental letter covering the Certificate of Appropriateness.

All documents **that are checked** on the "Checklist for Historic Conservation Board" document are a required part of the submission, and the submission will not be considered complete unless all of these documents are included. When you submit the copies of the application, the "Checklist" Sheet must be submitted as well. The application can be found at this link: <https://www.cincinnati-oh.gov/sites/planning/assets/HCB%20Application%20Revised%202.2.22%20Hyperlink.pdf>.

All deadlines for upcoming Historic Conservation Board hearings can be found <https://www.cincinnati-oh.gov/planning/historic-conservation/historic-conservation-board/>. **Applications must be submitted no later than 3pm on the deadline date.**

The applications and documents required will be turned into the *Law Department- Office of Administrative Boards*. Their office is located on the 5th floor of 805 Central Avenue in the Permit Center. Applications can be turned in **no later than 3pm on the deadline date**. You must contact Kasandra Maynes at 513-352-1559 or Kasandra.Maynes@cincinnati-oh.gov for submittal.

You may also contact me at the information listed below with historic conservation or zoning questions, concerns or to make an appointment.

Sincerely,



Douglas Owen

Interim Urban Conservator

(p): 513-352-4848

(e): douglas.owen@cincinnati-oh.gov

Checklist for Historic Conservation Board Hearing Application

The Historic Conservation Office will provide this list with the required items

checked off when an Adjudication letter is issued. All items checked must be submitted to the Law Department with submission or the application will not be accepted.

- ☐ 8 business days before the hearing date 10 hard copies and a digital copy in one pdf for the final board packet. Hard copies must be formatted and retain the proper scale on sheets no larger than 11x17 or 12x18.
- ☒ Non-Refundable Application Fee. Checks made payable to the City of Cincinnati. \$624.95

All Drawings and Plans must include the following

- ✓ A graphic scale required on all drawings
- ✓ North arrows on all site, context and floor plans
- ✓ Elevations labeled with North, South, East West, front, side and rear labels
- ✓ Street names labeled
- ✓ Date and/or revision dates

Architectural Drawings and Plans

- ☐ An index of drawings located on the first sheet
- ☒ Context Map showing the building within at least a block of context
- ☒ Existing site plans
- ☒ Proposed site plans
 - All site plans must have*
 - ✓ *Parcel/boundary lines*
 - ✓ *Building footprints and dimensions labeled*
 - ✓ *Setback dimensions from all property lines labeled*
 - ✓ *Existing and proposed principal and accessory buildings, including location, dimensions, and height labeled;*
 - ✓ *All properties and their structures immediately adjacent to the site*
 - ✓ *Location and placement of exterior utilities and vents*
- ☐ Existing elevation drawings (At minimum must provide photographs of existing conditions of all elevations)
- ☒ Proposed elevation drawings
 - All elevations (existing and proposed) must have*
 - ✓ *Total Height from grade to top of the building*
 - ✓ *Total height- ASL (Above Sea Level)*
 - ✓ *Materials labeled*
 - ✓ *Location and placement of exterior utilities and vents*
- ☐ Existing floor plans and roof plans (with chimney locations)
- ☒ Proposed floor plans and roof plans (with chimney locations)
 - All floor(existing and proposed) plans must have*
 - ✓ *Residential and Commercial Spaces labeled. Residential Spaces must be numbered.*
 - ✓ *Square feet of commercial spaces listed*
 - ✓ *Location of trash storage and Utilities*
 - ✓ *Location and placement of exterior utilities and vents*

- ☒ Site section and/or Site elevations including any adjacent properties
- ☒ Driveways, sidewalks, walkways, terraces, and other paved surfaces
- ☒ Existing and proposed accessory structures, including walls, fences, porches, lighting, signs, and other site improvements;
- ☒ Existing and proposed landscape areas and materials, if proposed to be altered;
- ☒ Proposed materials, textures, and colors. Include make, model and series for proposed materials
- ☐ Labeled photos of all sides of the building
- ☒ Labeled photos of 1 block streetscape context in all directions
- ☐ Site line drawings for any roof additions, roof decks, utilities.
- ☒ A color rendering, axonometric drawings and/or perspective of the proposed construction (required on infill projects)

Required if applicable to the project

- ☐ Historic Sanborn Maps of the site
- ☐ Window brochures and cut sheet
- ☐ Roof product information (brochure)
- ☐ Garage door brochures
- ☐ Sample materials or color samples. _____
- ☐ Fence drawings of style, fence brochures or photo of a sample fence
- ☐ Signs; drawings, photo showing the sign on the building, mounting info, materials, colors and illumination
- ☐ Mature tree removal requires a letter from an arborist stating its poor health
- ☐ All written correspondence submitted by the applicant and other affected persons
- ☐ Tentative project schedule
- ☐ Egress Plan/Route to Building Code Compliance (roof decks, multi-family developments)
- ☐ _____
- ☐ _____
- ☐ _____

Demolition (full or partial) for Historic Conservation Districts and Landmarks

- ☐ Demolition Case Sheet and all required information listed on the sheet unless otherwise not required by the Urban Conservator in writing and provided with application.
- ☐ Statement of plans for the property after demolition.

Hillside Overlay Zone (CZC § 1433)

- ☐ A development plan, accompanied by a property survey, showing existing vegetation and proposed development, and where applicable, streets, drives, parking areas, walkways, heights of structure(s), location of structures, elevation and setback of proposed buildings, drainage, existing contours and proposed grading and new landscaping plans, proposed uses and square footage of uses and recreational facilities;
- ☐ A preliminary geotechnical evaluation;
- ☐ A determination of the maximum building envelope;
- ☐ Average slope/grade of the property; and
- ☐ Graphic illustrations demonstrating that the proposed improvement or new structure has not exceeded the maximum building envelope

For additional questions about this checklist contact Urban Conservator at 513-352-4848 or urban.conservator@cincinnati-oh.gov

Note: The aforementioned information is general in nature. Additional information may be required by the Urban Conservator once the application is submitted. Please use this list to plan for the potential documents that could be required for a submission.

Dusty Rhodes, Hamilton County Auditor

Property Report

EXHIBIT
G

generated on 4/27/2022 4:14:04 PM EDT

Parcel ID
 096-0005-0116-00

Address
 2000 DUNLAP ST

Index Order
 Parcel Number

Tax Year
 2021 Payable 2022

Property Information

Tax District	001 - CINTI CORP-CINTI CSD	Images/Sketches
School District	CINCINNATI CSD	
Appraisal Area	01801 - OVER THE RHINE 01	
Auditor Land Use	499 - OTHER COMM STRUCTURE	
Owner Name and Address	RACE STREET TENANT ORGANIZATION COOPERATIVE 114 W 14TH ST CINCINNATI OH 45202 (call 946-4015 if incorrect)	
Tax Bill Mail Address	OTRCH 114 W 14th ST CINCINNATI OH 45202 (Questions? 946-4800 or treasurer.taxbills@hamilton-co.org)	
Assessed Value	14,730	Total Tax
Effective Tax Rate	88.991088	\$1,376.40
Property Description DUNLAP ST 100X100 LTS 27- 28-29-30 JAS C LUDLOWS SUB PRS 117-118-119 CONS		

Appraisal/Sales Summary

Year Built	2018
Total Rooms	0
# Bedrooms	0
# Full Bathrooms	0
# Half Bathrooms	0
Last Transfer Date	5/15/1992
Last Sale Amount	\$0
Conveyance Number	0
Deed Type	WE - Warranty Deed (EX)
Deed Number	
# of Parcels Sold	1
Acreage	0.234

Tax/Credit/Value Summary

Board of Revision	No
Rental Registration	No
Homestead	No
Owner Occupancy Credit	No
Foreclosure	No
Special Assessments	Yes
Market Land Value	35,130
CAUV Value	0
Market Improvement Value	6,930
Market Total Value	42,060
TIF Value	18,560
Abated Value	0
Exempt Value	0
Taxes Paid	\$720.98
Tax as % of Total Value	0.000%

Notes

1) 11-22-04 30 YEAR TIF ABATEMENT BEGAN 2003 THRU 2032

Structure List

Structure Name	Use Code	Finished Sq. Ft.	Year Built
Outbuilding	499 OTHER COMM STRUCTURE	0	2018

Commercial Appraisal Data

Section	Occupancy	Finished Area (sq. ft.)	Story Height	Stories
Improvements				
Improvement	Measurements	Year Built		
525-Asphalt	6600	2018		

No Proposed Levies Found

Levies Passed - 2021 Pay 2022 Tax Bill

Levy	Levy Type	Mills	Current Annual Tax	Estimated Annual Tax	Note
Hamilton County - Children Services	Renewal	2.77	\$35.74	\$35.74	B
Hamilton County - Children Services	Additional	1.74	\$0.00	\$25.63	B
Great Parks - Parks & Recreation	Additional	0.95	\$0.00	\$13.99	B

This is an estimated levy payment based on the current value of your property. Actual tax amounts per tax year may vary based on changes in property valuation and based on whether a parcel receives any abatement, credit, or reduction during the levy period.

Effective for the tax year 2005, Ohio's biennial budget bill, Amended Substitute House Bill 66, signed by the Governor on June 30, 2005, terminates the 10 percent real property tax rollback for the commercial and industrial classes of property, and agricultural property used for the commercial production of timber.

Effective for the tax year 2013, Ohio's biennial budget bill, House Bill 59, signed by the Governor on June 30, 2013, terminates the 10 percent real property tax rollback and the 2.5 percent homestead credit on all additional or replacement levies passed at the November 5, 2013 election or after. As a result of this legislation, those same levies will not qualify for the stadium tax credit.

Existing and renewal levies, as well as levies passed at the May 7, 2013 and August 6, 2013 elections will qualify for the credits. Residential and most agricultural properties with qualifying levies will receive what is now the Non-Business Credit Rollback Factor. Owner occupied residential dwellings with qualifying levies will receive what is now the Owner Occupancy Credit Rollback Factor, as well as the stadium tax credit.

Transfer History

Year	Conveyance #	Selling Price	Transfer Date	Previous Owner	Current Owner
1992	0	0	5/15/1992	TRUSTEES OF GENERAL	RACE STREET TENANT &
1991	0	0	1/29/1991	ALLIED STORES OF OHIO INC	TRUSTEES OF GENERAL

Transfer History

1900	0	0	1/1/1900	SEE OWNERSHIP CARD	ALLIED STORES OF OHIO INC
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Value History

Tax Year	Assessed Date	Land	Improvements	Total	CAUV	Reason for Change
2020	8/22/2020	35,130	6,930	42,060	0	120 Reappraisal, Update or Annual Equalization
2019	7/24/2019	28,100	5,540	33,640	0	30 New Construction - Full Value
2019	7/24/2019	28,100	0	28,100	0	70 All ReClassified Real Property
2017	11/15/2017	28,100	0	28,100	0	120 Reappraisal, Update or Annual Equalization
2014	9/20/2014	23,500	0	23,500	0	120 Reappraisal, Update or Annual Equalization
2011	9/5/2011	25,000	0	25,000	0	120 Reappraisal, Update or Annual Equalization
2008	9/27/2008	26,000	0	26,000	0	120 Reappraisal, Update or Annual Equalization
2008	3/6/2008	25,000	0	25,000	0	110 Miscellaneous
2005	9/19/2005	25,000	0	25,000	0	120 Reappraisal, Update or Annual Equalization
2002	10/8/2002	23,500	0	23,500	0	120 Reappraisal, Update or Annual Equalization
1999	11/6/1999	22,500	0	22,500	0	120 Reappraisal, Update or Annual Equalization
1996	1/1/1996	20,400	0	20,400	0	110 Miscellaneous

Board of Revision Case History

Case Number	Date Filed	Withdrawn	**Counter Complaint Filed	*Hearing Date/Time	Value Challenged	Value Requested	Value Decided by BOR	***Date Resolved
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*Once your hearing has been scheduled, you will receive a **Notice of Hearing** by certified mail, and the Scheduled Hearing Date and Time will be populated on this page.

**A counter-complaint may be filed by a party with interest in the value of your property, such as the Board of Education, if you request a decrease of \$50,000 or more in market value.

***Please allow four to six weeks to receive your **Notice of Result** by certified mail and to see your result on this page. Your Notice will contain basic facts about appealing your Board of Revision decision, should you wish to do so.

Payment Information

JILL A. SCHILLER, TREASURER

Tax Overview

Mail Payments to:	Hamilton County Treasurer 138 E. Court Street, Room 402 Cincinnati, Ohio 45202	Tax Lien Pending	No
Tax District:	001 - CINTI CORP-CINTI CSD	Tax Lien Sold	No
Current Owner(s)	RACE STREET TENANT ORGANIZATION COOPERATIVE	Full Rate	109.200000
Tax Bill Mail Address	OTRCH 114 W 14th ST CINCINNATI OH 45202	Effective Rate	88.991088
		Non Business Credit	0.087234
		Owner Occupancy Credit	0.021808
		Certified Delinquent Year	
		Delinquent Payment Plan	No
		TOP (Treasurer Optional Payment)	\$0.00
		Note: May represent multiple parcels	

Taxable Value

Land	12,300
Improvements	2,430
Total	14,730

Current Year Tax Detail

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Real Estate			\$804.26		\$804.26	
Credit			\$148.84		\$148.84	
Subtotal			\$655.42		\$655.42	
Non Business Credit			\$0.00		\$0.00	
Owner Occupancy Credit			\$0.00		\$0.00	
Homestead			\$0.00		\$0.00	
Sales CR			\$0.00		\$0.00	
Subtotal	\$0.00	\$0.00	\$655.42	\$0.00	\$655.42	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Real Estate Paid	\$0.00		\$655.42		\$0.00	
Real Estate Owed	\$0.00		\$0.00		\$655.42	
Special Assess Paid	\$0.00		\$65.56		\$0.00	
Special Assess Owed	\$0.00		\$0.00		\$0.00	
Total Due	\$0.00		\$720.98		\$655.42	
Total Paid	\$0.00		\$720.98		\$0.00	
Unpaid Delq Contract	\$0.00		\$0.00		\$0.00	
Total Owed	\$0.00		\$0.00		\$655.42	

Special Assessment Detail for 55-060 CINCINNATI - Urban Forestry

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Charge	\$0.00	\$0.00	\$65.56	\$0.00	\$0.00	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Paid	\$0.00		\$65.56		\$0.00	
Owed	\$0.00		\$0.00		\$0.00	

Payment Information for Current And Prior Year

Date	Half	Prior	1st Half	2nd Half	Surplus
1/31/2022	1 - 2021	\$0.00	\$720.98	\$0.00	\$0.00
6/21/2021	2 - 2020	\$0.00	\$0.00	\$656.15	\$0.00

Payment Information for Current And Prior Year

2/5/2021	1 - 2020	\$0.00	\$721.71	\$0.00	\$0.00
7/17/2020	2 - 2019	\$0.00	\$0.00	\$568.19	\$0.00
1/31/2020	1 - 2019	\$0.00	\$633.08	\$0.00	\$0.00
6/20/2019	2 - 2018	\$0.00	\$0.00	\$474.86	\$0.00
1/31/2019	1 - 2018	\$0.00	\$539.76	\$0.00	\$0.00
6/20/2018	2 - 2017	\$0.00	\$0.00	\$459.92	\$0.00
1/31/2018	1 - 2017	\$0.00	\$518.64	\$0.00	\$0.00
6/20/2017	2 - 2016	\$0.00	\$0.00	\$392.58	\$0.00
1/31/2017	1 - 2016	\$0.00	\$451.30	\$0.00	\$0.00

Information believed accurate but not guaranteed. Treasurer disclaims liability for any errors or omissions

Contact the County Treasurer with your tax bill questions at county.treasurer@hamilton-co.org
or 513-946-4800

Tax Distribution Information

Market Value		Assessed Value (35%)		Tax Rate Information	
Land	35,130	Land	12,300	Full Tax Rate (mills)	109.200000
Building	6,930	Building	2,430	Reduction Factor	0.185064
Total	42,060	Total	14,730	Effective Tax Rate (mills)	88.991088
				Non Business Credit	0.087234
				Owner Occupancy Credit	0.021808

Tax Calculations

Half Year Tax Distributions

Gross Real Estate Tax	\$1,608.52	School District	\$232.81
- Reduction Amount	\$297.68	Township	\$0.00
- Non Business Credit	\$0.00	City/Village	\$336.42
- Owner Occupancy Credit	\$0.00	Joint Vocational School	\$0.00
- Homestead	\$0.00	County General Fund	\$9.31
Half Year Real Taxes	\$655.42	Public Library	\$7.57
- Sales Tax Credit	\$0.00	Family Service/Treatment	\$1.27
+ Current Assessment	\$65.56	HLTH/Hospital Care-Indigent	\$10.18
+ Delinquent Assessment	\$0.00	Mental Health Levy	\$8.71
+ Delinquent Real Estate	\$0.00	Developmental Disabilities	\$15.44
Semi Annual Net	\$720.98	Park District	\$7.77
		Crime Information Center	\$1.14
		Children Services	\$17.24
		Senior Services	\$5.88
		Zoological Park	\$1.68

This shows the most recent tax bill calculation which normally occurs in early December and May. However, adjustments or corrections may have been applied to the tax bill after the initial tax calculation. Go to the Payment Detail tab to view any corrections or adjustments occurring after the initial tax calculation.

Parcel Photo



No sketch available.

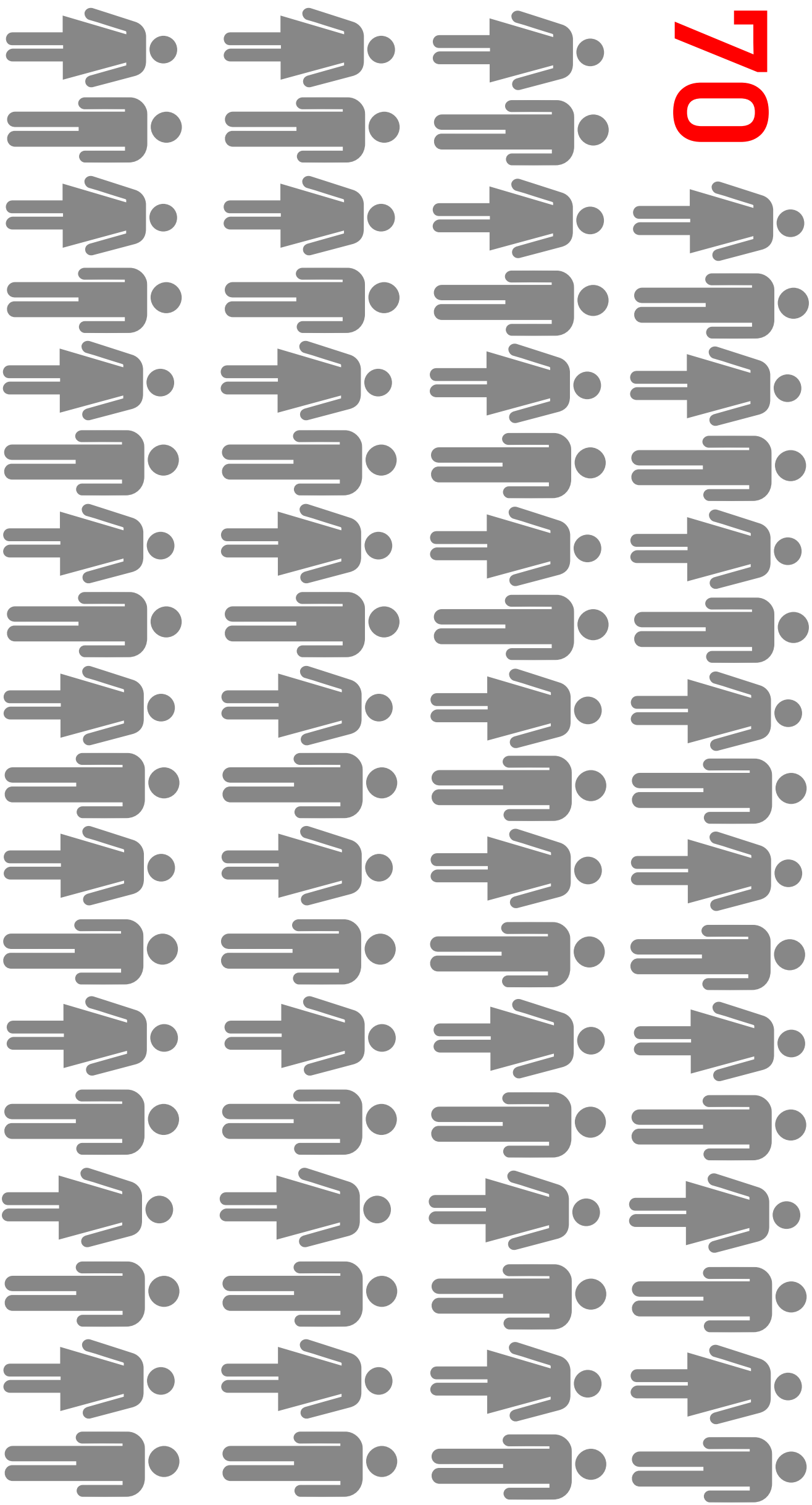
Special Assessments

Project	Ord/Res	Description	Certified	End Year	Payoff Amount
55-060		CINCINNATI - Urban Forestry	8/20/2019	2099	\$0.00

Related Names

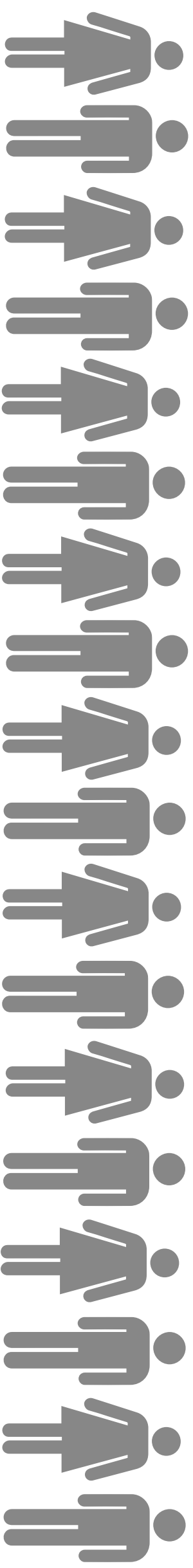
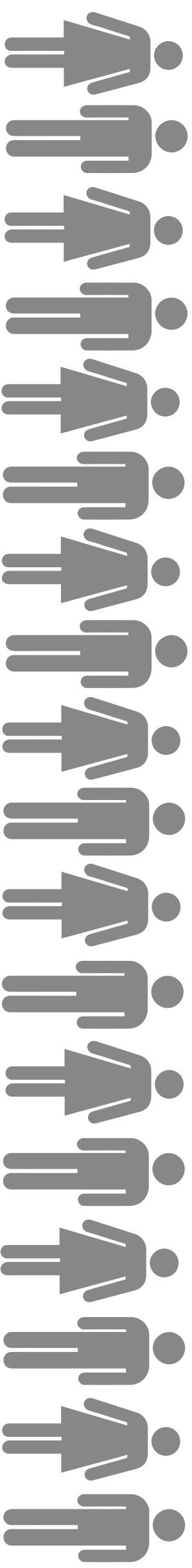
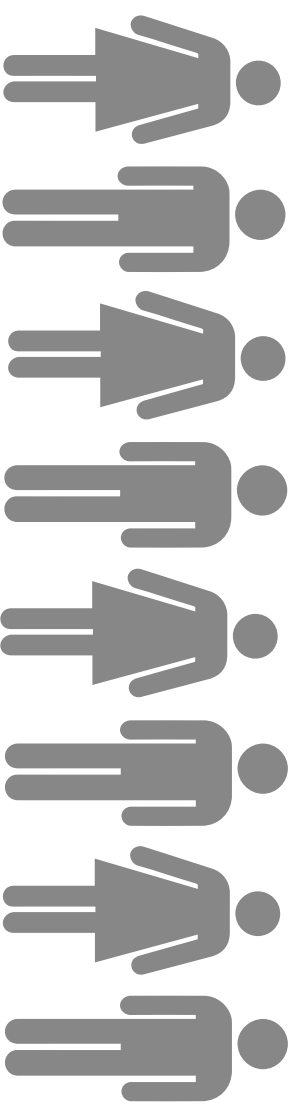
Name	Relationship	Status
RACE STREET TENANT ORGANIZATION COOPERATIVE	Parcel Owner	Current

70



BY RIGHT

44



WITH VARIANCE

EXHIBIT

I

SPEAKER LIST

Witnesses

Mary Burke Rivers
Executive Director
Over-the-Rhine Community Housing
mburke@otrch.org

Ben Eilerman
Senior Housing Developer
Over-the-Rhine Community Housing
beilerman@otrch.org

Andy Hutzel
Director of Housing Services
Over-the-Rhine Community Housing
ahutzel@otrch.org

Graham Kalbli
Principal Architect
New Republic Architecture
graham@newrepublicarchitecture.com

Attorneys

Sean S. Suder
Principal Attorney
Suder LLC
sean@ssuder.com

J.P. Burleigh
Associate Attorney
Suder LLC
jp@ssuder.com

January 21, 2022

Douglas Owen
Urban Conservator
City of Cincinnati

Re: 2000 Dunlap
Case Number: COA2022032

Dear Mr. Owen and Members of the Historic Conservation Board,

I am writing to support the Over-the-Rhine Community Housing (OTRCH) application for zoning variance for their project at 2000 Dunlap Street. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness. Cincinnati Center City Development Corp. (3CDC) feels there is a critical need for this type of housing in our community as a means to serve the people who are in desperate need of the support and services this project can provide. Our organization is uniquely positioned to provide perspective on this topic, as we not only develop of market-rate and affordable housing in the neighborhood but also oversee the GeneroCity 513 program, which employs five social service outreach workers whose goal is to help individuals who are panhandling or homeless get connected with the services they need, such as permanent housing.

3CDC understands that there are neighbors close to the project site who have expressed concerns about parking, outdoor space, density and other issues regarding how this project might impact the immediate area. Jimmy Health House, a 25-unit project located on Odeon Street that was completed in 2010, experienced similar concerns from neighbors during its planning process. Today, Jimmy Heath House provides evidence that if done right, this type of project can address these concerns and provide a positive impact on the neighborhood. 3CDC is ready and willing to work with OTRCH and the concerned neighbors to reach a mutually acceptable solution to allow this project to move forward. We believe all parties involved are committed to this neighborhood, and to supporting the individuals who would be served by this permanent supportive housing, and we are confident this important project can be completed while addressing the concerns that have been presented.

Sincerely,



Adam Gelter
Executive Vice President

Owen, Douglas

From: June Alexander <missjuneart@gmail.com>
Sent: Monday, June 13, 2022 3:01 AM
To: Owen, Douglas
Subject: [External Email] Dunlap project

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from missjuneart@gmail.com. [Learn why this is important](#)

External Email Communication

June 13 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing (OTRCH) is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

These days it is hard to find good, safe, and effective housing for a lot of people. So imagine how difficult that is, especially for people who have special needs. I know because I'm a senior citizen with mental health issues and physical limitations. First, the designs and drafts for the building look great. Someone passing by would think it is just another apartment building. As far as being appropriate for the neighborhood; I was looking at a condo listed for sale on Zillow on Dunlap- OTRCH's proposed designs looked a lot better than what was listed or what I saw in the area on google maps.

Second, OTRCH has met with the community and provided honest and thorough answers to questions asked about this project. I know they have addressed community members' concerns because, as a member of community council I have heard them. Furthermore, Cincinnati Metropolitan Housing Authority has OTRCH ranking as the most committed and thoughtful landlords in this city.

When I first came to this community in the early 2000's, I heard about these developers directly from their PR person at that time. According to her these developers were going to do something about chronic homelessness so this neighborhood would be a family friendly place. I'm from the deep south; I know racist sweet talk when I hear it. Here it is 2022 and my suspicions were correct. "Family Friendly" and "All American" are codes for "not in my backyard" and "whites only." Fortunately, there are champions for social justice like OTRCH who know those codes as well. It seems to me OTRCH has proven they know what they're doing. Consider the success with its other housing projects with Community Matters and Tender Mercies. All the while developing housing throughout this neighborhood. Then there is the success of the Jimmy Heath House! That alone should be *enough said*.

Sincerely,

June P. Alexander

1440 Pleasant Street
Cincinnati, OH 45202

Owen, Douglas

From: Janet Allen-Reid <janetallenreid@gmail.com>
Sent: Wednesday, June 15, 2022 11:57 AM
To: Owen, Douglas
Subject: [External Email] Dunlap PSH

You don't often get email from janetallenreid@gmail.com. [Learn why this is important](#)

External Email Communication

June 15, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

I have been to several of the 8 community meetings where OTRHC presented the design for the building and answered questions. Each time I went to a meeting they acknowledged concerns and showed ways they could address them. And each time offered to meet with anyone who would like to talk more about the design. I appreciate their willingness to be transparent and to engage the community.

I believe the design fits our neighborhood in scale and placement. I think OTRCH has worked hard and succeeded in their efforts to design a building that fits in visually to the current community. I like the design.

Cincinnati is in desperate need of more affordable housing. The Dunlap project will provide not only affordable homes, but support services to help stabilize and improve the lives of chronically homeless men and women in our community.

OTRCH has done an amazing job over many years in our community developing affordable housing. In 2010, the Jimmy Heath House on Odeon St. opened. There had been similar concerns in the neighborhood prior to the JHH opening. Those fears were never realized and in fact, the neighborhood has thrived and is a great example of how people of many different backgrounds can live together in harmony.

I live quite near the Dunlap project. I park off of Colby Alley which borders the proposed building. I will wholeheartedly welcome it and our new neighbors to OTR!

Sincerely,

Janet Allen Reid
1824 Elm St.
Cincinnati, OH 45202

Owen, Douglas

From: Roger G. Auer <AuerRG@elderhs.net>
Sent: Wednesday, June 15, 2022 1:30 PM
To: Owen, Douglas
Subject: [External Email] Dunlap PSH

You don't often get email from auerrg@elderhs.net. [Learn why this is important](#)

External Email Communication

June 15, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am very excited to hear about the Housing project at 2000 Dunlap St. OTRCC has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon St. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears gone unrealized, but JHH has provided a positive impact ON THE NEIGHBORHOOD and has been a model of how people of all different backgrounds can live together in harmony.

Sincerely
Roger G Ayer
5130 Boomer Rd
Cinti. Ohio 45247

CINCINNATI
DEVELOPMENT
FUND

June 3, 2022

Re: Dunlap Permanent Supportive Housing Project

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap St. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

The City of Cincinnati has a significant need for more affordable housing units, particularly for our most vulnerable residents. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of wrap around services designed to stabilize and improve the lives of new residents.

Cincinnati Development Fund has participated in many of OTRCH's successful housing development projects, and we value their long-standing commitment to the neighborhood.

Sincerely,



Joe Huber
President & CEO

June 15, 2022

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

After seeing the design of the proposed building, I find its scale, placement, massing, and density appropriate for the neighborhood. To the best of my knowledge OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

As a Federally Qualified Health Center providing health care services to those experiencing homelessness we realize the importance of housing. Statistics consistently show us how a person's health is positively affected by a stable housing situation. We recognize the continuing need for housing in our city. This project will reach those who are most in need of affordable housing, the chronically homeless. We are excited to hear how this project has been designed to meet the needs of those residents leaving chronic homelessness and that it will offer a full range of services meant to stabilize and improve the lives of new residents.

Cincinnati Health Network has partnered with OTRCH in many ways including providing health care services at its Jimmy Heath House (JHH) on Odeon Street. The JHH is an excellent example of OTRCH successfully operating in the neighborhood. When JHH was being developed in 2010 there were concerns like what is being presented regarding the Dunlap project. Those concerns have gone unrealized with the JHH providing a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

We hope that you look favorably on Over-the-Rhine Community Housing's project at 2000 Dunlap Street. We support this project and believe in this organization's efforts to support those experiencing homelessness.

Sincerely,



Brian VanderHorst, CEO
Cincinnati Health Network



Contact Center
1512 Elm Street First Floor
Cincinnati, Ohio 45202
513-996-0377

ORGANIZING IS PEOPLE WORKING TOGETHER TO GET THINGS DONE

June 15, 2022

Re: Dunlap PSH

To Whom It May Concern,

Contact Center, a local membership based non-profit in Over-the-Rhine, is in strong support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. This will be a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

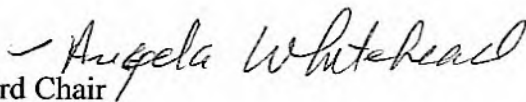
Contact Center has already witnessed how residents of the Jimmy Heath House, a similar housing program near our location, is helping formerly homeless individuals turn their lives around with stable and supportive housing.

Without the human essential of housing, people without homes can quickly disintegrate into acute depression on the streets. The Jimmy Heath House is turning lives around for the better and we know that the Dunlap Project will also value and assist human lives in the same manner. ***Each person, including those who are chronically homeless, is of value as a human life, and each person deserves to have a place to call home.***

We urge you to support the Dunlap Project to give more homeless people in our community a place to call home with supportive services on location.

Sincerely,

Angela Whitehead,
Contact Center Board Chair





June 17, 2022

To Whom it May Concern:

CSH, Corporation for Supportive Housing, fully supports Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find the scale, placement, massing, and density of the building are appropriate for the neighborhood. Tax credit funded supportive housing projects in Ohio tend to scale significantly larger than the proposed Dunlap project with 60 or more units. The Over-the-Rhine development team has taken great care to create a design that fits the architectural standards and density of the Over the Rhine neighborhood. It is this attention to context and detail that speaks to their well-deserved positive reputation in the field.

CSH is a national non-profit that partners with local communities to create and operate high performing supportive housing, a critical housing intervention for those experiencing homelessness. Hundreds of supportive housing projects have been sited across Ohio that have proven to be a long-term asset for their local neighborhoods and communities a large; quality design and materials coupled with affordability and intensive services provides the foundation for supportive housing and its residents to be good neighbors.

OTRCH is a trusted affordable and supportive housing developer and operator. Their property Jimmy Heath House (JHH) on Odeon Street experienced similar community concerns in 2010. Not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

Sincerely,

Director, CSH Ohio

DATE 5/31/22

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I spend a great deal of time in OTR and would love to support finding better solutions for those experiencing chronic homelessness. I feel this issue has reflected poorly on the City of Cincinnati which in turn has a negative impact on my business. I feel that OTRCH project is a tangible solution to this issue that would be well received.

Sincerely,
Ryan Doan
Deeper Roots Coffee Partner
2108 Colerain Ave
Cincinnati, OH
45214

Owen, Douglas

From: DeDe Dennig <dede.dennig@gmail.com>
Sent: Friday, June 17, 2022 9:55 AM
To: Owen, Douglas
Subject: [External Email] Support for OTRCH Housing on Dunlap

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from dede.dennig@gmail.com. [Learn why this is important](#)

External Email Communication

As an Over The Rhine resident, I am writing to voice my support FOR OTRCH's proposed building on Dunlap. We need safe, affordable housing for the many people in need. This is just a start, but an important one.

Thanks,
Diana Dennig
1507 Republic Street

OUR DAILY BREAD

SOUP KITCHEN & SOCIAL CENTER

1730 RACE ST.
CINCINNATI, OH 45202
P. (513) 621-6364
F. (513) 621-3513
WWW.OURDAILYBREAD.US

BOARD OF DIRECTORS

Linda Berger, *President*
Andrew Donohoe, *Treasurer*
Shawna Langworthy, *Secretary*
Matt Roberts, *Vice President*
Jasmine Coaston
Jeff Cornell
Yvan Demosthenes
Darlene Guess
Erika Judd
David Lohbeck
John Peter Perentesis, MD
Cary Powell
Erin Rolfes
Toby Schisler

ADMINISTRATION

Georgine Getty, *Executive Director*
Valerie Elfers, *Office Administrator*
Kat Heilman, *Director of Communications*
Tom Rasp, *Bookkeeper*

OPERATIONS

Kathy Schickel, *Director of Operations*
Garland Butts, *Head Chef*
Antionette Patman, *Inventory Coordinator*
Johnna Britten, *Kitchen Expeditor*
Abbie Freudemann, *Dishwasher*
Abdullah Muhammad, *Kitchen Coordinator*
Michael Tolbert, *Custodian/Dishwasher*
Cameron Williams, *Bag Check Coordinator*
Kenosha Jackson, *Security*

SOCIAL WORK

Pamela Lewis, *Social Worker*

OUR FOUNDER

Cookie Vogelpohl
In Loving Memory, 1941-2016

SERVING UP STABILITY & HOPE

ESTD

1985



June 13, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap St. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

I am the Executive Director of Our Daily Bread soup kitchen. For 37 years, we have provided home-cooked meals to people in need from our location at the corner of Race and Elder – near the proposed Dunlap site. I feel there has never before been a greater need for permanent supportive housing. Prior to COVID, 52% of our guests were homeless and now 70% of guests report that they are homeless. Our meal numbers also remain significantly higher (11%) than they were prior to COVID and 41% of our guests report that it is now harder for them to find food than it was before COVID.

A housing project of the scale presented would really help address this need. In addition, we know that OTRCH provides quality, wrap-around services for their residents, helping them to become stable and productive members of their community.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

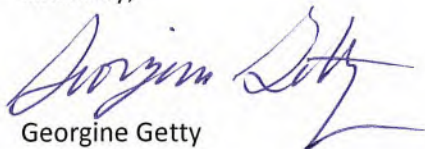
This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, people experiencing chronic homelessness. One hundred percent of the men and women moving into these apartments will be coming out of chronic homelessness. While each resident will sign a year's lease for their apartment, support services and support will be provided. This project will offer a full range of services meant to stabilize and improve the lives of residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

I believe in this project and know several of our guests who would benefit from this housing. It would be such a relief to know that, instead of staying in camps or in crowded shelters, these men and women would have a safe place to call home.

Please contact me at georginegetty@ourdailybread.us or 513-621-6364, ext. 13 if you would like any additional information.

Sincerely,



Georgine Getty

Executive Director
Our Daily Bread
1730 Race Street
Cincinnati, OH 45202

June 6, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. This project is meant to build 44 units of permanent supportive housing for people experiencing chronic homelessness.

Housing is a healthcare issue.

As a visiting nurse who has served many people with limited means in low-income communities such as Over-the-Rhine, Walnut Hills, Avondale, Evanston, and other neighborhoods I have witnessed how a person's housing affects their overall health. I have also served people of adequate to more than adequate means in communities such as Indian Hill, Kenwood, Madeira, and others.

People living in substandard housing experience too many issues in their lives that deflect or distract them from focusing on their health and continue experiencing their health challenge for longer periods of time or get worse. Those living in adequate housing, whether subsidized or not, are able to focus on their health and tend to return to a healthy state sooner.

In addition to having worked with patients as a visiting nurse, I have worked most recently in inpatient psychiatry. Many people experiencing homelessness also struggle with issues of mental health. It can be a vicious cycle when being both homeless and struggling with mental health challenges. Over-the-Rhine Community Housing's ongoing collaboration with Greater Cincinnati Behavioral Health as part of their permanent supportive housing model is an example of their ability to care for the whole person to help them reach their goals.

Over-the-Rhine Community Housing has a very successful model of permanent supportive housing in their Jimmy Heath House on Odeon Street. Please allow them to use their property on Dunlap Street to meet the needs of our neighbors with the greatest challenges.

Sincerely,

Michael Flood

Michael Flood

10 W 14th Street #3
Cincinnati, OH 45202-7504



Greater Cincinnati
**Behavioral
Health Services**

Our Work is Life Changing

George Wright
Board President/Chair

June 14, 2022

Jeff O'Neil
President/CEO

To Whom it May Concern:

Administrative Office
1501 Madison Rd.
Cincinnati, OH 45206
513-354-5200
TTY 513-569-4727
FAX 513-354-7115

www.gcbhs.com

Equal Opportunity Employer

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find the scale, placement, massing and density of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when developments are done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing; the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House (JHH) on Odeon Street. Similar concerns were raised in the development of the Jimmy Heath House in 2010. Not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can successfully live together in our communities.

Sincerely,

Jeff O'Neil
President & CEO
Greater Cincinnati Behavioral Health Services



720 E. Pete Rose Way, Suite 120
Cincinnati, OH 45202
gcfdn.org

June 14, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's development at 2000 Dunlap Street on the corner of Henry Street in OTR. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

Our city has a critical need of more affordable housing units. This project will provide safe, clean, and affordable housing for the most vulnerable in our City. It is for people experiencing chronic homelessness. 100% of the men and women moving into these apartments will be coming out of chronic homelessness. Placing chronically homeless individuals in permanent support housing is a Win-Win. It dramatically improves their quality of life and it save us all valuable resources by avoiding costly police and fire runs with individuals that are most often chronically ill.

I understand OTRCH met with the community on several occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed whenever development is done within our city.

OTRCH has demonstrated track record of success throughout OTR. It developed the Jimmy Heath House (JHH) on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010 but none of those fears have been realized. JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony. Greater Cincinnati Foundation was pleased to provide grant support for the JHH development.

I urge your approval of their requests in order to develop the Dunlap PSH project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ellen M. Katz". The signature is fluid and cursive, with a large loop at the end. It is positioned over the printed name and title of the signatory.

Ellen M. Katz,
President and CEO

Owen, Douglas

From: Kevin Hassey <kevinhassey1@gmail.com>
Sent: Monday, June 13, 2022 1:10 PM
To: Owen, Douglas
Cc: Mary B. Rivers; Roseann Hassey
Subject: [External Email] Upcoming Dunlap Project at HCB

Follow Up Flag: Follow up
Flag Status: Flagged

[You don't often get email from kevinhassey1@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

External Email Communication

Dear Doug,

I am writing to share my support for the proposed OTRCH project on Dunlap Street.

My wife Roseann and I live in OTR by the Jimmy Heath House. We have experienced no issues and are delighted to have the Jimmy Heath House in the neighborhood.

I believe some concerns were raised about impact on home values. I think that some of the highest home values in OTR are near the Jimmy Heath house. I don't think Jimmy Heath House has had any impact on home values.

Lastly, but most importantly, the audience being served by such a project critically needs the housing and support services that the Dunlap project would provide.

I urge HCB to support the project.

Best,

Kevin Hassey

217 W 15th Street

June 10, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building. The scale, placement, massing, and density, of the building are appropriate for the neighborhood, and I think it looks great! I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. We have lived within one block of Jimmy Heath House for over three years, and we need more of these projects! I also own a business at 111 W. McMicken Ave, within two blocks of the proposed Dunlap site; I know that this area needs more residential units. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood. Similar concerns were raised prior to the Jimmy Heath House opening in 2010. Our family parks in front of JHH (which has over 50 units); barely any of the residents own cars so parking has *never been* an issue. Odeon Street is perhaps the safest street in OTR, with a door attendant 24/7 and bright lights at their entrance. Property values have only increased. Market rate housing has been built adjacent to their property since operations began. JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can together in harmony.

Bottom line – it is better to have needs met than to see my homeless neighbors remain at risk. They deserve to be right next to transit options that don't force them to own an expensive car. They don't have or need much, which is why so many units work well. Thank you for your consideration.

Sincerely,
Chris Heckman
1526 Elm Street
Cincinnati, OH 45202

St. Francis Seraph Catholic Church 1615 Vine St. Cincinnati, OH 45202

June 14, 2022

Re: Dunlap PSH

To whom it may concern:

I am writing in support of the Over-The-Rhine Community Housing's project at 2000 Dunlap St. I have participated in several meetings where this 44-unit permanent supportive housing project has been presented. The goal, of course, is to provide housing for those experiencing chronic homelessness.

"Chronic homelessness" is what I see daily around St. Francis Seraph Church. I witness the many people coming for services at St. Anthony Center. If only more of these people had a place to live!

In my frequent neighborhood walks, I pass through the intersection on Dunlap where OTRCH is proposing to build this housing. I know it as mainly industrial, but not far from other services and residents. Given the track record of the Jimmy Heath House on Odeon Street and the acceptance of this communal living house by the other residents, I feel the neighbors around the Dunlap property will also be able to adjust to these new neighbors.

Housing is such a critical need in our city. Here we have an organization with a proven track record, a piece of property already owned by OTRCH and a very good plan for housing that should be an asset to the area. People of various backgrounds really can live together and have a sense of harmony in a neighborhood.

I have heard objections. I think OTRCH has tried to address those concerns. I honestly believe the greater good of helping people have housing should be the priority for all of us in OTR.

Sincerely,

Fr. Al Hirt, OFM
Pastor, St. Francis Seraph Church
Home address: 1723 Pleasant St.



June 15, 2022

Re: Dunlap PSH

To Whom It May Concern,

I am writing to support Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap. I understand that they are proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

We, the Intercommunity Justice and Peace Center (IJPC), are a nonprofit in Over-the-Rhine that believes in supporting all of the residents of our community, especially the most vulnerable among us. Cincinnati is in dire need of affordable housing and this project will directly meet that need for the chronically homeless. With programming in this project specifically designed to meet the needs of those residents leaving chronic homelessness, they are thoughtfully planning for all phases of success. It will offer a full range of services to both stabilize and improve the lives of new residents.

We are grateful for the support OTRCH gives the community and the way they bring experience and expertise to this project. They have met with concerned community members at least eight times to thoroughly answer questions about the project. They are committed to ongoing dialogue with stakeholders and provide needed transparency to promote trust and demonstrate honest development practices.

I believe OTRCH has taken appropriate steps to assure the new building integrates with the existing community. They have demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Though similar concerns were raised prior to JHH opening in 2010, JHH has provided a positive impact on the neighborhood and it has been a model of how people of all different backgrounds can live together in harmony.

Sincerely,

Allison Reynolds-Berry, MSW
Executive Director

215 E. Fourteenth Street, Cincinnati, OH 45202
phone: 513.579.854 website: IJPCcincinnati.org

IJPC Founding Sponsors: Congregation of St. Joseph, Sisters of Charity of Cincinnati, Sisters of Mercy, Sisters of Notre Dame de Namur, Sisters of St. Francis, Oldenburg. **IJPC Sponsors:** Anawim Community, Bellarmine Chapel, Cincinnati Friends Meeting, Cincinnati Mennonite Fellowship, Comboni Missionaries, Congregation of Divine Providence, Dominican Sisters of Hope, Franciscan Sisters of the Poor, Franciscans - St. John the Baptist Province, Glenmary Home Missioners, Hyde Park Community United Methodist Church, Mount Auburn Presbyterian Church, New Jerusalem Community, Sisters of Notre Dame of Covington, St. John Unitarian Universalist Church, Ursulines of Brown County, and Ursulines of Cincinnati.



LEGAL AID SOCIETY OF
SOUTHWEST OHIO, LLC
AN AFFILIATE OF THE LEGAL AID SOCIETY OF GREATER CINCINNATI

June 16, 2022

DONALD P. KLEKAMP
COMMUNITY LAW
CENTER BUILDING

215 East Ninth Street
Suite 500
Cincinnati, Ohio
45202

Telephone
(513) 241-9400
(800) 582-2682

Facsimile
(513) 241-0047

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find the scale, placement, massing, and density of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House (JHH) on Odeon Street. Similar concerns were raised in the development of the Jimmy Heath House in 2010. Not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live together in harmony.

Sincerely,

Nicholas J. DiNardo
Managing Attorney

LEGAL SERVICES IN

Brown County
Butler County
Clermont County
Clinton County
Hamilton County
Highland County
Warren County



6.15.2022

Subject: 2000 Dunlap, Permanent Supportive Housing

To Whom it May Concern:

I am a resident of OTR and am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street.

This Over-the-Rhine Community Housing (OTRCH) project includes 44 units of Permanent Supportive Housing — a much needed development for those in our community experiencing chronic homelessness.

I have seen the detailed design plans and believe the scale and materials are appropriate and respective of the surrounding area.

Additionally, with regard to the Density Variance being requested, if they built the allowed 14 units, but made them all multi-tenant units (eg 3-bedroom units), they would not need a variance to accommodate roughly the same number of residents (or more). As such, the density variance seems appropriate, and they have accomplished this without making an over-sized building.

I know OTRCH met with the community on numerous occasions, and I was part of multiple of those meetings, including those with the OTR Community Council and its various committees. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, people experiencing chronic homelessness — but who also need the wrap-around services provided by this proposal.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street — where neighbors are supportive.

Sincerely,
Victoria Leavitt
1514 Race Street, #3
Cincinnati, OH 45202



June 7, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing project at 2000 Dunlap St. It is my understanding that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

LISC is the nation's leading community development organization. In collaboration with local groups, we help identify priorities and challenges and help formulate comprehensive strategies to address them. At LISC Greater Cincinnati, we are a leading organization in helping community residents transform neighborhoods by working with cities, residents, nonprofit organizations, and key public and private partners to create affordable housing, support neighborhood economic development, help families reach financial stability, and sustain social capital.

As Executive Director of LISC Greater Cincinnati, my team and I are leading a broadly inclusive initiative called Housing Our Future that is working within multiple channels to ensure that in the near future everyone in Cincinnati and Hamilton County will have access to a safe, affordable place to call home in a community of their choice. The Housing Our Future initiative outlines the *goal of producing 2,000 units of affordable housing each year, for the next 10 years*, in order to address the unit gap alongside interventions in raising wages and increasing household stability. The Steering Committee leading the Housing Strategy's development agreed that the 2,000 units to be produced annually should serve households with incomes at or below 60% of the Area Median Income.

Cincinnati is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness and programming in this project has been designed to meet the needs of those residents. This project will also offer a full range of services meant to stabilize and improve the lives of new residents.

Sincerely,

A handwritten signature in black ink that reads "Kristen Baker". The signature is fluid and cursive.

Kristen Baker

Executive Director

June 17th, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Oden Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can together in harmony.

Sincerely,

David McDonald
261 W. McMicken Ave. Apt 22
Cincinnati, OH 45214

June 16, 2022

Re: Dunlap PSH

To Whom It May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

We understand the concerns of the neighbors who have disagreed with the density and location, but we believe there is a great need for affordable housing in Cincinnati's core and the 44-unit building is generally consistent with the surrounding community.

We have seen the success OTRCH has had at Jimmy Heath House, with good management and staffing—and that gives us the best indicator that they can do the same here for our chronically homeless urban core community members. Like Jimmy Heath House, the management and services make all the difference in an important project like this that is desperately needed.

We have invested tens of millions of dollars in mixed use and mixed income development within blocks of the proposed site, including our office, and we believe with OTRCH's commitment to the services for their residents and strong management, it can be a positive addition to the community.

Sincerely,



Bobby Maly

CEO

The Model Group |

June 6th 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I believe the placement, massing, and density, of the building are appropriate for the neighborhood. I know OTRCH to be competent in taking any appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with my community of Northside on multiple occasions; they've consistently provided honest and thorough answers to questions we've had in regard to their project in our neighborhood. This experience leaves me confident that OTRCH is committed to an ongoing dialog with stakeholders, close to the Dunlap St project, who may have interest in the design of this building. Based on the experiences Northside has been subjected to with other developers, we can testify this honest and transparent engagement is what's needed when development is done in our city.

Cincinnati is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. It's been so refreshing to learn this project will offer a full range of services meant to stabilize and improve the lives of new residents.

Lastly, I know OTRCH to have demonstrated success specifically with its Jimmy Heath House on Odeon Street. Although, I understand, similar concerns were raised prior to the JHH opening in 2010, not only have those fears gone unrealized, but JHH has provided a positive impact on that neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,



Briana Moss (bree)
President, Northside Community Council

Historic Conservation Board
City of Cincinnati
805 Central Avenue, Suite 500
Cincinnati, OH 45202

June 16, 2022

RE: Dunlap + Henry PSH

Honorable Board Members:

We are writing to express our support of Over-the-Rhine Community Housing's project at 2000 Dunlap, appearing before you on Monday June 27, 2022. We understand that Over-the-Rhine Community Housing (OTRCH) is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

We believe that the design of the building addresses the OTR Design Guidelines and that the scale, placement, massing, and density of the building are appropriate for the neighborhood. The building is contemporary yet respectful of the urban context and works well as a background building to the larger built environment. We also believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH and the design team remain committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is necessary for successful development in our city.

Cincinnati is in dire need of affordable housing, and Dunlap + Henry PSH (2000 Dunlap) will provide safe and affordable housing for those who need it most, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. This project will offer a full range of programming specifically designed to meet the needs of the new residents and will help stabilize and improve their lives.

Dunlap + Henry PSH will help our neighbors get off the streets and allow them to access permanent housing and resources. If this project doesn't move forward, the issue of homelessness will not simply go away. The people who will be living in the proposed community are already our neighbors. This site is an ideal location as it will allow the homeless residents of OTR to live and grow in a safe environment that's in an area they consider their home base.

This project will overall create a safer and healthier environment for our community. The project will turn a surface parking lot into a high value space that not only serves neglected residents of OTR but will bring life and purpose to an underutilized area of our urban environment.

OTRCH has demonstrated success throughout the neighborhood, specifically with Jimmy Heath House (JHH) on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, however, those fears have gone unrealized. In turn, JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can live together in harmony.

We urge you to approve the Dunlap + Henry PSH project, based on the points outlined in this letter above. This project will provide safe and affordable housing for underserved demographic while fostering equitable growth in the OTR neighborhood.

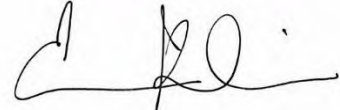
Sincerely,
New Republic Architecture



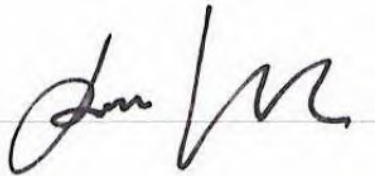
Graham Kalbli, AIA, LEED AP
Principal



Greg Albright, AIA
Director of Operations



Erin Kline
Registered Architect



Kara Vujanovich
Project Designer



Josh Pedoto, AIA
Registered Architect



Brandon Dalessandro
Project Designer



Megan Jones
Project Designer



Jim Gelis, AIA, LEED AP
Senior Project Manager



Nadja Stowasser
Designer



Sam Burgess
Designer



Ryan Minnich
Designer



Lindsey Sullivan
Solutions Strategist



Madison Bucchi
Designer

April 19, 2022

Over-the-Rhine Community Housing
114 W. 14th Street
Cincinnati, OH 45202



Dear Ashleigh and Ben,

The Infill Committee of the Over-the-Rhine Foundation appreciates the open dialogue and design conversations for this project. We support your design proposal for a new infill building at Dunlap and Henry for affordable housing.

Graciously,

A handwritten signature in blue ink, appearing to read "Danny Klingler".

Danny Klingler
Co-Chair
Infill Committee

A handwritten signature in black ink, appearing to read "Jennifer Lemasters-Wirtz".

Jennifer Lemasters-Wirtz
Co-Chair
Infill Committee



June 15, 2022

Re: 2000 Dunlap PSH

To Whom It May Concern:

We, the staff and board at Peaslee Neighborhood Center, write to support the Over-the-Rhine Community Housing (OTRCH) development project at 2000 Dunlap. We understand that they are proposing a 44-unit permanent supportive housing development that will provide housing for those experiencing chronic homelessness.

Peaslee has served the Over-the-Rhine community for more than 37 years, and we share a great deal of history and purpose with Over-the-Rhine Community Housing. OTRCH's affordable housing development is absolutely essential to the wellbeing of our community, and their work represents a gold standard for equitable development in our city.

The Jimmy Heath House (JHH), which serves as a model for the Dunlap PSH project, is a tremendous asset to the city of Cincinnati. Its "housing first" approach is the kind of smart, compassionate, and comprehensive response that is so desperately needed within systems that too often fail to meet the most basic needs of shelter and wellness for vulnerable Cincinnatians. Prior to the JHH opening in 2010, similar concerns were raised. Not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and been a model of how people of all different backgrounds can live in together in harmony. Given the opportunity to expand this kind of deep service to our community, our City should offer its support without hesitation.

Speaking from Peaslee's experience and knowledge of equitable development policy, we'd also like to emphasize that the housing units to be developed by this project are the most needed and most difficult units to produce, even without the wrap-around services that will be included for residents. These units provide housing at price points where our city has massive deficits. If Cincinnati is to be an equitable city, projects like this must be a top priority.

Thank you for your time and consideration.

Jennifer Summers, Executive Director
Peaslee Neighborhood Center
215 E 14th Street
Cincinnati, OH 45202

Owen, Douglas

From: Joseph Pflum <josephjpflum@gmail.com>
Sent: Friday, June 17, 2022 9:00 AM
To: Owen, Douglas
Subject: [External Email] Project at 2000 Dunlap St

You don't often get email from josephjpflum@gmail.com. [Learn why this is important](#)

External Email Communication

To Whom It May Concern;

April 16,2022

I am writing in support of the Over the Rhine Community Housing project at 2000 Dunlop St. The OTRCH housing project is a proposed 44 unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

I have seen the design of the proposed building. I find it attractive. It meets all the criteria for scale, placement, and design of a building appropriate for the neighborhood. I believe that the design maintains and enhances the social and visual context of the existing community. The variances requested are not out of line with the variances given to other new construction building projects in Over the Rhine.

The city is in dire need of housing for all people. This project reaches those who are most in need of affordable housing. People who are experiencing chronic homelessness. 100% of the residents will be people who have been experiencing chronic homelessness. The project is also unique in that it will provide on-site services at and support for the people coming out of homelessness. This is critical in order to stabilize and allow the lives of these people to move forward.

My wife and I have lived at 1529 Republic Street for over seven years. We are directly across the street from the Joseph House. It is a house where veterans live while they are recovering from substance abuse. Not only do they live here but they receive services to aid in their journey of recovery. We have found them to be wonderful neighbors. They are courteous, quiet, and very friendly. On one occasion my wife was having an emergency. She left our front door and called for help. The neighbors at the Joseph House came running to assist. . I have nothing but good feelings about them as neighbors.

My experiences in Over the Rhine with people who are living in group living situations have always been pleasant. The people at Tender Mercies, Jimmy Heath house, and the Joseph House are all good people. I feel that having stable, affordable housing in that area of over the Rhine will overtime come to be a huge asset for the local community and Cincinnati as a whole.

I have heard some say these types of projects have the potential to lower property values. This is categorically false. All three of the above mentioned houses have been there since 2010. There has been development on every block and a significant increase in property value throughout Over the Rhine.

I would strongly encourage you to vote to give this project a certificate of approval.

Thank you for your time.

Best Regards,

Joe Pflum

1529 Republic St.
Cincinnati, Ohio 45202
513.258.9558

Owen, Douglas

From: Katie Pflum <katiepflum@gmail.com>
Sent: Wednesday, June 15, 2022 8:41 AM
To: Owen, Douglas
Subject: [External Email] Fwd: OTRCH Dunlap PSH Project

You don't often get email from katiepflum@gmail.com. [Learn why this is important](#)

External Email Communication

----- Forwarded message -----

From: **Katie Pflum** <katiepflum@gmail.com>
Date: Wed, Jun 15, 2022 at 8:32 AM
Subject: OTRCH Dunlap PSH Project
To: <douglas.owens@cincinnati-oh.gov>

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

I have seen the design of the proposed building and I find the design, scale, and density of the building are appropriate for the neighborhood. OTRCH has taken all appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

The city of Cincinnati desperately needs more housing for people experiencing chronic homelessness. Without the immediate efforts of organizations such as OTRCH we are only going to see a larger crisis arise in the city that will create even greater problems for everyone living, working, and playing in Over The Rhine as well as surrounding neighborhoods.

I have now lived in OTR for seven years and I can state unequivocally that having neighbors such as residents living in OTRCH housing (i.e. Jimmy Heath House, Recovery Hotel) as well as The Joseph House which is directly across the street from my home has been a VERY positive experience. My negative experiences have ALL involved individuals who are roaming the streets with no place to go, no bathroom (hence urinating and defecating on the streets and alleys), essentially no stability in their lives.

Any opposition to an important and essential project such as the 2000 Dunlap Street project is tragically shortsighted and misguided during this time of economic uncertainty.

Regards,

Catharine J. Pflum
1529 Republic Street
Cincinnati, OH 45202
513-673-7446

--

Cheers!

Katie

Restoring Health, Transforming Lives

The mission of the Center for Respite Care is to provide quality, holistic medical care to people experiencing homelessness who need a safe place to heal, while assisting them in breaking the cycle of homelessness.

Board of Directors

Damian Billy – Chair

Mike Behme, CPA – *Treasurer & Chair Elect*

Christopher Tassone, JD – *Secretary*

Mark Manley, MD – *Past Chair*

Brian Antenucci, CFP
T. Canady
Cary Hines, CPA
Greg Jarvis
Diana Klindinst
Matt Koloseike
Rachel McKinney
Joseph Pflum, MD
Cary Powell
Martha Schueler
Tracie Shelton
Elizabeth Tuck, Esq.
Lori Uphaus
Judith Van Ginkel, Ph.D.
Amy Winkler

Advisory Board

Claudia G. Allen, JD
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Bob Hauser
Brian Jones, DHSc, CHPCA
Joe Kiesler, MD
Larry Neuman, JD
Marcia Spaeth
Tom Tillar

Laurel Derks Nelson
Chief Executive Officer

Robert Donovan, SM, MD
Physician
Services generously provided by Cincinnati Health Network

1615 Republic Street
Cincinnati, OH 45202

Mailing Address:
P.O. Box 141301
Cincinnati, OH 45250

Phone (513) 621-1868
Fax (513) 621-1872
www.centerforrespitecare.org

June 16, 2022

To: The Honorable Historic Conservation Board of the City of Cincinnati
II Centennial Plaza
5th Floor
805 Central Avenue
Cincinnati, Ohio 45202
(sent by e-mail to: Mr. Douglas Owen, Acting Urban Conservator
douglas.owen@cincinnati-oh.gov)

Re: Letter in Support of the Dunlap PSH Project at 2000 Dunlap Street
COA2022032

The *Center for Respite Care* strongly supports the *Over-the-Rhine Community Housing's* request to construct a four story, 44 apartment, congregate housing facility at 2000 Dunlap Street.

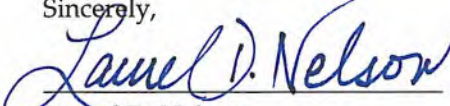
The goal of this project is to provide stable housing to those that are experiencing chronic homelessness coupled with on-site case management services. The Mission of *Over-the-Rhine Community Housing* closely aligns with our Mission.

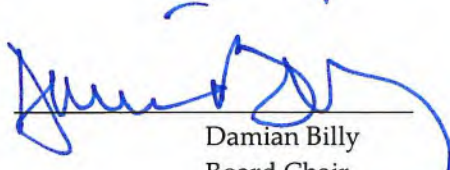
The *Center for Respite Care* is located at 1615 Republic Street within the St. Anthony Center. We are a 20 bed, 24-hour facility providing medical and nursing care to sick people experiencing homelessness to promote effective healing. Our clients receive quality medical care and assistance in breaking the cycle of homelessness. We have a 77% success rate in placing our clients into stable housing upon their medical discharge. However, finding stable housing is a constant challenge for us. The Dunlap PSH Project would provide an opportunity for our clients to continue their life in stable housing.

The proposed facility has a single entrance, with a staffed 24-hour front desk, which will enhance security for both the residents and the immediate neighborhood.

The *Center for Respite Care* joins with other organizations, such as the Greater Cincinnati Behavioral Health Services, 3CDC, the Greater Cincinnati Homeless Coalition, Strategies to End Homelessness, the Cincinnati Health Network, and others to strongly encourage the Historic Conservation Board's approval of the Dunlap PSH Project.

Sincerely,


Laurel D. Nelson
CEO


Damian Billy
Board Chair


June 16, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project.

My name is Ronjean Jackson. I live with Over-the-Rhine Community Housing and have lived in the Carries Place permanent supportive housing program since 2015. My housing helps me in more ways than just a roof over my head. I get support with employment, educational needs; support for whatever I need. There is truly help for whatever I need. This is a close neighborhood.

Downtown is a convenient and walkable place to live. This is a good area for a Permanent supportive housing program because people are already here, and they need this housing. There needs to be more permanent supportive housing in this neighborhood.

Sincerely,

Ronjean Jackson
East Clifton Ave, Cincinnati OH 45202
513-953-0053

June 16th, 2022

Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city, which I might add most developers do not meet with the community anywhere close to the extent that OTRCH has.

This city is in dire need of affordable housing! There are many people being displaced throughout the city and being priced out of Cincinnati. Just this week an article was released saying that Cincinnati is #4 in the nation for most expensive rent. As a resident of the neighborhood and teacher at Rothenberg (the Cincinnati Public neighborhood school) I have seen many neighbors and students displaced. The topic of homelessness is discussed on a daily basis at Rothenberg. We as a neighborhood and city need to do better. The Dunlap project proposed by OTRCH takes into account those in our city, those who are chronically homeless and are in dire need of affordable housing. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,
Jennifer Scheiderer

49 East Clifton Ave,
Cincinnati, Ohio 45202

June 16, 2022

Mr. Owens:

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

My organization, Strategies to End Homelessness leads a coordinated community effort to end homelessness in Greater Cincinnati. We also oversee funding from the U.S Department of Housing and Urban Development's Continuum of Care for the Homeless Program for Hamilton County/Cincinnati. One of the primary uses of such funds is to support Permanent Supportive Housing programs.

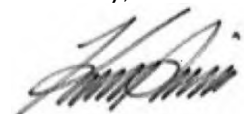
Cincinnati is in dire need of affordable housing, and this project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness, primarily from shelter or off the streets. Programming in this project has been designed to meet the needs of people leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

I have seen the design of the proposed building and believe the scale, placement, massing, and density of the building are appropriate for the neighborhood. I also understand the OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community, and that OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. And, after 24 years of working with OTRCH, I know that they, as always, remain committed to ongoing dialog with stakeholders who may interest in any of their buildings, which includes the design and operations of this Dunlap Street building. OTRCH understands as well as anyone that such honest and transparent engagement is what is needed when development is done in our city.

OTRCH has demonstrated success throughout the neighborhood, and specifically with the Jimmy Heath House (JHH) on Odeon Street. Many of the exact same concerns were raised in the development of the Jimmy Heath House in 2010, and those fears went unrealized. In fact, the Jimmy Heath House provides a positive impact on the neighborhood and is a model of how people of different backgrounds can live in together.

If you have any questions about our support, or the extensive need within our homeless services system, for projects like Dunlap Street please contact me at 513-263-2788 or kfinn@end-homelessness.org.

Sincerely,



Kevin Finn
President/CEO



June 15, 2022

Re: Dunlap PSH

To Whom it May Concern:

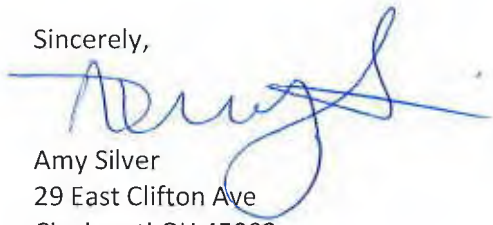
I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have participated in most of the community meetings regarding this project and I find the scale, placement, massing, and density of the building are appropriate for our neighborhood. OTRCH has been a strong community partner in our neighborhood and are continuing to do so with this current project.

OTRCH has been active at our Over-the-Rhine Community Council meetings and has been forthcoming with their plans for the project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Our cities need for projects like this cannot be overstated.

Sincerely,



Amy Silver
29 East Clifton Ave
Cincinnati OH 45202.
513-562-0240

6/16/2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,
Molly Simpson
2818 Erie Ave. Cincinnati, OH 45208

6/17/2022

Re: Dunlap PSH

To Whom it May Concern:

Please allow me to introduce myself, Edward Slater. I am a homeowner in Over the Rhine and work for the Center for Respite Care located at Liberty and Republic Streets. I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

My work over the years with several agencies working to end homelessness has taught me that the city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can together in harmony.

Sincerely,

Edward J. Slater
1420 Main Street Unit 2F
Cincinnati, Ohio 45202

June 16, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap St. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have attended a community council meeting where OTRCH has met with the community and provided honest and thorough answers to questions asked about this project. I believe OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can live in together in harmony.



Sincerely,
Steve Smith
1800 Race St

June 9, 2022

RE: Dunlap PSH Project
Case No. COA 2022032

To Whom It May Concern,

I am a long time resident of Over-the-Rhine and Resident Board Secretary of Over-the-Rhine Community Housing. I urge you to support our proposed 44-unit permanent supportive housing project at Dunlap and Henry Streets in Over-the-Rhine. It will serve persons experiencing chronic homelessness, which is a big need in our neighborhood and city. I often hear people complaining and/or frustrated about encountering people homeless on our streets. This is a humane and dignified solution that warrants your support. This use is permitted.

I have attended both the Economic Development and Housing Committee and General Membership meetings of our Over-the-Rhine Community Council. OTRCH gave excellent presentations, answered questions, and offered to meet with anyone who was interested in hearing more about our plans. We offered tours of Jimmy Heath House so that neighbors can better understand the model we will be using at the Dunlap PSH site. As a long time member of our Community Council, it is disheartening to witness the attitude of NIMBYISM, now present at our meetings. I have seen persons drop off of our Community Council because of the racial and economic biases that are expressed about those most vulnerable and marginalized in our neighborhood. I believe there is more support for this project than can be understood or expressed by one close vote taken at a membership meeting.

I am excited about the design and how it wraps services around the people who will be living there. We all, both businesses and residents have a great opportunity to demonstrate love in action, rather than fear that keeps us separated from those we think are so different than ourselves. We can expand our hearts to welcome people in greatest need. OTRCH has been awarded LIHTC for this project. We are so close to making this project come to fruition. Your affirmative vote will help us on that positive trajectory.

Sincerely,
Bonnie Neumeier
bonsunflower@gmail.com
Resident of Over-the-Rhine
Resident Board Secretary of OTRCH
10 W. 14th Street
Cincinnati, OH 45202



Chief Executive Officer
Russell Winters

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Jennifer Neyer Berg
Lt. Stephen Saunders
Stephen Wesselkamper
Edward Wolterman

Emeritus
Joseph Feldhaus
Eileen Mechley (1940-2020)
Marcia Spaeth

Frank Harkavy
(1926 – 2003)

June 8, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

I am familiar with OTRCH's long history of community engagement and their dedication to making OTRCH a place where all are welcome. OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. Our shortage of affordable housing has been well documented with 1,000 people experiencing homelessness on any given night. This project reaches the most vulnerable among us - the chronically homeless. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,

Russell L. Winters, LISW-S
Chief Executive Officer





June 8, 2022

RE: Dunlap PSH Letter of Support

To Whom it May Concern:

We are writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. It is our understanding that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

OTRCH has done many projects within the historic district of OTR, and I believe they will handle the design of this with the same level of care, within the oversight and approval of the Historic Conservation Board. We agree with the scale and size of the project, as it is usually not economically feasible to develop a smaller project.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. Our understanding is that programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. We at Urban Sites are in support of the balance of housing needed in the urban core, and believe OTRCH has proven itself a long-time advocate in the OTR neighborhood.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Westrich".

Tim Westrich
VP, Affordable Housing

June 14, 2022

To Whom it May Concern:

I am writing in full support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

This city is in dire need of affordable housing. According to the 2021 Gap report from the National Low-income Housing Coalition report the City of Cincinnati has 81,297 extremely low-income renters and renters and 31,180 extremely low income units. Cincinnati just like the rest of the country must develop low-income housing units to if the city is to maintain itself as a livable city for all residents

This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House (JHH) on Odeon Street and has been a model of how people of all different background can live in together in harmony and transition into meaningful communities.

As a former resident of Over-the- Rhine Community Housing, I know how much the stable supportive community basis programs can assist its residents in achieving success. My role as an advisor to 4 Presidents and the opportunity to become a national leader on the issue of homelessness would not be possible without the empowering compassionate services provided by the staff, board, and residence of Over-the Rhine Community Housing. I urge you to approve this project so that other who face life challenges can receive the shelter and care that is a constant in all programs operated by this amazing agency

Sincerely,

Donald H. Whitehead Jr.

Donald H, Whitehead Jr.
Executive Director
National Coalition for the Homeless
2201 P. Street Washington DC. 20037

6/16/2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

As the co-chair to the Over-the-Rhine Foundation's Infill Committee, I have reviewed almost every new construction project proposed in the district for the last five years. Our committee also worked directly with the architect of this proposed project, and they went to great lengths to accommodate our recommendations and made significant changes and improvements. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. This project is a strong example of good design, particularly for a constrained budget.

Outside of design matters, our city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. OTRCH continues to be an engaged community partner and has demonstrated success throughout the neighborhood.

Please support the equitable growth of our district and support this project's construction.

Sincerely,

Jennifer LeMasters Wirtz

Jennifer G. LeMasters Wirtz

Supervising Architect, Sr. Project Manager
AIA, PMP, LEED AP BD+C, ENV SP

1720 Pleasant Street
Cincinnati, OH 45202

M+ 1 513-703-8553



Over-the-Rhine Community Council
P.O. Box 662
Cincinnati OH 45201

May 18, 2022

Doug Owen
Urban Conservator
City of Cincinnati

Re: 2000 Dunlap Application for Certificate of Appropriateness and Variances

Dear Mr. Owen and Members of the Historic Conservation Board,

At our April 25, 2022 Over-the-Rhine Community Council meeting, the Board of Trustees recommended sending a letter of support regarding the Dunlap PSH project, including the project's request for a Certificate of Appropriateness and related variances. But the Membership voted against the Board's recommendation. There were 30 votes in favor and 34 votes in opposition, which means the "opposition" had a majority of votes. The project was presented to the Council on the following dates:

- December 13, 2021 – Board of Trustees
- January 4, 2022 – Economic Development and Housing Committee
- January 10, 2022 – Board of Trustees
- March 1, 2022 – Economic Development and Housing Committee
- March 14, 2022 – Board of Trustees
- March 28, 2022 – Full Council Meeting
- April 5, 2022 - Economic Development and Housing Committee
- April 11, 2022 – Board of Trustees
- April 25, 2022 – Full Council Meeting

Respectfully,

A handwritten signature in black ink, appearing to read "Maurice Wagoner". The signature is fluid and cursive.

Maurice Wagoner
President
Over-the-Rhine Community Council

cc: Mayor Pureval
City Manager John Curp
City Council

Owen, Douglas

From: David Berger <davidb@northernrow.com>
Sent: Friday, June 17, 2022 9:52 AM
To: Conservator, Urban
Subject: [External Email] Opposition to 2000 Dunlop St. Application for Certificate of Appropriateness and variances.

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from davidb@northernrow.com. [Learn why this is important](#)

External Email Communication

Mr. Doug Owens and members of the Historic Conservation Board
Urban Conservator City of Cincinnati,

I am writing your board as a property owner and a business owner to express my opposition to this request for variance. This neighborhood has been working long and hard to improve it's place as a safe and thriving OTR neighborhood. We have small businesses putting down roots, new residents moving in, and people coming into our neighborhood from all around the city to watch this transformation. This activity comes from the rich fabric of the buildings and people that are investing in and making this their community.

For years, we have invested tremendous private dollars to adhere to the historic guidelines during our development. This variance that is requesting a density of 44 units versus 14 is absurd. There are guidelines set which are rarely waived, and when they are, they are not nearly as egregious and against the wishes of businesses and the residents of the community as with this request.

In addition to an inappropriate density request, this project also proposes to bring an additional 44 units of institutional housing into a neighborhood that already has one of the highest saturations of low income recovery housing in the city. The building next to our business which is less than 300 feet from the proposed project, already has over 130 beds of sex offenders, newly released drug and alcohol abusers and puts a strain on the police and fire departments.

This projects application has also been improperly listed as "Congregate Housing", and should be listed as "Transitional Housing". It will include Court ordered drug and alcohol recovery; a use not permitted in the Urban mix zoning. This use also goes against and is inconsistent with the Mohawk Neighborhood Community Development Corporation's Comprehensive Plan which is quite clear when it describes allowable housing types. This project will house persons referred from the legal system having drug and alcohol issues. This guidance document was prepared by residents, business owners and city officials, and it is part of your boards responsibility to maintain and uphold the Historic, zoning and neighborhood directives.

This project is located in the heart of the Brewery District, and putting already at risk recovering alcohol and drug addicts in the center of it will not benefit their recovery, especially when the project does not ensure that the transitional housing project will provide onsite support services.

We have patrons from all over the city coming into our neighborhood and safety is very important to all of the businesses and residents. Ensuring that we do not invite additional people struggling with mental issues, drug and alcohol addictions into our neighborhood is very important to us, and is part of the City's responsibility of providing safety to its taxpayers! VOA - 130 beds (1 block away), Logan Towers - 62 beds (1 block away) boast two of the areas highest number of EMS, Police and Fire Department responses.

Neither the neighborhood nor the City safety services can afford to have additional crime and human warehousing projects dropped into our historic neighborhood.

The design of this project also asks for a setback variance of the building allowing it to be built up to the sidewalk. This will not meet with the building guidelines of the neighborhood and should also not be permitted.

I hope that you can see that there are multiple reasons that this application should not be approved as it does not warrant a variance of such magnitude allowing 44 versus 14 units, allowing for a setback variance, nor has it heeded the guidance of the Mohawk Neighborhood Community Development Corporation's Comprehensive Plan.

Thank you in advance for upholding the historic fabric of the neighborhood and guidelines set out by the residents and businesses that work each day to make our city a better place to live.

Cheers,

David Berger
Northern Row Brewery & Distillery
111 West McMicken Ave.
Cincinnati, Ohio 45202

Sent from [Mail](#) for Windows 10

Owen, Douglas

From: Alfred Berger <dsiltd@fuse.net>
Sent: Tuesday, June 14, 2022 3:32 PM
To: Conservator, Urban
Subject: [External Email] Opposition to: New Republic 2000 Dunlap Street Project.

You don't often get email from dsiltd@fuse.net. [Learn why this is important](#)

External Email Communication

Historic Limited Liability Co LLC

2572 Queen City Ave.

Cincinnati, Ohio 45238

Alfred J. Berger .Jr

Member

Doug Owens

Urban Conservator

City of Cincinnati Historic Conservation Board

Two Centennial Place

805 Central Avenue, Suite 500

Cincinnati, Ohio 45202

June 14th, 2022

Dear Mr. Owens,

This is my second letter to the City of Cincinnati Historic Conservation board and is a follow up letter to the January 3rd, 2022 letter that the Dunlap Neighbors submitted to the Historic Conservation Board (HCB). In that letter, signed by thirty-

four residents and neighbors, we outlined our opposition to the Dunlap Neighbors is an informal group of residents and businesses that formed after we discovered the applicant was planning to construct a 44 unit structure designed to provide supportive permanent supportive housing to homeless people in that location suffering from addiction to drugs and alcohol and suffering from serious mental issues. It is critical to note that virtually every adjacent business and resident and many other nearby businesses and residents are opposed to this project in its present form. We are not opposed to affordable housing. We are opposed to cramming in a 44 unit structure on a 100' x 100' lot designed for 14 units. In our January 3rd letter we outlined our concerns about the density and setback variances the applicant is seeking. In this letter, signed by members of Dunlap Neighbors, we will outline the many other reasons why this structure is the wrong project in the wrong place at the wrong time.

1. Despite the fact the applicant is seeking to build a structure entirely paid for by public tax dollars and seeking several zoning variances the applicant has not engaged the community about the purpose or overall design of this project.
2. This property due to its tax free status configuration will probably never contribute to the general tax basis of structures in our neighborhood. This will burden all of our neighborhood structures to make up the difference and only add to our tax burden. It has NOT been approved or supported by the Mohawk Neighborhood Development Corporation or the OTR Community Council. They have not engaged adjacent residents or businesses and most of the community only learned of this project after they obtained the HCB Notice of Public Hearing card in the mail.. We request that you delay rendering a decision on this project until the applicant appropriately engages the community.
3. HUD policy directly opposes the over concentration of low income housing. 2000 Dunlap Street is located to an area of OTR over saturated with low income and other institutional units that would be more effectively located in other mixed neighborhoods. 2000 Dunlap St is located 0.2 miles of 130 bed Volunteers of America facility that houses sex offenders and other convicted individuals serving out their sentence in this halfway house. This project is 0.2 miles from Logan Towers, a 63 bed permanent supportive housing site for the chronic homeless and half a mile from The Jimmy Heath House, a 25 bed housing site for the chronic homeless. There are many other low housing projects located next to 2000 Dunlap Street that are too numerous to mention. This concentration of institutional supportive housing is dropped into a neighborhood with high poverty. Many of our neighborhood families are poor African-American families that are struggling to raise their children in a neighborhood that is already saturated with institutional housing for the chronic homeless, many of whom are battling mental illness, drug and alcohol addiction and trauma. How are these struggling families going to successfully raise their children in this type of environment?
4. The applicant is proposing to construct a 44 unit structure for the chronic homeless and has stated the clients who will be housed there are individuals that are selected from the Coordinated Referral Entry System. Essentially the clients who will be served by this facility are referred by other clients in homeless shelters. This system is administered by Strategies to End Homeless Organization. This entry system is designed to select those individuals who exhibit the greatest need due to severe mental illness, addiction and past trauma. The applicant is proposing to house these 44 clients in a neighborhood with open prostitution and drug sales, elevated gun violence and a plethora of drinking establishments. One well established drinking hole is directly across the street. Imagine the situation with 44 addicted inmates waiting in line to get drunk in front of this bar with the bartender trying to get them to leave when they have drunk too much. These struggling individuals will be housed in units that are roughly 300 square feet with no guaranteed outside space to gather and recreate and breath fresh air. Or even worse their brown bags of quart beers getting drunk and sick in their cells.
5. Does any reasonable person at the end of the day believe that this type of unit is setting up the clients or the neighborhood families and businesses for success?
6. Where will these clients come from? Will they come from City of Cincinnati, Hamilton County, or the state of Ohio? A similar facility administered by applicant, OTR Community Housing, is located at 821 Ezzard Charles Drive. This 57 bed unit is designed to house the chronic homeless. According to Cincinnati Police Department 2021 data this address had 110 calls for service, 23 mental health, 14 report calls, 31 disorderly/trespassing, 3 weapons and 39 Other calls. Since there is no system in place to ensure that the clients of 2000 Dunlap Street are City of Cincinnati residents, the generous tax payers of this city, county and state will be paying for the services that these struggling individuals will invariably need and deserve.

7. This proposed project is in direct contrast to the stated goal of creating a mixed income neighborhood in OTR. Unlike other projects, such as 3CDC's Willkommen, this unit contains no mixed use residents and is exclusively low income with diagnosed proven social problems.
8. The applicant has not conducted a traffic or parking survey to indicate how this project will affect nearby residents and businesses that operate on Dunlap Street. The current use of 2000 Dunlap Street is a paved parking lot that was properly built and permitted and it provides desperately need parking. This project only proposes two parking spots. Where will visitors, staff, deliveries park? How will this affect the intersection of Henry and Dunlap Streets that receives a total of 35-50 tractor trailer loads each business day? How will the firetruck navigate their five daily runs to this tight packed project followed by an ambulance for any medical run.

We write this letter with a sympathetic heart for our homeless brothers and sisters who are in need of housing and services. We also write this letter with a clear understanding that this unvetted project fails to establish an environment where the proposed residents of this facility and the neighborhood families and businesses can be successful. We respectfully urge the HCB to delay a decision on this project until the community has been engaged and their questions answers.

I and others have presented the City with the plan later adopted by the City as the Development plan for the Over the Rhine plan. In this plan the treatment of mixed housing groups is clearly defined. The proposed development does not fit the plan but follows the former replaced practice of warehousing of the homeless. Please be sensitive to those who take their volunteer time to develop plans and strategies to improve our City and our treatment of those less fortunate than ourselves.

Regards,

Alfred J. Berger, Jr

Historic Limited Liability Co. LLC

Member

Owen, Douglas

From: Kristen Bonavita <kjbonavita@gmail.com>
Sent: Wednesday, June 15, 2022 11:29 AM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street PSH Development

You don't often get email from kjbonavita@gmail.com. [Learn why this is important](#)

External Email Communication

My company is located in OTR in the area of the proposed 2000 Dunlap Street PSH development. I have worked there for 15 years. Recently; I have heard that the new building is supposed to be over 43' High. I feel this is too high for the neighborhood and will look out of place. It will block sunlight and air circulation to surrounding buildings. I feel that a two-story building would be a better fit for the area. I hope they have accounted for the parking spaces they are eliminating.

Thank you hearing my concerns,
Kristen Bonavita

January 3, 2022, June 16, 2022

Dear Urban Conservator and HRB

Re: 2000 Dunlap Street request for variances

The Mohawk Neighborhood CDC Board of Trustees, without preliminary knowledge of the 2000 Dunlap project, were informed of the pre-hearing for zoning variances preliminary to a development project at Dunlap and Henry Streets. For the following reasons, we ask you to adhere to the current zoning criteria and do NOT grant the variances.

1.) There has been no outreach or community engagement within the Mohawk area of the Brewery District of OTR.

- Additionally, during the development of the Mohawk Area Plan (2016-2021) with The City's Planning Department, all property owners were informed by direct mail, and invited to participate in the plan's development.
 - Notifications were sent to property owners numerous times throughout the development of the plan.
 - Residential development is addressed in the plan with consensus on single and two-family homes on vacant lots within the district.
 - The property owner of 2000 Dunlap Street did not participate or express any specific residential use or density needs for the other participants to consider for this lot.

2.) If the 100'x100' lot were redeveloped for residential use, the Urban Mix zoning allows up to 14 residential units, with required rear setback of 10'. By Urban Mix standards this is appropriate as a maximum. To more than triple the number of residential units to 44 is a threat to the safety of the proposed residents and to the existing long-term industries.

- Urban Mix zoning was carefully designed and enacted a decade ago to safeguard existing industrial, processing, warehousing and commercial uses within the neighborhood district, while facilitating compatible adjacent development.
- 2000 Dunlap Street is in the heart of the Urban Mix zoning district. This 100' x 100' was made into a parking lot by the owners, with fencing, striping, and pay-box in 2018. It currently creates cash flow for the existing owners while serving the surrounding residences, businesses and industry.
- The Urban Mix zoning protection of density and setback, designed specifically for this area, must be retained for the purpose of the existing businesses and zoning protection.
 - The surrounding businesses include a large historic spent-grain processing facility (serving the breweries for well over 100 years!) that requires a daily steady flow of large semi-tractor trailer access on the existing narrow Dunlap Street;
 - A large industrial auction house that brings in used or surplus large equipment for reconditioning and reuse;
 - A decades-old bar/restaurant, multifamily residential, single and 2-family residential
 - Several other historic buildings that are vacant and in need of redevelopment.

3.) For further consideration, there is no listing for "Permanent Supportive Housing" under Urban Mix. "Transitional Housing" designed to (5.) assist persons recuperating from the effects of drugs, alcohol, even if under criminal justice supervision; or (6.) readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release and probationary programs is not permitted within the residential populations allowable in the Urban Mix zoning. This project is NOT congregate housing, similar to sorority and fraternity houses.

We would be interested in working with the developer toward a mutually agreeable affordable housing development.

Respectfully submitted,

Julie Fay, Chair, Board of Trustees, Mohawk Neighborhood Community Development Corporation
513-260-8434 jdfayotr@gmail.com

Owen, Douglas

From: Steven Fink <sfink@bangzoomdesign.com>
Sent: Wednesday, June 15, 2022 4:20 PM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street Project

Follow Up Flag: Follow up
Flag Status: Flagged

[You don't often get email from sfink@bangzoomdesign.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

External Email Communication

Hi Doug,

My name is Steve Fink, and I own a residence on Dunlap Street (1908 Dunlap St). I purchased it about 2 years ago, and since that time, have invested heavily into it. I'd say the residential building it is in has been maintained to very high standards, and the occupants, like myself, represent much of what is happening in the OTR area - a vast re-invention of higher end design for homes and businesses. Dunlap Street is an interesting(mixture of residence, businesses (manufacturers, restaurants, etc..). All of which will be very, very affected by the 2000 Dunlap Street Project in a negative way.

There are breweries and places all around serving alcohol...steps away from the 2000 Dunlap Street Project. That would be a very bad situation. Cramming so many beds/people in that space with hardly any green space and no parking will just force the residence to wander the streets and most likely incite violence and crime. There are so many other areas downtown where a facility is not going to have to be jammed into such a small space, surrounded by bars and breweries where they most likely be tempted to use the things they are not supposed to.

Overall, the goal of the city is to make OTR beautiful and reduce crime and increase foot traffic and business. That is what is happening on Dunlap Street...as I'm a good example of that (I also own a business on Central Parkway). This Project would be a huge step backwards...So I implore you to consider finding another, more practical location for it in the city.

Thanks,

Steven Fink

Owen, Douglas

From: Casey Henn - Cincinnati Industrial <casey@cia-auction.com>
Sent: Friday, June 17, 2022 2:35 PM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street Project

You don't often get email from casey@cia-auction.com. [Learn why this is important](#)

External Email Communication

Hi Mr. Owen,

Good afternoon- I am writing this email to you in hopes of expressing my concern for the development of the 2000 Dunlap Street facility plans. We are in opposition of the project.

With Regards,



Casey S. Henn, *Business Development Manager*
CIA Company | [Auctions](#) | [Acquisitions](#) | [Appraisals](#) | **Since 1961**
Casey@cia-auction.com
Address: 2020 Dunlap St., Cincinnati, Ohio 45214
Let's Connect on LinkedIn: www.linkedin.com/in/caseyhenn/
[LinkedIn](#) [Facebook](#) [YouTube](#)

Owen, Douglas

From: Deb Johnson <djohnson@robinimaging.com>
Sent: Monday, June 13, 2022 5:57 PM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street Project / My Concern as a Business and Resident

You don't often get email from djohnson@robinimaging.com. [Learn why this is important](#)

External Email Communication

Doug:

I would like to express my opposition to the 2000 Dunlap Street Project.

It would interrupt years of hard work that we businesses and residents have given to the Mohawk Neighborhood back to life.

My husband and I own Robin Imaging on Central Parkway and Mohawk Place and live nearby off Ravine Street.

We are hoping that new construction or rehabilitation of buildings would be owner-occupied.

These owner-occupied residents would add permanent neighbors, people who maintain their building and gardens, and spend money in the local businesses.

It has been our dream to do so.

There is already a large organization yards away from 2000 Dunlap Street Project that is a supportive temporary living place.

Why add another to our small corner of OTR when there could be another place without this already.

A mixed – use neighborhood is great – yet it is important to spread and balance the mix.

Please re-consider this 2000 Dunlap Street Project plan as it is being pushed forward.

Suggest another location to those planning it – Do they even know who we are who work and live here?

Respectfully,

Deb

Deborah Johnson, PhD
Co-owner, Robin Imaging Services
Gallerist, The Mohawk Gallery



www.robinimaging.com
(513) 381-5116
2106 Central Parkway
Cincinnati, OH 45214

Owen, Douglas

From: Rebecca Klabunde <rebecca.klabunde@gmail.com>
Sent: Friday, June 10, 2022 1:32 PM
To: Conservator, Urban
Cc: Kenneth Klabunde
Subject: [External Email] 2000 Dunlap Street

Follow Up Flag: Follow up
Flag Status: Flagged

External Email Communication

Good afternoon.

We are Kenneth and Rebecca Klabunde and we own the home at 2017 Elm Street in Cincinnati, less than 200 feet from the proposed project at 2000 Dunlap Street, Cincinnati. We are writing to you today to share with you our deep concerns about the current proposal.

It is our understanding that this project is intended to bring about much needed housing for some of the most vulnerable folks in our community, but upon closer inspection, we feel that this project is NOT suited to meet the needs of these individuals and could potentially bring about more harm than good to our community at large. Please consider the following points:

1. A small lot (100' x 100') is simply insufficiently sized to hold 44 homes. This is extremely dense, goes WELL beyond the zoning restrictions for our neighborhood, and does not offer enough living space for 44 human beings to live with dignity. We can do better than this.
2. This proposal removes every bit of "green space" from the existing property - including a number of maturing trees that greatly contribute to our neighborhood's beautification and sense of well being. Many of the folks who will be housed here are battling mental illness and depression - exposure to nature (fresh air, Vitamin D, ample vegetation, etc) will be very important to their stabilization and recovery. The proposal does now include a small walled-in courtyard, but we feel it is, again, insufficient for 44 human beings to live with dignity.
3. The proposed plan allows for only 2 parking spaces. This is comically insufficient for the staff and residents of such a large undertaking and doesn't come close to meeting its own needs. Dedicated parking should be allocated to security, medical teams, administrators, and residents/guests. And when considering the area at large, (while parking is always difficult in urban areas) our neighborhood serves as the main source of parking for visitors to our many popular breweries and restaurants, new businesses that are bringing about jobs and economic progress, and the MANY visitors to Cincinnati's beloved Findlay Market. To lose the parking spaces in the lot at 2000 Dunlap would drive foot traffic to another area and potentially shutter existing business. Economic setbacks to our budding community would not help us help these potential residents to live with dignity.
4. There is no policy in place that assures our community that the residents chosen for this development will even be from our area. This means that the folks living on our own streets could easily be passed over for housing because it's more profitable to house citizens from another city, or state, or region. (Additionally, please note that any tenants who are unable to pay their rent, will likely

be evicted onto our streets and only ADD to the number of chronically homeless individuals for whom our community is already caring.) *The men and women that we see on a daily basis, the ones we know by name, are our priority - it's important to us that we care for them. They, too, are our neighbors and a housing project in our own backyard should absolutely care for its own.*

Your organization, the Historic Conservation Board, is committed to providing "protection of public health, safety, prosperity and welfare" . Our desire is the same, and so we ask you to please consider helping us by not supporting the proposed 2000 Dunlap project as it stands now. A much more reasonable project should be proposed - one that takes into account the things listed above and any other concerns that members of our community would like to have the opportunity to share. Those of us who live and work in this small pocket of OTR would be happy to meet with you and discuss ways to bring about dignified housing (as well as other needed community services) for those whom this project is intended to serve. We love our little neighborhood, and we want to see it be a safe, welcoming home for all.

Thank you for your consideration.

Kenneth and Rebecca Klabunde

--

Rebecca Klabunde

Owen, Douglas

From: Jeffrey Luggen <jeffrey.michael23@gmail.com>
Sent: Monday, June 13, 2022 9:41 AM
To: Owen, Douglas; Conservator, Urban
Subject: Fwd: [External Email] Project at 2000 Dunlap St.

Follow Up Flag: Follow up
Flag Status: Flagged

Some people who received this message don't often get email from jeffrey.michael23@gmail.com. [Learn why this is important](#)

Doug,

I am writing this email in follow up to the email below which I sent to Beth Johnson on January 4, 2022. This is basically the same email that I sent then as most of my issues are the same. I would also like to add that this project was voted down by the OTRCC in April of this year and virtually every property Owner in the area has signed a petition opposing this project. If this is approved it shows how the voice of the neighbors is treated and I am not sure I want to live, work or play in that environment.

I am writing this letter in strong opposition to the proposed Over the Rhine Community Housing Project at 2000 Dunlap St.

I work at Cincinnati Industrial Auctioneers at 2020 Dunlap St., I now live at 1327 Pendleton St., and back in 2018 I purchased 2037 Elm. St. with the plans to rehab the property and make it my home. I had architectural drawings made and planned to invest more than \$750,000 in the property. While I have hit some snags due to the COVID-19 Pandemic and increased material and construction costs I still have hopes to someday move forward. I likely will not move forward if this project is approved for the simple fact that the voice seems to mean virtually nothing with regard

Here are some of my reasons for opposing this project.

Parking - The project calls for only a few parking spaces, where are the residents, their visitors, facility employees and service providers going to park? Parking in the area is already stressed and Emmert Grain has constant truck traffic, this will only further decline the situation

Zero lot line - I have several issues with this.

There is very little outdoor space for the residents, are they supposed to spend all of their time inside?

The building is designed to be built all the way back to Colby Alley, this will limit access up the alley, not only for individual use but for contractors and emergency vehicles.

Density - Again, several issues.

The letter from the architect says this will create (3) full time jobs, how is this sufficient to manage a facility of this size 24/7?

Dunlap is already a busy street, with trucks and employees of Emmert Grain and Cincinnati Industrial Auctioneers, the condos at 1920 and the apartments at 2027/2029 it will strain a traffic zone that is already difficult to navigate.

Each of the 44 units are supposed to be about 450 Sq. Ft. is this appropriate enough space for a person to live, especially with no outdoor leisure space?

Appearance – This modern building will stick out like a sore thumb amongst the historically preserved buildings of the Brewery District.

Neighborhood – Due to the proximity to Findlay Market and Rhinegeist this neighborhood has become an entertainment/commercial area more so than residential.

Thank you for your time, please consider my concerns above when ruling on this project, feel free to contact me via email or phone.

Jeffrey M. Luggen
Employee 2020 Dunlap St.
Resident 1327 Pendleton St.
Property Owner 2037 Elm St.

From: "Johnson, Beth" <beth.johnson@cincinnati-oh.gov>
Date: January 5, 2022 at 8:15:30 AM EST
To: Jeffrey Luggen <jeffrey.michael23@gmail.com>
Subject: RE: [External Email] Project at 2000 Dunlap St.

Your comments will be submitted to the HCB for review

Beth Johnson, AICP | Urban Conservator

City of Cincinnati | City Planning and Engagement Department
Permit Center | 805 Central Avenue | Cincinnati, OH 45202

513-352-4848 (p) | 513-352-2378 (f) | beth.johnson@cincinnati-oh.gov | [Website](#)



Effective October 3, 2021, the Zoning Division will be relocated to the City Planning and Engagement Department on the 7th floor, Centennial II, 805 Central Avenue. The Permit Center in the Department of Buildings & Inspections (B&I) will continue to coordinate all building permit, Zoning Verification Letter, Certificate of Appropriateness, and Zoning Certificate of Compliance

applications. We ask that all permit applications be received at the Permit Center, or by mail be submitted with **4 sets of plans**.

Our online permits services remain the best way to have your permit processed. We **encourage** you to submit your application by using [Electronic Plan Submission](#) (**which will eliminate 4 sets of plans**), online application (plumbing and HVAC) or by mail, 805 Central Avenue, Suite 500, Cincinnati, Ohio 45202. For questions about applications, please contact Customer Service at (513) 352-3271, opt. 9.

From: Jeffrey Luggen <jeffrey.michael23@gmail.com>

Sent: Tuesday, January 4, 2022 3:35 PM

To: Johnson, Beth <beth.johnson@cincinnati-oh.gov>

Subject: [External Email] Project at 2000 Dunlap St.

External Email Communication

Dear Ms. Johnson,

I am writing this letter in strong opposition to the proposed Over the Rhine Community Housing Project at 2000 Dunlap St.

I work at Cincinnati Industrial Auctioneers at 2020 Dunlap St., I also purchased 2037 Elm. St. in 2018 with the plans to rehab the property and make it my home. I had architectural drawings made and planned to invest more than \$750,000 in the property. While I have hit some snags due to the COVID-19 Pandemic and increased material and construction costs I still have hopes to someday move forward. I likely will not move forward if this project is approved. Here are some of my reasons for opposing this project.

- Parking - The project calls for only (2) parking spaces, where are the residents, their visitors, facility employees and service providers going to park? Parking in the area is already stressed and Emmert Grain has constant truck traffic, this will only further decline the situation.

- Zero lot line – I have several issues with this.
 - There is no outdoor space for the residents, are they supposed to spend all of their time inside?

 - The building is designed to be built all the way back to Colby Alley, this will limit access up the alley, not only for individual use but for contractors and emergency vehicles.

- Density – Again, several issues.
 - The letter from the architect says this will create (3) full time jobs, how is this sufficient to manage a facility of this size 24/7?
 - Dunlap is already a busy street, with trucks and employees of Emmert Grain and Cincinnati Industrial Auctioneers, the condos at 1920 and the apartments at 2027/2029 it will strain a traffic zone that is already difficult to navigate.
 - Each of the 44 units are supposed to be about 450 Sq. Ft. is this appropriate enough space for a person to live, especially with no outdoor leisure space?

- Appearance – This is a modern building will stick out like a sore thumb amongst the historically preserved buildings of the Brewery District.

- Neighborhood – Due to the proximity to Findlay Market and Rhinegeist this neighborhood has become an entertainment/commercial area more so than residential.

Thank you for your time, please consider my concerns above when ruling on this project, feel free to contact me via email or phone.

Regards,
 Jeffrey M. Luggen
 Contact: 513-708-9071, Jeffrey.Michael23@gmail.com
 Employee: 2020 Dunlap St.
 Property Owner: 2037 Elm St.



**Cincinnati
Industrial
Auctioneers**
NATIONWIDE

Jun 10, 2022

Doug Owen

Urban Conservator
805 Central Ave., Suite 500
Cincinnati, Ohio 45202

Via Email Only

Dear Mr. Owen,

I am Jeffrey Luggen, Vice President and partner in Dunlap Properties, LLC and Cincinnati Industrial Auctioneers, Inc. CIA is a nationwide provider of Industrial Auction and Appraisal services. We use our buildings for our offices and warehousing operations. We have been located at 2020 Dunlap Street in OTR since 1980. CIA employs 20 people. This PSH development will affect CIA's ability to operate its business.

As to the Zoning Variances Requested and Certificate of Appropriateness: CIA and the neighboring businesses ship and receive goods on a daily basis. We can attest to the fact that Dunlap is a busy street with commercial traffic on weekdays. On the weekends the area is crowded with tourists and customers of the surrounding businesses. This high-density usage for transitional or institutional housing is not a good fit for the area. Within a couple of blocks, our neighborhood has (130) bed facility at the Volunteers of America which houses convicted felons and sex offenders in a re-entry program. We have a (63) bed facility at Logan Towers which house the chronically homeless with mental illness and addiction. We have a (25) bed facility at the Jimmy Heath house which house the chronically homeless with addiction. Our neighborhood is oversaturated with this type of institutional housing. Granting variance from density limitations in any amount only exacerbates this problem.



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Industry Nationwide*

**Auctioneers
Appraisers
Liquidators**

2020 Dunlap Street
Cincinnati, Ohio 45214

Telephone:
(513) 241-9701

Facsimile:
(513) 241-6760

Internet:
www.cia-auction.com

E-Mail:
info@cia-auction.com



We have seen the neighborhood go through many changes over the past 40 years, reaching a low point around 2001. Prostitutes and drug dealers took over the streets. Slowly, north OTR began to change for the better. In recent years the neighborhood has experience a resurgence. Private citizens are renovating homes and new businesses are opening. A welcomed change.

At present, Elm Street north of Findlay Market is an "entertainment district" with breweries, bars, restaurants, businesses and low-density housing. Dunlap Street from Findlay Street north is occupied by commercial businesses, a Tavern, low density housing, a public park and a public swimming pool. This type of housing is a poor fit for the neighborhood.

In mid-December, we were surprised to hear that a building is planned for 2000 Dunlap Street. The project will require numerous variances to the building and zoning codes. The building does not appear to conform with the existing land use in the neighborhood.

The "High-Density Variance" will change the density from (14) units for the lot size to a high-density usage of (44) units, over a 200 percent increase above the code. This density is being requested to achieve "Economies of Scale" purely for economic benefits for the developer. According to the application, the developer is to receive a \$1.6m fee. Further, this density usage will cause numerous traffic, parking, health and safety issues for the community. On March 15th, Cincinnati City Council voted "NO" to increase density and stated that "it is just another way for developers to make money." The **density ordinance voted down** by City Council would only increase the density on the Dunlap site to (28). OTRCH is asking for a huge increase to (44).

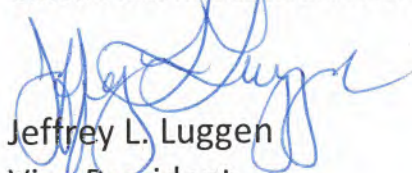
The "No Set Back Variance" gives the developer the ability to build from "lot line to lot line" for the sole purpose of creating density at the site. The plans only allow two spaces for parking, not enough to accommodate residents, guests, staff, delivery, or service personnel. The plans have little outdoor space for the residents to congregate. These necessities will be left to the surrounding streets to fulfill none of which facilities exist in close proximity.

Building to the "lot line" along Colby Alley will constrict the access to the alley making ingress and egress difficult for the residents. This constriction will make it

difficult for the Fire and Police Departments to gain access in case of emergencies. In January we requested reports from the Safety Department, Cincinnati Fire Department, Cincinnati Police Department, and the Transportation Department on how this would impact the neighborhood. To date we have seen nothing from the developer.

Little information has been given to the community regarding the development, or its effects on the neighborhood. We hope that the City will hear the residents', businesses, and property owners concerns and not grant these variances. The developer should adhere to the existing code.

Respectfully,
Cincinnati Industrial Auctioneers, Inc.

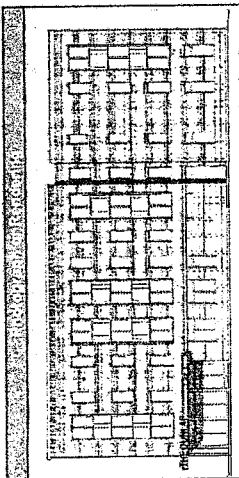


Jeffrey L. Luggen
Vice President

Proposal Summary

Dunlap PSH

This page auto-populates, but will permit you to add a photo or rendering. On the Insert tab, select "Pictures" to insert an image.

[illegible]

Pool
Population
Service Enriched
Service Enriched
Affordability
New Affordability
New-Construction
2000 Dunlap St
Arlington, VA 22204
Tel: 703/261-1111
Fax: 703/261-1111
County: Loudoun
Zip: 20160

Developer	Over-the-Rhine Community Housing
Developer Contact:	Ben Ellerman
Co-Developer	N/A
General Contractor	TBD
Management Co.	Over-the-Rhine Community Housing
Syndicator	Ohio Capital Corporation for Housing
Architect	New Republic Architecture

Ownership Entity	TBD
Managing Partner	to be formed
Parent Organization	Over-the-Rhine Community Housing
Minority Member #1	N/A
Parent Organization	0
Minority Member #2	N/A
Nonprofit	Over-the-Rhine Community Housing

[illegible]

CONSTRUCTION IN PROGRESS		
Tax Credit Equity	\$	589,535.00
HQAP	\$	540,000.00
Historic Tax Credit Equity	\$	-
Deferred Developer Fee	\$	-
Construction Loan	\$	4,963,488.00
Other1	\$	1,350,000.00
Other2	\$	-
Other3	\$	1,750,000.00
Other4	\$	1,728,184.00
Other5	\$	-
TOTAL	\$	10,921,217.00

Governmental Fund -		Governmental Fund -
	Operating	Capital
Tax Credit Equity	\$ 8,799,032.00	\$ -
HDAP: OHT/HOME	\$ 600,000.00	\$ -
HDAP: NHTF	\$ -	\$ -
Historic Tax Credit Equity	\$ -	\$ -
Deferred Developer Fee	\$ 22,185.00	\$ -
Permanent First Loan, Hard Debt	\$ -	\$ -
Permanent Second Loan	\$ -	\$ -
Other1	\$ -	\$ -
Other2	\$ 1,500,000.00	\$ -
Other3	\$ -	\$ -
Other4	\$ -	\$ -
Other5	\$ -	\$ -
TOTAL	\$ 40,921,217.00	\$ -

	Net Credit Request	\$	\$	Totaling Growth Potential
10-year Total		\$	\$	1,000,000 10,000,000
Acquisition		\$	\$	
Preddevelopment		\$	\$	551,500.00
Site Development		\$	\$	300,000.00
Hard Construction		\$	\$	7,676,991.00
Interim Costs/Finance		\$	\$	454,704.00
Professional Fees		\$	\$	1,560,000.00
Compliance Costs		\$	\$	175,800.00
Reserves		\$	\$	282,422.00
Total Project Costs		\$	\$	10,521,217.00
Per Unit		\$	\$	6,541.1
Total		\$	\$	287,786

Wage Requirement	Nonent
"Other" Detail	0

Dunlap Street Properties LLC
2020 Dunlap Street, Cincinnati, OH 45214

June 10, 2022

Doug Owen
Urban Conservator
805 Central Ave., Suite 500
Cincinnati, Ohio 45202

Via Email Only

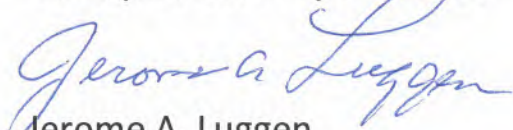
Dear Mr. Owen,

My company owns the building at 2008 Dunlap Street under the name 2008 Dunlap Street LLC. The building directly North of the 2000 Dunlap Street PSH development. As the owner of the adjacent property, I am entitled to a 10' setback, the entire length of the boundary line. I have no intention of relinquishing my right to a setback.

I own the adjacent building across Colby alley at 2001 Elm Street. Both of my buildings are one-story high. This 45' high structure will dwarf both of my one-story buildings and it will look odd and out of place.

I strongly urge HCB to deny the setback variances and to make the developer to adhere to the code.

Yours Truly,
Dunlap Street Properties LLC


Jerome A. Luggen
Partner

Owen, Douglas

From: Joe Luggen <joe@cia-auction.com>
Sent: Thursday, June 16, 2022 2:03 PM
To: Conservator, Urban
Cc: Owen, Douglas
Subject: [External Email] Joseph Luggen Objection to 2000 Dunlap PSN
Attachments: Joseph Luggen Opposition to 2000 Dunlap Street.pdf

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External Email Communication

Doug Owen – Urban Conservator,

Attached please find my opposition letter dated January 14th regarding the 2000 Dunlap Street PSH Development. My concerns are still the same.

- 1) No Engagement with the Neighborhood. I still have not been contacted by the Developer.
- 2) The Tripling of the Density is Far too Great. On March 15th, 2022, City Council voted “NO” to increase density. It appears to increase density only contributes to the economic benefit of the Developer, not to the occupants or the neighborhood.
- 3) The Size of the Building is Far too Great to Fit on this Lot.
- 4) The Height of the Building of Close to 45’ is Far too Tall in Relation to the Surrounding Buildings in the Neighborhood. It will look out of place.
- 5) Only (2) Parking Spots for (44) Residents, Guests, Case Managers, Building Maintenance, Security, Etc.
- 6) I am a Partner in the Building located at 2008 Dunlap Street, the Northern border of the PSH Building. The Developer is not allowing for a setback along the entire lot line.
- 7) The OTR Community Council voted “NOT” to recommend this project.

I do not know how the development will look anything like the buildings in the Historic district. Please do not allow these variances. The Developer should have to adhere to the existing code.

Thanks,
Joe



Joseph M. Luggen, Appraiser
CIA Company | Auctions | Acquisitions | Appraisals | Since 1961

513-241-9701 Office | 513-886-1268 Cell | joe@cia-auction.com
Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

January 14, 2022

Historic Conservation Board
c/o Ms. Beth Johnson
City of Cincinnati, Urban Conservator
805 Central Avenue, Suite 500
Cincinnati, OH 45202

Re: Opposition to 2000 Dunlap Street Project – Rushed Timeline

Dear Ms. Beth Johnson:

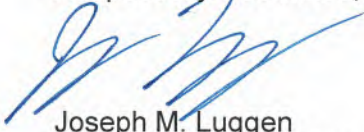
My name is Joseph Luggen, and I am an employee of Cincinnati Industrial Auctioneers, Inc. located at 2020 Dunlap Street. I'm writing this letter in opposition to the 2000 Dunlap Street Project. A few of the reasons for my opposition to said project is the quick project timeline and the lack of neighborhood community engagement. As far as the timing of this project, I feel it has been rushed from its conception to its presentation.

It is my understanding that OTRCH started brainstorming this idea in late September 2021. It was at that point that OTRCH came up with an idea and immediately engaged New Republic Architect regarding same. New Republic Architect was quick to finish drawings in early December 2021 (just two months after the initial conception). At that point, OTRCH submitted these drawings at the last minute at the Over-the-Rhine Community Council meeting in mid-December 2021. At that time, again it was quickly decided that a vote on the project would take place by the following meeting which would occur in early January 2022. At this time, they are seeking approval from the Historic Board shortly after late January 2022. I feel that this rushed timeline leads me to believe that the original project plan was ill-conceived and rushed in order to meet an OTRCH deadline in which to apply for government assistance in mid-February 2022. It is my belief that very little time and/or consideration was taken when presenting this project. A portion of the problem involved in the short timeline is the fact that the Council did not think about the area in which they are placing this project. This block of Dunlap mainly houses businesses between FL Emmert, Goodhart Motors, Cincinnati Industrial Auctioneers, Dunlap Café. This is not considered a "residential" area.

My next issue with the project is the lack of community engagement. There has been zero community engagement outside of going to the OTR Council meeting in December 2021. I work for Cincinnati Industrial Auctioneers which owns property directly east of this project and the garage building directly north of this project. This means that our company are the closest neighbors to this project and not one single person from OTRCH has ever reached out via email, phone or knocking on our door to discuss this project. Unfortunately, we did not become aware of this project until it was presented to the OTR Community Counsel in mid-December 2021. As well, most neighbors did not become aware of this project until they received a "Notice of Public Hearing" from the City of Cincinnati in the mail close to Christmas 2021. There has been little to no engagement with the neighbors regarding this project. What kind of neighbor are they going to be to us with no communication as to what they are doing? Considering the project's development, there should be open lines of communication to neighbors so that we can help look out for those who are being housed in the transitional homes, let their counselors know if anyone is having problems or issues, or if we can assist with obtaining possible part-time jobs for individuals coming into the community.

In conclusion, I am in no way against affordable housing. However, I am against this particular ill-conceived plan for affordable transitional housing. I don't believe the necessary time and consideration was taken into planning it or the correct amount of local community awareness was engaged.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'J. Luggen', is written over the printed name.

Joseph M. Luggen
Employee and Local Resident of Over the Rhine

Owen, Douglas

From: Ryan Luggen <ryluggen@gmail.com>
Sent: Friday, June 17, 2022 12:45 PM
To: Conservator, Urban; Owen, Douglas
Subject: [External Email] 2000 Dunlap Street Project

Some people who received this message don't often get email from ryluggen@gmail.com. [Learn why this is important](#)

External Email Communication

Mr. Owen,

I am emailing you to inform you of my opposition to the 2000 Dunlap Street Project. The variance request for increased density will not fit our current neighborhood. I urge you to count the number of current residents in this area.. Allowing the proposed density will certainly double to triple the number of residents in an already small area..

TGIF,
Ryan

Ryan L. Luggen
ryluggen@gmail.com

Owen, Douglas

From: David Macejko <davidmacejko@gmail.com>
Sent: Thursday, June 2, 2022 11:58 PM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street Project

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External Email Communication

As a property owner, business owner and resident of 1722 Elm Street I write in opposition to OTRCH's 2000 Dunlap housing project aimed at eliminating homelessness in Over the Rhine.

1st I and other residents believe the density of this building (40-50 units) is beyond reason and city guidelines for the size of the property. OTRCH might be better served by liquidating this small parcel and increasing its endowment. Find a more suited space.

2nd OTRCH for years has owned and operated several homeless projects within Over the Rhine. Other non profits have created homeless shelters within the urban core. Yet the homeless issue remains in the city. Brick and Mortar downtown isn't having lasting impact. Homelessness is not exclusive to Over the Rhine.

3rd More buildings won't address the real issues of the homeless.
Another 11 million dollars from the state for a structure neglects the the underlying issues. Dollars spent to enable a better minimum wage, restructuring draconian welfare regulations keep those in poverty from exiting the welfare system, and the lack of funding for existing infrastructure within the mental health support system would have better results. Do something different.

4th After visiting with local leadership who have dealt with the homeless and jobless has not convinced me more brick and mortar will impact homelessness in our community. Do something different.

5th I am unaware of any major metropolitan area that has created more and more homeless shelters has succeeded in solving this multifaceted issue. Politicians must have the courage to take a different path. If we don't embrace a different approach, we will continue to neglect the root causes and continue to enslave people and families in poverty and homelessness.

Respectfully
David Macejko
513.919.1541

Owen, Douglas

From: neil marquardt <neil.marquardt@gmail.com>
Sent: Friday, June 17, 2022 2:59 PM
To: Conservator, Urban
Subject: [External Email] Strong Opposition to the 2000 Dunlap Project

You don't often get email from neil.marquardt@gmail.com. [Learn why this is important](#)

External Email Communication

Hello Doug,

I would simply like to express my strong opposition to the proposed project at 200 Dunlap Street.

In addition to the various issues with building a project of that size, and moving from 14 to 44 proposed rooms, with little to no outdoor space and almost no parking, I am against it for another reason. My personal experience with OTRCH has been a nightmare. As I said in previous communications, the property that Mary Rivers runs on Clifton Avenue sits above our backyard and we've had multiple and ongoing issues with the units. My wife was almost killed by rollerblade that was tossed into our backyard by a resident and nothing was done to address this issue.

I would be happy to discuss how poorly OTRCH runs their properties.

Best,

Neil Marquardt
513.257.5133



STAGNARO, SABA
& PATTERSON

Jeffrey M. Nye
jmn@sspfirm.com

Direct dial: 513.533.6714
Direct fax: 513.533.2999

June 16, 2022

Historic Conservation Board
Two Centennial Plaza
805 Central Avenue, Suite 500
Cincinnati, OH 45202

Re: Cases COA2022032 and COA2021066 – Certificate of appropriateness and
variances at 2000 Dunlap Street

Dear Board Members:

I represent the F.L. Emmert Company. This letter is submitted in response to the recent application for a certificate of appropriateness (or “COA”) in case COA2022032. The hearing on that case is consolidated with an earlier application for two variances in case COA2021066. I submitted on behalf of Emmert a letter dated January 18 and presented argument at the January 24 hearing on the variance case. This letter is submitted in addition to, not in place of, that letter and those arguments.

Emmert has only a limited objection to the structure as proposed in the COA application. That objection relates to the orientation of the “main entrance” and parking lot of the structure.

This letter addresses two preliminary matters, then discusses Emmert’s objection to the COA application, and concludes with some additional discussion of the applicant’s variance requests.

A. The COA cannot be granted if the variances are denied.

At the risk of stating something obvious, the COA application is based on a proposed design that incorporates the variances applied for in case COA2021066. If those variances are not granted, the structure for which the COA is sought would not be in compliance with the Zoning Code and, ipso facto, would not be “appropriate” for the

historic district. In that event, the certificate of appropriateness must be denied. (This letter will return to the variances below.)

B. With respect to the COA, the Board should focus not on the *design* of the building (to which Emmert does not object) but rather on the *fit* of the building in the neighborhood.

While the application is focused on whether the proposed structure meets the standards in Part B of the Guidelines, the Board must not overlook Part A.

The Zoning Code incorporates the “Revised Over-The-Rhine Historic District Conservation Guidelines” to govern the COA application. *See* CZC 1435-07-2-C. Those Guidelines include a set of “Specific Guidelines” in Parts B-1 through B-9 that are, in essence, a set of *design principles*. They set out rules for the composition, materials, roof type, window organization, etc., of a proposed structure.

F.L. Emmert does not have any particular objection to the proposed structure’s adherence to those design principles.

But those design principles are only the means by which to achieve the *purposes* that are described in the “Intent and General Guidelines” section in Parts A-1 through A-4.

Of particular relevance to this case is the instruction in part A-3 of the “New Construction” Guidelines that “The Historic Conservation Board’s review of new construction will focus on the design compatibility with the surrounding contributing structures.” The Board is specifically directed to, and must, consider the “balanc[e]” of “the programmatic needs of the applicant with how well the design relates to the neighboring buildings” in the area. In other words, the Board is not supposed to look at merely the type of roof, the color of brick, and how the windows are arranged. The Board is also specifically —indeed, *primarily*—supposed to “focus on” the proposed structure’s relation to the existing buildings in the area, and must make sure the proposed structure is “compatib[le]” with the existing neighborhood.

C. If the proposed structure is built, it must be reoriented to better fit the neighborhood.

As the Board knows from the testimony at the January 24 hearing on case COA2021066 (which has been consolidated with case COA2022032), the neighboring buildings are largely not only commercial or industrial in appearance, but also

commercial or industrial in operation. It would not be appropriate to build a residential structure with the main resident ingress and egress (and the only parking lot) immediately adjacent to these existing uses.

Emmert owns the property immediately to the west of the subject (the address is 2007 Dunlap Street), where it operates its facility that manufactures animal feed materials and products for distribution to pet food and livestock feed companies all over the world. Emmert also leases the property on the southwest corner of Dunlap and Henry. This is sometimes known as the "Delhi Foods" building. (Its mailing address is 1800 Central Parkway, which is on the opposite side of the building.)

The nature of Emmert's business means that a large number of tractor trailers, hopper trucks, tank trucks, or other large equipment operates on Dunlap Street. Approximately 20 such trucks come into or out of the production facility every day; sometimes more. The Delhi Foods building is warehouse space, and materials and products are regularly moved between it and the production facility throughout the day, mainly via forklift. Other companies nearby operate other commercial or industrial businesses on Dunlap Street. The Board heard testimony from some of them at the earlier hearing, and may hear more in the COA case as well.

As Emmert explained in its January 18 letter, and argued to the Board at the January 24 hearing in the variance case, Emmert has no objection to the nature of the applicant's proposed use of the property, but has very serious safety concerns about the compatibility of the proposed structure in this specific location. Emmert does not believe that the safety implications of putting a 44-unit building alongside a busy corridor of heavy equipment have been fully considered.

Emmert's concern is exacerbated, not ameliorated, by the proposed design of the structure. According to the application letter (see §II-6 at page 3) and the site plan and elevations (Exhibit D to the application), the applicant is proposing to put a storefront-style "front entrance" at the southwest corner of the site. The site plan and elevations additionally show that the applicant is proposing to put a small parking lot on the northwest corner of the site. (The application letter states on page 1 that the parking lot is on the "northeast" corner, but this appears to be a typographical error.)

By proposing to place the front entrance and the parking lot on Dunlap Street, the applicant is putting them in direct proximity to where a large number of trucks and forklifts are currently operating. That is not an appropriate "balance" between the proposed structure and how it "relates to the neighboring buildings." It is not safe—not

for Emmert and its employees or vendors, and not for the applicant's prospective residents.

Emmert therefore asks the Board (if it grants the variances) to require the applicant to mirror the structure across the north-south axis of the property. In other words, if the structure is built, the main entrance should be on the *southeast* side of the building, and the parking lot should be on the *northeast* side of the building. That orientation would make the site safer for both Emmert and the prospective residents of the building, and would be closer to the appropriate "balance" with existing buildings and their uses.

Emmert submits that this orientation would also make the site more attractive to residents. The southeast corner of the site roughly faces east on Henry Street, looking toward Elm Street about 135 feet away. While residents may approach the building from any direction, it seems most likely that they will tend to approach the site on Henry, coming from Elm. Elm is one of the City's main streets, and it has both the streetcar and multiple Metro lines, not to mention regular private vehicular traffic. Residents would seem to be less likely to approach the site from either Dunlap Street, which (at just 25 feet wide) has no public transportation and much less private vehicular traffic, or from the west on Henry (which does not continue through to Central Parkway). Orienting the structure so the main entrance faces the direction from which residents are most likely to approach is the most sensible design even if not for the safety concerns described above.

Moving the parking lot from the northwest corner to the northeast corner is the most sensible choice for all the same reasons. The lot would be accessible through Colby Alley, which runs along the eastern edge of the site.

Emmert raised this "orientation" issue informally with the applicant prior to and after the June 8 pre-hearing, and understands that the applicant is looking into the feasibility of it. Emmert appreciates that effort. As of the date this letter is prepared, the applicant has not advised as to whether it intends to adopt this change.

D. The COA application does not justify the variances.

Because the COA application includes additional argument relating to the variances, Emmert will speak to them here. Emmert wishes to add three points to those it already made in the companion case.

1. The tail must not wag the dog.

One possible objection to Emmert's request to re-orient the building as a condition of a COA is that Colby Alley is not wide enough to accommodate a parking lot on the northeast corner of the site, or that it is not wide enough to accommodate public services like trash removal. (The trash bin is planned to be within the parking area, per the site plan in Exhibit D to the COA application.)

Emmert believes that any such objection would be incorrect. Colby Alley already serves the small amount of other residential traffic from the properties at 2013 Elm and 2015 Elm. (Despite their address and frontage on Elm, their curb cuts are on Colby Alley.) The proposed lot is only for two or three cars, and would not overload Colby. (It is worth repeating that Emmert's objection to placing the lot on the northwest corner isn't that Dunlap Street will become inundated with cars from this site once the project is completed. The objection is that the Board should take all reasonable steps to put a buffer between the parking lot and the existing truck and forklift traffic for safety reasons.)

But assuming for the sake of argument that Colby Alley cannot accommodate either the traffic or the trash removal, then the appropriate response is to deny the variance request under which the applicant seeks permission to build to the rear lot line. With respect to parking, the applicant could obviate any concern about Colby Alley by complying with the Zoning Code and including the required rear yard, which it could then use to aid ingress and egress via Dunlap if necessary. (The required rear yard is 10 feet. *See* CZC 1410-07 ("Building Form and Location"). A "yard" is simply the space between a "building" and the lot line. *See* CZC 1401-01-Y. A driveway is not a "building," *see* CZC 1401-01-B11, and thus is permitted within the rear yard. *See also* CZC 1410-07 ("Vehicle Accommodation—Driveways and Parking"; Driveway Restrictions: "None").)

With respect to trash removal, the Zoning Code explicitly states that it is not within the public interest to grant a variance if it affects the delivery of public services. *See* CZC 1445-13(j). The Board in January expressed its preference and exercised its discretion to consider the variances and the COA together. It should do exactly that—and should not grant a variance that would then box the neighborhood into an inappropriate COA. If it's impossible to place the parking lot on the northeast corner because the setback variance was granted, then the solution is to deny the setback variance, not to place the parking lot in an inappropriate location.

Again, to be absolutely clear—using the rear yard to accommodate ingress and egress via Dunlap is less preferable to Emmert because using Colby Alley is safer, and the Board should require the applicant to put the parking lot on the east side of the structure for that reason. But if Colby Alley is unusable, then the next best solution is to keep the required setback and use it to make the site safer at Dunlap. The COA cannot be the tail that wags the dog.

2. The site has no “special circumstances or conditions” that justify a variance.

Among the justifications offered for the variances in the COA application is the assertion (in §III-1, at page 7) that there are “practical difficulties” that warrant the granting of the variances.

The arguments made in support of the “practical difficulties” argument are wrong and should be rejected for reasons discussed extensively at the January 24 hearing,¹ but the Board should not lose sight of an even more significant problem with this argument.

The “practical difficulties” analysis is the second part of a two-part conjunctive test, and the applicant has not satisfied the other part of the test.

That test is contained in CZC 1445-15(a), which says that a variance may be granted if: “Owing to special circumstances or conditions pertaining to a specific piece of property, the strict application of the provisions or requirements of this Code or the Land Development Code, as applicable, are unreasonable and would result in practical difficulties.” Before even getting to the “practical difficulties” analysis, an applicant for a variance must first show that there are “special circumstances or conditions pertaining to [this] specific piece of property.” The “practical difficulties” must be directly caused by (or “ow[ed] to”) those special circumstances or conditions of the specific property at issue.

¹ One argument raised in the COA application that was not (to the best of Emmert’s recollection) raised at the variance hearing is the claim (on page 9) that a variance should be granted because the applicant acquired the property before the existing zone was implemented. That is a red herring. Pre-existing *uses* can be grandfathered in after zone changes. Pre-existing *ownership* does not exempt property owners from the Zoning Code when they are adopting a new use for a property.

The applicant fails that part of the test. The subject site has no special circumstances or conditions. It is perfectly square. It is almost perfectly flat. It has no characteristics of distinction, except perhaps for its perfect ordinariness.

As a matter of law under the Zoning Code, it is ineligible for variances because it lacks any “special circumstances or conditions.” Or to put it non-categorically, even if there are “practical difficulties,” they are not the result of any “special circumstances or conditions pertaining to [this] specific piece of property.”

If property qualifies for a variance, then every property in the City qualifies for a variance, and the Zoning Code’s restrictions are not requirements at all—they are just suggestions that can be dispensed with at the Board’s discretion. That is not how the law works.

3. City Council, not this Board, makes zoning policy and zone changes.

The applicant is effectively asking the Board to make a zone change. The COA application argues (at page 8) that the Board should grant variances because the Zoning Code’s requirements are “entirely unreasonable” for OTR.

It is the exclusive purview of City Council—not the applicant, and not this Board—to determine what zoning requirements are reasonable. A variance is not a tool to correct what an applicant (or anyone else) perceives as errors of judgment in zoning laws. That is not Emmert’s contention or interpretation of zoning principles—that is black-letter law from the Ohio Supreme Court’s holding in *Consolidated Management, Inc. v. Cleveland* (1983), 6 Ohio St.3d 238, 240 (“variances are not authorized to change zoning schemes or to correct errors of judgment in zoning laws”).

The applicant actually makes this same argument or request a second time in a roundabout way. It argues (in the last full paragraph on page 8) that a density variance should issue because “the Board has granted much larger variances to other properties.” Variances are not—or at least are not supposed to be—precedential. The reason is the same as the one described in the prior section of this letter: variances must be granted based on the specific parcel at issue and the special circumstances or conditions applicable to that parcel. Unless a variance was previously granted on this same parcel, any other variances are simply not relevant.

If it were otherwise, then this Board would effectively be amending the Zoning Code by granting the variances in this case (and indeed the variances in all cases). If

“the Board has granted other variances” were a ground to grant every variance, then the Board would have no choice but to grant the same density and setback variances to every parcel adjoining the subject site—and then every parcel adjoining those parcels, and every parcel adjoining *those* parcels, and on and on, until every parcel in the City has received a variance and the Zoning Code is barely a hint of anyone’s memory.

Fundamentally, arguments that existing zones are “unreasonable” or that these variances should be granted because other variances were granted, are arguments about whether this Board should make zoning policy, or whether City Council makes zoning policy.

The answer to that question cannot be seriously debated. This Board carries out City policy—it does not make it. Again, that is not Emmert’s view of how the law should work. It is the express holding of the Ohio Court of Appeals that governs Cincinnati, in the case of *Vandervort v. Sisters of Mercy* (1st Dist. 1952), 97 Ohio App. 153, 156-57 (explaining that “the determination of whether regulatory rules shall be enacted and their nature is a matter of policy confided by the Constitution to the law-making department of government; that is, the General Assembly for the state, and the council for the villages”; “the authority thus confided cannot be delegated,” and so only a City Council can establish policy and change zones).

Any argument that the policy is “unreasonable,” or wrong for any other reason, must have no purchase here. The Board must follow the policy set by City Council through the duly enacted ordinances that compose the Zoning Code, and must follow the Ohio courts’ pronouncements about the limited purpose of variances and the jurisdiction of the Board.

4. If the Board grants the variances, it should impose a condition that ensures street access is not impeded.

Finally, to return to an issue raised at the January 24 hearing, in addition to its safety concerns Emmert is worried about the effect that an over-dense, no-setback construction project will have on its ability to operate its business. Emmert fears that the projected 100 construction jobs, not to mention construction equipment, will interfere with the trucks and forklifts that deliver, move, and haul materials and goods.

Subsequent to the prior hearing on the variances, the applicant advised Emmert that if a building permit was issued, the applicant intended to ask construction

contractors to submit a plan for maintaining traffic on Dunlap and Henry during construction.

Emmert appreciates this effort, but to date is not aware of any specific plans that it (or the Board) can evaluate. Emmert therefore requests that if the Board grants any of the applications, then it impose an additional condition that the applicant submit and comply with a plan that ensures that construction does not impede traffic on Dunlap and Henry.

E. Conclusion

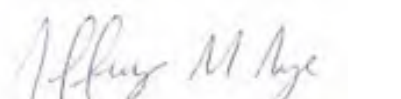
Emmert does not oppose the nature of the applicant's proposed use for the property, but the parcel has no special circumstances or conditions that warrant granting a variance, and in any event the variances requested are so substantial as to amount to a request for a zoning change, which this Board cannot grant.

If the Board nevertheless grants one or both variances, or if it grants the COA (with or without variances), it should impose the additional conditions (1) that the applicant submit and comply with a construction plan that does not impede traffic on Dunlap and Henry Streets, and (2) that the applicant relocate the main entrance and the parking lot to the east side of the structure.

We appreciate the Board's attention to these cases and look forward to seeing you on June 27.

Sincerely,

STAGNARO, SABA
& PATTERSON CO., L.P.A.



Jeffrey M. Nye

JMN/cmw

Owen, Douglas

From: Christine Oliver <tineabell@gmail.com>
Sent: Thursday, June 16, 2022 10:24 AM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street PSH Development Opposition

You don't often get email from tineabell@gmail.com. [Learn why this is important](#)

External Email Communication

I work near the proposed 2000 Dunlap PSH project. I learned from the neighbors that the building that will house (44) chronically homeless residents with special needs. This vulnerable population will need a full-time staff of counselors, caseworkers & medical staff, building maintenance and janitorial staff, food preparation personnel and security people. The building has only (2) parking places.

Where will the residents & their visitors park?

Where will the staff, counselors and medical personnel park?

Where will the case workers & cafeteria workers park?

Where will the security people park?

There is very little parking in our congested neighborhood of OTR. The Developer is eliminating (21) spaces of needed parking. At the very least the Developer should provide parking spaces for the staff instead of leaving that responsibility to the streets. They need to be "good neighbors". Providing parking would be a start.

Thank You,
Christine Oliver

Owen, Douglas

From: Robert Sehlhorst <robertsehlhorst@gmail.com>
Sent: Wednesday, June 15, 2022 2:05 PM
To: Conservator, Urban
Subject: [External Email] Petition Opposing 2000 Dunlap Street Project COA2022032
Attachments: 2000 Dunlap Street PSH Development Opposition Petition 4-11-2022.pdf

Follow Up Flag: Follow up
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You don't often get email from robertsehlhorst@gmail.com. [Learn why this is important](#)

External Email Communication

Historic Conservation Board
Two Centennial Plaza
805 Central Avenue, Suite 500
Cincinnati, Ohio 45202
Doug Owens
Urban Conservator

Dear Mr. Owens,

My name is Robert Sehlhorst and I reside at 2019 Elm Street. My rear property line is within 200 feet of the proposed OTRCH project at 2000 Dunlap Street. My neighbors and I and nearby businesses, are opposed to this project. Attached is a petition signed by 103 residents and business owners near and around 2000 Dunlap Street stating our opposition. We are opposed to this project for the following reasons.

1. The applicant is seeking a zoning density of 44 units on a 100' x 100' lot that is zoned for 14 units. They are seeking a zoning variance that is more than three times permitted density. That amount of density cannot be found on Dunlap Street or on adjacent streets. If that variance is granted, it would completely change the historic character of Dunlap Street and the Mohawk Neighborhood. Cincinnati City Council in 2022 decided to maintain current density requirements. This zoning variance request by the applicant is directly counter to the vision outlined by City Council.
2. The building is too tall and large for that lot. Nearby buildings are 1-3 stories high. If this proposed building is constructed it will create a monolithic structure that will tower over nearby homes and businesses. This proposed plan will undermine the historic character of Dunlap and Henry Streets and the Mohawk Neighborhood and is not appropriate.
3. Our small compact Mohawk Neighborhood is over saturated with institutional housing of this type. Adding 44 institutional units to this neighborhood would create 262 institutional beds. How many institutional beds can a fragile, transitional neighborhood absorb?
4. Nearby families with children and businesses are deeply concerned that this project will only add to the number of convicted sex offenders residing in our neighborhood. One block away from 2000 Dunlap Street is the Volunteers of America (VOA). VOA provides 130 beds for convicted criminals completing their sentences. According to the Hamilton County Sheriff's Department website there are 62 sex offenders housed at VOA. How many sex offenders will be residing at 2000 Dunlap Street?
5. The OTR Community Council membership in April voted to oppose this project. Mohawk Neighborhood CDC does not support this project in its current form. All nearby neighbors and businesses, with very few exceptions, are deeply opposed to this project.

For these reasons and many more outlined on our attached neighborhood petition, I urge the Historic Conservation Board to vote no on this project.

Respectfully,
Robert Sehlhorst

STOP OTRCH's 2000 Dunlap Street PSH Development

About this petition

OPPOSITION PETITION

STOP OTRCH's 2000 Dunlap Street PSH Development

Over The Rhine Community Housing (OTRCH) of Cincinnati, Ohio has proposed a PSH development, targeted to serve individuals experiencing chronic homelessness and have a history of mental health illnesses and drug and alcohol addiction, at 2000 Dunlap Street in the Mohawk Neighborhood of OTR. This development will consist of a four-story building with (44) studio apartments on a 100' x 100' Lot with zero lot line construction.

Residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas OPPOSE THIS PROJECT for the following reasons:

- This proposed project is seeking a zoning variance that would permit 44 units on a lot zoned for 14 units. This is three times the zoned density for this lot and results in too many units crammed into a small parcel in a busy, highly congested area that serves low density residential housing, commercial businesses, light industry, entertainment businesses, breweries, bars, night clubs and restaurants. Cincinnati City Council recently voted NO to increase density ensuring that existing zoning restrictions for density remain in place.
- This project will change the character of our neighborhood by adding another institutional/transitional type housing facility to our neighborhood that already has several, including the Volunteers of America that is less than 1-block and is a (130) Bed facility for sex offenders and other criminals finishing their sentences, Logan Towers is less than 2-blocks and is a (63) Bed facility for individuals experiencing chronic homelessness with a history of mental health or substance use disorders, OTRCH's Jimmy Heath House, (25) Bed facility for individuals experiencing chronic homelessness. The addition of this project will result in a total of 262 institutional beds in our small pocket neighborhood. Institutional housing will outnumber market rate housing more than 2 to 1. This is NOT affordable housing. This is institutional transitional housing.
- Placing 44 clients with mental health illnesses and drug and alcohol addiction in a neighborhood with open drug sales and prostitution, gun violence and a plethora of drinking establishments does NOT set up the chronic homeless for success. No more institutional projects need to be shoehorned into our small neighborhood which is trying to evolve from past neglect.
- Within a 10-minute walk of this project low-income government subsidized housing out numbers market rate housing almost 10 to 1. We support mixed housing, combination of market rate, low income, and workforce housing. Workforce housing for people who live, work, and generate payroll taxes in our city is what is needed to move the city and our neighborhood forward. Why is government subsidized housing limited to a handful of Cincinnati neighborhoods? The other 52 neighborhoods should be considered to disperse affordable housing throughout Cincinnati.
- There are absolutely no policies or guarantees in place to ensure that the clients of this facility are actually from this neighborhood or the city. Clients can and will come from nearby cities,

- other states, and regions. This will only increase the workload on the overburdened city services at the expense of the taxpayers of Cincinnati.
- There are no policies or guidelines in place that will prohibit additional sex offenders from being housed in this project. At last count on April 6th, 2022, there were 62 convicted sex offenders residing at Volunteers of America, 115 W. McMicken, a 1-minute walk from this proposed facility.
- The zero-lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street are already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
- No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
- Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.
- 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type. The Urban Mix Zoning was adopted in 2007 to pave the way for housing in this industrial/warehouse without detriment to existing businesses and jobs. Urban Mix Zoning has no reference to PSH, but specifically excludes Transitional Housing of the type the developer wants to put in (#5 and #6) is specifically excluded:
:§ 1401-01-T. - Transitional Housing.
- SHARE LINK TO SECTIONPRINT SECTIONDOWNLOAD (DOCX) OF SECTIONSEMAIL SECTION"Transitional housing" means housing designed to assist persons in obtaining skills necessary for independent living in permanent housing, including homes for adjustment and halfway houses. Transitional housing is housing in which:
 - An organization provides a program of therapy, counseling, or training for the residential occupants.
 - The organization operating the program is licensed or authorized by a governmental authority having jurisdiction over operation; and
 - The program is for the purpose of assisting the residential occupants in one or more of the following types of care:
 - Protection from abuse and neglect.
 - Developing skills necessary to adjust to life.
 - Adjusting to living with the handicaps of physical disability.
 - Adjusting to living with the handicaps of emotional or mental disorder or mental retardation.
 - Recuperation from the effects of drugs or alcohol, even if under criminal justice supervision; or
 - Readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release, and probationary programs.

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas Oppose the 2000 Dunlap Street PSH Development.

Signatures

1. Name: Kristen Bonavita (kristen@cia-auction.com) on 2022-04-13 19:32:34
Comments:

2. Name: Jeffrey M Luggen (jeffrey.michael23@gmail.com) on 2022-04-13 19:34:50
Comments: 2037 Elm St.

3. Name: Christine Oliver (christine@cia-auction.com) on 2022-04-13 19:38:02
Comments: 3707 Vollmer Place, Cincinnati, OH

4. Name: jeff luggen (jeff@jluggen.com) on 2022-04-13 19:39:30
Comments: 2020 dunlap street

5. Name: Robert Sehlhorst (robertsehlhorst@gmail.com) on 2022-04-13 20:23:45
Comments:

6. Name: Ryan Luggen (ryan@cia-auction.com) on 2022-04-14 18:08:54
Comments:

7. Name: Stuart Schulman (sschulman@dltdelivers.com) on 2022-04-15 16:58:30
Comments: 225 Stark Street Cincinnati, Ohio 45214

8. Name: Joseph M Vallo (jvallo@vallomanagement.com) on 2022-04-15 17:35:55
Comments:

9. Name: Nick Caruso (ncar7623@gmail.com) on 2022-04-15 18:53:51
Comments: I am a resident of Dunlap Street. This is not the right location for this project due to several factors in the immediate area surrounding the proposed location. This is a great project, but the people utilizing the service would be better served if this project was built in a location that doesn't promote and surround them with the very things that likely contributed to their situation.

10. Name: Michael Basch (squirrelweddingfilms@gmail.com) on 2022-04-15 20:05:39
Comments:

11. Name: Alfred J Berger Jr (dsiltd@fuse.net) on 2022-04-15 20:32:30
Comments: Warehousing the poor or the sick is a sick policy

12. Name: Deborah Johnson (djohnson@robinimaging.com) on 2022-04-15 21:09:11
Comments: As co-owner of Robin Imaging Services and resident in The Mohawk Neighborhood, I strongly disagree to add another institutional transitional housing facility where this is proposed. There are many other choices in Cincinnati to better support this need. Those of us in The Mohawk Neighborhood have been working to build affordable

housing here so that those who work here or in OTR can live here.

13. Name: Carol Ann schulman (gardenroselady@yahoo.com) on 2022-04-15 21:20:26
Comments:

14. Name: Kim McCarty (kimhalemccarty@gmail.com) on 2022-04-16 00:27:48
Comments: The placement of this project at 2000 Dunlap is predictably discriminatory and will have a disparate impact on the Disabled and African Americans. It will steer poor, disabled, predominately black people to a poor, predominately black community.

It is inhumane to provide housing for the targeted population in a low opportunity community that is infested with open-air drug markets, prostitution, chronic blight and uncontrollable crime.

15. Name: john valentine (johnv913@gmail.com) on 2022-04-16 01:07:23
Comments: We have had enough of this in our neighborhood!

16. Name: Sherri King (sherribarberphotography@gmail.com) on 2022-04-16 03:50:18
Comments:

17. Name: Kenneth Klabunde (k.klabunde@gmail.com) on 2022-04-16 11:16:01
Comments:

18. Name: Rebecca Klabunde (rebecca.klabunde@gmail.com) on 2022-04-16 11:25:58
Comments:

19. Name: Mikey Sorboro (mikey@latenightslice.com) on 2022-04-16 14:33:36
Comments: Business owner in neighborhood. Late Night Slice & Oddfellows

20. Name: Hal Lorton (notrollah@gmail.com) on 2022-04-16 21:20:09
Comments:

21. Name: Tara Lorton (4holytara@gmail.com) on 2022-04-16 22:34:30
Comments:

22. Name: Jerome Luggen (jerome@cia-auction.com) on 2022-04-18 12:38:12
Comments: 2020Dunlap Street

23. Name: John Walter (johnwalter@cinci.rr.com) on 2022-04-18 22:55:25
Comments: I am against this project for all the reasons argued in this petition.

24. Name: Paul Bauer (bauerp674@gmail.com) on 2022-04-20 15:29:43

Comments:

-
25. Name: Daniel Bascone (dfb1143@gmail.com) on 2022-04-20 15:41:23
Comments:
-
26. Name: Dale Anderson (daleanderson323@gmail.com) on 2022-04-20 16:13:38
Comments:
-
27. Name: Logan Reynolds (loganpreynolds@gmail.com) on 2022-04-20 16:14:03
Comments:
-
28. Name: Jenny Miller (jenny_miller4@aol.com) on 2022-04-20 17:14:31
Comments:
-
29. Name: Ethan Anost (ethananost2843@yahoo.com) on 2022-04-20 17:23:20
Comments:
-
30. Name: Jasmine Wells (jasmine.kww@gmail.com) on 2022-04-20 17:26:21
Comments:
-
31. Name: Sarah Harlow (sarahwv26@gmail.com) on 2022-04-20 17:32:06
Comments: 216 Klotter Ave
-
32. Name: Renee Miller (thespeckledwren@aol.com) on 2022-04-20 17:32:29
Comments:
-
33. Name: Julie Miller (millerjulie50@yahoo.com) on 2022-04-20 17:35:06
Comments:
-
34. Name: Colin Barge (bargecolin@gmail.com) on 2022-04-20 17:38:50
Comments: This is NOT in the best interest of the neighborhood and will have a negative impact.
-
35. Name: Jennifer Jill Cummins (jenjillj@gmail.com) on 2022-04-20 17:43:14
Comments:
-
36. Name: Evan Cummins (evan.cummins@gmail.com) on 2022-04-20 17:45:21
Comments:
-
37. Name: Blake Baxter (baxter.blake@gmail.com) on 2022-04-20 17:48:09
Comments:
-

38. Name: Kristina Elaine LaScalea-Sehlhorst (tinalascalea@gmail.com) on 2022-04-20 17:55:21
Comments:
-
39. Name: Caitlin Cummins (cjj.cummins@gmail.com) on 2022-04-20 18:10:16
Comments:
-
40. Name: Joseph Luggen (buckeyemachinery@hotmail.com) on 2022-04-20 18:16:17
Comments:
-
41. Name: David Macejko (overtherhinecigars@gmail.com) on 2022-04-20 18:39:04
Comments: Over the Rhine is Cincinnati's highest crime neighborhood of all kinds. according to Cincinnati Police. I've been a victim. This project will do nothing to mitigate that reality and will likely exacerbate problems with theft, breaking and entering, and violence between Liberty, and McMillan.
-
42. Name: Andy Smith (smith.andrew.lynn@gmail.com) on 2022-04-20 18:54:16
Comments:
-
43. Name: Matt Jacob (mattjjacob@gmail.com) on 2022-04-20 22:57:52
Comments:
-
44. Name: Elliott Culter (eculter@sugarcreek.com) on 2022-04-21 14:34:01
Comments: Signing on behalf of Southern Ohio Holding Organization which owns properties on Mohawk and McMicken.
-
45. Name: Bradley Rusk (ruskb34@gmail.com) on 2022-04-21 15:39:37
Comments:
-
46. Name: Frederick C Ellenberger (fellenberger@cinci.rr.com) on 2022-04-21 15:41:04
Comments:
-
47. Name: Brent Rohr (brent.rohr@gmail.com) on 2022-04-21 15:46:56
Comments:
-
48. Name: Rebecca Restrepo (restreeppo@gmail.com) on 2022-04-21 15:55:30
Comments:
-
49. Name: Carley Atchison (carley.atchison@gmail.com) on 2022-04-21 16:12:45
Comments:
-
50. Name: Liz Yauch (lizebear18@gmail.com) on 2022-04-21 17:00:16
Comments:
-

51. Name: Vincent Harnett (vincent.harnett@gmail.com) on 2022-04-21 21:06:03
Comments: I am against OTRCH's 2000 Dunlap Street PSH Development
-
52. Name: Ron Rowe (rhrproperties@gmail.com) on 2022-04-21 22:15:08
Comments:
-
53. Name: Patricia Berger (cinti1pa@aol.com) on 2022-04-22 13:04:02
Comments: This will increase insecurity and bad image to an already tainted neighborhood
-
54. Name: James Hautz (jjhautz@gmail.com) on 2022-04-22 13:06:45
Comments:
-
55. Name: Richard Cedar (rdcmole@aol.com) on 2022-04-22 13:19:21
Comments:
-
56. Name: Mary Fox (MARYFOX522@GMAIL.COM) on 2022-04-22 14:13:45
Comments: 522 CONROY ST
-
57. Name: Diego Jordan (arch_terra@hotmail.com) on 2022-04-22 16:21:31
Comments: Wrong proposal. Wrong place for this type of facility.
-
58. Name: Douglas Wainz (wanderlust@fuse.net) on 2022-04-22 16:40:21
Comments:
-
59. Name: Sandy Wainz (cityview@fuse.net) on 2022-04-22 16:41:48
Comments:
-
60. Name: David Reid (hman@h david.com) on 2022-04-22 16:47:43
Comments: We have enough social agencies in our neighborhood!
-
61. Name: Michael Fox (michaeljfox522@gmail.com) on 2022-04-22 17:01:48
Comments:
-
62. Name: Cherie Senger (cherie.senger@gmail.com) on 2022-04-22 21:35:30
Comments:
-
63. Name: Mitul Dadhanian (mituldadhanian@hotmail.com) on 2022-04-23 11:04:31
Comments:
-
64. Name: Kate Hensler (hensler.ka@gmail.com) on 2022-04-23 22:41:56
Comments:

-
65. Name: Nathan Baugh (nbaughlv@yahoo.com) on 2022-04-24 08:07:47
Comments:
-
66. Name: Molly Kirleis (mfk0220@gmail.com) on 2022-04-24 08:08:21
Comments:
-
67. Name: Craig Herget (craig.herget@gmail.com) on 2022-04-24 20:15:59
Comments: I oppose this project.
-
68. Name: Willim Johnson (BJohnson@RobinImaging.com) on 2022-04-25 12:42:14
Comments: The Mohawk neighborhood is trying very hard to move forward. We have enough mental health and homeless problems now and do not need more.
-
69. Name: steven fink (sfink@bangzoomdesign.com) on 2022-04-26 20:44:36
Comments: I am opposed to this project.
-
70. Name: Alex Dieterle (adieterle@bangzoomdesign.com) on 2022-04-26 21:32:44
Comments: 1415 Central PKWY
-
71. Name: Steve Casino (tamer-boa-0k@icloud.com) on 2022-04-26 22:06:13
Comments: 1415 Central Parkway
-
72. Name: Kimberly Starbuck (kimstarbuck9@gmail.com) on 2022-04-27 02:54:50
Comments:
-
73. Name: Michael Hoeting (MHOETING@GMAIL.COM) on 2022-04-27 19:43:44
Comments:
-
74. Name: Carol Schulte (carolnschulte@gmail.com) on 2022-04-27 19:45:02
Comments:
-
75. Name: Cary Satch Travis (carytravis@gmail.com) on 2022-04-27 23:05:27
Comments:
-
76. Name: Julie Fay (jdfayotr@gmail.com) on 2022-04-29 02:25:45
Comments: Too dense for the location, zoning and clientele served.
-
77. Name: Neil Marquardt (neil.marquardt@gmail.com) on 2022-04-29 12:23:01
Comments: This project makes NO sense at this location. Density issues, parking challenges, safety concerns, property values, putting at-risk people in the middle of this neighborhood are some of my tops concerns.
-

-
78. Name: Joe Maas (maas2212@gmail.com) on 2022-04-29 18:15:39
Comments: 10750 Mockernut Dr
Harrison. Ohio 45030
-
79. Name: David Berger (davidb@msdf1.com) on 2022-04-30 18:07:16
Comments:
-
80. Name: Nancy P Berger (Nancyb@northernrow.com) on 2022-04-30 20:13:25
Comments: 2567 Queen City Ave
-
81. Name: Josh Quattlebaum (Joshq@northernrow.com) on 2022-05-01 16:58:04
Comments:
-
82. Name: Karen Domine (edenpk2@aol.com) on 2022-05-02 12:41:13
Comments:
-
83. Name: Brenden Douglass (brendend@northernrow.com) on 2022-05-02 13:07:56
Comments: As someone who works in OTR and already deals with the current homeless situation I can see how a new homeless shelter in our neighborhood can negatively effect the company I work for and the guests we accommodate. Moreover, many people visiting Cincinnati come to OTR to enjoy themselves and this potential shelter would reflect poorly on our city
-
84. Name: Cody R Jackson (cjackson@bangzoondesign.com) on 2022-05-02 16:37:30
Comments:
-
85. Name: Alex Hutchins (alexh@northernrow.com) on 2022-05-03 17:33:54
Comments:
-
86. Name: Jonathon Pettit (tungstenx3@hotmail.com) on 2022-06-02 23:18:47
Comments:
-

OPPOSITION PETITION

STOP OTRCH's 2000 Dunlap Street PSH Development

April 11th, 2022

Over The Rhine Community Housing (OTRCH) of Cincinnati, Ohio has proposed a PSH development, targeted to serve individuals experiencing chronic homelessness and have a history of mental health illnesses and drug and alcohol addiction, at 2000 Dunlap Street in the Mohawk Neighborhood of OTR. This development will consist of a four-story building with (44) studio apartments on a 100' x 100' Lot with zero lot line construction.

Residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **OPPOSE THIS PROJECT** for the following reasons:

1. This proposed project is seeking a zoning variance that would permit 44 units on a lot zoned for 14 units. This is three times the zoned density for this lot and results in too many units crammed into a small parcel in a busy, highly congested area that serves low density residential housing, commercial businesses, light industry, entertainment businesses, breweries, bars, night clubs and restaurants. Cincinnati City Council recently voted NO to increase density ensuring that existing zoning restrictions for density remain in place.
2. This project will change the character of our neighborhood by adding another institutional/transitional type housing facility to our neighborhood that already has several, including the Volunteers of America (130) Bed facility for sex offenders and other criminals finishing their sentences, Logan Towers (63) Bed facility for individuals experiencing chronic homelessness with a history of mental health or substance use disorders, OTRCH's Jimmy Heath House, (25) Bed facility for individuals experiencing chronic homelessness. The addition of this project will result in a total of 262 institutional beds in our small pocket neighborhood. Institutional housing will outnumber market rate housing more than 2 to 1. This is NOT affordable housing. This is institutional transitional housing.
3. Placing 44 clients with mental health illnesses and drug and alcohol addiction in a neighborhood with open drug sales and prostitution, gun violence and a plethora of drinking establishments does NOT set up the chronic homeless for success. No more institutional projects need to be shoehorned into our small neighborhood which is trying to evolve from past neglect.
4. Within a 10-minute walk of this project low-income government subsidized housing out numbers market rate housing almost 10 to 1. We support mixed housing, combination of market rate, low income and workforce housing. Workforce housing for people who live, work and generate payroll taxes in our city is what is needed to move the city and our neighborhood forward. Why is government subsidized housing limited to a handful of Cincinnati neighborhoods? The other 52 neighborhoods should be considered to disperse affordable housing throughout Cincinnati.
5. There are absolutely no policies or guarantees in place to ensure that the clients of this facility are actually from this neighborhood or the city. Clients can and will come from nearby cities, other states and regions. This will only increase the workload on the overburdened city services at the expense of the taxpayers of Cincinnati.
6. There are no policies or guidelines in place that will prohibit additional sex offenders from being housed in this project. At last count on April 6th, 2022, there were 62 convicted sex offenders residing at Volunteers of America, 115 W. McMicken, a 1-minute walk from this proposed facility.

7. The zero-lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street are already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
8. No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
9. Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will **prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.**
10. 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type. The Urban Mix Zoning, was adopted in 2007 to pave the way for housing in this industrial/warehouse without detriment to existing businesses and jobs. Urban Mix Zoning has no reference to PSH, but specifically excludes Transitional Housing of the type the developer wants to put in (#5 and #6) is specifically excluded:

Transitional Housing		
Programs 1—4	P	
Program 5, 6	—	

: § 1401-01-T. - Transitional Housing.

11. SHARE LINK TO SECTIONPRINT SECTIONDOWNLOAD (DOCX) OF SECTIONSEMAIL SECTION

"Transitional housing" means housing designed to assist persons in obtaining skills necessary for independent living in permanent housing, including homes for adjustment and halfway houses. Transitional housing is housing in which:

- (a) An organization provides a program of therapy, counseling or training for the residential occupants;
- (b) The organization operating the program is licensed or authorized by a governmental authority having jurisdiction over operation; and
- (c) The program is for the purpose of assisting the residential occupants in one or more of the following types of care:
 - (1) Protection from abuse and neglect;
 - (2) Developing skills necessary to adjust to life;
 - (3) Adjusting to living with the handicaps of physical disability;
 - (4) Adjusting to living with the handicaps of emotional or mental disorder or mental retardation;
 - (5) Recuperation from the effects of drugs or alcohol, even if under criminal justice supervision; or
 - (6) Readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release and probationary programs.

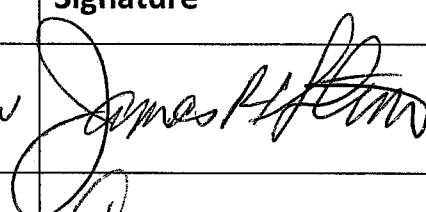
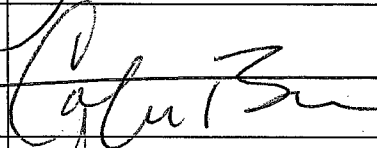
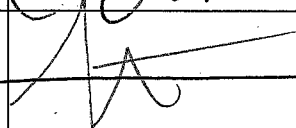
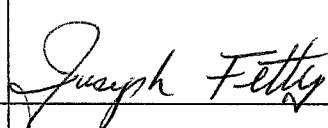
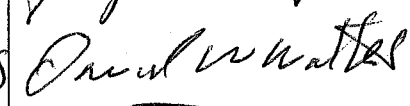
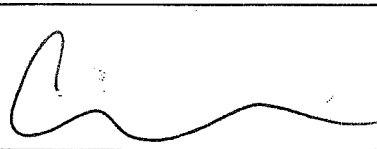
The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
MARK GATHERWRIGHT	<i>Mark Gatherwright</i>	2025 ELM ST. 45202
Janet Gatherwright	<i>Janet Gatherwright</i>	2025 Elm St 45202
Juliana Lemen	<i>Juliana Lemen</i>	2023 Elm St 45202
Mike Fitzgerald	<i>Mike Fitzgerald</i>	2023 Elm St 45202
Kyle Stein	<i>Kyle Stein</i>	2023 Elm St 45202
Beth Ali Munzio	<i>Beth Ali Munzio</i>	2023 Elm St 45202
Patricia Greene	<i>Patricia Greene</i>	2023 Elm St 45202
Gerald Manies	<i>Gerald Manies</i>	enabler 2025 Elm
Joanne Farmer	<i>Joanne Farmer</i>	2035 ELM ST #84 45202
Kelly Johnson	<i>Kelly Johnson</i>	1885 1885 Forestview Ct. 45233
Cherie Antorum	<i>Cherie Antorum</i>	1926 Dunlap 45202

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

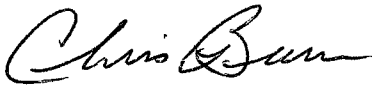
We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
JAMES R. STERN		2020 DUNLAP ST (CINT/ INDUSTRIAL AUCTIONEERS)
Colm Borge		2031 Dunlap St Cinci 45214
Steven Fink		1908 Dunlap St #2 Cincinnati OH 45214
Joseph V Fetti		242 STARK ST CINT OH 45214
David Walters		260 STARK ST CINC OH 45214
Mamad SHALAS I.		2020 Central Pkwy CIN OH 45214
John Philkovic		235 Stark St. Cincinnati OH 45214
Cosin		2020 Puler St. Cincinnati, OH 45214

Signal
Electrical
Sign
Electrical

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
CHRIS BURNS		2016 Elm St. Cincinnati, OH 45202
Chris Helmers		2023 Elm St. Cincinnati Ohio 45202
Adam Dehn		2023 Elm St Cincinnati Oh, 45202 Cincinnati
JIM MARTIN		1528 Elm St Cincinnati Ohio 45202

Owen, Douglas

From: Kristina LaScalea-Sehlhorst <tinalascalea@gmail.com>
Sent: Friday, June 17, 2022 11:50 AM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street COA20222032

You don't often get email from tinalascalea@gmail.com. [Learn why this is important](#)

External Email Communication

Dear Urban Conservator,

My name is Kristina LaScalea and I want to express my opposition to the OTR Community Housing project at 2000 Dunlap Street. I live within 200 feet of that site. Requesting a zoning variance of 44 units for a lot zoned for 14 units far exceeds the intended use of that lot. Placing 44 chronic homeless people with mental illness and drug and alcohol addiction in a fragile transitional neighborhood with open drug sales, open prostitution, and elevated gun violence does not create an environment that is safe for the homeless or for neighbors and businesses.

As a mother and grandmother I am very concerned about the number of convicted sex offenders in our neighborhood. One block away from 2000 Dunlap Street is the Volunteers of America institution that houses 130 convicted criminals that are completing their sentences. According to the Hamilton County Sheriff's website there are 62 sex offenders held there. How many more sex offenders will reside at 2000 Dunlap Street? This building is too large and too tall and will tower over adjacent buildings and will forever alter the historic character of Dunlap Street and the Mohawk Neighborhood.

I urge the Historic Conservation Board to vote no on this application.

Respectfully.

Kristina LaScalea

Owen, Douglas

From: rep81@aol.com
Sent: Friday, June 17, 2022 1:55 PM
To: Owen, Douglas
Cc: Conservator, Urban
Subject: [External Email] Proposed PHS Building at 2000 Dunlap St.

Follow Up Flag: Follow up
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External Email Communication

Mr. Owen:

I have worked with a business in OTR near the proposed PSH building site for over 30 years. In my frequent visits, I have seen the resurgence of the neighborhood, i.e. Findlay Market, Rhinegeist Brewery, The Streetcar, Shops, Restaurants, Bars, etc. With all of the public and private efforts in financing, planning and construction that were put forward to revitalize and preserve the architecture and character of the area, I feel that the planned facility is not a good fit. The size and architectural style of the proposed building are completely out of character for the surrounding area.

While the proposed use of this facility is a noble one, I would suggest that a more suitable location would be appropriate.

Thank you for your time and consideration in this matter.

Regards,

James Stern

Gregory R. Wilson

1400 Sycamore Street LLC

1411 Sycamore Street
Cincinnati, Ohio 45202
(513) 352-5858
Fax (513) 823-2891*

*Note updated fax
number

June 16, 2022

VIA EMAIL AND REGULAR U.S. MAIL

Mr. Doug Owen
Urban Conservator
805 Central Ave., Suite 500
Cincinnati, Ohio 45202

Re: New Construction at 2000 Dunlap Street, Cincinnati, Ohio 45214; Hearing Date
June 27, 2022

Dear Mr. Owen:

Please convey the following public comment to the Historic Conservation Board to be considered as part of their deliberations on the above application. I may also request permission to express these comments at the scheduled hearing. Thank you in advance for your cooperation.

TO THE HISTORIC CONSERVATION BOARD

I am an attorney practicing from my office at 1411 Sycamore Street in OTR and also a property owner of a multi family dwelling at 1400 Sycamore Street. I represent several other property owners in OTR on general business matters but I am not engaged with regard to the application being heard on June 27, 2022. With respect to that application I am before you as a citizen of the City with a long time commitment to the success of OTR. I thank you in advance for considering my comments.

I do not have any specific expertise in zoning, land use, architecture, or historic building guidelines. So, I speak to you as a layman.

Notwithstanding the foregoing, I have observed the undertakings of the HCB for more than 25 years. I have had many hundreds of conversations with my neighbors, colleagues, and clients regarding the HCB and while most all of these conversations are positive with respect to the mission of the Urban Conservator and the HCB, I think I can say confidently that it is generally accepted that there is the appearance that there are applied different standards of review and approval by the HCB depending upon who is the applicant, who is in support or opposed to the project, and what is the nature of the activity that is to be housed in the project. This public perception may be entirely wrong or there may be some truth in it. I just do not know. But, I am

sure that there is that public perception.

Accordingly, I ask you in connection with your consideration of this application, as you deliberate, to consider the following question:

If the requests presented to us today for 44 apartments on a 100' by 100' lot were presented by a “for profit” developer, motivated only by its personal financial gain¹, for no apparent higher purpose, and opposed by the City’s leading influencers, would we grant or deny these variances and COA.

It may be that this is intrinsic in each of your determinations, please do not take offense by my request as to the public perception, but, if you ask this question as a predicate for your determinations I will be satisfied regardless of the outcome.

Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to be "Ante", with a long horizontal line extending to the right.

¹It should not be assumed that I think that this application is motivated by considerations other than what appears to be a \$1,560,000.00 “Developer Fee” referenced in the OHFA financing application.

Additional Letters Received

From: [Jessica D. Gibson](#)
Sent: Friday, June 17, 2022 4:01 PM
To: [Owen, Douglas](#)
Cc: [Conservator, Urban](#); [Christopher P. Finney](#)
Subject: [External Email] 2000 Dunlap Case Nos. COA2021066 and COA2022032
Attachments: [CIA Letter in Opp.pdf](#)
[A-K.pdf](#)

Follow Up Flag: Follow up
Flag Status: Flagged

Some people who received this message don't often get email from jdg@finneylawfirm.com. [Learn why this is important](#)

External Email Communication

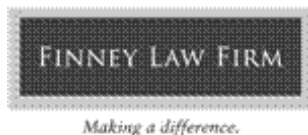
Dear Mr. Owens,

Attached please find a letter in opposition to the proposed zoning variances and certificate of appropriateness from our office, on behalf of our clients Dunlap Street Properties, LLC and Cincinnati Industrial Auctioneers, Inc.

If you have any trouble opening the exhibits, please let me know.

Respectfully,

Jessica D. Gibson, Esq.
FINNEY LAW FIRM, LLC
4270 Ivy Pointe Boulevard, Suite 225
Cincinnati, Ohio 45245
Office: 513.943.5677
Fax: 513.943.6669
jdg@finneylawfirm.com
www.finneylawfirm.com



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FINNEY LAW FIRM

4270 Ivy Pointe Boulevard, Suite 225, Cincinnati, OH 45245

June 17, 2022

Christopher P. Finney, Esq.

Direct Dial: (513) 943-6655

Fax: (513) 943-6669

Chris@FinneyLawFirm.com

VIA ELECTRONIC MAIL

Historic Conservation Board

c/o Mr. Douglas Owen

805 Central Avenue, Suite 500

Cincinnati, Ohio 45202

douglas.owen@cincinnati-oh.gov

urban.conservator@cincinnati-oh.gov

**RE: 2000 DUNLAP STREET, CINCINNATI, OH 45214
CASE NO. COA2021066 AND COA2022032
HEARING ON JUNE 24, 2022**

This firm has been retained to represent Dunlap Street Properties, LLC and Cincinnati Industrial Auctioneers, Inc. (collectively, “CIA”) in connection with the zoning variance application and request for certificate of appropriateness related to the property located at 2000 Dunlap Street, Cincinnati, OH 45214 (the “Property”) pending before the members of the Historical Conservation Board (the “Board.”) For the reasons set forth below, the Board should deny the requested density and rear setback variances, and the Board should not grant a certificate of appropriateness for the proposed construction on the Property.

I. BACKGROUND

The Property is located in Over-the-Rhine in the Urban Mixed-Use Zone, just down the street from CIA headquarters located at 2020 Dunlap Street, and near additional properties owned by CIA including 2016 through 2034 Dunlap Street, 2008 Dunlap Street, 2001 Elm Street, 2036 through 2046 Dunlap Street, and four (4) lots on McMicken Avenue (the “CIA Properties.”) An aerial satellite map illustrating the CIA Properties located near or adjacent to the Property is attached hereto as **Exhibit A**.

CIA has deep seeded roots in Over-the-Rhine, operating on 2020 Dunlap Street since 1980, nearly 40 years. CIA employs 20 people and conducts its business as a nationwide provider of asset disposition, auction and appraisal services on behalf of Fortune 500 companies, small businesses, lending institutions, government agencies, and federal and local courts.

On or about mid-December 2021, CIA and its neighbors learned of the first application (COA2021066) for zoning relief submitted in connection with the Property, on behalf of Over-

the-Rhine Community Housing (“OTRCH” or “Applicant,”) which requested a density variance over three times the permitted density in an Urban Mixed-Use Zone and a rear setback variance to build to the zero-lot line of the Property. Inappropriately, the first application failed to contain a request for a Certificate of Appropriateness for a coordinated review of the Project as required by CZC § 1445-11 (c).¹ A hearing was held on January 24, 2022 (the “Jan. Hearing”) before the Board and continued to a later date, pending the submission of a request for a Certificate of Appropriateness.

This request was submitted nearly *five months* later on May 12, 2022 (COA2022032,) and a second hearing on this matter has been set for June 24, 2022. Hereinafter, application No. COA2021066 and COA2022032 shall collectively be referred to as the “Application.” The proposed building to be constructed in connection with the Application shall be referred to as the “Project.” To the extent necessary, CIA incorporates herein the arguments set forth in the previous letter sent on its behalf on or about January 14, 2022 by Peter E. Koenig, Esq. and all the testimony and evidence presented at the first hearing that was held on January 24, 2022.

II. THE REQUESTED DENSITY AND SETBACK VARIANCES SHOULD BE DENIED

From the outset, the Board found at the Jan. Hearing that the applicant for the zoning variance failed to meet its burden necessary for the Board to grant a variance. However, the applicant has been given a second bite at the apple upon the Board’s generous offer to “table” the matter pending the submission of additional information. Notwithstanding, based upon the Application and the Jan. Hearing testimony, the request for a density variance and setback variance should be denied.

A. The requested variances are not in the public interest.

The Board, under CZC § 1445-13, may approve an application for a variance if the proposal conforms with all applicable laws, ordinances and regulations and is in the public interest. In addition, the variance must also meet the standards set forth in CZC § 1445-15. When making a determination if the variance is in the public interest, the Board must consider the factors set forth under CZC § 1445-13 (a)-(p). Several of these factors weight *against* granting a variance.

(a) Zoning. The proposed work conforms to the underlying zone district regulations and is in harmony with the general purposes and intent of the Cincinnati Zoning Code or the Land Development Code, as applicable.

¹ *Coordinated Review and Approval of Applications.* Whenever, in addition to a variance, special exception or conditional use pursuant to this chapter, the applicant also requires another decision by the examiner, the applicant **must** simultaneously file all other required applications. All required notices must include reference to the request for all required examiner approvals.

It is not clear based on the Application and testimony that the proposed use conforms to the underlying zone district regulations. Mr. Doug Owen, as a Zoning Plans Examiner, found that the proposed use would be permissible “congregate housing” rather than impermissible “transitional housing.” However, this conclusion was reached with no fact finding or any opportunity for community members to challenge or impeach this determination. At the Jan. Hearing, Ms. Johnson indicated this decision was reached because the residents would have annual leases and the residents were not *obligated* to engage in “services” as with transitional housing. However, the services provided under “congregate housing” appear to be those types of services associated with domestic life (i.e., dining, housekeeping, recreational activities, transportation services) while transitional housing provides services related to mental and physical health and drug addiction – the very types of services that will be provided at the Property.²

Additionally, based on the plain language of the “transitional housing” definition, there is no explicit requirement that (i) transitional housing must be short-term, it simply defines transitional housing as “housing designed to assist persons in obtaining skills necessary for independent living in permanent housing” and (ii) that the resident(s) must receive services, instead it simply states that the services are provided. CZC 1401-01-T. Further, the applicant has consistently referred to this project as “permanent supportive housing” rather than “congregate housing.” Therefore, the proposed use of the Property does not appear to conform to the underlying zone district regulation, instead it appears to be prohibited transitional housing (5) or (6).

(b) Guidelines. The proposed work conforms to any guidelines adopted or approved by Council for the district in which the proposed work is located.

The proposed work does not conform to the historical guidelines of the Over-the-Rhine Historic District (the “District.”) The primary areas of noncompliance, as thoroughly explained below in Section III below, is the lack of vertical emphasis and the improper windows.

(d) Traffic. Streets or other means of access to the proposed development are suitable and adequate to carry anticipated traffic and will not overload the adjacent streets and the internal circulation system is properly designed.

The surrounding streets will be unable to carry anticipated traffic and will overload the adjacent streets. The Project will create 44 dwellings and require several employees to be managed, as evidenced by the fact the Project will contain twelve (12) “dedicated program” offices.³ Testimony was given at the Jan. Hearing by Mr. Bob Carbon, on behalf of the Applicant, that no traffic impact study related to the Project has been conducted. The Applicant seems to assume that the residents will not have vehicles – notwithstanding the fact that the architecture plans seem to

² Exhibit D to the letter written in support of the Application by Sean Suder, Esq. dated May 12, 2022 (the “Suder Letter”) shows a floorplan which includes rooms for “visiting nurse,” “private counseling,” and “case managers.” The types of rooms necessary to provide mental health and addiction support services.

³ See Exhibit D to Suder Letter.

include “bike parking,” which are vehicles that will use and occupy the surrounding streets, not to mention the fact the Project will have twelve employee offices.

(h) Neighborhood Compatibility. The proposed work is compatible with the predominant or prevailing land use, building and structure patterns of the neighborhood surrounding the proposed development and will not have a material net cumulative adverse impact on the neighborhood.

Additionally, the proposed work is not compatible with the neighborhood surrounding the Property as the Project will be for residential living units on a street where CIA and F.L. Emmert Company operate. Both businesses require daily shipments often by large trucks or semi-trucks, creating consistent loud noises and pollution on Dunlap, making it ill-suited for residential dwellings. Further, the blocks around the Property are predominantly commercial properties, including four (4) distilleries and breweries, four (4) restaurants and taverns, two (2) nightclubs, an axe throwing club, a printing company, a cabinet manufacturer, a novelty wholesale company, tool supply and repair, three (3) automotive repair shops, an elevator repair company, and a bridal make-up/photography salon.

(i) Proposed Zoning Amendments. The proposed work is consistent with any proposed amendment to the zoning code or the Land Development Code then under consideration by the City Planning Commission or Council.

Although at the time of the Jan. Hearing there was a proposed zoning amendment that would remove the density requirements from an Urban Mixed Zone, this proposed amendment was denied. Thus, it is clear that the City Council believes that an increase in density is *not* in the best interests of the public.

(j) Adverse Effects. Any adverse effect on the access to the property by fire, police, or other public services; access to light and air from adjoining properties; traffic conditions; or the development, usefulness or value of neighboring land and buildings.

At the Jan. Hearing and in the Application conclusory statements were given that emergency services would not be hindered by the construction of the Project to the zero-lot lines, yet no report or statements from the fire department or police department have been provided.

(n) Tax Valuation. Any increase in the real property tax duplicate.

Furthermore, although the staff report for the Jan. Hearing considers the increase in the real property tax valuation, the Property will likely be exempt from taxation under R.C. 5709.12(E)(1). Thus, this factor does *not* weigh in favor of granting a variance. In fact, the current use of the Property is not exempt from taxation.

(p) Public Benefits. The public peace, health, safety or general welfare.

Finally, the Board should consider the competing public benefits at issue here. Currently, the Property serves as a parking lot in a highly trafficked area where parking is hard to come by, a

public benefit. The provision of affordable housing is also an important public benefit, however it is important to maintain a mixed-income strategy in development, so as not to overburden any particular neighborhood, or particular part of a neighborhood, with concentrated poverty and/or institutional uses. Currently, within approximately a half mile of the Property, there are already at least six (6) institutions providing low-income supportive housing including the Jimmy Heath House, Logan Towers, Volunteers for America, Recovery Hotel, Buddy's Place, and the Nannie Hinkston House. See the attached **Exhibit B**.

Therefore, the Board should find that the CZC § 1445-13 (a)-(p) factors weigh against the grant of a variance, because it is not in the public's interest.

B. The requested variance does not meet the standards imposed by CZC § 1445-15.

Under CZC § 1445-15, a variance may only be granted if the condition giving rise to the request for variance was not created by the owner and one of two conditions is met: (i) "[o]wing to special circumstances or conditions pertaining to a specific piece of property, the strict application of the provisions or requirements of this Code or the Land Development Code, as applicable, are unreasonable and would result in practical difficulties" or (ii) "[t]he variance is necessary for the preservation and enjoyment of a substantial property right of the applicant possessed by owners of other properties in the same district or vicinity."

- i. There are no special circumstances or conditions of the Property that would make application of the zoning laws unreasonable and result in practical difficulties.

As a preliminary matter, there are no special circumstances or conditions of the Property that require a variance. The Property is a 100 ft. x 100 ft. square lot, which is being profitably utilized as a parking lot. The Property generates around \$60,000 in revenue each year, according to the testimony of Ms. Rivers at the Jan. Hearing. Thus, there are no special circumstances or conditions of the Property to warrant a variance, as the Property is already usable as-is. Furthermore, the Property is squarely shaped and evenly graded, which would make the construction of a conforming structure simple.

The only reason the Applicant is requesting the density and setback variance appear to be because the method of funding sought for the Project is Low Income Housing Tax Credit (LIHTC) funding which, according to staff report prepared for the Jan. Hearing, "...often requires a certain level of scale to be eligible and competitive for the funding allotment." This is not the type of special circumstance contemplated by the zoning code. However, even if this is a special circumstance, it appears from the application that there are no specific number of units *required* to obtain the funds, rather the number of units increases the amount of funding received. See **Exhibits C and D**. There is no indication that it is *necessary* for the Project to nearly *triple* the permitted density and build to the zero-lot line in order receive LIHTC funds.

However, even assuming for the sake of argument that the funding issue creates a "special circumstance" it will not result in practical difficulties. The seminal case defining what are considered "practical difficulties" is *Duncan v. Middlefield*, 23 Ohio St.3d 83, 491 N.E.2d 692

(1986) which outlines all factors to be considered. Applying the *Duncan* factors to this Property and Project, it is clear that the zoning laws do not result in practical difficulties.

(1) whether the property in question will yield a reasonable return or whether there can be any beneficial use of the property without the variance;

Here, as already mentioned, the Property currently yields a reasonable return of \$60,000 in revenue annually as a parking lot. The Property here was generously donated to the Applicant in 1992 by the Trustee of General Electric Pension Trust. Thus, any income produced by the Property is a reasonable return, as there was no initial investment by the Applicant.

(2) whether the variance is substantial;

The variances requested in this matter are substantial. Specifically, the density variance would nearly *triple* the density permitted under the Zoning Code. Additionally, the rear setback variance would further narrow the already extremely narrow Colby Alley. CIA owns property immediately across Colby Alley from the subject Property, 2001 Elm Street, and believes that the setback, required by the Zoning Code, is necessary for CIA to access its property from Colby Alley. Additionally, CIA owns the garage adjacent to the Property, at 2008 Dunlap, which includes a door that will be rendered inaccessible if the Project is constructed without the required 10-foot setback.

The Suder Letter claims that the 14 units permitted under the Zoning Code result in “64 people residing on the Property as a matter of right.” This assumption is made under the belief that the “average” amount of people per unit is 4, however the United States 2020 Census Data indicates that the average household size is about 2.5. See **Exhibit E**. Thus, “by right,” the amount of tenants permitted at the Property under the Zoning Code would be 35, *still* fewer than the 44 single resident units planned.

(3) whether the essential character of the neighborhood would be substantially altered or whether adjoining properties would suffer a substantial detriment as a result of the variance;

As already discussed herein, the adjoining properties would suffer a detriment as a result of the variance due to the increased level of traffic in the immediate vicinity. Furthermore, the amount of parking available in the neighborhood will be significantly reduced. Finally, CIA in particular will lose the ability to access a door on one of its buildings adjacent to the Property, and it will be hard for CIA to access its 2001 Elm Street property from Colby Alley.

(4) whether the variance would adversely affect the delivery of governmental services (e.g., water, sewer, garbage);

The increased traffic along Dunlap and Henry Street, in addition to adversely impacting the neighboring properties, will undoubtedly make the delivery of governmental services more of a challenge. Further, permitting triple the permitted density, substantially increasing the demand for governmental services in this area, may strain the provision of those services.

(5) whether the property owner purchased the property with knowledge of the zoning restriction;

The Suder Letter claims that the density and setback restrictions were not in place prior to OTRCH's acquisition of the Property in 1992, however this is an assumption made based on the fact that the *current* density and setback requirements of the Urban Mixed Zone were adopted in 2007. However, the Suder Letter fails to provide what the zoning regulations were in 1992. It is conceivable that the zoning regulations in 1992 may have been *more* restrictive than the current version, as to density and setback requirements.

(6) whether the property owner's predicament feasibly can be obviated through some method other than a variance;

As mentioned *supra*, there is no indication in the application materials for the LIHTC funds that it is *necessary* for the Project to contain 44 units. It appears that funding could be obtained if the Project scaled down to a permitted number of units, which likely would obviate the need to build to the zero lot line on all sides. Thus, the OTRCH's funding predicament could be resolved without obtaining a variance.

(7) whether the spirit and intent behind the zoning requirement would be observed and substantial justice done by granting the variance.

The spirit and intent behind the zoning requirements would not be observed by granting the variance, particularly in regards to the density variance. The City Council recently refused to pass an ordinance eliminating the density requirements. Additionally, the Property is located in a zone where parking is not required for developments. The density restriction is a way to keep parking in Over-the-Rhine manageable while under the Urban Parking Overlay Zone.

- ii. The requested variances are not necessary for the preservation and enjoyment of a substantial property right.

There are no substantial property rights enjoyed by neighboring properties that may not be enjoyed by the OTRCH's ownership of the Property. OTRCH has profitably utilized the Property since constructing a parking lot on the Property on or before 2019. Additionally, if OTRCH wanted to, it could construct a dwelling on the Property that conforms with the zoning code. Thus, the requested variances are not necessary.

III. THE CERTIFICATE OF APPROPRIATENESS SHOULD NOT BE GRANTED.

The plans provided in the Application fail to adhere to the Revised Over-the-Rhine Historic District Conservation Guidelines for New Construction (the "Guidelines.") Thus, the Board should not grant a certificate of appropriateness.

A. There is not a strong vertical emphasis, a design element of critical importance in the Over-the-Rhine Historical District.

What is most critical, and notably lacking in the Application, is the overall vertical emphasis of the whole design. The Guidelines emphasize this importance throughout, touching on it in the specific guidelines for composition, rhythm, and emphasis.

The Project here is for the construction of a building that will be 100 ft long on all sides, significantly longer than it will be tall. Thus, inherently there is a horizontal emphasis in the Project that must be overcome. The applicant attempts to overcome this hurdle by creating three distinct sections on the Dunlap Street side, but inexplicitly fails to do the same on the Henry Street side. The view from Henry Street has a strong horizontal emphasis, with the same type of brick dominating that side of the building. The “vertical bay” windows do little to draw interest upward.

What is noticeably absent in the designs submitted in the Application are some of the key historical decorative elements that create a vertical emphasis. There are no columns, piers, pilasters, or clever changes in plane (aside from the vertical bay windows) to draw interest upward. Although there are some projecting cornices, these appear to only occupy half the street facing sides of the building.

Additionally, the design plans have elements that create a *horizontal* emphasis rather than a vertical emphasis. Specially, the consistent change in materials above/below the windows, especially on the Henry Street side, draw the eye horizontally across the building.

B. The window openings, an extremely important element in this district, are unlike the windows found on other structures of similar use in the district.

As a preliminary matter, the windows in this District are typically found individually, rather than in pairs or grouped. In the Project, the windows are frequently found in pairings. Furthermore, the “vertical bay” windows appear as a group, rather than distinct individual windows.

The Suder Letter attempts to overcome this noncompliance under the Guideline that ultimately requires the window placements to be related to the size and placement of openings found on historic structures of similar use in the district. The Suder Letter cites four different properties as “examples” of similar use buildings using double-hung windows, rather than individual windows. However, two of these “buildings,” 1915 Elm Street and 2070 Elm Street, do not seem to exist, see the attached **Exhibit F**. The Perseverance project windows, generally do *not* include double hung windows, only approximately 11.4% of the windows are double hung, unlike here where approximately 26.3% of the windows are double hung.⁴ See **Exhibit G**. The property located at 1908 Dunlap do appear to have more double hung windows, but the placement of those windows, and also the windows of the Perseverance, is distinguishable from the Project because the windows on the aforementioned properties are evenly and consistently spaced, establishing a

⁴ Counting only the windows that are on the street facing sides of the buildings.

nice rhythm. *See Exhibit H.* The Project, in contract, has inconsistent spacings between the window placements.

Furthermore, an examination of other similar residential properties in the District, reveal that individually placed, evenly spaced, windows predominate. Specifically, the low-income senior apartments located at 1500 Elm Street, the Guild House located on 1622 Vine Street, the Mercer Commons located on 1341 Walnut Street, and the Nannie Hinkston Apartments located on 41 E. McMicken, pictures of which are attached hereto as **Exhibit I.**

Finally, the windows typically have decorative lintels, sills or decorative surrounds. Here, the windows appear to be relatively plain. There appears to be a lintel/header that simply uses the same surrounding brick material. There is no indication that there will be any decorative sills or other surrounding elements. Examining the above photos of windows on buildings with similar use, there are generally very distinct and decorative lintels and sills. Additionally, the window lintel and sills pictured on the Perseverance seem to be in sharp contrast with other buildings found within the District. It is worth noting that it was designed by New Republic Architecture, the same firm that created the designs submitted in the Application.

C. The Project fails to comply with several other Guidelines including the composition of the base, the excessive height, and the materials used.

The Guidelines require that new construction have a well-defined base distinguishable from the rest of the building. The Project appears to successfully employ this requirement on the Henry Street Side, however the Dunlap Street Side lacks a well-defined base.

Next, the height of the building cannot vary more than one story from adjacent contributing buildings. There are no contributing buildings next to the Property, however the non-contributing buildings adjacent to the Property are only one story tall. A four-story structure, with a tall first floor, built to the zero-lot lines will dwarf the adjacent buildings, weakening the overall appearance of the streetscape.

Finally, the dominant materials that may be used are brick, limestone, sandstone, cast-iron, slate, wood and sheet metal. However, the Project will be composed of a significant amount of cement blocks.

Mr. Douglas Owen

June 17, 2022

Page 10 of 10

IV. CONCLUSION

The Board should (i) deny the requested density variance, (ii) deny the requested rear setback variance, and (iii) refuse to grant a Certificate of Appropriateness. Also enclosed herein is Exhibit J, a petition circulated in the community signed by individuals opposed to the Project and Exhibit K, a list of witnesses CIA expects to call to testify at the June 24, 2022 hearing.

Sincerely,

FINNEY LAW FIRM, LLC



Christopher P. Finney

cc: Jessica D. Gibson. Esq.
Mr. Jeff Luggen

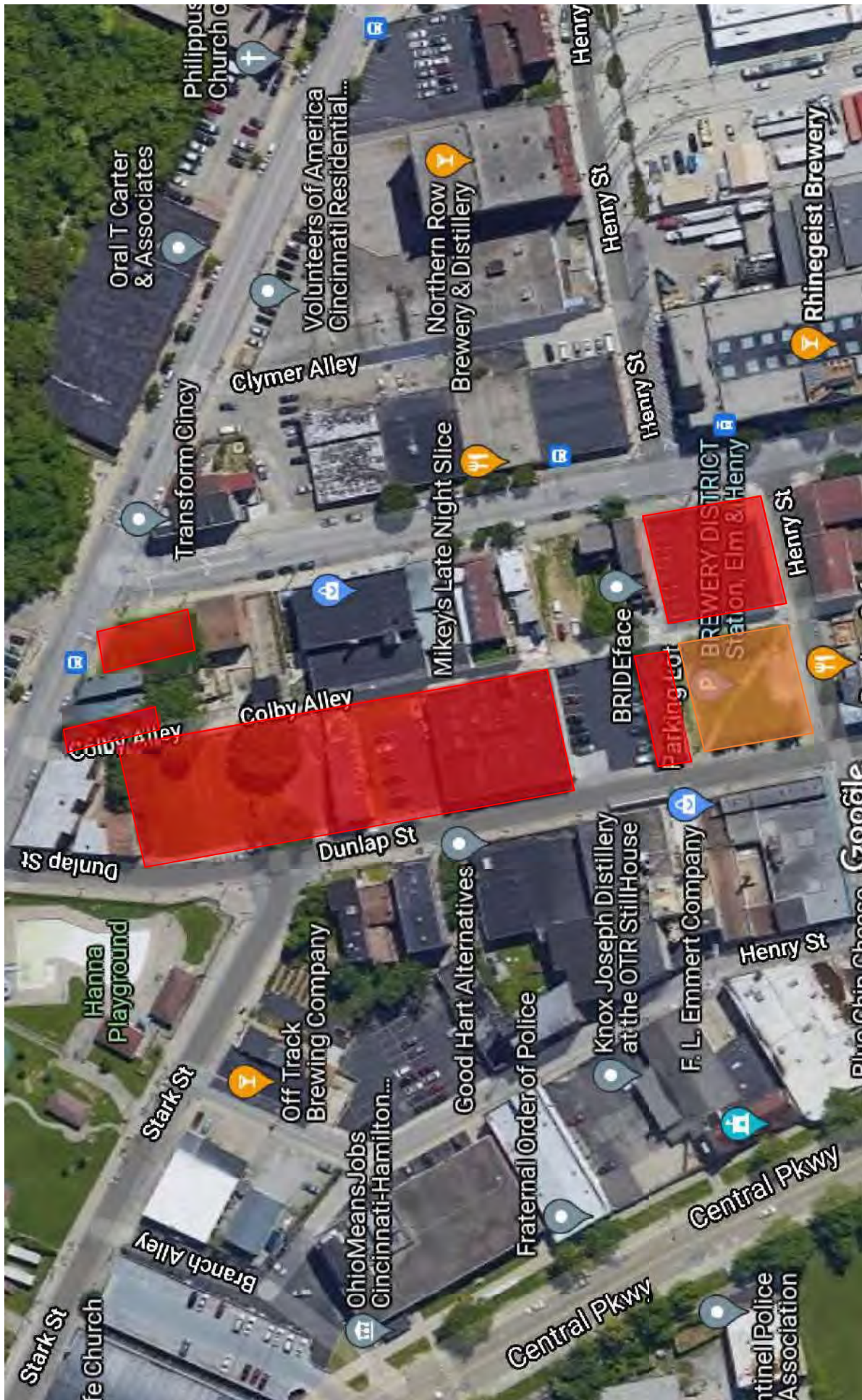
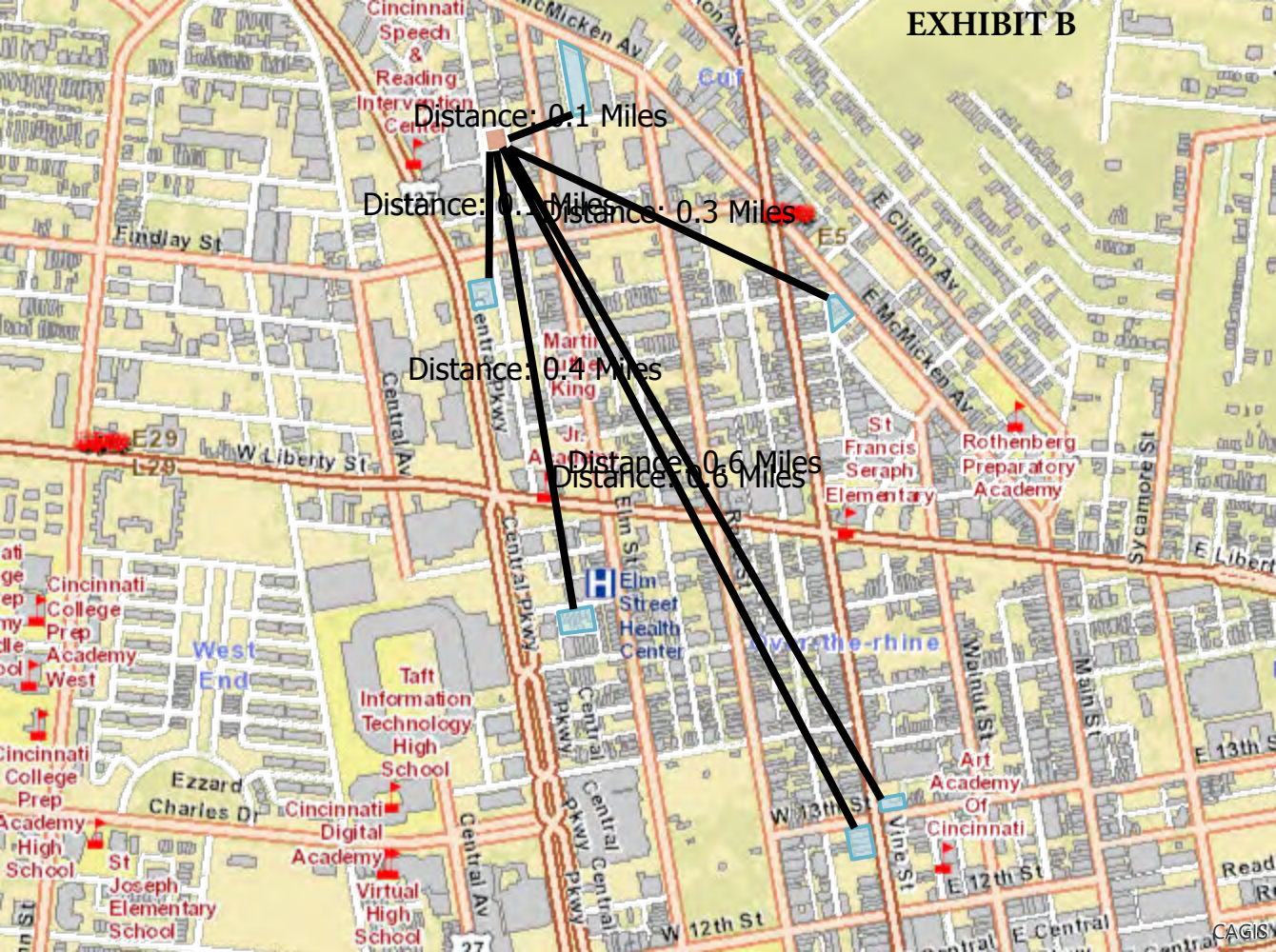


EXHIBIT B



Document Submission Requirements

AHFA

Details and applicability for all document submission requirements can be found in the QAP, and may be more stringent for other programs such as Bond Gap Financing.

HOW TO NAME AND ORGANIZATION THE APPLICATION SUBMISSION:

- Documents must be labeled using the following naming convention: "[Document#][Document Name]".
- Categories with multiple documents may be submitted in a folder that is named using the convention.
- All documents must be highlighted and annotated directing staff to relevant portions.
- Documents submitted in Adobe PDF format should be bookmarked. PDF "Portfolio" (which assembles multiple PDF documents into one file without merging them) should not be used.
- Unless specifically required by the QAP, supporting documentation may not exceed 25 pages per competitive section (not per competitive point category).
- The only original signature documents OHFA requires are documents that will be recorded, promissory notes, and HDAP funding agreements, none of these documents are due with the AHFA.

HOW TO SUBMIT THE APPLICATION:

- Unless otherwise communicated by OHFA in advance of the application deadline, all application materials must be submitted on a CD that is delivered to Ohio Housing Finance Agency, Development Division, 57 East Main Street, Columbus, Ohio 43215.
- For security purposes, OHFA will not accept submissions via an outside file transfer protocol, Google Drive, DropBox, etc..
- All submissions must include the respective application fee payable by check, money order, or ACH to the Ohio Housing Finance Agency. Project name must be included on the memorandum line of the check. If paying via ACH, applicant must contact OHFA for ACH instructions.

SKIP TO:

[Competitive 9% HTC Submission Requirements](#)[Non-Competitive 4% HTC Only Submission Requirements](#)[Bonds Only Submission Requirements](#)[Bond Gap Financing Submission Requirements](#)

COMPETITIVE 9% HTC				
See QAP for details				
Doc#	Document Naming Convention	DUE WITH		
		Proposal	Final	8609
1	Affordable Housing Financing Application (AHFA)	■	■	
2	Appraisal		■	
3	Architectural Plans & DCF Form	■	■	
4	Authorization to Release Tax Information		■	
5	Community Outreach Plan		■	
6	Competitive Support Documents (folder)	■		
7	Conditional Financial Commitments		■	
8	Condominized Space Description		■	
9	Development Team Consultant Statement	■		
10	Development Team Experience and Capacity Review	■		
11	Evidence of Site Control		<i>If changed</i>	
12	Exception Requests	■		
13	Federal Tax Identification Number Documentation		■	
14	Green Certification			■
15	HCGF Application (if applicable, AHFA tab)	■	■	
16	Legal Description (.docx format)		■	
17	LHTC Lease Addendum		■	
18	Limited Partnership Agreement			■
19	List of Changes from Proposal Application	■		
20	Management Company Capacity Review (AHFA tab)	■	■	
21	Market Study	■		
22	Notification to Statewide Accessibility Groups		■	
23	Ohio Housing Locator		■	
24	Phase I Environmental Site Assessment	■		
25	Phase II Environmental Site Assessment (if applicable)		■	
26	Physical Capital Needs Assessment & Scope of Work	■		
27	Proposal Summary PDF			
28	Public Notification		<i>If changed</i>	
29	Related Party Transaction Questionnaire		■	
30	Relocation Plan		■	
31	Rental Subsidy Contract	■	■	
32	Revitalization Plan	■		
33	Scattered Site Development Map	■		
34	Site Visit Documents	■		
35	Supportive Services Plan & Providers			■
36	Utility Allowance Information	■	<i>If changed</i>	
37	Zoning	■		

NON-COMPETITIVE 4% HTC ONLY				
See QAP for details				
(Not applicable for BGF application- see BGF section for those requirements)				
Doc#	Document Naming Convention	DUE WITH		
		Submission	8609	
1	Affordable Housing Financing Application (AHFA)	■		
2	Appraisal	■		
3	Architectural Plans & DCF Form	■		
4	Authorization to Release Tax Information	■		
5	Community Outreach Plan	■		
6	Conditional Financial Commitments	■		
7	Condominized Space Description	■		
8	Development Team Consultant Statement	■		
9	Development Team Experience and Capacity Review	■		
10	Evidence of Site Control	■		
11	Exception Requests	■		
12	Federal Tax Identification Number Documentation	■		
13	Green Certification		■	
14	Legal Description	■		
15	LHTC Lease Addendum	■		
16	Limited Partnership Agreement		■	
17	Management Company Capacity Review (AHFA tab)	■		
18	Market Study	■		
19	Multifamily Bond Financing Information	■		
20	Notification to Statewide Accessibility Groups	■		
21	Ohio Housing Locator		■	
22	Phase I Environmental Site Assessment	■		
23	Phase II Environmental Site Assessment (if applicable)	■		
24	Physical Capital Needs Assessment & Scope of Work	■		
25	Proposal Summary PDF	■		
26	Public Notification	■		
27	Related Party Transaction Questionnaire	■		
28	Relocation Plan	■		
29	Rental Subsidy Contract	■		
30	Scattered Site Development Map	■		
31	Site Visit Documents	■		
32	Supportive Services Plan & Providers		■	
33	Utility Allowance Information	■		
34	Zoning	■		

BOND GAP FINANCING				
See QAP for details				
Doc#	Document Naming Convention	DUE WITH		
		Proposal	Final	8609
1	Affordable Housing Financing Application (AHFA)	■	■	
2	Appraisal		■	
3	Architectural Plans & DCF Form	■	■	
4	Articles of Incorporation (nonprofits only)	■	■	
5	Audited Financial Statements (existing projects only)	■	■	
6	Authorization to Release Tax Information		■	
7	Board Resolution (nonprofits only)	■	■	
8	Community Outreach Plan		■	
9	Competitive Support Documents	■		
10	Conditional Financial Commitments		■	
11	Condominized Space Description		■	
12	Development Team Consultant Statement	■		
13	Development Team Experience and Capacity Review	■		
14	Evidence of Site Control		<i>If changed</i>	
15	Exception Requests	■		
16	Federal Tax Identification Number Documentation			■
17	Green Certification		■	■
18	Legal Description (.docx format)		■	
19	LHTC Lease Addendum			■
20	Limited Partnership Agreement			■
21	List of Changes from Proposal Application	■		
22	Management Company Capacity Review (AHFA tab)		■	
23	Market Study	■	■	
24	Multifamily Bond Financing Information			
25	Notification to Statewide Accessibility Groups			
26	Ohio Housing Locator			■
27	Phase I Environmental Site Assessment	■		
28	Phase II Environmental Site Assessment (if applicable)		■	
29	Physical Capital Needs Assessment & Scope of Work	■		
30	Proposal Summary PDF	■		
31	Public Notification (new units only)	■	<i>If changed</i>	
32	Related Party Transaction Questionnaire		■	
33	Relocation Plan		■	
34	Rental Subsidy Contract	■	■	
35	Scattered Site Development Map	■		
36	Site Visit Documents	■		
37	Supportive Services Plan & Providers			■
38	Utility Allowance Information	■	<i>If changed</i>	
39	Zoning	■		

BONDS ONLY		
See Bond Guidelines for details		
Doc#	Document Naming Convention	Submission
1	AHFA tabs:	■
	Proposal Summary	■
	Project Details	■
	Budget & Costs	■
	Development Team	■
	Multifamily Bonds	■
	Program Certification	■
2	Proposal Summary PDF	■
3	Public Notification	■
4	Capital Needs Assessment (Rehab Only)	■
5	Scope of Work (Rehab Only)	■
6	Project Executive Summary	■
7	Experience & Capacity	■
8	Statement of Development	■
9	Letter on Bond Structure	■
10	Calendar of Actions	■



2022-2023

Qualified Allocation Plan

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I. GENERAL OVERVIEW & REQUIREMENTS

The Housing Tax Credit (HTC) program is governed by Section 42 of the Internal Revenue Code (IRC). The Ohio Housing Finance Agency (OHFA) has developed a Qualified Allocation Plan (QAP) for the distribution of HTC.

A. MODIFICATION AND INTERPRETATION

OHFA's actions, determinations, decisions, or other rulings pursuant to this QAP are not a representation or warranty by OHFA as to a development's compliance with applicable legal requirements, the feasibility or viability of any development, or of any other matter whatsoever.

The QAP is subject to modification pending developments in federal, state, and OHFA policy. OHFA makes no representation that underwriting or competitive decisions from a prior year will be determinative in future application rounds. Identical year-over-year submissions may receive differing treatment, with or without notice to an applicant, due to new insights gained during prior review periods, shifts in policy, the need for consistent in-year interpretation, increased applicant competition, or any other reason OHFA deems necessary.

OHFA will clarify and issue responses to commonly posed questions regarding the QAP through a Frequently Asked Questions (FAQ) document that will be posted on the [OHFA website](#). The FAQ, as well as the OHFA Multifamily Underwriting Guidelines, Design and Architectural Standards, and Affordable Housing Funding Application (AHFA) are specifically incorporated herein and binding on all applicants. Notwithstanding the foregoing, errors and omissions in the AHFA are not binding on OHFA and do not modify the QAP.

The allocation of HTCs is made at the sole discretion of OHFA. OHFA will resolve all conflicts, inconsistencies, or ambiguities, if any, in this QAP or which may arise in administering, operating, or managing the reservation and allocation of tax credits. This includes the interpretation of requirements and guidelines and the determination of a development meeting the intent of those requirements and guidelines. OHFA may modify or waive, on a case-by-case basis, any provision of this QAP that is not required by law. All such modifications or waivers are subject to written approval by the Executive Director, Chief Operating Officer, or Director of Multifamily Housing.

B. APPLICATION PROCESS – COMPETITIVE HTC

1. Pre-Application Meeting (optional)

Applicant may request a pre-application meeting with OHFA according to the dates listed in the Program Calendar in the following circumstances:

- developer has not worked with OHFA in the past; or
- the proposed project is unique and the development team needs specific guidance on submitting the application.

2. Development Team Pre-Approval Process

Applicant submits an Experience & Capacity pre-approval form to OHFA as outlined in the Document Submission Requirements for Development Team Experience & Capacity Review by the date listed in the Program Calendar.

3. Development Team Pre-Approval Review

OHFA reviews pre-approval submissions and notifies applicants of their ability to move forward with the development team as proposed or of any deficiencies to be resolved.

4. Proposal Application Submission

Applicant submits a proposal application in accordance with the document submission requirements by the date listed in the Program Calendar.

5. Proposal Review

OHFA notifies applicants of deficiencies during the review process and provides one week to clarify. Apart from this clarification period or in response to specific request for information from OHFA, applicants may not communicate with OHFA Office of Multifamily Housing staff regarding their application during this time.

6. Pre- or Post-Award Site Visit

OHFA may conduct a site review and may remove the application from further consideration for detrimental land uses, or excessive development challenges (e.g., inadequate access, steep slopes).

7. Announcement of HTC Awards

OHFA announces award recipients on its website and by phone and/or in writing.

8. Final Application Submission

Applicants must submit a final and complete application, including all supporting documentation, by the deadline shown in the Program Calendar.

C. CONTACT INFORMATION

Questions regarding the QAP or HTC application process may be directed to QAP@ohiohome.org. General contact information for OHFA is as follows:

Ohio Housing Finance Agency
Office of Multifamily Housing, Development Division
57 E. Main Street
Columbus, Ohio 43215
888.362.6432
www.ohiohome.org

D. 2022 PROGRAM CALENDAR: COMPETITIVE HTC

Deadlines reflected in the following program calendar are subject to change based on the quantity of applications received and other conditions outside OHFA's control. Dates for the 2023 Competitive HTC Round will be released summer of 2022.

Dates	Applicant	OHFA
Oct. 29, 2021	Deadline for submission of CHDO Certification Pre-Application	
Nov. 2021		Application materials posted to the OHFA website

Nov. 2021		HTC training – details will be posted on the OHFA website
Dec. 1, 2021	Last day to request a pre-application meeting	
Dec. 3, 2021	Deadline to request approval for a Part 1 from the State Historic Preservation Office for historic tax credits (applicants seeking a Preliminary Determination the Part 1 utilizing the Checklist provided in Appendix E)	
Dec. 10, 2021		Decisions issued for CHDO Certification Pre-Application
Dec. 17, 2021	Last day pre-application meetings will be held	Last day pre-application meetings will be held
Jan. 7, 2022	Last day Development Team Pre-Approval forms may be submitted	
Jan. 14, 2022	Deadline to submit FAQ	
	Recommended deadline to commission market studies	
	Deadline to submit Exception Requests (program exceptions only)	
Jan. 21, 2022		Last date by which Development Team Pre-Approvals will be issued
Feb. 4, 2022		Decisions issued for Exception Requests
Feb. 10, 2022	Deadline to submit proposal applications, due no later than 5:00 p.m. ET	Consideration of public comments begins
Feb. 22, 2022		Proposal summaries posted to the OHFA website
		Competitive scoring, underwriting, and select site visits begin
April 1, 2022		Site visits conclude
Apr. 4, 2022		Notice of preliminary scores and underwriting issues sent to applicants
		Consideration of public comments ends
Apr. 11, 2022	Deadline to respond to preliminary scores and underwriting issues	
May 18, 2022		Final results of competitive scoring released and presented to the OHFA Board of Directors

May 20, 2022		Binding reservation agreements and notice of threshold deficiencies issued
May 25, 2022	Development Next Steps meetings begin	Development Next Steps meetings begin; Site visits begin
June 10, 2022	Deadline to return binding reservation agreements	OHFA begins scheduling Debrief Meetings
	Deadline to submit all cures for threshold deficiencies	
July 29, 2022	Development Next Steps and debrief meetings conclude	Development Next Steps and debrief meetings conclude
Sept. 23, 2022	Deadline to submit final applications, due no later than 5:00 p.m. ET	
Dec. 9, 2022		Final date for issuance of carryover agreements

E. 2022 PROGRAM CALENDAR: NON-COMPETITIVE (4%) HTC

Application windows reflected in the following program calendar apply to the Non-Competitive HTC application process (for projects seeking 4% HTC without OHFA gap financing only) and are subject to change based on the quantity of applications received. Applicants submitting an application for a reservation of Non-Competitive HTCs must also refer to the [Multifamily Bond program guidelines](#) for other requirements, where applicable.

Applicants must contact OHFA 45 days in advance of applying to schedule a pre-application meeting. OHFA may choose to waive the meeting.

Dates	Applicant
January 3-7, 2022	Applications due no later than 5:00 p.m. ET on January 7
April 4-8, 2022	Applications due no later than 5:00 p.m. ET on April 8
July 4-8, 2022	Applications due no later than 5:00 p.m. ET on July 8
October 3-7, 2022	Applications due no later than 5:00 p.m. ET on October 7

F. 2022 FEE SCHEDULE

OHFA will assess fees as described in in Appendix A. Fees may change without QAP amendment.

II. HTC REQUIREMENTS

The following requirements apply to all projects utilizing Competitive or Non-Competitive HTC, alone or in conjunction with other OHFA funding, unless otherwise specified. OHFA will consider exceptions only where specifically noted.

A. DOCUMENT SUBMISSION REQUIREMENTS

All proposal and final application submissions must include a completed Affordable Housing Funding Application (AHFA) and all supporting documentation according to the specified instructions and index and be submitted via OHFA's File Transfer Protocol (FTP) site.

The application submission must include supporting documentation for all competitive scoring criteria up to a maximum of 25 pages per competitive criterion section, (excluding Revitalization Plan and Supportive Services Plan) with relevant portions of the supporting documents highlighted and annotated.

The documentation below is also required at one or more of the following development stages:

- P = Proposal Application
- F = Final Application
- S = Application Submission
- 8609 = Request for IRS Form 8609

1. Appraisal

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include an as-is appraisal for all development site(s) which complies with all Appraisal Requirements in the OHFA Multifamily Underwriting Guidelines. An appraisal is not required if the applicant is not seeking Housing Development Assistance Program (HDAP) funds and is not including any acquisition costs in eligible basis.

2. Architectural Plans and Design & Construction Features Form

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include architectural plans for all development site(s) in accordance with the OHFA Design & Architectural Standards and a completed Design & Construction Features Form, including Construction Certification. Architectural plans must be submitted both in 11 x 17 hard copy and electronically.

Non-Competitive HTC only: OHFA may allow additional time for Non-Competitive HTC developments to submit 80% complete architectural plans and specifications. A review period of at least 60 days is necessary between the submission of 80% plans and the issuance of a 42m Letter of Eligibility.

3. Authorization to Release Tax Information

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Final applications must include a completed [Authorization to Release Tax Information Form](#) for the parent company of each member of the ownership entity, and if applicable, the parent company of the HDAP recipient.

4. Community Outreach Plan

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include a community outreach plan, documentation or other evidence that it was completed prior to submission, its exhibits, and the following components:

- **List of Stakeholders Notified.** May include but are not limited to residents, businesses, local elected officials, police and fire departments, community development corporations, and/or nonprofit community organizations.
- **Stakeholders Notification Method.** May include posting notices in libraries or other public spaces where residents or potential residents may frequent, public meetings, design charrettes, and/or notices in local papers and social media. Outreach notifications need not identify the population proposed to be served.
- **Copies of all Materials** placed or published, presentations or meeting materials, including any sign-in sheets from any public meetings, and support or opposition letters from community groups or contacts established through the outreach process.
- **Description of Stakeholder Feedback & Developer Response.**

5. Conditional Financial Commitments

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include financial commitment documentation for all non-OHFA permanent and construction sources of debt and equity plus any project-based rental subsidies.

a. Proposal Application: Financial commitments must be evidenced by a conditional commitment following the applicable OHFA format, letter of interest for construction and/or permanent financing, or term sheet specific to the project indicating the following:

- loan or grant amount;
- loan term; and
- interest rate.

Conditional equity commitment letters are not required at proposal application.

For any sources from a competitive or contingent source (e.g. city or county HOME funds,

Federal Home Loan Bank), the applicant must provide either

- a letter or other documentation from the funder detailing when the funding round will be open, the maximum awards available, and when funding decisions will be released, or
- a conditional commitment letter from the funding entity the minimum amount of funding it will provide to the project upon successful completion of regulatory reviews and funding availability.

Applicants must provide evidence of an alternative plan to fill the funding gap if unsuccessful.

b. Final Application: Financial commitments must be evidenced by a commitment letter indicating the following:

- loan or grant amount;
- loan term and amortization schedule/term (and/or payment requirements);
- interest rate;
- fees associated with the loan or grant;
- reserve requirements; and
- lien position of the loan.;

Conditional equity commitment letters are required.

The applicant must provide supporting documentation detailing the terms and conditions of any assumed or restructured debt including the current outstanding balance.

OHFA may request additional information to support any credit or equity pricing and may underwrite to the pool equity pricing average.

6. Condominimized Space Description

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

If any portion of the development will be condominimized, the application must include a brief description of the governing agreement (costs and maintenance of common space, parking availability, air rights, default remedies, commercial uses, and tenant selection).

7. Development Team Consultant Statement

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application must include a statement regarding any development consultant(s) describing:

- their role in the project;
- scope of their authority to negotiate for and bind the development team; and
- a summary of all projects they are currently advising and the scope of those agreements.

For the purposes of this section, development consultants include any person or entity providing professional advice or assistance with the preparation of an application to the HTC program, but do not include syndicators.

OHFA may consider consultants co-developers and hold them responsible for the overall success of the development.

8. Development Team Experience and Capacity Review

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

OHFA will evaluate the experience and capacity of the development team, including General Partners, developers, and development consultants at proposal application for Competitive HTC and BGF projects, and at final application for Non-Competitive HTC projects. OHFA will evaluate management companies at final application for all project types.

Appendix C: Experience & Capacity Characteristics outlines the minimum eligibility and evaluation criteria. Consultants may not be the only source of team experience.

For Competitive HTC only, all development teams must receive pre-approval from OHFA to submit a proposal application. OHFA will provide an Experience and Capacity Pre-Approval Form by October 15th and be made available on the [OHFA website](#). OHFA will accept completed forms on or before January 4, 2022 issue and issue approvals no later than January 24, 2022.

Submission Requirements:

- Completed Experience and Capacity tab in the AHFA.
- Professional bios for all staff members of the development team. Organizational charts that show the structure of the ownership entity, General Partners, development team, and consultants and the relationships and ranks of all relevant positions.
 - If planning to claim basis or developer fee boost for minority or women-owned business is the Majority General Partner in the ownership structure, submit documentation demonstrating eligibility
- Narratives describing development experience and work performed for each staff member of the development team.
- Any changes to the developer's staff that have occurred since the last HTC application round in which they competed.
- For General Partners that haven't placed into service a project in Ohio within the last five years, the previous four years of:
 - independently-prepared audited financial statements (if available);
 - internally-prepared annual balance sheets including changes in owners' capital and statement of cash flow ending on the last day of each year;
 - internally-prepared annual income statements ending on the last day of each year; and
 - a current internally-prepared accounts payable aging report.

The above will be for the parent companies if the General Partners are new entities.

Applicants must disclose changes to any development team between the proposal and final application. OHFA may disqualify applications that do not maintain the core competency and experience necessary to successfully develop and manage a project.

CHDOs only: Any member intending to become certified as a CHDO during the initial application phase must submit documentation indicating the CHDO will maintain effective development control; is the sole General Partner of the development; and will make the key

decisions regarding the selection, financing, improvement, management, and disposition of the development.

OHFA may request additional information to evaluate experience and capacity.

9. Evidence of Site Control

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application (proposal for Competitive HTC and BGF) must comply with the following. Any updates to site control documents must be submitted with the final application.

- a. **Related Party:** If the General Partner or limited partner owns the real estate, copies of the executed and recorded deed(s); or
- b. **Arm's-Length:** If the current owner is not a General Partner or limited partner, then:
 - a purchase contract or option;
 - a ground lease contract or option; or
 - documentation from the local government/land bank regarding the transfer of property.
 - If parcels will be acquired from a city land bank a copy of the final city council resolution, city council ordinance, letter from a board of control or designated official, or contingent purchase agreement approving the legal description and transfer of all applicable sites.
 - If parcels will be acquired from a county land bank a letter from the board of control or a designated official approving the transfer of all applicable sites.

Option agreements must include evidence of the agreement to purchase the property within a specified time period.

- c. **Ground Lease:** Any ground lease must be for a minimum term of 35 years. Evidence of site control may not expire until a reasonable period following the scheduled announcement date for Competitive HTC awards, or for Non-Competitive HTCs, at least 180 days from the date the application is submitted.

- d. **Scattered Site Developments:** Competitive HTC scattered site developments must have at least 35% of the sites under control at the time of proposal application. OHFA may reduce eligible basis when issuing a Carryover Agreement if the minimum site control percentage required at proposal application is not maintained. Non-Competitive HTC scattered site developments must have 100% of the sites under control at the time of application, including those seeking BGF.

10. Exception Requests

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

OHFA will consider exceptions only for those items specifically allowed under this QAP and represented in the Exception Request Form. Any response issued applies exclusively to the year in which the application was submitted and cannot be used for future applications.

For Competitive HTC, applicants must submit requests for exceptions to specific program requirements referenced in the QAP in advance of the proposal application. All other requests are due with the application.

11. Federal Tax Identification Number

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application must include the ownership entity's Federal Tax Identification Number.

12. Green Certification

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

All multifamily developments must obtain one of the energy efficiency or green building certifications outlined in OHFA's Design and Architectural Standards. Additionally, Competitive HTC applicants proposing New Construction developments must obtain one of the following energy efficiency or green building certifications:

- 2020 Enterprise Green Communities
- Leadership in Energy & Environmental Design (LEED) – silver or higher
- ICC 700 National Green Building Standard (NGBS) – silver or higher

Rehabilitation and adaptive reuse projects unable to obtain one of the above certifications may use the OHFA Limited Scope Rehabilitation Sustainability Standards as an alternative.

Competitive HTC projects selecting this option must also demonstrate:

- meeting or exceeding the higher of either the Overlay criteria or the current Ohio adopted standard; and
- post-construction blower door test 150% improvement over the pre-rehabilitation test, up to 12 ACH.

The request for IRS Form 8609 must include evidence of final certification from a HERS rater, green building certification organization, or otherwise qualified and licensed professional as approved by OHFA.

c. Heat Island: Developments with any buildings located in an area indicated as a “Severe” heat island on the [Urban Heat Island Severity map, as defined by The Trust for Public Land](#), must provide one or more of the following mitigations:

- 25% of available site green space must be tree canopy
- 2:1 Unit to parking space parking lot
- Cool Pavement parking lot and sidewalks
- Cool or green roof

13. Housing Credit Gap Financing Application

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Competitive HTC developments that will request Housing Credit Gap Financing (HCGF) must include a request in both the proposal and final applications that is consistent with the requirements outlined in the HCGF section.

14. Legal Description

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application must include a legal description, street address, and permanent parcel number in Word format of each parcel that will be included in the development.

15. LIHTC Lease Addendum

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application must include a written statement from the owner certifying use of the [LIHTC Lease Addendum](#) (other than units under a HUD model or USDA model lease).

16. Limited Partnership Agreement

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applicants must submit a copy of the Limited Partnership Agreement detailing the roles and responsibilities of each partner or entity at request for IRS Form 8609.

17. List of Changes from Proposal Application

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The final application must include a description of any substantive changes made to the development represented in the proposal, including but are not limited to changes in ownership or development team, design, construction or configuration, site(s) excluding scattered site developments, targeted populations including special needs populations, and any items affecting competitive scoring. OHFA must approve any changes.

18. Management Company Capacity Review

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The AHFA (final for Competitive HTC and BGF) must include a completed Management Company Capacity Review tab. Competitive HTC and BGF applicants will identify only the management company at proposal application.

19. Market Study

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include a market study conducted by an OHFA-approved market study professional updated or approved within 12 months of the application submission date. Refer to the Multifamily Underwriting Guidelines for OHFA's market study requirements.

All multi-site developments must be within the boundaries of a single Primary Market Area (PMA) other than the following exceptions:

- The market analyst determined that an entire county constitutes a single PMA.
- Scattered site Service Enriched developments that span multiple submarket areas if the Primary or Secondary Priority Letter specifies how supportive services will be provided in a manner that is accessible to all residents despite being geographically dispersed.
- Proposals seeking to combine multiple existing developments into one project for financing purposes with an explanation of the Sponsor and Management Agent's capacity to continue operating these properties under a single financing structure (may include documentation from other government entities giving permission to combine projects).

20. Multifamily Bond Financing Information

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Application must include a letter from the bond underwriter detailing:

- the bond financing structure,
- cost of bond issuance and terms,
- calendar outlining anticipated actions,
- responsible parties for closing the transaction, and either
 - the timeframe for approving OHFA-issued bonds (dates for inducement and final approval), or
 - for non-OHFA issued bonds, a preliminary or final bond resolution from the issuer and a letter from the bond underwriter identifying the anticipated interest rate, term, and amortization.

OHFA may require a legal opinion stating that the development is eligible to receive an allocation of HTCs pursuant to IRC Section 42(h)(4). Refer to OHFA's Multifamily Bond Guidelines.

21. Notification to Accessibility Groups (newly affordable units only)

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applicants proposing newly affordable units must notify all accessibility groups in the county of the proposal.

Applicants agree to accept referrals for prospective residents and consider design recommendations for the property. The application shall include copies of all correspondence between the applicant and accessibility groups.

If requested by an accessibility group, the applicant will provide the most current copy of the development's architectural plans prior to submitting the final application.

22. Ohio Housing Locator

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Owners must list properties on the [Ohio Housing Locator](#) (or other equivalent substitute at OHFA's direction) and new construction on the [Lead-Safe Rental Registry](#). Owners are responsible for keeping the property listings current.

23. Phase I and II Environmental Site Assessments

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include a Phase I Environmental Site Assessment (ESA) for all sites dated within six months prior to the application deadline completed in accordance with the most current ASTM Standard and include the following non-scope considerations: Mold; Asbestos-containing building materials; Radon; Lead-based paint; Lead-in-drinking-water; and Wetlands.

For scattered site projects not seeking HDAP funding, applicants may submit an [Environmental Questionnaire for Scattered Site Projects](#) for each site at proposal application. The Phase I ESA for each site is due at final application.

Owners must complete a Phase II ESA and/or additional testing if recommended in the Phase I ESA and submit the Phase II ESA at final application.

OHFA may reject any sites indicated to have environmental problems or hazards.

Competitive HTC and BGF only: Applicants may submit a Phase I ESA dated between six months and one year prior to the application deadline but must submit an update at final application.

24. Physical Capital Needs Assessment and Scope of Work (rehabilitation or adaptive reuse only)

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications for the rehabilitation of existing housing units and adaptive reuse must include a Physical Capital Needs Assessment (PCNA) and Scope of Work for all buildings. The PCNA must reflect current building conditions, conform to the standards in the Multifamily Underwriting Guidelines, and demonstrate the required repairs, replacements, and improvements involve the replacement of two or more major building components and the hard construction dollars of rehabilitation per unit equals \$40,000 or more.

OHFA will use the PCNA and AHFA to determine if the project meets the threshold requirement of substantial rehabilitation.

25. Proposal Summary (.PDF format)

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

The application shall include a copy of the Proposal Summary tab.

26. Public Notification

Competitive HTC			Non-Comp. HTC		BGF				
P	F	8609	S	8609	P	F	8609		

Applications must include evidence of completing the public notification process before OHFA approves any funds, including executing a Carryover Agreement.

An applicant requesting funds must provide the notice to any/all of the following that apply:

- The chief executive officer and the clerk of the legislative body of any municipal corporation in which the project is proposed to be constructed or that is within one-half mile of the project's boundaries;
- The clerk of any township in which the project is proposed to be constructed or that is within one-half mile of the project's boundaries; and
- The clerk of the board of county commissioners of any county in which the project is proposed to be constructed or that is within one-half mile of the project's boundaries.

The applicant must use the [OHFA letter template](#), and the notification must include all information requested, be in writing, and be sent via certified mail, return receipt requested. Applicants must submit a copy of the stamped post office receipt, return receipt not required, for certified mail and copies of notification letters with the proposal application. The name and address of the officials must be on the return receipts.

OHFA will accept public comments about proposal applications at any time and will consider public comments during the review process until the deadline indicated in the Program Calendar.

Scattered Site Developments: Scattered site developments must complete the public notification process for all sites. Public Notifications for any new sites must be sent to the applicable officials prior to submitting the final application.

27. Related Party Transaction Questionnaire

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Applications must include the [Related Party Transaction Questionnaire](#) for any transactions between related parties.

28. Relocation Plan (existing rental units only)

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Any development involving rehabilitation of occupied units that will result in permanent displacement must submit a complete [Acquisition, Relocation, and Demolition Questionnaire](#) and the Relocation Assistance Plan. OHFA may prohibit, limit, or mitigate any permanent displacement.

If a development will result in resident relocation during the construction period, the application must include a narrative detailing the tenant relocation plan addressing the method(s) for relocating residents, provide a breakdown of any associated costs, and identify if tenants will be permanently displaced.

29. Rental Subsidy Contract

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

If the development currently receives a rental subsidy, the application must include a copy of the current contract. OHFA may request a letter from the Metropolitan Housing Authority (MHA) / Public Housing Authority (PHA) with updated rental payment information.

If the development is seeking a rental subsidy, the application must include a letter or other evidence from the subsidy provider describing the process and timeline and verifying the project is eligible. For non-HUD and non-USDA subsidies, the letter must address the following:

- Whether the subsidy is project-based or tenant-based.
- What entity is providing the funding, under what program, and whether there are any pass-through entities.
- How likely it is for the subsidy to be guaranteed for fifteen years, the length of the contract, how often funding must be renewed, source of renewal (local levy, state budget appropriation, etc.), contingencies that are in place in the event of non-renewal, a past history of renewal attempts including how often a full appropriation has been approved, and any recent increases in program funding.
- Eligibility requirements for residents, their typical income sources (SSI, work, other benefits) and amounts, the current tenant pipeline and/or waitlist, including the number of individuals currently waiting to participate, and the referral process.
- Whether subsidy recipients must contribute a portion of their income to housing expenses (for example, does the program require tenants to pay 30% of their income towards rent and/or utilities).
- Any guarantees in place and how the project will be sustainable should the subsidy not be renewed.

Developments receiving a rental subsidy must provide an executed commitment to enter into a binding agreement at final application.

30. Revitalization Plan

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

To qualify for a set-aside or point category related to a revitalization plan, applicants must provide a copy of the concerted community revitalization plan (Revitalization Plan) and proof that the proposed development is located within its target area and consistent with the plan. Revitalization Plans must satisfy the substance of the components below.

The following are not eligible: draft plans, short-term work plans, consolidated plans, municipal zoning plans, planned unit developments, or plans OHFA determines were created in bad faith exclusively for the purposes of satisfying QAP criteria.

a. Scope: The Revitalization Plan must include a delineated target area and an assessment of the conditions existing in the community. If the Revitalization Plan is more than ten years old, the Applicant must also provide a supplemental letter or other evidence from the administrator describing progress made and confirming that the proposal continues to meet target area needs.

b. Community Input & Ownership: The Revitalization Plan must have been developed through a public process as evidenced by any of the following:

- creation of the Revitalization Plan by a Community Development Corporation; or
- adoption or endorsement of the Revitalization Plan by the local government; or
- proof of solicitation of public and stakeholder input.

c. Housing Policy: The Revitalization Plan must include:

- The incorporation and integration of affordable and other housing throughout the geographic area, including but not necessarily limited to the use of existing housing.
- The plans designed to accomplish the above.

d. Other Policy: The Revitalization Plan (or specifically referenced collateral plan) must address at least two of the following goals and the plans designed to accomplish them:

- expansion or preservation of economic activity and/or employment opportunities;
- expansion or preservation of access to public transit;
- improvement of schools that are accessible to residents of the target area; or
- mitigation or avoidance of adverse health conditions (such as lead-based paint hazards, environmental justice issues, and crime prevention).

e. Implementation Measures: The Revitalization Plan must include implementation measures which may include but are not limited to: general timeframes to achieve the above policies, potential funding sources, and entities responsible for execution. A final plan need not be fully implemented or have funding sources committed.

31. Scattered Site Development Map

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Proposals meeting the Scattered Site Definition & Requirements section criteria must provide a detailed map clearly identifying the location of all buildings and parcels considered for the application.

32. Site Visit Documents

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

Unless required at an earlier stage, OHFA may conduct a site review prior to final application submission and may deem the site unsuitable.

Applications must include:

- a detailed aerial map clearly depicting the physical location of the site, the nearest intersection, and all roads leading to the site; and
- photos of the site and surrounding properties.

33. Supportive Services Plan & Providers

Competitive HTC			Non-Comp. HTC		BGF		
P*	F	8609	S	8609	P	F	8609

a. Supportive Services Plans (SSP) are due no later than the request for IRS Form 8609 for all projects except the following, which are due with the proposal application:

- Service Enriched developments;
- Senior developments seeking points for Experienced Service Provider

b. Applications or requests for Form 8609 must include evidence of salaried or in-kind service coordination on-site, contiguous, or accessible to the development and linkages to information and resources appropriate to the population. All service coordinators must have a history of serving the targeted area or population.

c. The SSP must be unique to the development, identify the population served, be customized to that population and include the following:

- performance period and, if different, length of service coordinator's contract term;
- project service coordination funding amount and funding sources;
- methods to provide residents with information and referrals to all appropriate resources; and
- specific services to be provided, including
 - identification of partnerships with qualified service-provider agencies
 - methods to assess resident needs and develop a plan for service delivery
 - how transit will be provided to off-site services and referral entities
 - memorandum of understanding with all applicable local service providers
 - methods to monitor and evaluate service delivery and outcomes

d. Service Enriched developments may submit a plan accepted by the local Continuum of Care or HUD in place of the items specified above. The SSP is due at proposal application but local service provider agreements may be submitted upon request for IRS Form 8609. All SSPs for Service Enriched developments must address the following:

- Population(s) to be served and the experience that the supportive services provider(s) have serving the target population(s).
- Formal and informal methods that will be used to evaluate the success of the supportive services plan in meeting the individual needs of the residents, addressing overall issues of homelessness, and how this information will be conveyed to OHFA and other organizations.
- Methods to provide assistance in applying for Medicaid and other benefits to ensure the needs of residents are met.
- Methods to link residents to services not offered on-site.
- Physical characteristics of the site, design and/or location that will enhance the lives of residents.
- Sources of funding for all supportive services and how the supportive services will be sustained over the 30-year extended use period.

34. Utility Allowance Information

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

a. **Competitive HTC at Proposal / Non-Competitive at Submission:** Applications must include a utility allowance projection determined using any permissible or reliable calculation method.

b. **Final Application:** Applications must include utility allowance information consistent with IRS Regulation 1.42-10 and [OHFA's Utility Allowance Policy](#).

Properties with OHFA-awarded HOME funds cannot use the PHA estimate or other estimates that are not project-specific. HCGF applicants must follow those program requirements. OHFA will accept, but must approve the following:

- Utility Company Estimates
- HUD Utility Schedule Model
- Engineer's Energy Consumption Model, calculated by a properly licensed engineer or qualified professional

35. Zoning

Competitive HTC			Non-Comp. HTC		BGF		
P	F	8609	S	8609	P	F	8609

a. Applications must include either:

- a valid building permit
- a letter from the local municipality stating that either the current zoning will permit the proposed development or no zoning regulations are in effect.

Evidence must be dated within one year of the application due date.

b. For scattered site developments only, any sites added to the project after proposal

application must be identified in the final AHFA and applicable zoning documentation provided at final application.

c. OHFA may waive or modify zoning requirements for projects involving new construction that encounter an extreme and unforeseeable delay where final zoning approval was not granted due to circumstances beyond the applicant's control if the applicant can demonstrate

- correctly following the local zoning process,
- providing all necessary documents for local review, and
- giving adequate time for local consideration.

The exception request form must include a narrative describing the circumstances and a letter from the unaffiliated entity responsible for the delay describing the situation and the timeline for obtaining the appropriate approval. OHFA may require zoning either with the final application or prior to the release of funding decisions.

B. HTC PROGRAMMATIC REQUIREMENTS & OVERSIGHT

The following requirements apply to all HTC applicants unless otherwise specified.

1. Assisted Living

Competitive HTC	Non-Comp. HTC	BGF
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Affordable Assisted Living proposals are only eligible for the Non-Competitive HTC (non-BGF) program and must meet the requirements in the Multifamily Underwriting Guidelines.

2. Average Income Minimum Set-Aside

Competitive HTC	Non-Comp. HTC	BGF
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Applicants planning to elect the Average Income minimum set-aside must comply with the [Average Income Policy](#).

3. Broadband Infrastructure

Competitive HTC	Non-Comp. HTC	BGF
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All developments must install wireless broadband infrastructure in compliance with Federal Register 81 FR 31181 "Narrowing the Digital Divide through Installation of Broadband Infrastructure".

Installation must result in speeds in each unit (living or dining room and each bedroom) and all common areas meeting the Federal Communications Commission's (FCC's) definition in effect at the time of generating the pre-construction estimates. Owners are not required to pay for tenants' service but must provide free access in all common areas (exclusive of circulation space) through the Extended Use Period (does not apply to developments in areas that lack broadband service).

4. Competitive Application and Developer Award Limitations

Competitive HTC	Non-Comp. HTC	BGF
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a. Applicants and their related and affiliated entities may submit the following number of Competitive HTC applications and receive the following number of Competitive HTC allocations each year:

Type of Previous Experience	Number of Applications	Number of Awards
Applicant has never received Ohio 9% HTCs but meets the minimum eligibility requirements in Appendix C .	1	1
Applicant has received Ohio 9% HTCs and received Form(s) 8609 for at least one project in the past 10 years.	2	1
Applicant has received Ohio 9% HTCs and received Form(s) 8609 for at least two projects in the past 10 years.	3	2 (total credit allocation per applicant may not exceed \$2.5 million)
- Applicant has received Ohio 9% HTCs and received 8609s for at least three projects in the past 10 years.	4	2 (total credit allocation per applicant may not exceed \$2.5 million)
- Applicant has received Ohio HTCs and received 8609s for at least 5 projects in the last 10 years.	5	3 (total credit allocation per applicant may not exceed \$2,500,000)

The above application and award limits are inclusive of any projects on which an entity or individual is serving in a role of Development Consultant, Co-Developer, or other member of a development team.

OHFA will utilize information provided as part of the Experience and Capacity submission to determine eligibility and may request additional information.

b. Applicants submitting multiple proposals may provide a letter indicating their preferred rank. The ranking does not guarantee the highest ranked proposal(s) will be selected. If the applicant elects not to rank their proposals, OHFA will determine which will be awarded (if any).

5. Community Housing Development Organization (CHDO) Certification

Competitive HTC	Non-Comp. HTC	BGF
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An applicant seeking to participate in a development as a state-certified CHDO (will apply for the CHDO set-aside HOME funds from OHFA) must submit the CHDO Certification Application by the deadline indicated in the Program Calendar. OHFA will notify applicants of deficiencies prior to the proposal application deadline. The application must include a letter from the syndicator confirming that the CHDO has the financial capacity to provide the requisite project guarantees.

All CHDO requirements can be found on OHFA's [CHDO webpage](#). Questions and correspondence regarding CHDO certification may be directed to CHDOcertification@ohiohome.org.

6. Competitive Scoring

Competitive HTC	Non-Comp. HTC	BGF
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Applicants may not use the competitive review period to finish an application that was incomplete at the time of submission. OHFA will permit threshold cures for administrative errors only and may require proof the cure documentation existed on or before the application deadline. Applications selected for an award of HTCs will continue to the final application stage.

If a development has multiple sites and crosses scoring boundaries, regardless of whether it meets the definition of scattered site, the scoring category will be applied to the development area with the most affordable units unless otherwise stated.

7. Compliance with Multifamily Underwriting Guidelines

Competitive HTC	Non-Comp. HTC	BGF
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All requirements in the Multifamily Underwriting Guidelines are incorporated herein.

8. Cost Containment

Competitive HTC	Non-Comp. HTC	BGF
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OHFA will set the maximums according to the criteria below.

a. No later than two months prior to the application deadline, OHFA will post the maximum amounts per unit and/or per square foot for new construction vertical construction line items (hard construction costs, general requirements, builder's overhead, builder's profit, and contingency).

OHFA will determine the limits based on public input, recently submitted cost certifications, and third-party data. The posted limits will be higher for the following proposals:

- detached single family houses;
- within a central business district;
- public housing redevelopment; or
- four or more stories using steel and concrete;

OHFA may approve other limits prior to posting.

OHFA will determine the amount for rehabilitation cost line items on a per-project basis using the PCNA, scope of work, and contractor's cost estimate. **b.** OHFA will evaluate construction costs for adaptive re-use projects on a case by case basis.

c. OHFA will evaluate the appropriate amounts for other line-items (e.g., soft costs) based on:

- comparisons with other applications
- recently submitted cost certifications

- third party data, reports, and other input
- staff's professional judgment

Amounts outside the standard deviation may result in a requirement for the applicant to provide an explanation and/or the application being ineligible.

9. Design & Architectural Standards

Competitive HTC	Non-Comp. HTC	BGF
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All requirements in the Design & Architectural Standards are specifically incorporated herein.

10. Detrimental Land Uses

Competitive HTC	Non-Comp. HTC	BGF
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a. OHFA will not select New Affordability or Permanent Supportive Housing applications for developments sited adjacent to any detrimental land use or sufficiently close to impair residents' use. Detrimental land uses include:

- significant numbers of uncontrolled Blighted parcels
- high levels of noise and/or noxious odors
- land uses incompatible with residential occupancy (e.g. landfills, factory farming, etc.)
- others as determined by OHFA

Blighted has the same definition as in Ohio Revised Code §1.08.

b. Applicants may submit the following supplemental information to negate a finding of detrimental land use with the proposal application and/or following the site visit:

- A narrative explaining plans or strategies to mitigate or eliminate the adjacent conditions prior to the property being placed into service.
- If the site(s) are under third party control, documentation from the owner confirming the remedial plans and estimated completion time.
- If the site(s) are under land bank control and scheduled for demolition or renovation, documentation from the land bank proving their ownership confirmation of its corrective plan.

11. DevCo

Competitive HTC	Non-Comp. HTC	BGF
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OHFA may require HTC recipients to enter information into the DevCo reporting system.

12. Extended Use Agreement

Competitive HTC	Non-Comp. HTC	BGF
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All HTC developments will file a Restrictive Covenant provided by OHFA which waives the right of the owner to petition OHFA to have the extended use period terminated as described in Section 42 of the IRC.

13. Fraud, Waste, and Abuse

Competitive HTC	Non-Comp. HTC	BGF
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Documented instances of fraud, waste, or abuse may result in any action listed in the Penalties section and/or any other action OHFA deems necessary.

14. HUD 811 Project Rental Assistance Program

Competitive HTC	Non-Comp. HTC	BGF
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Applicants will commit at least 10% or five units in the proposed development to participation in the Section 811 Project Rental Assistance Program upon OHFA request. (The applicable requirements may result in fewer units.) OHFA will select developments based on need and demand. This commitment does not guarantee selection. OHFA will prioritize applications with general occupancy/non age restricted units.

15. Non-Competitive HTC Requirements (additional)

Competitive HTC	Non-Comp. HTC	BGF
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Specific requirements of the Multifamily Bond Financing program are provided in the most current [guidelines](#).

a. Application Submission: OHFA accepts applications for Non-Competitive HTC (non-BGF) on a quarterly basis in accordance with dates in the [Program Calendar](#). Applicants must contact OHFA at least 45 days prior to the submission date to schedule a meeting with staff.

b. Application Review: OHFA will notify applicants of any underwriting or threshold deficiencies and will allow two calendar weeks to correct the items. After the applicant has responded to any deficiencies, OHFA will continue to communicate with the applicant to resolve any outstanding issues for two additional weeks. After the second two-week period OHFA may reject the application.

c. HTC Reservation: OHFA will determine the amount of Non-Competitive HTCs and conditions for final award. OHFA will not evaluate any subsequent changes to the project until the request for Form(s) 8609.

16. Penalties

Competitive HTC	Non-Comp. HTC	BGF
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Violations of QAP, missed deadlines, failure to honor commitments made in the application process, or other instances of noncompliance with OHFA requirements may result in any or all of the following non-exhaustive sanctions:

- Reduction in the number of applications an entity may submit or awards an entity may receive in future funding cycles.
- Removal from application consideration (if during current application round)
- Cancellation or reduction of an award.

- Prohibition from participation in OHFA funding programs.
- Permanent or temporary prohibition from participation in one or more OHFA programs.
- Removal from a position of Good Standing for a period of one year or more, resulting in permanent or temporary prohibition from participation in all OHFA programs.
- Monetary fee in an amount to be determined by OHFA.
- Reduction in the developer fee in an amount to be determined by OHFA.
- Referral for independent cost audit (commissioned by OHFA but paid for by the owner/developer).
- Referral to internal staff for additional physical inspection/site visit.

17. Resyndication

Competitive HTC	Non-Comp. HTC	BGF
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- Developments with a previous Competitive HTC allocation may not compete for another allocation of Competitive HTC until ten years after the end of the Compliance Period.
- Developments with a previous Competitive HTC allocation may seek Non-Competitive HTCs one year after the end of the Compliance Period if the application demonstrates a need for replacement of major building components which exceed the available resources in the replacement reserve accounts.
- Developments that received a previous Non-Competitive HTC allocation may apply for Competitive or Non-Competitive HTC at the end of the Compliance Period.

18. Scattered Site Definition & Requirements

Competitive HTC	Non-Comp. HTC	BGF
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A development qualifies as scattered site if there are 10 or more sites and 50% or fewer are contiguous. Scattered site developments cannot include non-HTC/market rate units.

Applicants must adhere to requirements in the Architectural Plans, Market Study, Public Notification, Site Visit Documents, and Scattered Site Development Map sections.

19. Scoring Reassessments

Competitive HTC	Non-Comp. HTC	BGF
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OHFA will reassess applications with a reservation of Competitive HTCs at final application and again upon request for IRS Form 8609. Applications must maintain all elements and features of the proposal application regardless of whether elimination would affect scoring or ranking, including cost increases and unit configuration changes. OHFA may assess any sanction listed in the Penalties section for failure to conform to the preceding.

20. Tenant Protections

Competitive HTC	Non-Comp. HTC	BGF
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- a. The ownership entity and management agent will:
- expressly include reasonable accommodations in the application for tenancy;
 - not ask applicants/residents for medical or other protected information unless and only to the extent legally necessary (e.g., processing reasonable accommodations);
 - use standard leases with the same rights available to, and responsibilities expected of, all households, including duration of tenancy (cannot be transitional);
 - ensure participation in any supportive services is entirely voluntary (not a formal or implied condition of occupancy); and
 - not give a preference based on either disability type (actual or perceived) or being a client of a particular provider.
- b. As an exception to subsection (a) above, projects may give preference to disabled families who need services offered in accordance with the following:
- The preference is limited to the population of families (including individuals) with disabilities that significantly interfere with their ability to obtain and maintain themselves in housing.
 - Who, without appropriate supportive services, will not be able to obtain or maintain themselves in housing and for whom such services cannot be provided in a nonsegregated setting.
 - Residents will not be required to accept the particular services offered.
 - The owner may advertise the project as offering services for a particular type of disability however the project must be open to all otherwise eligible persons with disabilities who may benefit from services provided.

The application must include a letter representing the project will meet the criteria in this subsection (b). The letter must be from either a Continuum of Care or other public entity (e.g., Mental Health and Recovery system board, local child welfare system of care) which has no affiliation with any member of the Development Team

- c. The ownership entity's members/partners, the management agent, and affiliates thereof may not engage in medical, therapeutic, or other activities regulated by the U.S. Centers for Medicare & Medicaid Services with respect to the residents.

C. DEVELOPER COSTS AND FEES

1. Development Support Budget

The "Development Support Budget" is defined as the developer fee, as calculated below, plus the total of all application or development consultant fees, construction management fees, guarantee fees, developer asset management fee and any financing fees charged by the developer. OHFA may add other fees to the calculation as appropriate.

For Competitive HTC projects, the maximum Development Support Budget is \$1,750,000.

2. Competitive HTC Developer Fee Calculation

The base developer fee plus the developer fee supplement represent the maximum amount.

The base developer fee for all Competitive HTC applications is calculated as follows:

Pool	Developer Fee
New Affordability	\$30,000 per affordable unit
Preserved Affordability	30% of rehabilitation hard costs
Service Enriched Housing	\$30,000 per affordable unit

The following activities will supplement the base developer fee by \$75,000, however they will not count toward the \$1,750,000 maximum Development Support Budget.

Activity
New Affordability developments with at least 25% extremely low income (ELI) units
State-certified CHDO
Development required by law to pay prevailing wage rates (the application must contain proof)
Developments leveraging State or Federal Historic Tax Credits
A Minority or Women-Owned Business is the Majority General Partner in the ownership structure

Developer fees for Competitive HTC applications will be locked in at proposal application and may not increase.

Applicants must show that any deferred developer fee can be paid in full from development cash flow within the first 15 years.

3. Non-Competitive HTC Developer Fee Calculation

Developer fee shall be no more than 25% of the total acquisition, rehabilitation, and new construction eligible basis. The developer fee itself is not included in this calculation. Developer fees in excess of 20% must be deferred or a capital contribution (included in the sources of permanent financing). All cost containment must be satisfied inclusive of developer fee.

D. 6-2-6: CONTRACTOR COST LIMITS

The maximum amount of the contractor's fee is locked in at either (a) final application or (b) execution of the signed general contractor agreement by delivering a copy of that agreement and a lock-in request to OHFA within 30 days of execution. This amount cannot increase. There is no obligation to decrease the amount if final hard construction costs are lower.

E. BASIS BOOST POLICY

1. Codified Basis Boost

Developments located in a Difficult Development Area (DDA) or Qualified Census Tract (QCT) are eligible for an increase of up to 130% of the eligible basis.

2. Discretionary Basis Boost

The following development types are eligible for a 130% basis boost:

- competing in the Service Enriched Housing pool;
- located in a High or Very High Opportunity census tract as designated by the USR Opportunity Index; or
- located in Moderate USR Opportunity Index areas that also have a Strong Growth or

higher Community Change Index rating.

The following development types are eligible for a 115% basis boost:

- competing in the Rural and Preserved Affordability pools;
- New Affordability in which 25% or more of units are affordable to ELI households; or
- a Minority or Women-Owned Business is the Majority General Partner in the ownership structure.

F. LIMITS ON HOUSING CREDIT GAP FINANCING FUNDS

Competitive HTC applicants may seek one HCGF source at the time of proposal application:

1. Ohio Housing Trust Funds (OHTF)

The following development types are eligible to request up to \$300,000 of OHTF:

- Service Enriched developments
- New Affordability family housing developments located in a High or Very-high Opportunity Census tract
- a Minority or Women-Owned Business is the Majority General Partners in the ownership structure

2. HOME Funds

Applications in any pool may request up to \$600,000 in HOME funds if “sponsored” by a state-certified CHDO. OHFA will consider projects with a prior HDAP award on a case-by-case basis following the submission of an Exception Request Form.

G. ACCESSIBLE DESIGN

1. Universal Design

All HTC developments must incorporate all mandatory Universal Design components, as outlined in Appendix D, and either

- 10 additional in 50% of units or
- 5 additional in 100% of units.

2. 504 Units

At least 10% of units in Competitive HTC developments must meet the 504 requirements defined in the Design & Architectural Standards.

III. HOUSING POLICY POOLS AND COUNTY LIMITS – COMPETITIVE HTC

OHFA will distribute the annual per capita amount among the following allocation pools.

Pool	Allocation Amount
New Affordability: Central City	26% (approx. \$7.7 million)
New Affordability: Metro/Suburban	23% (approx. \$6.7 million)
New Affordability: Rural	17% (approx. \$5.0 million)
Preserved Affordability	20% (approx. \$5.8 million)
Service Enriched Housing	14% (approx. \$4.0 million)

The maximum credit request per application is as follows:

New Affordability: Central City Pool and Metro/Suburban Pool: \$1,250,000

All Other Pools: \$1,000,000

In the event that Congress authorizes an increase in 9% HTC allocations, OHFA may revise the allocation amounts.

A. NEW AFFORDABILITY

Applications in which the majority of units propose new construction or renovation of existing structures creating units that are newly affordable, meaning not previously rent- or income-restricted or occupied, may compete in one of the New Affordability pools. Renovation of existing structures must be in the form of either:

- adaptive reuse of a building not originally designed or built for residential purposes, or
- renovation of a building which may have been previously used for residential purposes but has been 100% vacant for at least three years.

Presuming sufficient requests among eligible applications, OHFA will award at least 35% of New Affordability HTCs to family or senior proposals (neither will receive more than 65%).

1. Set-Aside: Non-R/ECAP

For each of the three geographic Pools, OHFA will award at least one housing development outside of a HUD-defined Racially- or Ethnically-Concentrated Area of Poverty (R/ECAP) meeting all of the following criteria:

- The proposed development is located in a High or Very High Opportunity or Moderate Opportunity Census tract (the latter must also have a Community Change Index rating of Strong Growth or Growth).
- The proposed development will not be restricted to occupancy by persons 55 years of age or older.
- No more than 35% of affordable units may be one-bedroom and/or efficiencies.
- 5% of all affordable units must be three-bedroom or larger and also be affordable to those earning 60% AMI or less.

2. Set-Aside: Revitalization Area

For each of the three geographic Pools, OHFA will award at least one housing development in a

QCT meeting all of the following criteria:

- In an area subject to a Revitalization Plan as defined in Section II(A)(30).
- The proposed development is not located in a High or Very High Opportunity Census tract.
- The proposed development will not be restricted to occupancy by persons 55 years of age or older.
- No more than 35% of affordable units may be one-bedroom and/or efficiencies.
- 10% of all affordable units must be three-bedroom or larger and also be affordable to those earning 60% AMI or less.

3. Set-Aside: Single Family Development

OHFA will award one development in the Central City Pool involving the new construction of single family homes or townhomes, including but not limited to those intended for eventual resident ownership.

4. Set-Aside: Appalachian County

OHFA will award two developments in the Rural Pool located in one of the 32 Appalachian counties as designated in the Appalachian Regional Development Act of 1965, as amended.

B. PRESERVED AFFORDABILITY

Includes applications in which the majority of units preserve existing affordability by maintaining project-based subsidies or Year 30 HTC developments.

1. Set-Aside: RAD Conversion

OHFA will award one housing development that is approved by HUD to proceed with either a RAD or RAD for PRAC conversion as demonstrated by a formal federal commitment. A majority of units must maintain existing project-based subsidies through a HUD program.

2. Set-Aside: USDA Subsidy Preservation

OHFA will award one housing development with a majority of units maintaining existing project-based subsidies through a program administered by USDA Rural Development.

C. SERVICE ENRICHED HOUSING

1. Minimum Requirements

Proposed developments must meet the State of Ohio [Permanent Supportive Housing definition](#) and meet all of the following criteria:

a. Serve target populations at or below 30% AMI with a disability, as defined in the Interagency Council on Homelessness and Affordable Housing [Permanent Supportive Housing Policy Framework](#) and, as evidenced by one of the following factors set forth in [HUD Coordinated Entry Notice CPD-17-01: Section II.B.3](#):

- significant challenges or functional impairments, including physical, mental, developmental, or behavioral health challenges, which require a significant level of support in order to maintain permanent housing;
- high utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities;
- vulnerability to illness or death;
- high risk of homelessness; and/or
- vulnerability to victimization, including physical assault, trafficking, or sex work.

b. A minimum of 50% of the total affordable units in the development must have a commitment for rental subsidy.

c. The majority General Partner(s) must be a nonprofit organization with experience developing, owning, or managing permanent supportive housing.

d. Has support from the applicable Continuum of Care (CoC) through either a primary or secondary priority letter:

- demonstrating that the CoC believes the project can prevent homelessness;
- summarizing what, if any, relationship the development will have with the CoC regarding the coordinated entry system, referral services, and data sharing; and
- confirming there is sufficient market demand for the project in its defined market area.

2. CoC Priority

The applicable CoC shall designate a primary and may designate a secondary priority by indicating the rank of each. CoCs have explicit authority to:

- prioritize projects that meet OHFA's minimum requirements in any manner they determine, and
- impose more restrictive population or eligibility criteria.

3. Set-Aside: Balance of State/Small CoC

At least one award will be in Canton/Stark, Youngstown/Mahoning, Lucas County, or the Balance of State Continuum of Care.

D. STRATEGIC INITIATIVES

After reserving the majority of credits in each pool based on the results of the competitive scoring process, the remaining credits in the pool will be reserved for Strategic Initiatives funding. OHFA will award a minimum of \$1,000,000 through Strategic Initiatives.

Proposals must apply for consideration in one of the above allocation pools and meet all threshold criteria.

OHFA will give priority selection consideration to each of the following:

- Proposals that address priority housing needs evidenced in the most recent Housing Needs Assessment.
- Proposals meeting a quantifiable need and targeting policy and/or geographic areas left underserved through the competitive selection process, including but not limited to meeting OHFA's CHDO set-aside obligation.
- Proposals that assist Ohio in meeting our obligation to Affirmatively Further Fair Housing including but not limited to projects that enhance mobility strategies and encourage development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization.
- Resubmitted applications that met all threshold and minimum scoring criteria for funding in a prior round but did not receive an award due to competitive rankings.
- Proposals with a significant community and population impact, including historic, adaptive reuse, mixed-use and mixed-income developments

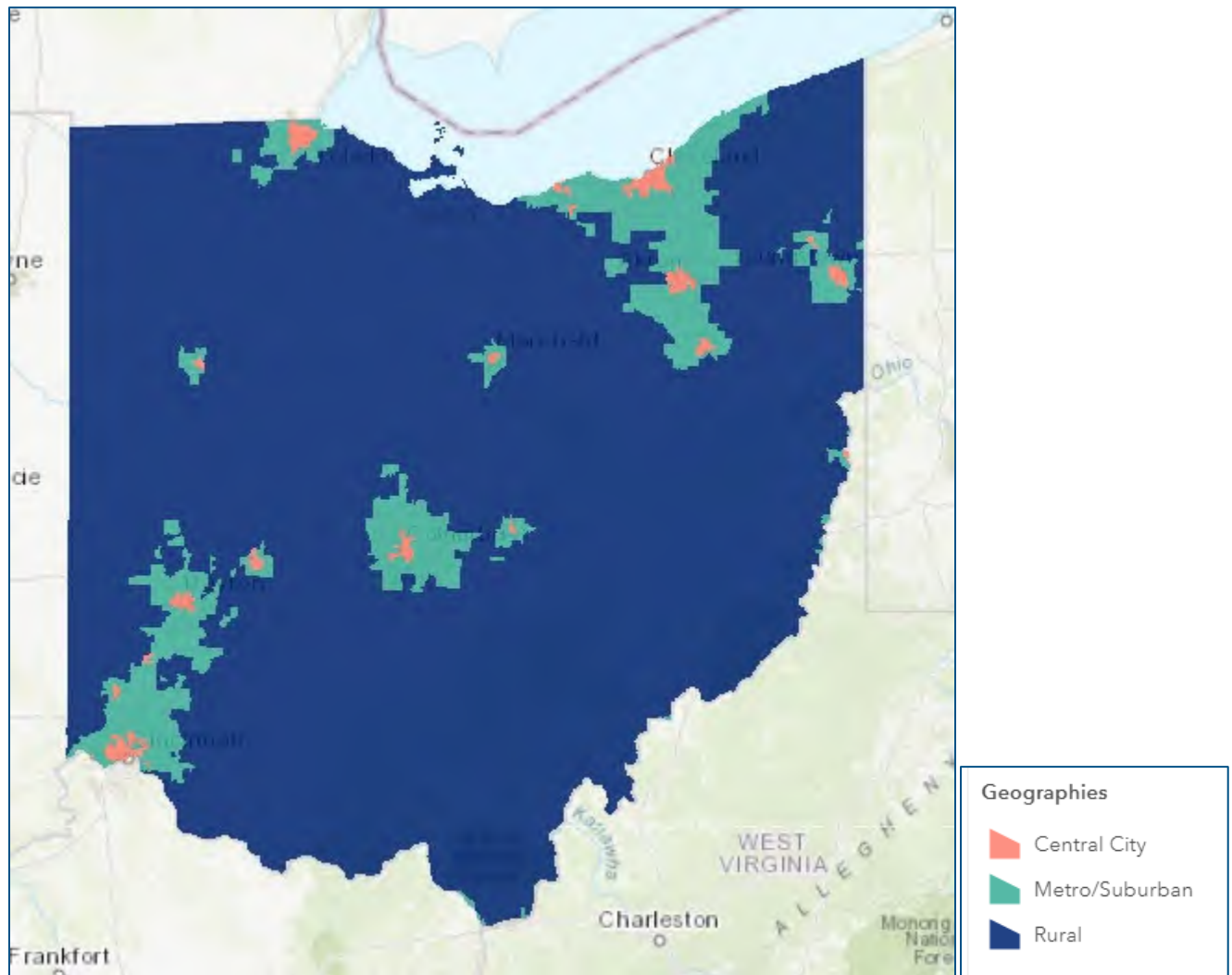
E. COUNTY LIMITS

OHFA will make no more than the following awards per county. If applications across multiple Pools would qualify for awards in excess of these limits, OHFA will base the order on how each placed in its respective competition.

- Seven: Cuyahoga, Franklin
- Five: Hamilton
- Three: Summit, Montgomery, Lucas
- Two: Butler, Stark, Lorain
- One: all others

F. GEOGRAPHIC DEFINITIONS

An interactive map showing Central City, Metro/Suburban, and Rural Pools is available at: <https://arcg.is/0a0yij>. The typologies are based on the USR Opportunity Index map created in partnership with the Kirwan Institute.



IV. COMPETITIVE CRITERIA

The point values for scoring criteria are unique to each allocation pool to account for policy considerations. An application must achieve at least 70% of the total available points in the applicable pool to be considered for an award of Competitive HTCs. OHFA will not award partial points. All distance-based scoring criteria are measured in linear distance and are verified in Google Maps.

The following tiebreakers apply in the event two applications have the same score:

1. The development located in the census tract that has received the fewest number of Competitive HTC awards over the past three years.
2. Opportunity Index ranking for New Affordability applications; percentage of project-based rental assistance preserved for Preserved Affordability applications.
3. OHFA discretion.

A. NEW AFFORDABILITY

The following scoring criteria will be applied to proposals competing in the New Affordability pool.

Scoring Category	Max Points Available
Local Partner or In-State Experience	10
Resident Amenities	5
Income Diversity	10
Housing Need	10
Credits Per Affordable Unit	5
Leverage	15
New Affordability Pool Priorities	35
TOTAL:	90

1. Local Partner or In-State Experience

Maximum Points: 10 (select one)

a. Local Nonprofit Partner: The development will include a local nonprofit that can demonstrate a history of providing housing in the target area. The organization must have at least 25% General Partnership interest in the ownership of the proposed development. OHFA may consider for-profit entities that are controlled by nonprofit parent organization.

b. Housing Authority Partner: The development will include a local MHA that has 51% General Partnership interest in the ownership of the proposed development and owns the land the project will be located on.

c. CHDO Partner: The development will be owned, developed, or sponsored by a community-based housing development organization currently serving the area that was certified as a CHDO by OHFA during the application phase and is requesting HOME funds from OHFA as part of the proposal.

d. In-State Experience: The developer has a General Partnership interest in five Ohio HTC properties (including Non-Competitive) placed in service in Ohio in the last ten years. OHFA

may consider affiliated entities.

2. Resident Amenities

Maximum Points: 5 (select one)

a. Exercise & Wellness: Development will include one of the following specific to the population being served:

- Onsite fitness area with equipment specific to the total number of units.
- Onsite health clinic or wellness suite in a property with a service coordinator on-site at least 10 hours per week.
- Partnership with an off-site fitness or recreation facility to provide access for the development's residents at no charge for a minimum of five years. The facility must be located within five miles of the development.

b. Design Features: Development will include one or more of the following:

- 1 point- Dishwasher and garbage disposal in all units.
- 2 points- Washer/dryer hookup in all units.
- 2 points- Lease Addendum allowing for pet ownership.
- 2 points- Interior and exterior security cameras.
- 5 points- Private patio or balcony for at least 20% of units.
- 5 points- Additional storage space for at least 50% of units.
- 5 points- Parking enclosed within walls/fencing and either locked, monitored by security personnel, or monitored via electronic surveillance.

The additional storage space must be tenant storage lockers within the building or in-unit space (24 inches deep, 36 inches wide, 84 inches high) in addition to one closet per bedroom, a coat closet, and a linen closet.

3. Income Diversity

Maximum Points: 10 (select one)

a. ELI Targeting: Developments that will commit to the following minimum percentage of all affordable units being occupied by and affordable to households at or below 30% AMI:

- 20% in Central City
- 15% in Metro/Suburban
- 10% in Rural

b. Project-Based Rental Subsidy: Developments that have a commitment of project-based rental subsidy for a minimum of 15% of the units from the local housing authority or transferred housing assistance contracts through HUD. If PBRA is transferred, no more than 50% of the total units in the development can be covered by the contract.

c. Market Integration: Developments that promote economic integration by providing at least 5% of units that are not income restricted and the market study shows the market rents are at least 110% of the applicable HTC rents.

Market rate units must be distributed proportionately throughout each building, floor, and bedroom/bath mix and type. Both market rate and affordable units must have the same design regarding unit amenities and square footage.

4. Housing Need

Maximum Points: 10

a. Percent of Very Low-Income (VLI) Households: Developments located in a census tract with a high percentage of VLI households, as shown in the applicable QAP Interactive Map.

- 30% – 48% = 1 point
- > 48% – 66% = 3 points
- Greater than 66% = 5 points

b. Underserved Counties: Developments located in a county where the volume of HTC per capita is less than what the county would have received if allocations were based solely on population size, as shown in the applicable QAP Interactive Map.

- Greater than 2 = 1 point
- > 1.5-2 = 2 points
- > 1 – 1.5 = 3 points
- > 0 – 1 = 4 points
- 0 = 5 points

5. Credits per Affordable Unit.

Maximum Points: 5

Developments requesting HTC of less than the following per affordable unit.

- \$24,000 = 5 points
- \$25,000 = 3 points
- \$26,000 = 1 point

6. Leverage

Maximum Points: 15

a. Only loans of or from the following will qualify:

- HOME from a local participating jurisdiction;
- CDBG from a local participating jurisdiction;
- Federal Home Loan Bank Affordable Housing Program;
- established local government housing programs;
- public housing authority resources;
- CDFI Fund awards through the Capital Magnet Fund, New Markets Tax Credit Program, or CDFI Program
 - These funding sources are permitted to be provided to a project in which the general partner or its parent company has been awarded one of the above directly by the CDFI Fund.
- philanthropic charitable organizations registered in Ohio.

Equity invested for historic rehabilitation tax credits also will qualify if the application includes a letter both adequately documenting calculation of the amount and reflecting the current market price. For scoring purposes, OHFA may disregard a source affiliated with the developer (excluding public housing authorities).

b. Loans(s) must be listed as a loan in the full application with:

- an interest rate of no more than 2%,
- amortization of at least 20 years, and
- no commercially unreasonable fees.

c. OHFA will calculate the total amount of qualifying funds committed per total unit (excluding one for an employee) and award points based on the following amounts:

	Central City	Metro/Suburban	Rural
15 points	\$15,000/unit	\$9,000/unit	\$6,000/unit
10 points	\$10,000/unit	\$6,000/unit	\$4,000/unit
5 points	\$5,000/unit	\$3,000/unit	\$2,000/unit

For scoring purposes, OHFA will reduce the amount from a local government by the cost of any land to be sold to the ownership entity by that local government.

7. New Affordability Priorities

Maximum Points: 35

a. **Transit:** OHFA will award points based on the following Center for Neighborhood Technology's Transportation Connectivity Index (TCI) as shown in the applicable QAP Interactive Map. "Free Rides" are defined in two ways:

- Development-provided transportation: (Option 1) Transportation services are provided by the development (funded by development or partner organization) at no charge to the residents, and available to residents at least five times per week.; or
- On-Demand Service: (Option 2) Transportation is available to residents on an on-demand basis, coordinated by the property, and provided at no charge or reduced charge for residents.(5 points)

Available Points	Central City	Metro/Suburban	Rural
1 point	TCI Score = 1-2	TCI Score = 1	N/A
3 points	TCI Score = 3-5	TCI Score = 2	TCI Score = 1 or Free Ride Option 1
5 points	TCI Score = 6 or higher	TCI Score = 3 or higher	TCI Score = 2 or Higher or Free Ride Option 2

b. **Number of Bedrooms. (Family Only):** For family properties, 15% of units must be three or more bedrooms. (5 points)

c. **Proximity to Amenities:** Development is located within a linear distance listed below to positive land uses and amenities as defined below (10 points total):

- Full service supermarket with fresh produce (3 points)
- Pharmacy (2 points)
- Medical clinic (1 point)
- Public recreation center (1 point)
- Public park (1 point)
- Public library (1 point)
- Public elementary, middle, or high school (1 point)

Distance	Central City	Metro/Suburban	Rural
Miles	1	2	5

Only one establishment in each amenity category will count.

Applicants must use the applicable QAP Interactive Map. Applicants may submit an establishment that falls into one of the above amenity categories but is not included in the QAP Interactive Map for point consideration; OHFA will determine if it qualifies; expanded definitions can be found on OHFA's [website](#).

The majority of sites in a scattered site development must meet the criteria to claim points.

e. Low Poverty Area: Developments located in census tracts with a poverty level of either 15% and below or 10% and below, as shown in the applicable QAP Interactive Map.

Central City

- Poverty rate of 30% and below = 3 points
- Poverty rate of 20% and below = 5 points

Metro/Suburban and Rural

- Poverty rate of 15% and below = 3 points
- Poverty rate of 10% and below = 5 points

f. Job Access: Development will be located in an area meeting either of the following:

- Within a linear distance as defined below of 3,000 or more jobs. Map may be found at <http://onthemap.ces.census.gov/> (select 2018 data)
 - 3,000 – 3,999 jobs = 3 points
 - 4,000 – 4,999 jobs = 4 points
 - 5,000 and greater jobs = 5 points

Distance	Central City	Metro/Suburban	Rural
Miles	1	3	5

- In a census tract with an Entry Level Job Index score of at least 0.50 as defined in the applicable QAP Interactive Map.
 - 0.5 – 0.99 = 3 points
 - 1.0 – 1.5 = 4 points
 - Above 1.5 = 5 points

g. Neighborhood Revitalization (Family Only): Development is located in an area that meets both of the following criteria (Rural applications can choose one of the following criteria) (5 points):

- Within two miles of real estate development and/or community development investments of at least
 - \$10,000,000 completed in calendar years 2019, 2020, and/or 2021, and
 - \$10,000,000 planned and committed for calendar years 2022-2024.
- Within the area of a Revitalization Plan dated within the past ten years which:
 - is geographically specific,
 - outlines a clear plan for implementation and goals for outcomes,
 - includes a strategy for applying for or obtaining commitments of public or private investment (or both) in non-housing infrastructure, amenities, or services, and
 - demonstrates the need for community revitalization.

The points in subsections 8(g) and 8(h) are mutually exclusive; applicants may request consideration under only one.

h. Opportunity Area (Family Only): Development is located in an area that meeting the following criteria (5 points):

- Very High Opportunity Area = 5 points
- High Opportunity Area = 4 points
- Moderate Opportunity Area = 3 points
- Low Opportunity Area = 2 points
- Very Low Opportunity Area = 1 point

i. CORES or Experienced Service Coordinator (Senior Only):

Maximum Points: 5 (for one)

- The General Partner will be a Certified Organization for Resident Engagement & Services (CORES) entity prior to the first building placing in service or will contract with a third-party CORES entity for the duration of the compliance period.
- Developments demonstrating a commitment by an experienced local or regional service entity to coordinate appropriate services on-site at least 15 minutes per unit per week for the duration of the compliance period. The service coordinator must have a history of serving the targeted area. Residents' participation in service coordination must be entirely voluntary (not a formal or implied condition of occupancy).

j. Senior Center (Senior Only):

Maximum Points: 5

The project site is within the following distance of a Senior Center that offers regularly scheduled programming for seniors at no or nominal costs to residents:

Distance	Central City	Metro/Suburban	Rural
Miles	1	2	5

Establishments with a membership fee are eligible only if the project covers the cost for all residents.

B. PRESERVED AFFORDABILITY

The following scoring criteria will be applied to proposals competing in the Preserved Affordability pool.

Scoring Category	Max Points Available
Development Characteristics	10
Preservation Priorities	10
Experienced Ownership	5
Subsidy Preservation	15
TOTAL:	40

1. Development Characteristics

Maximum Points: 10

a. Rehab Scope: OHFA will award points based on the AHFA demonstrating the following hard construction costs per unit:

- \$40,000 - \$45,000 = 2 points
- \$45,001 - \$50,000 = 3 points
- \$50,001 - \$55,000 = 4 points
- More than \$55,000 = 5 points

b. Exercise & Wellness: Development includes one of the following specific to the population being served (5 points):

- Onsite fitness area with equipment specific to the total number of units.
- Onsite health clinic or wellness suite in a property with a service coordinator on-site at least 10 hours per week.
- Partnership with an off-site fitness or recreation facility to provide access for the development's residents at no charge for a minimum of five years. The facility must be located within five miles of the development.

2. Preservation Priorities

Maximum Points: 10 (select one)

a. Financially-Troubled Asset: Development that meets all of the following:

- Development is either at risk of default or foreclosure or has negative cash flow.
- Applicant acquired the development two years before first applying for HTCs or has a purchase agreement in place contingent upon HTC award of credits, and had above conditions at the time of purchase, and seller was not a related entity.
- The seller did not, or will not, receive any operating, maintenance, or other reserve funds as a result of or concurrent with the sale of the asset.

b. Good Management: Developments that have been maintained through good management but contain no more than three Major Building Systems that are past their effective useful life, need immediate replacement, and will be replaced as part of the Scope of Work. The replacement of other Major Building Systems, or components which make up those Systems, which are beyond 75% of their EUL may be included in the Scope of Work, but the PCNA does not evidence a need for immediate replacement. The developer/owner must have been the owner for at least five years and must remain a part of the ownership structure.

c. Risk of Market Rate Conversion: Developments with either

- a federal, project-based rental subsidy contract subject to potential non-renewal in the next five years, or
- an affordable rent advantage of at least 10% for each bedroom size in the primary market area.

Affordable Rent Advantage =

$1 - (\text{the 60\% AMI HTC rent at the site} / \text{achievable market rents}) * 100$

d. Need for Replacement: Development has been become obsolete due to factors beyond the control of the current ownership and poses significant health and safety concerns in its current state. Demolition of the existing obsolete structure(s) and replacement with newly constructed units is more financially feasible than rehabilitation due to the scope of repairs and replacements needed. The replacement development must provide the same number of units that will be demolished.

3. Experienced Ownership

Maximum Points: 5

Developments meeting both of the following:

- the General Partner is in the ownership entity of at least five federal, project-based rental subsidy contract properties in Ohio, and
- the property manager has at least 10 years of affordable housing experience.

4. Subsidy Preservation

Maximum Points: 15

a. Preserved Units: Developments that preserve the following percentages of a federal, project-based rental subsidy:

- 74% or less of the affordable units = 8 points
- 75-84% of the affordable units = 10 points
- 85-94% of the affordable units = 13 points
- 95-100% of the affordable units = 15 points

b. Maturing Mortgage: Developments with a USDA RD Section 515 loan maturing by 2026 (5 points).

c. Year 30: HTC Projects placed in service more than 25 years before the application date (15 points):

- in an area where the market rents for comparable properties are at least 5% higher than the HTC maximum, and
- no affordability restrictions for another program restricts the real estate.

C. SERVICE ENRICHED HOUSING

The following scoring criteria will be applied to proposals competing in the Serviced Enriched Housing pool.

Scoring Category	Max Points Available
Experienced Service Coordinator	20
Local Partners	15
Expert Recommendations	20
Neighborhood Development & Impact Initiative	20
High Need County	5
TOTAL	80

1. Experienced Service Coordinator.

Maximum Points: 20

Proposals demonstrating a commitment by an experienced local or regional service provider(s) to deliver comprehensive services. All service providers must have a history of serving the area. Comprehensive means two or more of the following eligible service programs:

- Before and/or after school care every weekday for the duration of the school year
- Early childhood education
- Educational assistance programs

- Financial literacy, credit counseling, or other education
- Health promotion, nutrition, or wellness
- Job training, search, and/or placement assistance, including employment services
- Life skills training
- Transportation
- Legal services

Residents' participation in service coordination must be entirely voluntary (not a formal or implied condition of occupancy).

2. Local Partners

Maximum points: 15

Proposals including both of the following:

- **Referral Partnership:** The development team has established an MOU with either the applicable (1) Continuum of Care for PSH applicants or (2) ADAMH Board for Substance Abuse Recovery applicants to admit referrals from a coordinated entry system and will target households including individuals and families meeting the applicable target population.
- **Medicaid Partnership:** Evidence of a partnership with a service provider who will coordinate provision of Medicaid-funded services.

3. Expert Recommendations

Maximum points: 20

Proposals that have been designated a primary or secondary priority/recommendation by the applicable Continuum of Care (CoC) for PSH applicants.

- Primary designation = 20 points
- Secondary designation = 10 points

Proposals with a letter of support/recommendation from outside of a Continuum of Care meeting the following criteria (10 points):

- from a public entity (e.g., Mental Health and Recovery system board, local child welfare system of care) which has no affiliation with any member of the Development Team;
- accurately addresses multiple aspects specific to the application, and
- does not express expectations inconsistent with QAP limitations or requirements.

4. Neighborhood Development & Impact Initiative

Maximum points: 20

a. Transit (10 points):

OHFA will award points based on the following Center for Neighborhood Technology's Transportation Connectivity Index (TCI) as shown in the applicable QAP Interactive Map. "Free Rides" are defined in two ways:

- Development-provided transportation: (Option 1) Transportation services are provided by the development (funded by development or partner organization) at no charge to the residents, and available to residents at least five times per week.; or
- On-Demand Service: (Option 2) Transportation is available to residents on an on-demand basis, coordinated by the property, and provided at no charge or reduced charge for residents.(5 points)

Available Points	Central City	Metro/Suburban	Rural
2 points	TCI Score = 1-2	TCI Score = 1	N/A
4 points	TCI Score = 3-4	TCI Score = 2	N/A
6 points	TCI Score = 5-6	TCI Score = 3	N/A
8 points	TCI Score = 7-10 or Free Ride Option 1	TCI Score = 4-5 or Free Ride Option 1	Free Ride Option 1
10 points	TCI Score = 11 or higher or Free Ride Option 2	TCI Score = 6 or higher or Free Ride Option 2	Free Ride Option 2

b. Proximity to Amenities (10 points): Scoring will operate in the same manner as Section IV(A)(7)(c).

5. High Need County

Maximum points: 5

Developments that are located in a county with a high number of literally homeless individuals as determined by HUD's 2019 Point in Time (PIT) count as shown in the applicable QAP Interactive Map.

- 50-99 = 1 point
- 100-499; 2 points
- 500-999 = 3 points
- 1,000-1,499 = 4 points
- 1,500 or greater = 5 points

V. POST-AWARD AND PROJECT ADMINISTRATION

A. BINDING RESERVATION AGREEMENT

OHFA will send Binding Reservation Agreements to the contact person indicated in the proposal application. OHFA must receive the original Binding Reservation Agreement and Election Statement, a reservation fee equal to 6% of the reservation amount, and any additional documentation indicated in the agreement by the date indicated in the Program Calendar.

B. WAITING LIST

OHFA will place applications that do not receive an award on a waiting list.

C. PRE-PLACED IN SERVICE PROPERTY, OWNERSHIP, AND/OR MANAGEMENT CHANGES

OHFA must approve all development changes and may require new application, processing fee, public notification letters. OHFA may reduce or revoke a reservation of HTCs if changes are made without prior approval or if applicants fail to complete a development as approved.

OHFA may allow the admission of an additional General Partner after HTC award based on a letter from the owner's legal counsel confirming the new General Partner will:

- own no more than 24% of the General Partner shares;
- materially participate in the development;
- gain little or no financial benefit from the development; and
- not count the development toward their experience in future OHFA applications.

D. SPECIAL ALLOCATION

An owner of a development that is unable to proceed may seek a special allocation of HTCs in the current year. An applicant must meet all of the following requirements:

1. The applicant must have received an allocation of Competitive HTCs from OHFA in a previous year. The owner must have returned the allocation or OHFA must have revoked it prior to the required placed-in-service date.
2. The underlying reason for the inability of the development to proceed must relate to actions by unrelated parties that affect the purchase of the site, plan approval or building permit issuance.
3. The applicant must obtain a final legal judgment in favor of the owner, a settlement among the parties (including, but not limited to, HUD, USDA Rural Development, a local government or property owner) that will enable the development to proceed, or other documentation as permitted by OHFA evidencing an imminent resolution.
4. The applicant must complete a current year application. Any monetary damages received that are related to the development, less direct costs of litigation apportioned between damages that are related and unrelated to the development, must be pledged to the development.
5. The request must be submitted no later than three years after the previous allocation was returned or revoked.

OHFA has no affirmative obligation to grant approval to any development seeking relief. Developments approved for a special allocation must pay a new reservation fee equal to 10% of the allocation amount. The original reservation fee will not be refunded.

E. PLACED-IN-SERVICE RELIEF

OHFA may grant relief to applicants unable to meet their placed-in-service deadline due to circumstances outside their control that could not be reasonably anticipated before the proposal application date. The applicant must meet all the following requirements:

1. Submit a formal request outlining reasons that the placed-in-service deadline cannot be met. The request must be submitted after September 1 and no later than November 30 of the year of the placed-in-service deadline.
2. Agree to return their HTC allocation to OHFA prior to the placed-in-service deadline.
3. Demonstrate significant progress (roughly 75%) toward completion of the construction and/or rehabilitation of the development at the time the request is submitted.
4. Pay a new reservation fee equal to 10% of the allocation amount.

For approved requests OHFA will make a new allocation and extend the placed-in-service deadline for up to one year.

F. CARRYOVER ALLOCATION FOR 9% HTC

All developments must meet the Treasury Regulation 1.42-6 carryover allocation requirements. OHFA will issue a Carryover Agreement to Competitive HTC recipients by the end of the calendar year of award. OHFA may add conditions or require follow-up items in the Carryover Agreement that must be met before OHFA will issue IRS Form(s) 8609.

G. 42M LETTER OF ELIGIBILITY FOR 4% HTC

OHFA will send a 42m Letter of Eligibility to the contact person for approved applications.

H. QUARTERLY CONSTRUCTION MONITORING REPORTS

Owners must submit online [Quarterly Construction Monitoring Reports](#) detailing construction progress to OHFA for all 9% and 4% HTC projects and HDAP projects beginning the first quarterly reporting period following OHFA Board approval through 100% construction completion. Submission dates are January 1, April 1, July 1 and October 1.

I. DEVELOPMENT COMPLETION STAGE / 8609 REQUEST

Upon development completion, the owner must notify OHFA of the placed-in-service date of each building and submit the items OHFA requires to request IRS Form(s) 8609 by the date listed in the Carryover Agreement. OHFA will not process incomplete or insufficient requests. Owners must complete closeout process for any HDAP funds before 8609s are issued.

VI. TRAINING AND TECHNICAL ASSISTANCE

A. COMPLIANCE NEXT STEPS PROCESS

Completion of the Compliance Next Steps (CNS) process, including attending meetings, is required as part of the request for IRS Form 8609.

OHFA staff will schedule an initial CNS meeting based on the following criteria:

- *New Construction or HDAP*: when the project reaches 50% construction completion.
- *Acquisition/Rehabilitation*: when the property is transferred to the new ownership entity.
- *Rehabilitation only*: when the property reaches the 50% rehabilitation completion point or within 30 days of the first or only building placing in service, whichever is first.

Additional transition meetings will occur based on various factors.

Refer to the [Compliance Next Steps Policy](#) for further information on the CNS process.

B. TRAININGS AND COURSE OFFERINGS

Completion of the [OHFA LIHTC Essentials Compliance Training](#) is required in order to obtain IRS Form 8609. A representative of the owner and/or management company also must attend the [OHFA Compliance Policies and Regulations Training](#) every two years.

C. ONBOARDING AND RELATIONSHIP BUILDING PROGRAM

OHFA may require participation in the Onboarding and Relationship Building program at any point in the life of the property. Events that may trigger participation include:

- changes in ownership or management at a property;
- working with OHFA for the first time;
- having minimal experience with HTC, HOME, or other OHFA multifamily programs; or
- significant and/or systemic compliance issues, such as frequent management company turnover, repeated unresponsiveness to OHFA, etc.

Owners should review [OHFA's Partner Relationship and Onboarding](#) Process for further information.

VII. PROGRAM COMPLIANCE

A. INTRODUCTION

The monitoring process determines if a property is complying with IRC requirements. The HTC monitoring process is outlined in IRC Section 42, IRS Regulation 1.42-5, the QAP, and other OHFA policies. Compliance with IRC requirements is the sole responsibility of the owner of the building for which the HTC was allocated. OHFA's obligation to monitor for compliance does not make OHFA liable for owner noncompliance.

The term "extended use period" shall be defined as: "Beginning on the first day in the 15-year compliance period ... and ending 15 years after the close of the compliance period." This definition shall apply to any references of "extended use period" made in the 2022-2023 QAP.

B. MONITORING REQUIREMENTS AND PROCESS

HTC projects are required to comply with the below requirements, in addition to any other requirements described in guidance published on OHFA's [Compliance webpage](#).

Compliance requirements are communicated to owners and managers of HTC developments through the OHFA website, training sessions, email updates, and other means such as the OHFA newsletter. Owners and managers are expected to subscribe to OHFA's email listing and consult these and other resources to ensure they are up-to-date regarding policies and procedures established by OHFA.

Owners are responsible for ensuring that the property management agent has all documents and information necessary to meet all rent, income, or other requirements attached to all sources of funding used to develop the project. Such documents may include, but are not limited to, tenant files, Form 8609, the HTC restrictive covenant(s), Housing Development Assistance Program (HDAP) funding agreement, or HUD 811 Rental Assistance Contract.

1. All residents must be income qualified, to ensure they meet income restrictions as adjusted for household size prior to moving into the unit. Units must be rent restricted as provided for in the IRC. All units allocated HTCs must be safe, decent and sanitary housing units complying with local building, health, safety, and zoning codes.
2. Within 15 days of placing the last building in service, the project owner must forward a letter to the compliancesteps@ohiohome.org assigned to the project indicating the date on which the last building was placed-in-service. Failure to provide written notification may result in a noncompliance fee.
3. The owner of a HTC development must keep records for each qualified low-income building in the project for each year of the compliance and extended use period. These records must include but are not limited to the following for each building in the project:
 - a. The total number of residential rental units in the building (including the number of bedrooms and the size in square feet of each residential rental unit).
 - b. The percentage of residential rental units in the building that are low-income units;
 - c. The rent charged on each residential rental unit in the building (including any utility allowances).
 - d. The number of occupants in each low-income unit.
 - e. The unit vacancies in the building and information showing when, and to whom, the next available units were rented.
 - f. The annual income certification of each low-income resident per unit (if applicable).

- g. Annual student status certification.
 - h. Demographic information.
 - i. Documentation to support each low-income resident's income certification. Resident income is calculated in a manner consistent with the determination of annual income under Section 8, not in accordance with the determination of gross income for federal income tax liability.
 - j. The eligible basis and qualified basis of the building at the end of each year of the credit period, compliance and extended use periods.
 - k. The character and use of the non-residential portion of the building included in the building's eligible basis under IRC Section 42(d).
4. The owner of a HTC development is required to retain the records described in #3 for 21 years for the original qualifying households and 6 years after move out for all other households.
 5. Owners must have access to DevCo (or other online system designated by OHFA) and ensure property managers and the appropriate on-site staff have access to, and are registered, in DevCo. Owners are required to update all tenant and project data in DevCo each month. For further information on DevCo including guides and webinars, access the [DevCo webpage](#).
 6. OHFA will review resident files and conduct physical inspections of the buildings, common areas and units throughout the 15-year compliance period and the entire Extended Use Period as specified in the Restrictive Covenant. OHFA has the right to perform on-site inspections of any low-income housing project through the end of the Extended Use Period. Buildings receiving new allocations of credit will be inspected no later than the end of the second calendar year following the year the last building in the project is placed-in-service. Some of the factors that determine the frequency and the number of units and buildings inspected include the type of funding in the property as allocated by OHFA, whether the property is in Extended Use, changes in ownership or management company, scores compiled through an internal Risk Assessment, systemic non-compliance issues from past inspections, and resident complaints. OHFA may audit and/or conduct physical inspections at its discretion. For all properties in the compliance period, pursuant to Treasury Regulation 1.42-5(c)(2) at least once every three years, OHFA will conduct on-site inspections of all buildings in the project and review a sample of low-income units for physical inspection and file review based on the table to paragraph (c)(2)(iii). The owner/property management company is responsible to ensure adequate staff are available to assist with the inspection and all tenant files and unit keys are readily accessible.
 7. The owner will receive written reasonable notice of the inspection generally no more than 15 days per Treasury Regulation 1.42-5(c)(2). The owner must provide tenants with a notice of inspection at least 24 hours prior to the date of the inspection. The owner is responsible for ensuring all requested documentation is uploaded into DevCo no later than the date/time specified in the notice. Owners that fail to timely submit the requested documents may be placed in Not in Good Standing status and may be issued a fee for noncompliance.
 8. If OHFA is unable to serve notice to the property owner by mail, email, and/or telephone or owners fail to cooperate with OHFA staff to conduct an inspection, OHFA may consider the property out-of-compliance and notify the IRS by filing Form 8823, or take other appropriate action such as designating the project and its owner/agent as Not in Good Standing.
 9. During the correction period, an owner must correct any noncompliance and provide evidence to OHFA of such corrections. Failure to correct noncompliance may warrant OHFA to issue Uncorrected Form 8823 to the IRS.
 10. OHFA is required to file Form 8823 with the IRS for all identified deficiencies. In addition to notifying the IRS of noncompliance, the owner or management company may be placed in Not in Good Standing status.

C. ANNUAL OWNER CERTIFICATION REQUIREMENTS

Owners and sponsors of developments funded by OHFA with HTCs, HDAP, or Multifamily Bonds must annually submit certifications and reports to remain in compliance with these programs. Owners are required to submit Annual Owner Certifications and Tenant Data via OHFA's online reporting system. Annual Owner Reports are due March 1 of each year. The property's funding and age determine the required reporting.

- *Extended Use Properties:* These properties have completed the first 15 years of the compliance period and are required to submit tenant data on all rental activity for the reporting year. Student status updates are not required during the extended use period but are suggested if the project is considering receiving more credits in the future. The extended use annual certification questionnaire must also be submitted.
- *HDAP-only Properties:* Properties with HOME, OHTF, and/or NHTF only are still required to submit tenant data on their HDAP units and complete the gap financing annual certification.
- *New Projects or Lease-Up Phase:* If any unit is qualified during the reporting period, the owner is required to submit the tenant data and annual certification.
- *Properties Sold During the Reporting Year:* If the property was sold during the reporting period, the owner of record at the end of the year is responsible for annual reporting for the entire calendar year. Please make sure you request access to new acquired properties through the DevCo help desk as soon as possible to comply with annual reporting and monthly tenant data entry requirements.

When completing the owner certification, the owner is certifying that, for the previous calendar year, the owner met the following requirements:

1. Specifying if there has been a change in the owner or management during the reporting period.
2. Specifying if the property is third-party managed or managed by a company that is not part of the ownership interest.
3. The 20-50 test under IRC Section 42(g)(1)(A), the 40-60 test under section 42(g)(1)(B), or the Average Income test under section 42(g)(1)(C).
4. There was no change in the applicable fraction (as defined in section 42(c)(1)(B)) of any building in the project, or that there was a change, accompanied by a description.
5. The owner has received an annual income certification from each low-income resident, as appropriate, and documentation to support that certification; or, in the case of a resident receiving Section 8 housing assistance payments, the statement from a MHA described in paragraph (b)(1)(vii) IRS Regulation 1.42-5.
6. Each low-income unit in the project was rent-restricted under Section 42(g)(2).
7. All units in the project were for use by the general public and used on a non-transitional basis (except for transitional housing for the homeless provided under Section 42).
8. Pursuant to requirements under Treasury Regulation 1.42-5, the buildings and low-income units were suitable for occupancy, taking into account local health, safety, and building codes, and the state or local government unit responsible for making local health, safety, or building code inspections did not issue a violation report for any building or low-income unit in the project. If a violation report or notice was issued by the governmental unit, attach a statement summarizing the violation report or notice or a copy of the violation report or notice to the annual certification and state whether the violation has been corrected.
9. There was no change in the eligible basis for any building in the development, or if there was a change, the nature of the change (e.g. a common area has become commercial space, or a fee is now charged for a resident facility formerly provided without charge).
10. All resident facilities included in the eligible basis of any building, such as swimming pools,

other recreational facilities, and parking areas, were provided on a comparable basis without charge to all residents in the building.

11. If a low-income unit in the project became vacant during the year, that reasonable attempts were or are being made to rent that unit or the next available unit of comparable or smaller size to residents having a qualifying income before any units in the project were or will be rented to residents not having a qualifying income.

12. If the income of residents of a low-income unit in the project increased above the limit allowed in Section 42(g)(2)(D)(ii), the next available unit of comparable or smaller size in the building was or will be rented to residents having a qualifying income.

13. The owner has not refused to lease a unit in the project to a Section 8 applicant because the applicant holds a Section 8 voucher or certificate.

14. No finding of discrimination under the Fair Housing Act has occurred for the project (a finding of discrimination includes an adverse final decision by HUD, an adverse final decision by a substantially equivalent state or local fair housing agency, or an adverse judgment from a Federal court).

15. For the preceding calendar year, no residents in low-income units were evicted or had their tenancies terminated other than for good cause and no gross rents were increased other than permitted under Section 42.

16. An extended low-income housing commitment as described in Section 42(h)(6) was in effect. OHFA may adjust the above requirements according to changes in federal regulations.

17. Verifying the information for the property in the Ohio Housing Locator is current.

18. Certifying that the Supportive Services Plan established for the property is being followed.

19. Certifying that the owner is in compliance with VAWA requirements.

20. Certifying that a representative of the owner and/or management company has attended a HTC training at least once every two years.

21. Certifying that only active brokers and their affiliated salespersons associated with a brokerage may perform property management services for a fee and for another in the State of Ohio. Licensure exemptions are found in Ohio Revised Code Section 4735.01(l) and, in part, include an owner of a property whether such owner is a person, partnership, association, limited liability company, limited liability partnership, or corporation. The exemption also includes the regular employees of the property owner(s).

OHFA requires that the owner of a HTC development annually certify that residents meet the program requirements, including but not limited to the income and assets, using the form(s) specified by OHFA. Projects that are 100% occupied by qualified low-income households may discontinue recertifications as described in IRC Section 42. However, IRC Section 42 requires owners with HTC funding to continue verifying resident student status annually. Owners must use OHFA's [Student Certification](#).

Properties funded with multiple subsidies will have to adhere to all of the recertification requirements for each funding source. Refer to the Tenant Income Certification section of the [OHFA Compliance Policies Manual](#).

D. PROPERTY, OWNERSHIP, AND/OR MANAGEMENT CHANGES

Changes in owner and/or management companies or sale of the property that occur after a development has placed-in-service must be submitted to OHFA's Division of Asset Management in accordance with OHFA policy, available on the [OHFA website](#) in the Project Changes section. Various documentation for these changes must be submitted to ohfaprojectchanges@ohiohome.org, a minimum of 30 days prior to the change or sale. OHFA must approve all ownership change requests prior to the change going into effect.

Management company changes do not require approval by OHFA; however, the Management Company Change Form must still be submitted to OHFA a minimum of 30 days prior to terminating the services of the current management company. In accordance with [Ohio Revised Code Chapter 4735](#), fee managed companies (not part of the ownership) must have an active Ohio Broker's License. Evidence of this must be submitted with the documentation of the management company change.

Failure to provide timely requests for approval may place the owner, general partner and/or property manager in Not in Good Standing status and assessed a noncompliance fee. Owners who fail to provide 30-day notice of an owner or management company change may further be subject to a noncompliance fee as outlined in Appendix A: Fee Schedule.

E. DOMESTIC VIOLENCE PROTECTION AND PREVENTION

In conformity with the Violence Against Women's Act (VAWA) of 2013, an applicant for or tenant of housing assisted under the HTC program, or any affiliated individual thereof, may not be denied admission, denied assistance, terminated or evicted from the housing on the basis that they are a victim of domestic violence, dating violence, sexual assault or stalking, if the applicant, tenant, or affiliated individual otherwise qualifies for admission, assistance, participation, or occupancy. Every resident and applicant must be provided a [Notice of Occupancy Rights](#) when admitted as a tenant, denied admission, denied assistance, or being terminated/evicted.

An incident of domestic violence, dating violence, sexual assault, or stalking shall not be considered a lease violation by the victim, nor shall it be considered good cause for an eviction of the victim. If a tenant or affiliated individual who is a victim requests an early lease termination, lease bifurcation from the abuser, or transfer to another unit because she/he is in danger, the owner/manager shall make every effort to comply with the request and shall not penalize the tenant.

Each owner/manager shall have an [emergency transfer plan](#) for victims seeking safety, which incorporates reasonable confidentiality measures to ensure that the owner or manager does not disclose the location of the dwelling unit of a tenant to a person that commits an act of violence or stalking against the tenant. Be advised that an emergency transfer plan incorporates many features in addition to a transfer plan, since an emergency transfer often may not be possible.

An owner/manager may request documentation from a victim before these protections are triggered. If the owner/manager requests documentation, the applicant, tenant, or affiliated individual may provide any one of the following documents and owner/manager shall accept it as adequate documentation: a letter or form signed by the victim, including [HUD's Self-Certification Form 5382](#); a letter signed by a domestic violence service provider, attorney, or medical/mental health professional who assisted the victim; a police report; or a court or administrative record. This submission shall be confidential as defined in 81 FR 80724, 24 CFR §5.2007(C). Owners/managers shall also comply with all court orders.

Guidance related to complying with VAWA at OHFA-funded properties can be found on the [OHFA Compliance Policies webpage](#).

F. FAIR HOUSING REQUIREMENTS

The owner shall comply and ensure the project complies with all requirements of the federal Fair Housing Act, Ohio Revised Code Section 4112, and local fair housing requirements, as each may be amended. The owner shall itself ensure and shall ensure the project does not discriminate, as defined by 42 U.S.C. 3604, against any person because of sexual orientation or gender identity or expression. Also see the [Quid Pro Quo and Hostile Environment Harassment and Liability for Discriminatory Housing Practices under the Fair Housing Act](#) final rule. Additionally, OHFA directly and affirmatively seeks to promote the Olmstead and ADA integration principles through its policies and funded developments.

Owners will adopt Tenant Selection Plans (TSPs) allowing individuals with a criminal record to access HTC housing while ensuring the safety of all residents.

- The TSP must explicitly prohibit the denial of admission, termination of assistance or eviction on the basis of arrest records alone, not accompanied by additional conditions that ultimately diminish or negate the effect of the prohibition.
- The TSP may create reasonable look-back periods for review of crimes but must not have blanket prohibitions on any person with any conviction record. The housing provider should have a policy that considers the nature, severity, and recency of criminal conduct.
- The TSP must include an individual assessment of each tenant applicant's history and provide the tenant applicant an opportunity to provide mitigating information before denying housing based on upon the result of criminal screening. This item requires the consideration of additional information before denying housing based on an individual's criminal record. The TSP must reflect that the housing provider will request mitigating information from the applicant before denying housing based on the applicant's criminal history without the tenant applicant needing to request an individualized assessment or submitting an appeal. In all cases, this should occur before a denial/decision has been made.

The TSP is also required to be submitted and reviewed by OHFA as part of the Compliance Next Steps process for the project.

When developing their TSPs, Owners should refer to HUD's [Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions](#) (HUD Guidance) and this [model criminal background screening policy](#).

G. VIOLENCE AGAINST WOMEN ACT ONGOING COMPLIANCE

Adherence to the requirements of VAWA is required for all projects receiving funding through one or more of OHFA's Multifamily Housing programs. Properties that receive HOME, OHTF, and/or NHTF funding are required to follow the [HUD 2013 VAWA Final Rule](#). Although the IRS has not provided guidance on how to comply with the VAWA, OHFA requires properties with HTC funding follow the [HUD 2013 VAWA Final Rule](#) when implementing VAWA Rule protections for their tenants. For more information on ongoing compliance with VAWA, visit [OHFA's Compliance Policies webpage](#).

H. EVICTIONS

Owners will neither advertise "no evictions" screening policies nor deny an application for tenancy based on the following:

1. Credit information or report, tenant screening report, or any other consumer report demonstrating a failure to pay rent or utility bills during the COVID-19 emergency period.
2. An eviction proceeding that
 - is sealed,
 - did not result in a judgment in favor of the plaintiff,
 - was brought during the COVID-19 emergency period for nonpayment, or
 - was filed against tenants subsequent to a foreclosure of the rental property.
3. An eviction judgment by agreement or a judgement that has been either vacated or marked satisfied.
4. Cases in which the tenant
 - prevailed on any significant defense or setoff claim, even if possession was awarded to the landlord; or
 - was named but at the time of the eviction suit was either a minor or not residing in the premises.
5. Cases filed based on lease violations from household members who will not be included in the proposed future household.
6. Any eviction case filed, or eviction judgment entered, four or more years before the application to rent was submitted.

I. AFFIRMATIVE FAIR HOUSING MARKETING PLANS

Affirmative Fair Housing Marketing Plans (AFHMP) and affirmative marketing procedures are required for all projects receiving funding through one or more of OHFA's Multifamily Housing programs, including but not limited to HTC, HOME, OHTF, and/or NHTF funds and any recipients of federal funds such as Section 8, 202, 236, BMIR projects or USDA/Rural Development Section 515. Projects receiving any of these funding sources are required to have Affirmative Fair Housing Marketing Plans. Federal regulations for Affirmative Fair Marketing are in [24 CFR Part 200, Subpart M](#).

Information and guidance related to completing the AFHMPs can be found on [OHFA's Compliance Policies webpage](#) under "Affirmative Fair Housing Marketing". The project's AFHMP must be submitted to OHFA's Compliance Office for approval. For developments allocated OHFA funding on or after 2021, the AFHMP must be approved by OHFA prior to issuance of Form 8609.

J. COMPLIANCE FEE

OHFA requires HTC owners to pay a one-time compliance monitoring fee. Additionally, OHFA may charge the owner for fees related to project changes, noncompliance, or any other administrative items.

VIII. ASSET MANAGEMENT

Submission requirements can be found on the [Asset Management webpage](#). All documentation should be e-mailed to the Office of Multifamily Housing's Division of Asset Management at assetmanagement@ohiohome.org by the applicable dates as specified below.

A. REQUIREMENTS FOR HTC PROJECTS

Beginning with projects funded through the 2018 QAP, all HTC projects must submit annual independently-prepared audited financial statements throughout the 15-year compliance period. During the Extended Use Period, projects with 50 or more units will continue to submit independently-prepared audited financial statements; projects with less than 50 units will submit independently-prepared reviewed financial statements. OHFA may request additional information. The reporting periods and submission dates are:

Reporting Period: Annually, January 1 – December 31

Submission Due: July 31 of the following year

B. REQUIREMENTS FOR PROJECTS WITH HOME OR NHTF FUNDING

1. HOME-Funded Projects

24 CFR § 92.504 requires that projects with 10 or more HOME-assisted units that were allocated funding on or after July 24, 2014 must undergo periodic financial review. The participating jurisdiction must examine at least annually the properties' financial condition to determine the continued financial viability of the housing and must take actions to correct problems, to the extent feasible. The reporting periods and submission dates are:

Reporting Period: Annually, January 1 – December 31

Submission Due: July 31 of the following year

2. NHTF-Funded Projects

24 CFR § 93.404 (e) requires that projects with 10 or more NHTF-assisted units must undergo periodic financial review. The grantee must examine at least annually the properties' financial condition to determine the continued financial viability of the housing and must take actions to correct problems, to the extent feasible. The reporting periods and submission dates are:

Reporting Period: Annually, January 1 – December 31

Submission Due: July 31 of the following year

Additionally, 24 CFR § 93.404(c)(2)(iii) requires that NHTF funding recipients must submit to OHFA an annual audit performed on each project assisted with HTF funds, beginning the first year following the cost certification and with the final annual audit occurring the last year of the affordability period. The reporting periods and submission dates are:

Reporting Period: Annually, January 1 – December 31

Submission Due: July 31 of the following year

IX. HOUSING CREDIT GAP FINANCING

A. HCGF OVERVIEW

1. Purpose

The Housing Development Assistance Program (HDAP), including the Housing Credit Gap Financing (HCGF) program, provides financing to support the preservation or construction of affordable housing for persons who have low incomes and households in the State of Ohio. Resources are subject to appropriation of funds to the Ohio Housing Trust Fund (OHTF) by the State Legislature, allocation by the OHTF Advisory Committee, HUD, and approval of the State Consolidated Plan.

2. Funding Sources

The following resources are used to provide HCGF assistance to eligible projects:

a. HOME Investment Partnerships Program (HOME): HOME funds are subject to approval of the State Consolidated Plan and the OHFA Board.

b. Ohio Housing Trust Fund (OHTF): The Ohio Housing Trust Fund provides funding to HDAP projects predominantly serving low- to moderate-income households with incomes at or below 50% of the Area Median Income (AMI). The OHTF gives preference to projects that benefit households with incomes at or below 35% of the AMI for the county in which the project is located, as established by HUD. Applicants receiving an award of OHTF dollars may be subject to State of Ohio Prevailing Wage Rate rules. The amount and use of OHTF dollars are subject to appropriation, per project approval by the State Controlling Board, and approval by the OHFA Board.

c. National Housing Trust Fund (NHTF): The annual NHTF Allocation Plan is specifically incorporated herein.

NHTF funds will only be made available to the extent they are not awarded through the Bond Gap Financing or Housing Development Gap Financing programs.

The owner/developer/borrower and any of its employees, agents or sub-contractors doing business with OHFA are responsible for adhering to and comply with all Federal Civil Rights legislation inclusive of the Fair Housing Laws, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act as well as any state and local Civil Rights legislation and any required related codes and laws.

Applicants receiving an HDAP award must meet all program requirements and will be subject to approval from the OHFA Board. OHFA will award HDAP dollars based on the need to meet set-asides specific to each funding source and based on the source most appropriate for the applicant/project. Applicants that have compelling reasons to request a specific source of funding can do so in a separate letter sent to the attention of the Operations Manager in the Office of Multifamily Housing prior to the submission of their HTC application. OHFA does not guarantee that any request for a specific type of funds will be approved.

B. HCGF ELIGIBILITY

1. Eligible Applicants

Eligible HCGF applicants are private for-profit housing developers, not-for-profit 501(c)(3) and 501(c)(4) organizations and public housing authorities who are seeking Competitive HTC. Religious organizations and their subsidiaries/affiliates must meet the provisions in 24 CFR Part 92.257. All applicants must act as a General Partner or sole owner of the project during the construction phase.

2. Eligible Uses of Funds

HDAP funds may only be applied in the development budget toward non-related party acquisition, hard costs associated with new construction or rehabilitation, and developer fees associated with the project.

The following development budget line items are permitted:

- Acquisition (non-related party only)
- Demolition (not applicable for preservation projects)
- On-site improvements
- Construction and/or renovation costs including construction fee items, construction contingency, and contractor overhead and profit (excluding costs associated with construction of commercial property)
- Furnishings and appliances
- Architectural and engineering fees
- Developer fees and developer overhead
- Consultant fees
- Legal fees

The following development budget line items are not permitted:

- Costs associated with creating market rate housing and/or commercial spaces
- Single family lease purchase developments
- Free-standing, non-residential buildings
- Infrastructure dedicated back to the local municipality

3. Ineligible Developments

Ineligible developments include the following:

- Residential care/assisted living/memory care facilities
- Projects that received a prior HDAP award. OHFA will consider exceptions to this requirement. Applicants must contact OHFA prior to submitting an application for additional HDAP resources.
- Projects that include or constitute Single-Room Occupancy (SRO) housing, congregate housing, group homes, shared housing or cooperative housing as defined by HUD in Chapter 17 of the HUD Housing Choice Voucher Program Guidebook
- Projects that require residents to occupy the unit with another person (roommate)
- Projects that will not result in a certification of residential occupancy by the local government or project architect
- Hospitals, nursing homes, sanitariums, life care facilities, retirement homes (if providing significant services other than housing are mandatory for residents), employer housing, mobile homes and student housing
- Projects that include for-sale homes that are currently under construction or that were

- recently approved for HTCs or are currently within a HTC compliance period
- HUD Section 9 developments not converting to Project-Based Rental Assistance

C. HCGF FINANCING TERMS

Applicants that appropriately evidence status as a not-for-profit organization may request HDAP funds in the form of a loan or grant. OHFA may award either a loan or a grant based on the financial underwriting of the project. Applicants should refer to the most current Multifamily Underwriting Guidelines. The following loan terms and criteria apply:

- Up to a 2% interest rate.
- The loan will mature at the end of the affordability period. The affordability period is defined as the minimum term required in 24 CFR Part 92 plus an extended affordability period required by OHFA – total term will be up to 40 years. If USDA or HUD is involved as a direct lender, not a guarantor, the total term will be up to 45 years. The affordability term must agree with the loan term. Year 1 is calculated from the date all close-out documentation is approved by OHFA.
- Collateral will be a subordinate mortgage position. OHFA prefers a second or shared second position. If a lower position is necessary, the applicant should indicate so in the application along with an explanation and supporting documentation.
- Loans will be made to the HDAP Recipient as the project's General Partner, managing member or equivalent. The HDAP Recipient may loan the HDAP funds to the project. If the project has more than one General Partner/managing member (or equivalent), OHFA may determine which will be the HDAP Recipient.
- OHFA will consider alternate terms prior to the approval of the award by the OHFA Board.

If the property is sold prior to loan maturity, OHFA may require that all or a pro-rated amount of the outstanding principal and interest become due and payable.

OHFA may allow for the forgiveness of all or a portion of the outstanding debt if, at the end of the 30-year loan period, OHFA determines that the property has been maintained as a safe, decent, and sanitary affordable housing project, as defined by the Uniform Physical Condition Standards or OHFA's current standards, throughout the term.

Grants must be requested by the applicant and are available only if:

- The eligible applicant is the controlling general partner and is a 501(c)(3) or 501(c)(4) entity;
- At least 20% of the units in the development will be occupied by and affordable to households at or below 35% of AMI;
- The recipient treats the funds as a grant for tax purposes;
- The recipient does not loan the funds to the development, but treats it as a grant or capital contribution; and
- Cash flow demonstrates the project cannot support debt.

For HTC projects that request a direct grant of HDAP funds, the HDAP funds may be included in eligible basis if the HDAP funds are a General Partner's capital contribution and provided that the project can provide a tax-opinion certifying the funds as part of eligible basis. The project must still meet all of the above requirements to be eligible for a grant. However, when considering eligibility for a grant, OHFA will apply the regulations governing the funds awarded when considering how the HDAP recipient passes the award onto the project.

D. HCGF PROJECT REQUIREMENTS

1. Rent and Income Restrictions

Developments that will include HDAP funds must meet the following requirements in addition to requirements of the HTC program.

a. HDAP Restricted Units:

Developments located in Participating Jurisdictions (PJ) areas must show both:

- A minimum of 40% of the affordable units occupied by and affordable to households at or below 50% AMI for the entire affordability period. The HDAP/HOME-assisted units cannot exceed the HUD Low- and High-HOME rent for the county where the development will be located; and
- A minimum of 10% of units occupied by and affordable to households at or below 35% AMI for the entire affordability period. These units may count toward requirements and scoring incentives for the HTC program.

Developments located in Non-PJ areas must show both:

- A minimum of 35% of the affordable units occupied by and affordable to households at or below 50% AMI households for the entire affordability period; and
- A minimum of 5% of units occupied by and affordable to households at or below 35% AMI for the entire affordability period. These units may count toward requirements and scoring incentives for HTC program.

b. HDAP Assisted Units:

All projects will be required to maintain HDAP-Assisted Units, which are determined by the amount of HDAP provided, the 234 limits, and the costs to develop the unit. Affordable units are defined as units that are affordable to households at or below 80% AMI.

Projects with federal project-based subsidy on the greater of (i) at least 50% of the units or (ii) the number of restricted and assisted units will set rents (with utilities) as allowed by that project-based assistance. Existing tenants may not be displaced to achieve the minimum percentage of occupancy by very low-income households. Occupancy in up to 60% of the development by households with higher incomes is to occur over time; at turnover, units may be leased to higher income households.

c. Exception to Rent Restrictions (50% rents and High and Low HOME Rents)

Units that have project-based rental assistance with units that are occupied by families below 50% AMI and pay no more than 30% of their adjusted income toward rent and utilities are exempted from the rent restrictions associated with the Low HOME Rents and restricted units at 50% AMI. Project-based rent assisted units can charge up to the contract rent prescribed by their project-based rental assistance contract. However, these projects must still comply with the occupancy requirements that accompany the restricted and assisted units in (a) and (b) above. Should the project-based assistance contract be discontinued, the project will then be required to comply with the restricted rent (50% AMI) and High and Low HOME Rent requirements.

2. Environmental Review (ER)

OHFA will conduct a supplemental Environmental Review for all projects receiving HOME, OHTF or NHTF funds, as required by those funding sources.

Projects may not begin construction prior to the completion of the environmental review process

and the issuance of a funding agreement. In addition, projects receiving Federal HOME dollars may not acquire the site prior to completion of the Part 58 HOME Environmental Review. Projects that do begin any construction or construction-related activity prior to the issuance of a funding agreement and receipt of all appropriate clearances, at a minimum, will be subject to the following penalty:

- **HOME-funded Projects:** The funding agreement will be rescinded. OHFA cannot guarantee the availability of other funds to fill the gap.
- **NHTF- and OHTF-funded Projects:** The project may request to keep the award of funds. However, the recipient must provide a letter detailing the reasons construction began prior to the completion of the ER process and what measures will be taken to ensure it does not happen with future projects.

The Multifamily Committee of the OHFA Board will review all requests either to change the source of the HDAP award, or to keep the award of NHTF and/or OHTF dollars if construction begins prior to the completion of the environmental review process. If approved, the recipient will not be able to draw HDAP funds until construction has been completed. The Multifamily Committee may choose to impose additional requirements or restrictions.

Regardless of the funding source, OHFA may take further action if the recipient violates this restriction on future projects, or has violated this restriction on prior projects.

3. Design & Construction Requirements

All applications shall meet the minimum design requirements as outlined in the OHFA Design & Architectural Standards. Developments receiving HOME funding must meet all requirements as outlined in 24 CFR §92.251 – Property Standards. Developments receiving funding from the National Housing Trust Fund must meet all requirements as outlined in 24 CFR §93.301 – Property Standards.

For developments involving rehabilitation of existing units, applicants will be further required to meet ODSA's Residential Rehabilitation Standards. The proposed scope of work will also be evaluated to determine whether rehabilitation will ensure 30-year sustainability.

4. Lead-Based Paint Strategy

All projects originally constructed prior to 1978 must adhere to the Lead-Based Paint Guidelines found in the [Ohio Consolidated Plan-Annual Action Plan](#). Such projects must submit a lead-based paint strategy that includes the following:

- Indicate whether or not the property(ies) has (have) been tested for lead-based paint.
- If the units/buildings have been tested, describe the test results. If the project has not been tested, describe the estimated cost for testing and confirm that these costs were incorporated in the project's development budget.
- Describe how the cost to treat lead-based paint will be covered by the project budget, and the cost estimate to treat lead-based paint.
- Describe the availability of licensed lead testers, contractors and workers in the area. If there is a shortage of personnel, how that might affect construction regarding timeline and strategies to find licensed personnel.

5. Appraisals

All projects will be required to submit an "as-is" appraisal that supports those costs. Appraisals must meet OHFA's requirements as outlined in the OHFA Multifamily Underwriting Guidelines and must be submitted with the final application submission. The purchase price should be less

than or equal to the appraised value. If the purchase price is greater than the appraised value, the applicant must explain why. OHFA may limit funding of acquisition costs to the appraised value of the site.

6. Uniform Relocation Act (URA) Relocation Standards

a. Relocation Forms

The application shall include Real Property Acquisition and Relocation Certifications and Voluntary Acquisition Forms, available on [OHFA's website](#), for all developments involving acquisition of real property or easements, or rehabilitation as follows:

- A complete URA Attachment "Acquisition, Relocation and Demolition Questionnaire" and URA Attachment "Residential Anti-Displacement & Relocation Assistance Plan".
- Complete URA Attachments "Sample Voluntary Acquisition, Donation and Waiver of Real Estate Appraisal and/or Voluntary Acquisition Public Entity" forms for each seller of land and/or building acquired for use in the development, where applicable. Forms must be submitted with original signatures.

OHFA will review the application will be reviewed for compliance with [ODSA's relocation policies](#), the Uniform Relocation and Real Property Acquisition Policies Act of 1970 and Section 104(d) of the Housing and Community Development Act. Any issues of non-compliance must be resolved prior to execution of the HDAP funding agreement.

b. Relocation Plan

The application will include a complete [Acquisition, Relocation and Demolition Questionnaire](#) and Relocation Plan, for all developments involving the rehabilitation of (an) existing occupied unit(s). If the development is receiving federal funds, the plan must meet the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

The Relocation Plan submitted with the HDAP application must address the following:

- During renovation, residents will: (i) stay in place, (ii) be temporarily relocated within the project, (iii) be temporarily relocated off-site, (iv) be permanently relocated. The applicant may choose a strategy that includes a combination of the foregoing.
- If some or all residents will stay in place, the applicant must describe the rehabilitation items to be completed and strategies to do so without requiring relocation.
- If residents will be temporarily relocated or permanently relocated, the applicant must describe what resources are anticipated to be needed to accomplish the relocation (including the applicant's basis for estimates for the cost of relocation), the notices that will be provided to residents, how the applicant will staff relocation activities, and source of funds to cover the cost of relocation activities.

7. Affirmative Fair Housing Marketing Plan

OHFA must ensure that all projects financed with Agency resources are affirmatively marketed. A completed Affirmative Fair Housing Marketing Plan with required attachments must be submitted at the Compliance Next Steps meeting in accordance with the most current policies.

8. Wage Rate Compliance

The applicant will be responsible for compliance with state and federal wage rates that may be applicable to the project. Appropriate wage rates need to be factored into the applicant's construction budget.

Funding from OHTF and NHTF may be subject to Ohio's Residential Prevailing Wage Rates as detailed in ORC 176.05. The number of HOME-assisted units in the project will determine the applicability of federal wage rates for the project

E. HCGF POST AWARD

1. Loan Closing Requests

OHFA will enter into a Funding Agreement with the HDAP recipient and Limited Partnership. The HDAP recipient may then formally request a closing (procedures are available on the [OHFA website](#)). OHFA requires a minimum of 30 days to complete its review once all of the required checklist items have been received.

2. Subsequent Changes

The HDAP recipient must notify OHFA immediately and request approval of any changes that occur in the project at any time after project approval through the affordability period, including but are not limited to, changes in the development team; changes in the number of units or unit mix; changes to the target population. The request will be sent to:

Ohio Housing Finance Agency
Office of Multifamily Housing, Development Division
57 East Main St., 4th Floor
Columbus, OH 43215

OHFA may assess fees consistent with its current Fee Schedule.

3. Project Administration and Drawing HDAP

Recipients will reference the Guide to Requesting HDAP Funds document on the [Project Administration Page](#).

4. Compliance Reporting Requirements

Recipients are responsible for compliance with applicable implementation, reporting, file and physical inspections, and record-keeping requirements associated with the HDAP requirements as specified herein and further described in enabling legislation, regulation, and rule.

a. Annual Reporting: The owner is responsible for [reporting to OHFA annually](#) through the DevCo online system including the Annual Owner Certification and resident and project data using the XML upload or housing credit compliance software (e.g. Yardi) as well as other reports and certifications necessary to evidence compliance with HCGF requirements.

b. HOME Rent Approval: In accordance 24 CFR 92.210, OHFA must review and approve rents for each HOME-assisted rental project each year. OHFA will require owners to certify on an annual basis what HOME rent will be used.

c. HOME Utility Allowance Approval: For projects awarded HOME funding after August 23, 2013, OHFA will approve an individual utility allowance on an annual basis in accordance with 24 CFR 92.252. Effective January 1, 2017, owners must submit a utility allowance request by using either the HUD Utility Schedule Model or a utility allowance methodology as described in OHFA's [Utility Allowance Policy](#).

APPENDIX A: FEE SCHEDULE

Description	Fee	Due Date
9% Proposal Application Fee	\$5,000	With application
9% Final Application Fee	\$3,000	With Final Application
4% Final Application Fee	\$3,500	With Final Application
Subsidy Layering Review Fee	\$5,000	With submission
Additional Assisted Living Application Fee	\$5,000	With Final Application
9% Reservation Fee	6% of Reservation Amount	With Binding Reservation
4% Reservation Fee	6% of Reservation Amount	Prior to 42m Letter
Reassessment Fee – HTC	Varies based on issue	With request
Reassessment Fee – HDAP	Varies based on issue	With request
HTC Compliance Monitoring Fee	\$2,400 per unit	With 8609 request
Funding Agreement Amendment Fee	\$1,000	With amendment request
Funding Agreement Extension Fee	\$1,000	With extension request
Owner/Manager Change Fine Without 30-Day Notification to OHFA	\$1,000	Invoiced by OHFA
Multifamily Bond Closing Fee	1/10 of 2% of the bond amount or \$3,000, whichever is greater	At closing
Program Compliance: GP/LP Changes after PIS	\$500	With request
Program Compliance: Management Changes	\$500	With request
Program Compliance: Restrictive Covenant Modifications	\$750	With request
Program Compliance: Restrictive Covenant Releases	\$5,000	With request
Program Compliance: Qualified Contract	\$1,500	With request
Program Compliance: Late Annual Owner Certification	\$1,000	TBD
Program Compliance: Late Project Change Notification	\$1,000	With request

APPENDIX B(1): SUBMISSION REQUIREMENTS – COMPETITIVE HTC

Competitive HTC: Required Documents	PROGRAM		
	Proposal	Final	8609
Affordable Housing Financing Application (AHFA)	■	■	
Appraisal		■	
Architectural Plans & DCF Form	■	■	
Authorization to Release Tax Information		■	
Community Outreach Plan		■	
Competitive Support Documents	■		
Conditional Financial Commitments	■	■	
Condominimized Space Description		■	
Development Team Consultant Statement	■		
Development Team Experience and Capacity Review	■		
Evidence of Site Control	■	■	
Exception Requests	■		
Federal Tax Identification Number Documentation		■	
Green Certification			■
Housing Credit Gap Financing Application (in AHFA)	■	■	
Legal Description		■	
LIHTC Lease Addendum		■	
Limited Partnership Agreement			■
List of Changes from Proposal Application		■	
Management Company Capacity Review (in AHFA)		■	
Market Study	■		
Notification to Statewide Accessibility Groups (new units)		■	
Ohio Housing Locator			■
Phase I Environmental Site Assessment	■		
Phase II Environmental Site Assessment (if applicable)		■	
Physical Capital Needs Assessment / Scope of Work	■		
Proposal Summary PDF	■		
Public Notification (new units only)	■		
Related Party Transaction Questionnaire		■	
Relocation Plan		■	
Rental Subsidy Contract	■	■	
Revitalization Plan	■		
Scattered Site Development Map	■		
Site Visit Documents	■		
Supportive Services Plan & Providers	■		■
Utility Allowance Information	■	■	
Zoning	■		

APPENDIX B(2): SUBMISSION REQUIREMENTS – NON-COMPETITIVE HTC ONLY

Non-Competitive HTC: Required Documents	PROGRAM	
	Submission	8609
Affordable Housing Financing Application (AHFA)	■	
Appraisal	■	
Architectural Plans & DCF Form	■	
Authorization to Release Tax Information	■	
Community Outreach Plan	■	
Conditional Financial Commitments	■	
Condominimized Space Description	■	
Development Team Consultant Statement	■	
Development Team Experience and Capacity Review	■	
Evidence of Site Control	■	
Exception Requests	■	
Federal Tax Identification Number Documentation	■	
Green Certification		■
Legal Description	■	
LIHTC Lease Addendum	■	
Limited Partnership Agreement		■
Management Company Capacity Review (in AHFA)	■	
Market Study	■	
Multifamily Bond Financing Information	■	
Notification to Statewide Accessibility Groups (new units)	■	
Ohio Housing Locator		■
Phase I Environmental Site Assessment, Phase II if applicable	■	
Physical Capital Needs Assessment and Scope of Work	■	
Proposal Summary PDF	■	
Public Notification (new units only)	■	
Related Party Transaction Questionnaire	■	
Relocation Plan	■	
Rental Subsidy Contract	■	
Scattered Site Development Map	■	
Site Visit Documents	■	
Supportive Services Plan & Providers		■
Utility Allowance Information	■	
Zoning	■	

APPENDIX C: EXPERIENCE & CAPACITY CHARACTERISTICS

All Development Teams must submit their team for pre-approval to OHFA by the date listed in the Program Calendar.

MINIMUM ELIGIBILITY REQUIREMENTS – 4% HTC

Applicants must have at least one HTC project has been placed in service in Ohio or other states within the past 10 years in order to apply for 4% HTCs.

OHFA may impose application limits or restrictions on developers new to Ohio, for example, requiring that developers who have received their first Ohio 4% HTC award must begin construction on that project before seeking additional 4% HTC from OHFA.

MINIMUM ELIGIBILITY REQUIREMENTS – 9% HTC

Applicants must have prior 9% HTC experience as defined below in order to apply for 9% HTCs:

- At least one 9% HTC project has been placed in service in Ohio within the past 10 years; or
- At least three 9% HTC projects have been placed in service in other states within the past 10 years.

If the applicant does not meet one of the above requirements but can demonstrate one or more of the below, they may request an exception to be able to apply:

- Applicant has received their first award of Ohio 9% HTCs but has not yet received Form 8609 for the associated project; or
- Applicant will be partnering with an entity who does have the required experience (see requirements for eligible partners below); or
- Applicant has 9% HTC experience gained while working at a different organization; or
- Applicant has 4% LIHTC experience.

Only developers that have received Ohio 9% HTCs and received 8609s for at least three projects in the past 10 years are eligible to serve as a co-developer/partner entity to those applicants not meeting the 9% HTC minimum eligibility requirements.

EXPERIENCE & CAPACITY REVIEW

OHFA will evaluate each organization individually and as a whole to determine whether the team has the following core competencies:

- Capacity to construct and operate the proposed project;
- Record of completing affordable housing developments in required timeframes;
- Record of meeting project deadlines set by OHFA;
- Management team experience marketing and leasing affordable housing units;
- Experience developing and managing communities similar to the proposal; and
- Compliance with the requirements of the HTC program and other OHFA-administered programs.

OHFA will use information submitted with the application and other reasonable sources available to make all determinations, including reports and opinions of other public funding sources. OHFA may request additional information to evaluate experience and capacity as it determines may be necessary. OHFA may place additional restrictions on development team members, limit the number of awards, applications or amount of resources available to a

development team, and limit awards due to identities of interest between organizations applying for OHFA funding.

Any team that lacks sufficient experience and capacity to manage an award will be removed from consideration. OHFA may determine whether any entity is acting as a developer based on the totality of available information.

Development Team Evaluation

OHFA will use the following criteria to evaluate the team as a whole, including General Partners, developers, and development consultants, for the proposed development (the experience of syndicators will not be considered when evaluating the Experience and Capacity of a development team):

- **Development History:**
 - OHFA will review the experience of the development team with the housing type, location or type of geographic area, and scope of the development being proposed, including developments financed by OHFA, HTC developments in other states, and other types of affordable housing in any state.
- **Past Performance:**
 - OHFA will analyze the degree to which prior OHFA commitments were honored and the extent to which the development team as a whole had positive interactions with OHFA, including but not limited to the history of exchanging HTCs, extending deadlines on HDAP agreements, submitting requests for Form(s) 8609 within established deadlines, timely submission of reports, maintenance of properties on Ohio Housing Locator, and compliance with competitive scoring criteria.
- **Present Capacity:**
 - OHFA will review all developments that the team members presently have in development and determine whether there is sufficient capacity to successfully complete all developments and any new development awards in a timely and efficient manner. The amount of resources awarded to a particular team may be limited based on OHFA's judgment of capacity.
- **Financial Strength:**
 - OHFA must find the financial capacity of the team as a whole to be acceptable. OHFA may request financial statements for members of the ownership entity providing guarantees.
 - General Partners that have not placed a service a project in Ohio within the last five years must submit financial documentation as described in the Development Team Experience & Capacity Review Document Submission Requirements section.
- **Outstanding financial obligations:**
 - All financial obligations to OHFA and to the State of Ohio must be current. Any delinquent obligations of any team member may disqualify the team from competing for an award, including timeliness and completeness of HDAP repayments and communication with OHFA staff regarding those obligations. OHFA will perform a credit check on the developer and General Partner.

Property Management Company Evaluation

The Experience and Capacity review of the management company as described below will be completed upon submission of the Final Application. At proposal application, the applicant must only identify the management company in the AHFA.

Final Application: At final application (or submission for Non-Competitive HTC), the applicant must provide a completed Management Company Capacity Review form. The Management Company Capacity Review form is contained as a tab within the AHFA.

The following criteria, outlined in more detail in the Review form, will be used to evaluate the management company for the proposed development:

- **Experience and Performance**, including but not limited to years of experience, current portfolio, quality and success of previous developments, history of violations, and required certifications for on-site managers.
- **Operations and Structure**, including but not limited to ownership structure, ownership interests, and possession of an Ohio Real Estate Broker's license if applicable.

At a minimum, the management company must have managed at least five HTC and/or federally-subsidized developments (each consisting of at least ten units) for at least one year each; or must have managed two HTC developments (each consisting of at least ten units) for at least three years each.

Management companies with the requisite experience above, but with no prior experience managing OHFA properties will be evaluated by the information contained in their completed OHFA Management Company Capacity Review. These companies will be required to attend an HTC training and complete the OHFA Onboarding Program.

All developments currently owned and/or managed by the company must not have any uncured Forms 8823. Exceptions may be granted on a case-by-case basis for 8823 events that are not the fault of the company, such as a casualty loss, or non-compliance issues that are inherited from the prior property manager or owner.

APPENDIX D: UNIVERSAL DESIGN COMPONENTS

Developments must incorporate all mandatory components (marked with an asterisk) of Universal Design in all units, as well as the specified number of additional components required for points. Exception requests for mandatory components will be accepted for rehabilitation projects.

OHFA will accept proposed universal design features beyond the provided list relevant and necessary to the applicant's development. The applicant will be required to clearly describe the additional feature and provide justification for the necessity of its inclusion. The evaluation, acceptance, and classification of universal design proposals is the sole discretion of OHFA.

Universal Design is not a safe harbor for other required accessibility codes such as ANSI A117.1, UFAS or the Fair Housing Act. It should be used as a supplement to required accessibility codes and building codes.

Entry

- ✓ *36"-wide (minimum) entry door with lever-style handle (mandatory for NC only)
- ✓ *Minimum 5' x 5' level clear space inside and outside entry door
- ✓ *Adequate non-glare lighting at walkways, accessible routes, and exterior spaces
- ✓ *Adequate lighting both inside and outside the building and unit entrance
- ✓ *High visibility address numbers (both building and exterior units)
- ✓ *Overhead weather protection at entrances (mandatory for NC only)
- ☐ Built-in shelf/bench/ledge located outside the door
- ☐ Nonslip surfaces on walkways and entryways
- ☐ Primary unit entry with an accessible/dual peephole and backlit doorbell
- ☐ Door locks that are easy to operate, such as keyless locks with remote control or keypad
- ☐ No-step entry (1/2" or less threshold) at main entrance

Interior Stairs and Hallways

- ✓ *Adequate lighting to illuminate all stairway(s), landings, and hallway(s)
- ✓ *Hallways with a minimum width of 42"
- ✓ *Anti-slip strips on front edge of steps in color-contrast material
- ☐ Color contrast between stair treads and risers
- ☐ Handrails on both sides of interior stairs

Interior Doors

- ✓ *34"-wide (minimum) doors leading to habitable room, allowing for a 32" minimum clearance
- ✓ *Lever-style door hardware on all interior doors
- ✓ *Interior maximum door threshold of ¼ inch beveled or flush
- ☐ Pocket doors with easy-to-grip handles

Faucets

- ✓ *Anti-scald faucets with lever handle for all sinks, bathtubs, and showers
- ✓ *Pressure balanced faucets

Electrical

- ✓ *Thermostat and control panels that are easy to read and simple to operate
- ✓ *Rocker, touch light, or hands-free switches
- ✓ *Extra electrical outlets near the bed (for medical equipment or rechargeable items, etc.) placed 18" to 24" above finished floor (bedroom only)
- ☐ Lighted switches visible in the dark
- ☐ Switched outlets for lamps, etc. to be turned on with wall switch
- ☐ Electrical outlets, phone jacks, and data ports at least 18" above finished floor
- ☐ Light switches between 44"-48" above finished floor; thermostats no more than 48" above finished floor
- ☐ Clear access space of 30" by 48" in front of switches, outlets, and controls
- ☐ Audible and visual alarms for smoke/fire/carbon monoxide in all code-required accessible areas and all units

Bathrooms

- ✓ *Countertops with beveled edges
- ✓ *Adjustable-height showerhead or hand-held showerhead with flexible hose and easily operable controls
- ✓ *Non-glare lighting at vanities
- ☐ A full- or half-bath on the main floor with clear floor space of 30" x 48"
- ☐ Overhead light fixture in tub/shower
- ☐ Mirror(s) placed for both standing and sitting, such as a full-length or tilting mirror
- ☐ Toilet centered at least 18" from any side wall, tub, or cabinet
- ☐ In at least one bathroom per unit:
 - Low-threshold or curbless shower at least 5' x 3' OR ADA bathtub with seat
 - Clear knee space (at least 27" high) under sink. May be open knee space or achieved by means of removable vanity or fold-back or self-storing doors. Pipe protection panels must be provided to prevent contact with hot or sharp surfaces.
 - Grab bars, or wall-blocking for future installation of grab bars, in tub/shower, and toilet. Grab bars must be properly anchored and supported.

Kitchen

- ✓ *At least 15" clear space on each side of stove, sink, and one side of fridge
- ✓ *Loop handles on drawers and cabinets
- ✓ *Non-glare task lighting to illuminate sink, stove, and work areas
- ☐ Adjustable height shelves in wall cabinets
- ☐ Base cabinets with pull out drawers
- ☐ Pull-out work surface near the oven, refrigerator and/or microwave.
- ☐ Visual contrast at front edge of countertop or between the countertop and the cabinets
- ☐ Side-by-side refrigerator-freezer
- ☐ Cooktop/range with front or side-mounted controls (senior units only)
- ☐ Extra outlets for small appliances, electronics, etc.
- ☐ Clear knee space (at least 27" high) under sink, counters, and/or cook tops. If under sink, pipes must have protection and may not be in the required knee space. May be open knee space or achieved by means of removable base cabinets or fold-back or self-storing doors.

Closets/Storage

- ☐ Area is well-lit with a switch located outside the space
- ☐ Doors and handles that are easy to operate. No bi-fold or accordion-type doors.
- ☐ Adjustable-height shelving and/or closet rods OR clothes rods installed at multiple heights
- ☐ Pull out-shelves, rollout cabinets, and other easy to access storage components

APPENDIX E: OHPO PRELIMINARY DETERMINATION OF LISTING

Checklist for OHFA Applicants Seeking a Preliminary Determination of Listing

Supporting Materials

Photos

- ☐ Photos of property in "before" (pre-rehab) state - including all exterior elevations and sample views of each interior level.
- ☐ Labels on the back that include property name, address, sequential numbers, view.
- ☐ Keyed to a photo-key floor plan/sketch map of property.

- ☐ Printed in color on photo paper.
- ☐ 4"x6"
- ☐ 2 sets

Photo Key

- ☐ Shows all numbered photo locations with arrow showing direction of view.

Part 1 Form: Evaluation of Significance

- ☐ Fill out sections 1 and 3 completely.

Section 2 "Nature of Request"

- ☐ Check the box to choose the appropriate "preliminary determination" option.

Section 4 "Applicant"

- ☐ Check the applicable box in the middle of the text field regarding ownership.
- ☐ If applicant is not the owner, send owner statement with form.
- ☐ Sign and date (blue ink is preferable).
- ☐ Make sure there is an original, dated signature on both copies.

Section 5 "Description of Physical Appearance"

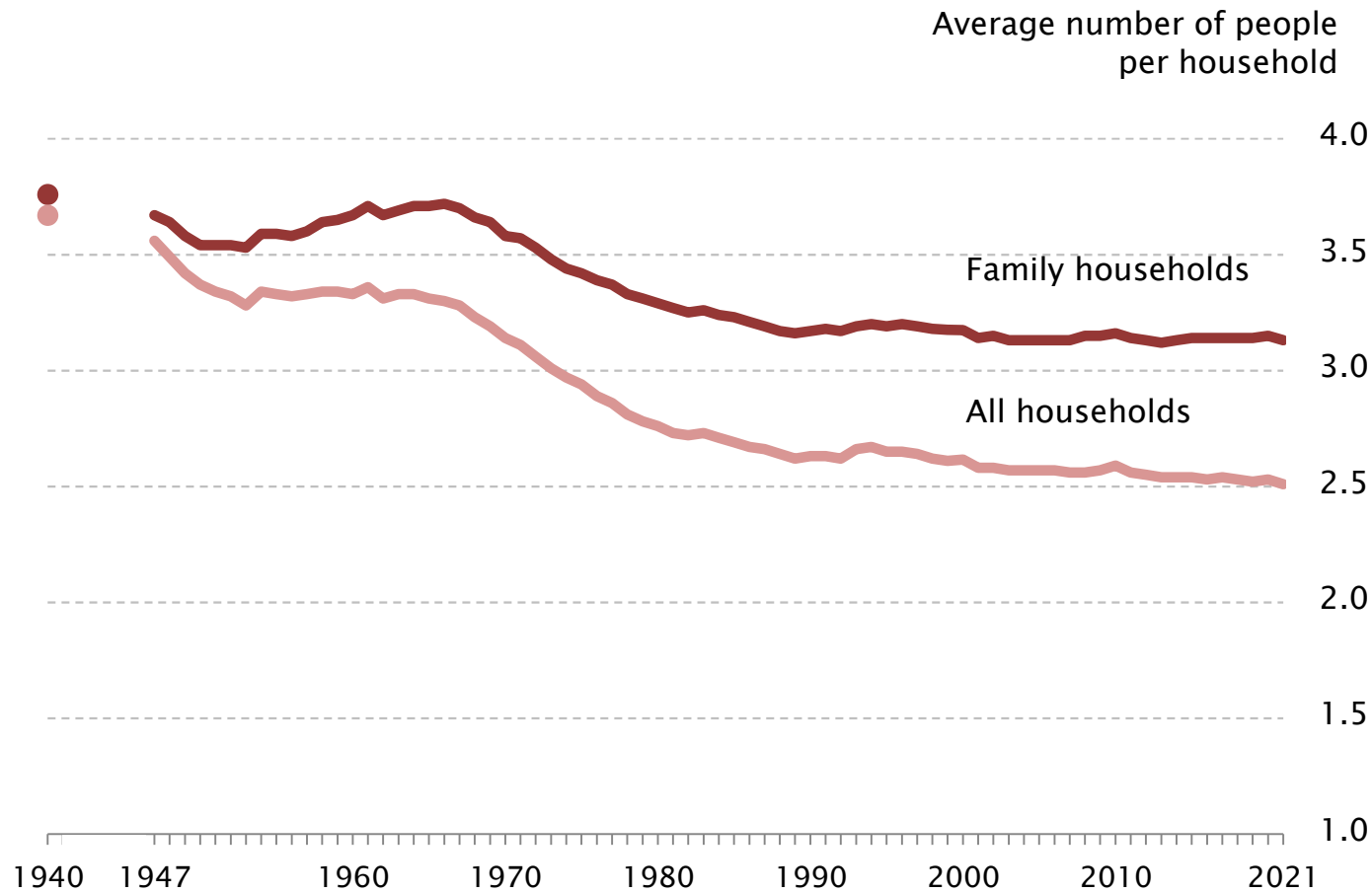
- ☐ Are the important features of the property identified in the Description Section, including site, date, materials, style, size, roof-shape, story, plan, windows, foundation, details, and interior?
- ☐ Does the description convey the significant qualities of the property? Through what features? Do these features retain integrity?
- ☐ Does the Description include information about the setting, environment, and or surrounding buildings/areas?
- ☐ Have contributing and noncontributing features been identified?
- ☐ Is the Description clear and complete? If the property has been altered, is the difference between the original (or historic) and the current condition and appearance clear?
- ☐ Have alterations (if any) been adequately described? Has the evaluation of their impact on the integrity been made? Have alterations been evaluated regarding significance that may have accrued over time?

Section 6 "Statement of significance"

- ☐ Does the specific date or date range reflect the property's period of historic significance?
- ☐ Does the context in which the property has been evaluated as significant justify the local, state, or national level of significance chosen for the property?
- ☐ Is the Statement of Significance written in a clear and complete manner?
- ☐ Does the integrity relate to the overall property, not its features and parts?

Applications for preliminary determinations must contain substantially the same level of documentation as National Register nominations, as specified in 36 CFR Part 60 and NPS instructions for completing National Register nominations.
Note that the Part 1 Evaluation of Significance does not take the place of nomination to the National Register of Historic Places.

Figure HH-6
Changes in household size



Source: U.S. Census Bureau, Current Population Survey, Annual Social and Economic Supplements, 1940 and 1947 to 2021.





2070 Elm Street



204

2.00

141

138

130

126

150

2054

217

211

207

205

203

201

209

2048

2046

2044

2042

2040

2036

2035

2033

2022

20242028

137

139

135

131

133

129

123

W. McMick

EXHIBIT G



Google Maps 1909 Dunlap St

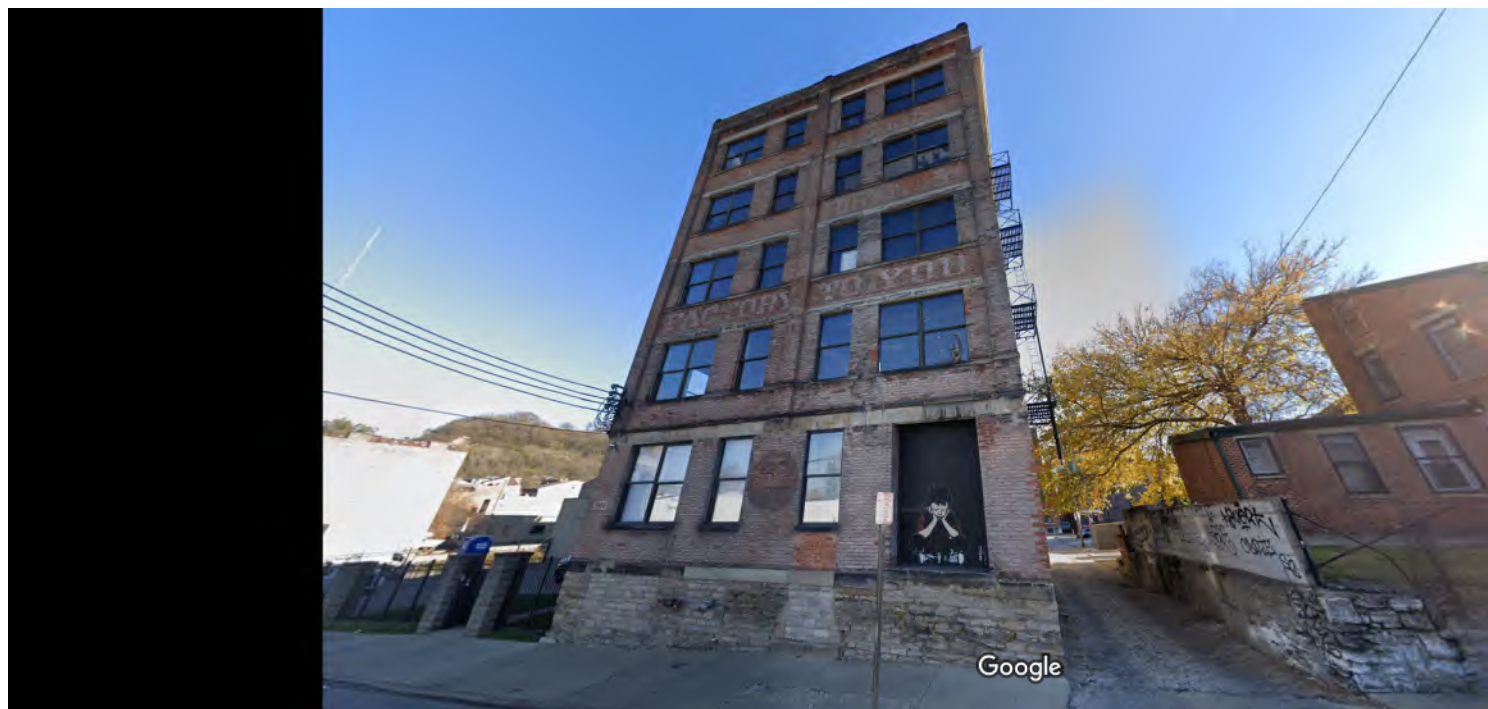


Image capture: Nov 2020 © 2022 Google

←

1908 Dunlap St

All

Street View & 360°

Cincinnati, Ohio

Google

Street View - Nov 2020

Google Maps 1500 Elm St



Image capture: Nov 2020 © 2022 Google

←

1500 Elm St

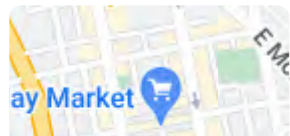
All

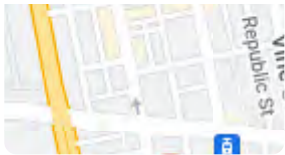
Street View & 360°

Cincinnati, Ohio

Google

Street View - Nov 2020





Google Maps

1622 Vine St



Image capture: Nov 2020 © 2022 Google

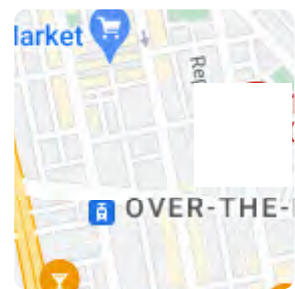
←

1622 Vine St

All

Street View & 360°

Cincinnati, Ohio
Google
Street View - Nov 2020



Google Maps 1341 Walnut St



Image capture: Nov 2020 © 2022 Google

← 1341 Walnut St

- All
- Street View & 360°

Cincinnati, Ohio
Google
Street View - Nov 2020

Google Maps

41 E McMicken Ave



Image capture: Nov 2020 © 2022 Google

←

41 E McMicken Ave

All

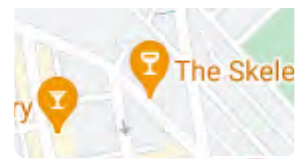
Street View & 360°

Cincinnati, Ohio

Google

Street View - Nov 2020







This petition has collected
86 signatures
using the online tools at www.ipetitions.com

Printed on 2022-06-07

JUNE 7th 2022

(86) I P

(23) H.S.

EXHIBIT J

109

STOP OTRCH's 2000 Dunlap Street PSH Development

About this petition

OPPOSITION PETITION

STOP OTRCH's 2000 Dunlap Street PSH Development

Over The Rhine Community Housing (OTRCH) of Cincinnati, Ohio has proposed a PSH development, targeted to serve individuals experiencing chronic homelessness and have a history of mental health illnesses and drug and alcohol addiction, at 2000 Dunlap Street in the Mohawk Neighborhood of OTR. This development will consist of a four-story building with (44) studio apartments on a 100' x 100' Lot with zero lot line construction.

Residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas OPPOSE THIS PROJECT for the following reasons:

- This proposed project is seeking a zoning variance that would permit 44 units on a lot zoned for 14 units. This is three times the zoned density for this lot and results in too many units crammed into a small parcel in a busy, highly congested area that serves low density residential housing, commercial businesses, light industry, entertainment businesses, breweries, bars, night clubs and restaurants. Cincinnati City Council recently voted NO to increase density ensuring that existing zoning restrictions for density remain in place.
- This project will change the character of our neighborhood by adding another institutional/transitional type housing facility to our neighborhood that already has several, including the Volunteers of America that is less than 1-block and is a (130) Bed facility for sex offenders and other criminals finishing their sentences, Logan Towers is less than 2-blocks and is a (63) Bed facility for individuals experiencing chronic homelessness with a history of mental health or substance use disorders, OTRCH's Jimmy Heath House, (25) Bed facility for individuals experiencing chronic homelessness. The addition of this project will result in a total of 262 institutional beds in our small pocket neighborhood. Institutional housing will outnumber market rate housing more than 2 to 1. This is NOT affordable housing. This is institutional transitional housing.
- Placing 44 clients with mental health illnesses and drug and alcohol addiction in a neighborhood with open drug sales and prostitution, gun violence and a plethora of drinking establishments does NOT set up the chronic homeless for success. No more institutional projects need to be shoehorned into our small neighborhood which is trying to evolve from past neglect.
- Within a 10-minute walk of this project low-income government subsidized housing out numbers market rate housing almost 10 to 1. We support mixed housing, combination of market rate, low income, and workforce housing. Workforce housing for people who live, work, and generate payroll taxes in our city is what is needed to move the city and our neighborhood forward. Why is government subsidized housing limited to a handful of Cincinnati neighborhoods? The other 52 neighborhoods should be considered to disperse affordable housing throughout Cincinnati.
- There are absolutely no policies or guarantees in place to ensure that the clients of this facility are actually from this neighborhood or the city. Clients can and will come from nearby cities,

other states, and regions. This will only increase the workload on the overburdened city services at the expense of the taxpayers of Cincinnati.

- There are no policies or guidelines in place that will prohibit additional sex offenders from being housed in this project. At last count on April 6th, 2022, there were 62 convicted sex offenders residing at Volunteers of America, 115 W. McMicken, a 1-minute walk from this proposed facility.
- The zero-lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street are already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
- No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
- Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.
- 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type. The Urban Mix Zoning was adopted in 2007 to pave the way for housing in this industrial/warehouse without detriment to existing businesses and jobs. Urban Mix Zoning has no reference to PSH, but specifically excludes Transitional Housing of the type the developer wants to put in (#5 and #6) is specifically excluded:
:§ 1401-01-T. - Transitional Housing.
- SHARE LINK TO SECTIONPRINT SECTIONDOWNLOAD (DOCX) OF SECTIONSEMAIL SECTION"Transitional housing" means housing designed to assist persons in obtaining skills necessary for independent living in permanent housing, including homes for adjustment and halfway houses. Transitional housing is housing in which:
 - An organization provides a program of therapy, counseling, or training for the residential occupants.
 - The organization operating the program is licensed or authorized by a governmental authority having jurisdiction over operation; and
 - The program is for the purpose of assisting the residential occupants in one or more of the following types of care:
 - Protection from abuse and neglect.
 - Developing skills necessary to adjust to life.
 - Adjusting to living with the handicaps of physical disability.
 - Adjusting to living with the handicaps of emotional or mental disorder or mental retardation.
 - Recuperation from the effects of drugs or alcohol, even if under criminal justice supervision; or
 - Readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release, and probationary programs.

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas Oppose the 2000 Dunlap Street PSH Development.

Signatures

1. Name: Kristen Bonavita (kristen@cia-auction.com) on 2022-04-13 19:32:34
Comments:

2. Name: Jeffrey M Luggen (jeffrey.michael23@gmail.com) on 2022-04-13 19:34:50
Comments: 2037 Elm St.

3. Name: Christine Oliver (christine@cia-auction.com) on 2022-04-13 19:38:02
Comments: 3707 Vollmer Place, Cincinnati, OH

4. Name: jeff luggen (jeff@jluggen.com) on 2022-04-13 19:39:30
Comments: 2020 dunlap street

5. Name: Robert Sehlhorst (robertsehlhorst@gmail.com) on 2022-04-13 20:23:45
Comments:

6. Name: Ryan Luggen (ryan@cia-auction.com) on 2022-04-14 18:08:54
Comments:

7. Name: Stuart Schulman (sschulman@dltdelivers.com) on 2022-04-15 16:58:30
Comments: 225 Stark Street Cincinnati, Ohio 45214

8. Name: Joseph M Vallo (jvallo@vallomanagement.com) on 2022-04-15 17:35:55
Comments:

9. Name: Nick Caruso (ncar7623@gmail.com) on 2022-04-15 18:53:51
Comments: I am a resident of Dunlap Street. This is not the right location for this project due to several factors in the immediate area surrounding the proposed location. This is a great project, but the people utilizing the service would be better served if this project was built in a location that doesn't promote and surround them with the very things that likely contributed to their situation.

10. Name: Michael Basch (squirrelweddingfilms@gmail.com) on 2022-04-15 20:05:39
Comments:

11. Name: Alfred J Berger Jr (dsiltd@fuse.net) on 2022-04-15 20:32:30
Comments: Warehousing the poor or the sick is a sick policy

12. Name: Deborah Johnson (djohnson@robinimaging.com) on 2022-04-15 21:09:11
Comments: As co-owner of Robin Imaging Services and resident in The Mohawk Neighborhood, I strongly disagree to add another institutional transitional housing facility where this is proposed. There are many other choices in Cincinnati to better support this need. Those of us in The Mohawk Neighborhood have been working to build affordable

housing here so that those who work here or in OTR can live here.

-
13. Name: Carol Ann schulman (gardenroselady@yahoo.com) on 2022-04-15 21:20:26
Comments:
-
14. Name: Kim McCarty (kimhalemccarty@gmail.com) on 2022-04-16 00:27:48
Comments: The placement of this project at 2000 Dunlap is predictably discriminatory and will have a disparate impact on the Disabled and African Americans. It will steer poor, disabled, predominately black people to a poor, predominately black community.
- It is inhumane to provide housing for the targeted population in a low opportunity community that is infested with open-air drug markets, prostitution, chronic blight and uncontrollable crime.
-
15. Name: john valentine (johnv913@gmail.com) on 2022-04-16 01:07:23
Comments: We have had enough of this in our neighborhood!
-
16. Name: Sherri King (sherribarberphotography@gmail.com) on 2022-04-16 03:50:18
Comments:
-
17. Name: Kenneth Klabunde (k.klabunde@gmail.com) on 2022-04-16 11:16:01
Comments:
-
18. Name: Rebecca Klabunde (rebecca.klabunde@gmail.com) on 2022-04-16 11:25:58
Comments:
-
19. Name: Mikey Sorboro (mikey@latenightslice.com) on 2022-04-16 14:33:36
Comments: Business owner in neighborhood. Late Night Slice & Oddfellows
-
20. Name: Hal Lorton (notrollah@gmail.com) on 2022-04-16 21:20:09
Comments:
-
21. Name: Tara Lorton (4holytara@gmail.com) on 2022-04-16 22:34:30
Comments:
-
22. Name: Jerome Luggen (jerome@cia-auction.com) on 2022-04-18 12:38:12
Comments: 2020Dunlap Street
-
23. Name: John Walter (johnwalter@cinci.rr.com) on 2022-04-18 22:55:25
Comments: I am against this project for all the reasons argued in this petition.
-
24. Name: Paul Bauer (bauerp674@gmail.com) on 2022-04-20 15:29:43

Comments:

-
25. Name: Daniel Bascone (dfb1143@gmail.com) on 2022-04-20 15:41:23
Comments:
-
26. Name: Dale Anderson (daleanderson323@gmail.com) on 2022-04-20 16:13:38
Comments:
-
27. Name: Logan Reynolds (loganpreynolds@gmail.com) on 2022-04-20 16:14:03
Comments:
-
28. Name: Jenny Miller (jenny_miller4@aol.com) on 2022-04-20 17:14:31
Comments:
-
29. Name: Ethan Anost (ethananost2843@yahoo.com) on 2022-04-20 17:23:20
Comments:
-
30. Name: Jasmine Wells (jasmine.kww@gmail.com) on 2022-04-20 17:26:21
Comments:
-
31. Name: Sarah Harlow (sarahwv26@gmail.com) on 2022-04-20 17:32:06
Comments: 216 Klotter Ave
-
32. Name: Renee Miller (thespeckledwren@aol.com) on 2022-04-20 17:32:29
Comments:
-
33. Name: Julie Miller (millerjulie50@yahoo.com) on 2022-04-20 17:35:06
Comments:
-
34. Name: Colin Barge (bargecolin@gmail.com) on 2022-04-20 17:38:50
Comments: This is NOT in the best interest of the neighborhood and will have a negative impact.
-
35. Name: Jennifer Jill Cummins (jenjillj@gmail.com) on 2022-04-20 17:43:14
Comments:
-
36. Name: Evan Cummins (evan.cummins@gmail.com) on 2022-04-20 17:45:21
Comments:
-
37. Name: Blake Baxter (baxter.blake@gmail.com) on 2022-04-20 17:48:09
Comments:
-

38. Name: Kristina Elaine LaScalea-Sehlhorst (tinalascalea@gmail.com) on 2022-04-20 17:55:20
Comments:
-
39. Name: Caitlin Cummins (cjj.cummins@gmail.com) on 2022-04-20 18:10:16
Comments:
-
40. Name: Joseph Luggen (buckeyemachinery@hotmail.com) on 2022-04-20 18:16:17
Comments:
-
41. Name: David Macejko (overtherhinecigars@gmail.com) on 2022-04-20 18:39:04
Comments: Over the Rhine is Cincinnati's highest crime neighborhood of all kinds. according to Cincinnati Police. I've been a victim. This project will do nothing to mitigate that reality and will likely exacerbate problems with theft, breaking and entering, and violence between Liberty, and McMillan.
-
42. Name: Andy Smith (smith.andrew.lynn@gmail.com) on 2022-04-20 18:54:16
Comments:
-
43. Name: Matt Jacob (mattjjacob@gmail.com) on 2022-04-20 22:57:52
Comments:
-
44. Name: Elliott Culter (eculter@sugarcreek.com) on 2022-04-21 14:34:01
Comments: Signing on behalf of Southern Ohio Holding Organization which owns properties on Mohawk and McMicken.
-
45. Name: Bradley Rusk (ruskb34@gmail.com) on 2022-04-21 15:39:37
Comments:
-
46. Name: Frederick C Ellenberger (fellenberger@cinci.rr.com) on 2022-04-21 15:41:04
Comments:
-
47. Name: Brent Rohr (brent.rohr@gmail.com) on 2022-04-21 15:46:56
Comments:
-
48. Name: Rebecca Restrepo (restreppo@gmail.com) on 2022-04-21 15:55:30
Comments:
-
49. Name: Carley Atchison (carley.atchison@gmail.com) on 2022-04-21 16:12:45
Comments:
-
50. Name: Liz Yauch (lizebear18@gmail.com) on 2022-04-21 17:00:16
Comments:
-

-
51. Name: Vincent Harnett (vincent.harnett@gmail.com) on 2022-04-21 21:06:03
Comments: I am against OTRCH's 2000 Dunlap Street PSH Development
-
52. Name: Ron Rowe (rhrproperties@gmail.com) on 2022-04-21 22:15:08
Comments:
-
53. Name: Patricia Berger (cinti1pa@aol.com) on 2022-04-22 13:04:02
Comments: This will increase insecurity and bad image to an already tainted neighborhood
-
54. Name: James Hautz (jjhautz@gmail.com) on 2022-04-22 13:06:45
Comments:
-
55. Name: Richard Cedar (rdcmole@aol.com) on 2022-04-22 13:19:21
Comments:
-
56. Name: Mary Fox (MARYFOX522@GMAIL.COM) on 2022-04-22 14:13:45
Comments: 522 CONROY ST
-
57. Name: Diego Jordan (arch_terra@hotmail.com) on 2022-04-22 16:21:31
Comments: Wrong proposal. Wrong place for this type of facility.
-
58. Name: Douglas Wainz (wanderlust@fuse.net) on 2022-04-22 16:40:21
Comments:
-
59. Name: Sandy Wainz (cityview@fuse.net) on 2022-04-22 16:41:48
Comments:
-
60. Name: David Reid (hman@hdavid.com) on 2022-04-22 16:47:43
Comments: We have enough social agencies in our neighborhood!
-
61. Name: Michael Fox (michaeljfox522@gmail.com) on 2022-04-22 17:01:48
Comments:
-
62. Name: Cherie Senger (cherie.senger@gmail.com) on 2022-04-22 21:35:30
Comments:
-
63. Name: Mitul Dadhania (mituldadhania@hotmail.com) on 2022-04-23 11:04:31
Comments:
-
64. Name: Kate Hensler (hensler.ka@gmail.com) on 2022-04-23 22:41:56
Comments:

-
65. Name: Nathan Baugh (nbaughlv@yahoo.com) on 2022-04-24 08:07:47
Comments:
-
66. Name: Molly Kirleis (mfk0220@gmail.com) on 2022-04-24 08:08:21
Comments:
-
67. Name: Craig Herget (craig.herget@gmail.com) on 2022-04-24 20:15:59
Comments: I oppose this project.
-
68. Name: Willim Johnson (BJohnson@RobinImaging.com) on 2022-04-25 12:42:14
Comments: The Mohawk neighborhood is trying very hard to move forward. We have enough mental health and homeless problems now and do not need more.
-
69. Name: steven fink (sfink@bangzoomdesign.com) on 2022-04-26 20:44:36
Comments: I am opposed to this project.
-
70. Name: Alex Dieterle (adieterle@bangzoomdesign.com) on 2022-04-26 21:32:44
Comments: 1415 Central PKWY
-
71. Name: Steve Casino (tamer-boa-0k@icloud.com) on 2022-04-26 22:06:13
Comments: 1415 Central Parkway
-
72. Name: Kimberly Starbuck (kimstarbuck9@gmail.com) on 2022-04-27 02:54:50
Comments:
-
73. Name: Michael Hoeting (MHOETING@GMAIL.COM) on 2022-04-27 19:43:44
Comments:
-
74. Name: Carol Schulte (carolnschulte@gmail.com) on 2022-04-27 19:45:02
Comments:
-
75. Name: Cary Satch Travis (carytravis@gmail.com) on 2022-04-27 23:05:27
Comments:
-
76. Name: Julie Fay (jdfayotr@gmail.com) on 2022-04-29 02:25:45
Comments: Too dense for the location, zoning and clientele served.
-
77. Name: Neil Marquardt (neil.marquardt@gmail.com) on 2022-04-29 12:23:01
Comments: This project makes NO sense at this location. Density issues, parking challenges, safety concerns, property values, putting at-risk people in the middle of this neighborhood are some of my tops concerns.

-
78. Name: Joe Maas (maas2212@gmail.com) on 2022-04-29 18:15:39
Comments: 10750 Mockernut Dr
Harrison. Ohio 45030
-
79. Name: David Berger (davidb@msdf1.com) on 2022-04-30 18:07:16
Comments:
-
80. Name: Nancy P Berger (Nancyb@northernrow.com) on 2022-04-30 20:13:25
Comments: 2567 Queen City Ave
-
81. Name: Josh Quattlebaum (Joshq@northernrow.com) on 2022-05-01 16:58:04
Comments:
-
82. Name: Karen Domine (edenpk2@aol.com) on 2022-05-02 12:41:13
Comments:
-
83. Name: Brenden Douglass (brendend@northernrow.com) on 2022-05-02 13:07:56
Comments: As someone who works in OTR and already deals with the current homeless situation I can see how a new homeless shelter in our neighborhood can negatively effect the company I work for and the guests we accommodate. Moreover, many people visiting Cincinnati come to OTR to enjoy themselves and this potential shelter would reflect poorly on our city
-
84. Name: Cody R Jackson (cjackson@bangzoondesign.com) on 2022-05-02 16:37:30
Comments:
-
85. Name: Alex Hutchins (alexh@northernrow.com) on 2022-05-03 17:33:54
Comments:
-
86. Name: Jonathon Pettit (tungstenx3@hotmail.com) on 2022-06-02 23:18:47
Comments:
-

The Dunlap neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

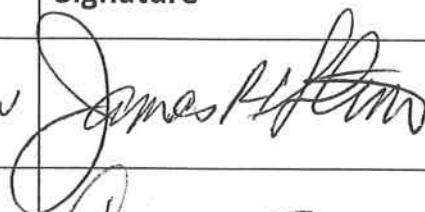
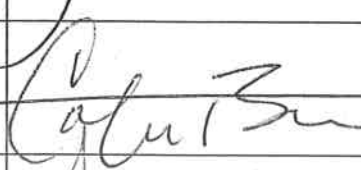
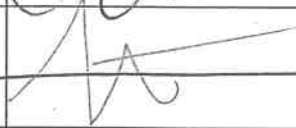
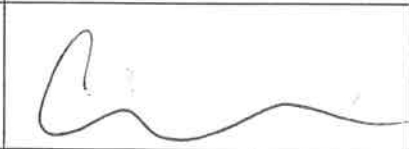
22

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
MARK GATHERWRIGHT	Mark Gatherwright	2025 ELM ST. 45202
Janet Gatherwright	Janet Gatherwright	2025 Elm St 45202
Juliana Lemen	Juliana Lemen	2023 Elm St 45202
Mike Fitzgerald	Mike Fitzgerald	2023 Elm St 45202
Kyle Stein	Kyle Stein	2023 Elm St 45202
Beth Ali Muzio	Beth Ali Muzio	2023 Elm St 45202
Patricia Greene	Patricia Greene	2023 Elm St 45202
GERALD MAWIES	Gerald Mawies	enabler 2025 Elm
Joanne Farmer	Joanne Farmer	2035 ELM ST #84 45202
Kelly Johnson	Kelly Johnson	1885 1885 Forestview Ct. 45233
Cherie Antares	Cherie Antares	1926 Dunlap 45202

The Dunlap neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
JAMES R. STERN		2020 DUNLAP ST (CENT INDUSTRIAL BUILDINGS)
Colin Burge		2031 Dunlap St Cinci 45214
Steven Fink		1908 Dunlap St #2 Cincinnati OH 45214
Joseph V FETIG		242 STARK ST CINT OH 45214
David Walters		260 STARK ST CINC OH 45214
Mehmet SHALVAS I.		2020 Central-Pkwy CINC OH 45214
John Philkovic		235 Stark St. Cincinnati OH 45214
Cosun		2020 Puler St. Cincinnati, OH 45214

Signal
Electron
Sign
Electron

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
CHRIS BURNS		2016 Elm St. Cincinnati, OH 45202
Chris Helmers		2023 Elm St. Cincinnati Ohio 45202
Adam Dehn		2023 Elm St Cincinnati Oh, 45202 Cincinnati
JAM MARTIN		1528 Elm St Cincinnati OH 45202

- The Dunlap Neighbors do not oppose the mission of providing affordable housing for our low income families and our workforce brothers and sisters. We believe this project is the wrong project in the wrong place.

[illegible]

EXHIBIT K

Witness List

Names	Address	Topics
Bob Sehlhorst	2019 Elm Street, Cincinnati, OH 45202	Over Loading of Institutional Housing in OTR
Jeffrey L. Luggen	2020 Dunlap Street, Cincinnati, OH 45214	Bldg. too Big & Too Tall - Will look out of place. Construction of Colby Alley will cause problems CPD, CFD & EMS, Traffic & Parking Patterns, Setback as Adjacent Property Owner
Ryan Luggen	2020 Dunlap Street, Cincinnati, OH 45214	Density Setback
John Walter	Klotter Street, Cincinnati, OH	OTRCC Vote to Oppose the Project
Neil Marquardt	42 W McMicken Avenue, Cincinnati, OH	Experience with OTRCH Changing Character of the Neighborhood Changing Appearance of the Neighborhood
Jeffrey M. Luggen	2020 Dunlap Street, Cincinnati, OH 45214	Petitions

From: [Jessica D. Gibson](#)
Sent: Friday, June 24, 2022 3:59 PM
To: [Owen, Douglas](#)
Cc: [Conservator, Urban](#); [Christopher P. Finney](#)
Subject: [External Email] Supplemental Exhibits 2000 Dunlap Case Nos. COA2021066 and COA2022032
Attachments: [Exhibit L-O.pdf](#)

External Email Communication

Good Afternoon Mr. Owen,

Attached please find supplemental exhibits Dunlap Street Properties LLC and Cincinnati Industrial Auctioneers respectfully requests the Board to consider in case nos. COA2021066 and COA2022032.

Additionally, please find "Exhibit P" which is a short video at the OneDrive link below for the Board's consideration.

 [Exhibit P.MOV](#)

Have a great weekend!

Jessica D. Gibson, Esq.
FINNEY LAW FIRM, LLC
4270 Ivy Pointe Boulevard, Suite 225
Cincinnati, Ohio 45245
Office: 513.943.5677
Fax: 513.943.6669
jdg@finneylawfirm.com
www.finneylawfirm.com



Please connect with us on [Facebook](#), [Twitter](#), and [LinkedIn](#). Also, please visit our title company web site at www.ivypointetitle.com.

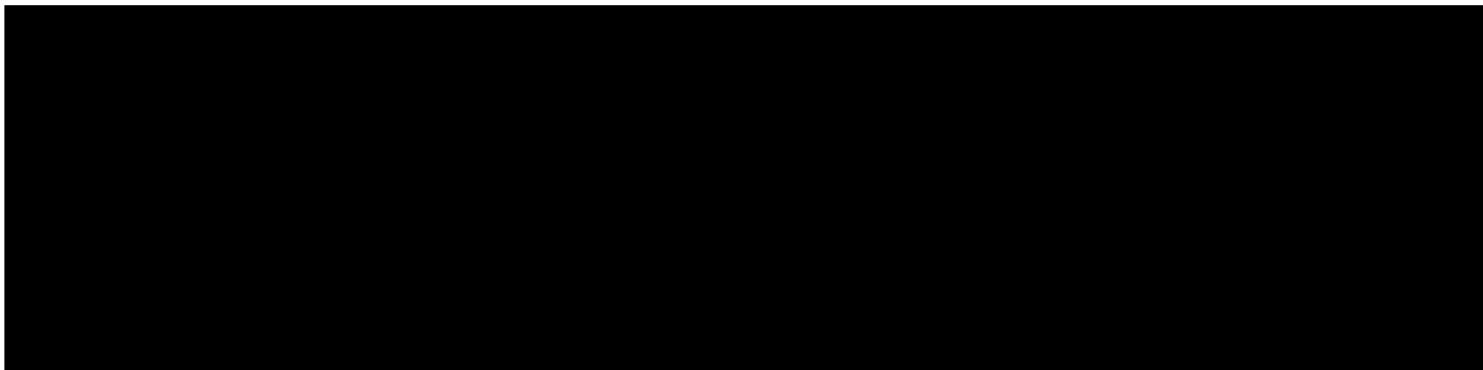
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EXHIBIT L

Jessica D. Gibson

From: Jeff Luggen <JEFF@cia-auction.com>
Sent: Wednesday, June 22, 2022 12:09 PM
To: Jessica D. Gibson
Subject: RE: 2000 Dunlap Street PSH Project



Jeffrey L. Luggen, Vice President
CIA Company | Auctions | Acquisitions | Appraisals | Since 1961
513-241-9701 Office | 513-702-4554 Cell | jeff@cia-auction.com
Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

From: Foust, David <DFoust@ohiohome.org>
Sent: Thursday, June 9, 2022 2:36 PM
To: Jeff Luggen <JEFF@cia-auction.com>
Subject: RE: 2000 Dunlap Street PSH Project

Jeff,

Sorry for the delay. I was recently out of the office for unexpectedly.

The answer to your first two questions can be found in our QAP:
<https://ohiohome.org/ppd/documents/2022-2023-QAP.pdf>

On page 44 you will find information regarding Special Allocations. In short: Special Allocation scenarios may occur if a development is unable to proceed due to the actions of unrelated parties. The developer may apply for a special allocation of credits within three years following the return of their original allocation of competitive tax credits.

On page 41 you will find the scoring criteria for Service-Enriched Housing.

Opponents of a particular development are permitted to speak at the OHFA Multifamily Committee meeting during which the Committee is presented the project in question. As I said before, we do not have a date when this project will be presented to the Multifamily Committee just yet. It will likely be sometime late fall or winter this year when the project is ready to go in front of the committee.



David Foust / Director of Multifamily Housing

Ohio Housing Finance Agency

57 E Main Street Columbus OH 43215

Phone 614.387.1646

Email DFoust@ohiohome.org

www.ohiohome.org

STAY CONNECTED...



We open the doors to an affordable place to call home.

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

From: Jeff Luggen <JEFF@cia-auction.com>

Sent: Tuesday, June 7, 2022 11:32 AM

To: Foust, David <DFoust@ohiohome.org>

Subject: 2000 Dunlap Street PSH Project

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to or click the Phish Alert Button if available.

Hi David,

If HCB does not approve the variances for the 2000 Dunlap Street, can OTRCH use the approved funding for another location?

Can you send me a Scoring Criteria for the PSH project?

When will the neighborhood opposition be able to voice their opinion?

Thanks for your help,

Jeff

Jeffrey L. Luggen, Vice President

CIA Company | Auctions | Acquisitions | Appraisals | Since 1961

513-241-9701 Office | 513-702-4554 Cell | jeff@cia-auction.com

Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

EXHIBIT M

ATTACHMENT A- Density Variances in Historic Districts Reviewed by HCB									
No.	Case	Address	New Construction /existing	Sq. Ft. / Unit	Notes	Allowed	Approved	% Change	Unit Increase
1	ZH20210028	116 E McMicken	Existing	290	10 units = 290.5 sf/unit (existing 8 units. Allowed 5 units by code)	5	10	100%	5
2	ZH2021069	1120 Broadway	Existing	283	6 units=283 sf/unit (existing 5 units. Allowed 3 units by code)	3	6	100%	3
3	ZH20210083	2025 Vine Street	Existing	232	17 units= 232 sf/unit (vacant, allowed 7 units by code)	7	17	142%	10
4	ZH20210084	222 Mohawk St	Existing	488	5 units= 488 sf./unit (existing 4 units. Allowed 3 units by code)	3	5	67%	2
5	ZH20210118	1608 Elm St	Existing	400	5 units=400 sf/unit (vacant, allowed 4 units by code)	4	5	25%	1
6	ZH20210124	1684 Central Parkway	New Construction	312	32 units=312.5sf/unit (allowed 14 by code)	14	32	129%	18
7	ZH20210146	209 Wade St	Existing	495	4 units= 495sf/unit (allowed 3 units by code)	3	4	33%	1
8	ZH20210149	1712 Logan Street	New Construction	517	42 units= 517 sf/unit (allowed 31 by code)	31	42	35%	11
9	ZH20210174	1628 Walnut Street	Existing	332	5 units= 332 sf/unit (vacant, allowed 3 units by code)	3	5	66%	2
10	ZH20220025	118 Findlay St	Existing	312	8 units = 312.5 sf/unit (allowed 5 by code)	5	8	60%	3
11	ZH20220026	112-116 W Elder	Existing	301	16 units = 301 sf/unit (allowed 9 by code)	9	16	78%	7
12	ZH20220027	1338 Main St	Existing	389	11 units = 298.6 sf/unit (allowed 6 by code)	6	11	83%	5
13	ZH20220053	100 E. Clifton Av	Existing	624	7 units = 624 sf/unit (allowed 6 by code)	6	7	17%	1
	Totals:			4975		99	0	935%	69

OTR Density Average Approval 2021 & 2022

- 1) Total 69 Unit Approved in (13) Bldg. the Average Approval being 5.31 Units
- 2) Total Percentage of Approval 935% Over (13) Bldg. Average Approval Density 72%
- 3) 2000 Dunlap PSH Asking for an Increase from (14) to (44), (30) Units. 214% Increase.
- 4) This is a 465% Increase over the Average of 5.31 Units
- 5) The average density increase is 382 sq. ft. of area / unit. Dunlap Street PSH is asking for 227 sq. ft. of area / unit.

Exhibit N

2022 9% LIHTC Final Results

OHFA Tracking Number	Project Name	Allocation Pool	Funding Result	City	County	Geography	Population Served	Lead Developer	Total Units	Credits Reserved	HDAP Reserved	HDL Reserved
22-0002	Sidney Village Apartments	Preserved Affordability	Funded - Competitive	Sidney	Shelby	Rural	Families	Buckeye Community Hope Foundation	34	\$475,592	\$0	\$1,250,000
22-0023	Broadway Commons	Service Enriched Housing	Funded - Competitive	Lorain	Lorain	Central City	Service Enriched	CHN Housing Partners	62	\$1,000,000	\$600,000	\$1,750,000
22-0016	Margaret Wagner Senior Apartments	Preserved Affordability	Funded - Competitive	Cleveland Heights	Cuyahoga	Metro/Suburban	Seniors	CHN Housing Partners	80	\$1,000,000	\$0	\$1,250,000
22-0038	Fieldstone Cottages	New Affordability-Metro/Suburban	Funded - Competitive	Columbus	Franklin	Metro/Suburban	Seniors	Columbus Housing Partnership, Inc. dba Homeport	40	\$960,000	\$0	\$1,250,000
22-0017	Garrett Square Senior Apartments	New Affordability- Central City	Funded - Competitive	Cleveland	Cuyahoga	Central City	Seniors	Commonwealth Development Corporation of America	49	\$1,171,100	\$0	\$1,250,000
22-0024	Park Hotel Redevelopment	Service Enriched Housing	Funded - BoS/Small CoC Set Aside	Toledo	Lucas	Central City	Service Enriched	Community Housing Network, Inc.	45	\$1,000,000	\$300,000	\$1,750,000
22-0018	Poplar Fen Place	Service Enriched Housing	Funded - Competitive	Columbus	Franklin	Metro/Suburban	Service Enriched	Community Housing Network, Inc.	44	\$1,000,000	\$300,000	\$1,750,000
22-0020	Pedretti Place	New Affordability-Metro/Suburban	Funded - Competitive	Cincinnati	Hamilton	Metro/Suburban	Seniors	Episcopal Retirement Services Affordable Living LLC	48	\$1,152,000	\$0	\$1,250,000
22-0041	Elevate 340	New Affordability- Central City	Funded - Strategic Initiatives	Columbus	Franklin	Central City	Families	Fairfield Homes, Inc.	66	\$1,250,000	\$0	\$1,250,000
22-0014	Reserve at Mount Gilead, The	New Affordability- Rural	Funded - Competitive	Mount Gilead	Morrow	Rural	Seniors	Fairfield Homes, Inc.	47	\$1,000,000	\$300,000	\$1,250,000
22-0003	Henrietta Homes	New Affordability- Central City	Funded - Single Family Set Aside	Cleveland	Cuyahoga	Central City	Families	Farnicos Foundation	40	\$960,000	\$0	\$1,250,000
22-0049	Harvest Crossing Senior Villas	New Affordability- Rural	Funded - Competitive	Milton Twp	Jackson	Rural	Seniors	Frontier Community Services	46	\$983,617	\$600,000	\$1,250,000
22-0072	Victory Vistas	New Affordability- Central City	Funded - Competitive	Cincinnati	Hamilton	Central City	Seniors	Kingsley Consulting, LLC dba Kingsley + Co.	50	\$1,199,950	\$0	\$1,250,000
22-0035	Germantown Crossing	New Affordability- Central City	Funded - Revitalization Set Aside	Dayton	Montgomery	Central City	Families	Model Property Development, LLC	50	\$1,199,900	\$0	\$1,250,000
22-0053	Liberty Senior Lofts	New Affordability- Rural	Funded - Appalachian Set Aside	Liberty Township	Trumbull	Rural	Seniors	MVAH Development LLC	43	\$1,000,000	\$0	\$1,250,000
22-0054	Secor Senior Lofts II	New Affordability-Metro/Suburban	Funded - Competitive	Toledo	Lucas	Metro/Suburban	Seniors	MVAH Development LLC	50	\$1,200,000	\$0	\$1,250,000
22-0058	Blanchard House	Preserved Affordability	Funded - RAD Set Aside	Findlay	Hancock	Rural	Seniors	National Church Residences	37	\$594,464	\$0	\$0
22-0060	Vassar Village	Preserved Affordability	Funded - Competitive	Canton	Stark	Central City	Seniors	National Church Residences	65	\$1,000,000	\$0	\$0
22-0026	Preston Pointe	New Affordability- Central City	Funded - Strategic Initiatives	Columbus	Franklin	Central City	Families	Ohio Community Development Finance Fund	50	\$1,199,950	\$0	\$1,250,000
22-0027	Dunlap PSH	Service Enriched Housing	Funded - Competitive	Cincinnati	Hamilton	Central City	Service Enriched	Over-the-Rhine Community Housing	44	\$1,000,000	\$600,000	\$1,750,000
22-0043	Vandalia Point	New Affordability- Central City	Funded - Strategic Initiatives	Cincinnati	Hamilton	Central City	Families	Over-the-Rhine Community Housing	52	\$1,247,948	\$600,000	\$1,250,000
22-0006	Franciscan Annex	New Affordability- Central City	Funded - Competitive	Cleveland	Cuyahoga	Central City	Seniors	Salus-Joyce Development LLC	63	\$1,250,000	\$0	\$1,250,000
22-0008	Canal Crossing	New Affordability- Rural	Funded - Non-RECAP Set Aside	Hebron	Licking	Rural	Families	Spire Development, Inc.	42	\$1,000,000	\$0	\$1,250,000
22-0010	Walnut Woods	New Affordability-Metro/Suburban	Funded - Revitalization Set Aside	Massillon	Stark	Metro/Suburban	Families	Spire Development, Inc.	53	\$1,250,000	\$0	\$1,250,000
22-0046	Bexley Apartments	New Affordability-Metro/Suburban	Funded - Non-RECAP Set Aside	Bexley	Franklin	Metro/Suburban	Families	The Community Builders, Inc.	43	\$1,032,000	\$300,000	\$1,250,000
22-0045	Amesbury Rosalind Apartments	Preserved Affordability	Funded - Competitive	Cleveland	Cuyahoga	Central City	Families	The Orlean Company	66	\$1,000,000	\$0	\$1,250,000
22-0074	Bainbridge Manor Apartments	Preserved Affordability	Funded - USDA Set Aside	Bainbridge	Ross	Rural	Families	Wabuck Development Company, Inc	47	\$802,945	\$0	\$0
22-0063	Greentree Village Apartments	Preserved Affordability	Funded - Competitive	Cincinnati	Clermont	Metro/Suburban	Families	Wallick Development, LLC	50	\$760,000	\$0	\$1,250,000
22-0066	Landings at Delta Crossing, The	New Affordability-Metro/Suburban	Funded - Competitive	Maumee	Lucas	Metro/Suburban	Seniors	Wallick Development, LLC	60	\$1,250,000	\$0	\$1,250,000
22-0067	Gordon Crossing	New Affordability- Central City	Funded - Non-RECAP Set Aside	Cleveland	Cuyahoga	Central City	Families	Woda Cooper Development, Inc.	46	\$1,000,000	\$0	\$1,250,000
22-0068	Hemming Crossing	New Affordability- Rural	Funded - Appalachian Set Aside	Center Township	Carroll	Rural	Seniors	Woda Cooper Development, Inc.	42	\$1,000,000	\$0	\$1,250,000
Total:									1,554	\$31,939,466	\$3,600,000	\$37,000,000

Dusty Rhodes, Hamilton County Auditor

generated on 6/24/2022 10:17:32 AM EDT

Property Report

Parcel ID 221-0013-0223-00	Address 1601 BLUE ROCK ST	Index Order Parcel Number	Tax Year 2021 Payable 2022
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Property Information

Tax District School District	001 - CINTI CORP-CINTI CSD CINCINNATI CSD		Images/Sketches 
Appraisal Area 03900 - NORTHSIDE	Auditor Land Use 300 - INDUSTRIAL VACANT LAND		
Owner Name and Address PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (call 946-4015 if incorrect)	Tax Bill Mail Address PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (Questions? 946-4800 or treasurer.taxbills@hamilton-co.org)		
Assessed Value 15,330	Effective Tax Rate 88.991088		
Property Description SS BLUE ROCK ST 0.579 AC S28 T3 FR2			
			Total Tax \$1,567.24

Appraisal/Sales Summary	
Year Built	
Total Rooms	
# Bedrooms	
# Full Bathrooms	
# Half Bathrooms	
Last Transfer Date	8/6/2020
Last Sale Amount	\$1,500,000
Conveyance Number	241025
Deed Type	CCP - Court of Common Pleas (Conv)
Deed Number	
# of Parcels Sold	6
Acreage	0.579

Tax/Credit/Value Summary	
Board of Revision	No
Rental Registration	No
Homestead	No
Owner Occupancy Credit	No
Foreclosure	No
Special Assessments	Yes
Market Land Value	43,800
CAUV Value	0
Market Improvement Value	0
Market Total Value	43,800
TIF Value	0
Abated Value	0
Exempt Value	0
Taxes Paid	\$1,567.24
Tax as % of Total Value	0.000%

Notes

** 2/2/16 NEW BALANCE PARCEL AFTER C/U/, OLD PARCEL NUMBER 163, TAX YR 2017

Structure List

Structure Name	Use Code	Finished Sq. Ft.	Year Built
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No Proposed Levies Found

Levies Passed - 2021 Pay 2022 Tax Bill

Levy	Levy Type	Mills	Current Annual Tax	Estimated Annual Tax	Note
Hamilton County - Children Services	Renewal	2.77	\$37.20	\$37.20	B
Hamilton County - Children Services	Additional	1.74	\$0.00	\$26.67	B
Great Parks - Parks & Recreation	Additional	0.95	\$0.00	\$14.56	B

This is an estimated levy payment based on the current value of your property. Actual tax amounts per tax year may vary based on changes in property valuation and based on whether a parcel receives any abatement, credit, or reduction during the levy period.

Effective for the tax year 2005, Ohio's biennial budget bill, Amended Substitute House Bill 66, signed by the Governor on June 30, 2005, terminates the 10 percent real property tax rollback for the commercial and industrial classes of property, and agricultural property used for the commercial production of timber.

Effective for the tax year 2013, Ohio's biennial budget bill, House Bill 59, signed by the Governor on June 30, 2013, terminates the 10 percent real property tax rollback and the 2.5 percent homestead credit on all additional or replacement levies passed at the November 5, 2013 election or after. As a result of this legislation, those same levies will not qualify for the stadium tax credit.

Existing and renewal levies, as well as levies passed at the May 7, 2013 and August 6, 2013 elections will qualify for the credits. Residential and most agricultural properties with qualifying levies will receive what is now the Non-Business Credit Rollback Factor. Owner occupied residential dwellings with qualifying levies will receive what is now the Owner Occupancy Credit Rollback Factor, as well as the stadium tax credit.

Transfer History

Year	Conveyance #	Selling Price	Transfer Date	Previous Owner	Current Owner
2020	241025	1,500,000	8/6/2020	ADCO REALTY INC % PRODIGY PROPERTIES, RECEIVER	PLK COOPER LLC
2018	181368	0	8/28/2018	ADCO REALTY INC	ADCO REALTY INC

Value History

Tax Year	Assessed Date	Land	Improvements	Total	CAUV	Reason for Change
2020	8/22/2020	43,800	0	43,800	0	120 Reappraisal, Update or Annual Equalization
2019	3/15/2019	42,120	0	42,120	0	130 Annual Maintenance on Splits & Combines
2017	11/15/2017	42,050	0	42,050	0	120 Reappraisal, Update or Annual Equalization
2017	3/10/2017	36,210	0	36,210	0	130 Annual Maintenance on Splits & Combines

Board of Revision Case History

Case Number	Date Filed	Withdrawn	**Counter Complaint Filed	*Hearing Date/Time	Value Challenged	Value Requested	Value Decided by BOR	***Date Resolved
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*Once your hearing has been scheduled, you will receive a **Notice of Hearing** by certified mail, and the Scheduled Hearing Date and Time will be populated on this page.

**A counter-complaint may be filed by a party with interest in the value of your property, such as the Board of Education, if you request a decrease of \$50,000 or more in market value.

***Please allow four to six weeks to receive your **Notice of Result** by certified mail and to see your result on this page. Your Notice will contain basic facts about appealing your Board of Revision decision, should you wish to do so.

Payment Information

JILL A. SCHILLER, TREASURER

Tax Overview

Mail Payments to:	Hamilton County Treasurer 138 E. Court Street, Room 402 Cincinnati, Ohio 45202	Tax Lien Pending	No
Tax District:	001 - CINTI CORP-CINTI CSD	Tax Lien Sold	No
Current Owner(s)	PLK COOPER LLC	Full Rate	109.200000
Tax Bill Mail Address	PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236	Effective Rate	88.991088
		Non Business Credit	0.087234
		Owner Occupancy Credit	0.021808
		Certified Delinquent Year	
		Delinquent Payment Plan	No
		TOP (Treasurer Optional Payment)	\$0.00
		Note: May represent multiple parcels	
Taxable Value			
Land	15,330		
Improvements	0		
Total	15,330		

Current Year Tax Detail

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Real Estate			\$837.02		\$837.02	
Credit			\$154.90		\$154.90	
Subtotal			\$682.12		\$682.12	
Non Business Credit			\$0.00		\$0.00	
Owner Occupancy Credit			\$0.00		\$0.00	
Homestead			\$0.00		\$0.00	
Sales CR			\$0.00		\$0.00	
Subtotal	\$0.00	\$0.00	\$682.12	\$0.00	\$682.12	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Real Estate Paid	\$0.00		\$682.12		\$682.12	
Real Estate Owed	\$0.00		\$0.00		\$0.00	
Special Assess Paid	\$0.00		\$203.00		\$0.00	
Special Assess Owed	\$0.00		\$0.00		\$0.00	
Total Due	\$0.00		\$885.12		\$682.12	
Total Paid	\$0.00		\$885.12		\$682.12	
Unpaid Delq Contract	\$0.00		\$0.00		\$0.00	
Total Owed	\$0.00		\$0.00		\$0.00	

Special Assessment Detail for 55-060 CINCINNATI - Urban Forestry

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Charge	\$0.00	\$0.00	\$203.00	\$0.00	\$0.00	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Paid	\$0.00		\$203.00		\$0.00	
Owed	\$0.00		\$0.00		\$0.00	

Payment Information for Current And Prior Year

Date	Half	Prior	1st Half	2nd Half	Surplus
6/14/2022	2 - 2021	\$0.00	\$0.00	\$682.12	\$0.00
1/28/2022	1 - 2021	\$0.00	\$885.12	\$0.00	\$0.00
6/9/2021	2 - 2020	\$0.00	\$0.00	\$682.88	\$0.00
2/5/2021	1 - 2020	\$0.00	\$883.64	\$0.00	\$0.00
7/15/2020	2 - 2019	\$0.00	\$930.76	\$710.95	\$0.00
6/20/2019	2 - 2018	\$0.00	\$0.00	\$710.35	\$0.00
1/23/2019	1 - 2018	\$0.00	\$710.35	\$0.00	\$0.00
6/19/2018	2 - 2017	\$0.00	\$0.00	\$688.02	\$0.00
1/24/2018	1 - 2017	\$0.00	\$688.02	\$0.00	\$0.00

Information believed accurate but not guaranteed. Treasurer disclaims liability for any errors or omissions

Contact the County Treasurer with your tax bill questions at county.treasurer@hamilton-co.org
or 513-946-4800

Tax Distribution Information

Market Value		Assessed Value (35%)		Tax Rate Information	
Land	43,800	Land	15,330	Full Tax Rate (mills)	109.200000
Building	0	Building	0	Reduction Factor	0.185064
Total	43,800	Total	15,330	Effective Tax Rate (mills)	88.991088
				Non Business Credit	0.087234

Market Value		Assessed Value (35%)		Tax Rate Information	
				Owner Occupancy Credit	0.021808
Tax Calculations		Half Year Tax Distributions			
Gross Real Estate Tax	\$1,674.04	School District	\$433.71		
- Reduction Amount	\$309.80	Township	\$0.00		
- Non Business Credit	\$0.00	City/Village	\$87.92		
- Owner Occupancy Credit	\$0.00	Joint Vocational School	\$0.00		
- Homestead	\$0.00	County General Fund	\$17.31		
Half Year Real Taxes	\$682.12	Public Library	\$14.09		
- Sales Tax Credit	\$0.00	Family Service/Treatment	\$2.37		
+ Current Assessment	\$203.00	HLTH/Hospital Care-Indigent	\$18.95		
+ Delinquent Assessment	\$0.00	Mental Health Levy	\$16.21		
+ Delinquent Real Estate	\$0.00	Developmental Disabilities	\$28.76		
Semi Annual Net	\$885.12	Park District	\$14.47		
		Crime Information Center	\$2.11		
		Children Services	\$32.12		
		Senior Services	\$10.97		
		Zoological Park	\$3.13		

This shows the most recent tax bill calculation which normally occurs in early December and May. However, adjustments or corrections may have been applied to the tax bill after the initial tax calculation. Go to the Payment Detail tab to view any corrections or adjustments occurring after the initial tax calculation.

Parcel Photo



No sketch available.

Special Assessments

Project	Ord/Res	Description	Certified	End Year	Payoff Amount
55-060		CINCINNATI - Urban Forestry	8/20/2019	2099	\$0.00

Special Assessment Detail

Prior Delinquent	Current Charge	Current Paid	Future Charge	Admin Fee	Payoff Amount
\$0.00	\$197.09	\$203.00	\$0.00	\$5.91	\$0.00

Payments

Year	Installment	Payment Date	Amount Paid
2020	1	02/05/2021	\$200.76
2021	1	01/28/2022	\$203.00

Comments

Related Names

Name	Relationship	Status
PLK COOPER LLC	Parcel Owner	Current

Related Names		
PLK COOPER LLC	Mail Name	Current

Dusty Rhodes, Hamilton County Auditor

generated on 6/24/2022 10:19:07 AM EDT

Property Report

Parcel ID 221-0013-0002-00	Address 1609 BLUE ROCK ST	Index Order Parcel Number	Tax Year 2021 Payable 2022
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Property Information

Tax District School District	001 - CINTI CORP-CINTI CSD CINCINNATI CSD	Images/Sketches 
Appraisal Area 03900 - NORTHSIDE	Auditor Land Use 399 - OTHER INDUSTRIAL STRUCTUR	
Owner Name and Address PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (call 946-4015 if incorrect)	Tax Bill Mail Address PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (Questions? 946-4800 or treasurer.taxbills@hamilton-co.org)	
Assessed Value 75,120	Effective Tax Rate 88.991088	
Property Description BLUE ROCK ST 125.90 FT IRR LOTS 43-44-45 JACOB HOFFNERS SUB PARS 2-3-4 CONS		
		Total Tax \$6,749.22

Appraisal/Sales Summary	
Year Built	1900
Total Rooms	0
# Bedrooms	0
# Full Bathrooms	0
# Half Bathrooms	0
Last Transfer Date	8/6/2020
Last Sale Amount	\$1,500,000
Conveyance Number	241025
Deed Type	CCP - Court of Common Pleas (Conv)
Deed Number	
# of Parcels Sold	6
Acreage	0.136

Tax/Credit/Value Summary	
Board of Revision	No
Rental Registration	No
Homestead	No
Owner Occupancy Credit	No
Foreclosure	No
Special Assessments	Yes
Market Land Value	22,610
CAUV Value	0
Market Improvement Value	192,040
Market Total Value	214,650
TIF Value	0
Abated Value	0
Exempt Value	0
Taxes Paid	\$6,749.22
Tax as % of Total Value	0.000%

Notes

Structure List

Structure Name	Use Code	Finished Sq. Ft.	Year Built
Structure 1	399 OTHER INDUSTRIAL STRUCTUR	9,346	1900

Commercial Appraisal Data

Section	Occupancy	Finished Area (sq. ft.)	Story Height	Stories
Section 1	344 Office Building	4,673	10	1
Section 2	344 Office Building	4,673	10	1

No Proposed Levies Found

Levies Passed - 2021 Pay 2022 Tax Bill

Levy	Levy Type	Mills	Current Annual Tax	Estimated Annual Tax	Note
Hamilton County - Children Services	Renewal	2.77	\$182.29	\$182.29	B
Hamilton County - Children Services	Additional	1.74	\$0.00	\$130.71	B
Great Parks - Parks & Recreation	Additional	0.95	\$0.00	\$71.36	B

This is an estimated levy payment based on the current value of your property. Actual tax amounts per tax year may vary based on changes in property valuation and based on whether a parcel receives any abatement, credit, or reduction during the levy period.

Effective for the tax year 2005, Ohio's biennial budget bill, Amended Substitute House Bill 66, signed by the Governor on June 30, 2005, terminates the 10 percent real property tax rollback for the commercial and industrial classes of property, and agricultural property used for the commercial production of timber.

Effective for the tax year 2013, Ohio's biennial budget bill, House Bill 59, signed by the Governor on June 30, 2013, terminates the 10 percent real property tax rollback and the 2.5 percent homestead credit on all additional or replacement levies passed at the November 5, 2013 election or after. As a result of this legislation, those same levies will not qualify for the stadium tax credit.

Existing and renewal levies, as well as levies passed at the May 7, 2013 and August 6, 2013 elections will qualify for the credits. Residential and most agricultural properties with qualifying levies will receive what is now the Non-Business Credit Rollback Factor. Owner occupied residential dwellings with qualifying levies will receive what is now the Owner Occupancy Credit Rollback Factor, as well as the stadium tax credit.

Transfer History

Year	Conveyance #	Selling Price	Transfer Date	Previous Owner	Current Owner
2020	241025	1,500,000	8/6/2020	ADCO REALTY INC % PRODIGY PROPERTIES, RECEIVER	PLK COOPER LLC
1970	0	0	1/1/1970	SEE OWNERSHIP CARD	ADCO REALTY INC

Value History

Tax Year	Assessed Date	Land	Improvements	Total	CAUV	Reason for Change
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Value History

2020	8/22/2020	22,610	192,040	214,650	0	120 Reappraisal, Update or Annual Equalization
2017	11/15/2017	21,740	184,650	206,390	0	120 Reappraisal, Update or Annual Equalization
2014	9/20/2014	18,710	187,800	206,510	0	120 Reappraisal, Update or Annual Equalization
2011	9/4/2011	19,900	199,790	219,690	0	120 Reappraisal, Update or Annual Equalization
2008	9/27/2008	20,700	182,830	203,530	0	120 Reappraisal, Update or Annual Equalization
2005	9/21/2005	19,900	175,800	195,700	0	120 Reappraisal, Update or Annual Equalization
2002	10/8/2002	17,800	174,400	192,200	0	120 Reappraisal, Update or Annual Equalization
1999	11/6/1999	17,000	166,900	183,900	0	120 Reappraisal, Update or Annual Equalization
1996	1/1/1996	16,300	155,900	172,200	0	110 Miscellaneous

Board of Revision Case History

Case Number	Date Filed	Withdrawn	**Counter Complaint Filed	*Hearing Date/Time	Value Challenged	Value Requested	Value Decided by BOR	***Date Resolved
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*Once your hearing has been scheduled, you will receive a **Notice of Hearing** by certified mail, and the Scheduled Hearing Date and Time will be populated on this page.

**A counter-complaint may be filed by a party with interest in the value of your property, such as the Board of Education, if you request a decrease of \$50,000 or more in market value.

***Please allow four to six weeks to receive your **Notice of Result** by certified mail and to see your result on this page. Your Notice will contain basic facts about appealing your Board of Revision decision, should you wish to do so.

Payment Information

JILL A. SCHILLER, TREASURER

Tax Overview

Mail Payments to:	Hamilton County Treasurer 138 E. Court Street, Room 402 Cincinnati, Ohio 45202	Tax Lien Pending	No
Tax District:	001 - CINTI CORP-CINTI CSD	Tax Lien Sold	No
Current Owner(s)	PLK COOPER LLC	Full Rate	109.200000
Tax Bill Mail Address	PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236	Effective Rate	88.991088
		Non Business Credit	0.087234
		Owner Occupancy Credit	0.021808
		Certified Delinquent Year	
		Delinquent Payment Plan	No
		TOP (Treasurer Optional Payment)	\$0.00
		Note: May represent multiple parcels	
Taxable Value			
Land	7,910		
Improvements	67,210		
Total	75,120		

Current Year Tax Detail

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Real Estate			\$4,101.55		\$4,101.55	
Credit			\$759.04		\$759.04	
Subtotal			\$3,342.51		\$3,342.51	
Non Business Credit			\$0.00		\$0.00	
Owner Occupancy Credit			\$0.00		\$0.00	
Homestead			\$0.00		\$0.00	
Sales CR			\$0.00		\$0.00	
Subtotal	\$0.00	\$0.00	\$3,342.51	\$0.00	\$3,342.51	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Real Estate Paid	\$0.00		\$3,342.51		\$3,342.51	
Real Estate Owed	\$0.00		\$0.00		\$0.00	
Special Assess Paid	\$0.00		\$64.20		\$0.00	
Special Assess Owed	\$0.00		\$0.00		\$0.00	
Total Due	\$0.00		\$3,406.71		\$3,342.51	
Total Paid	\$0.00		\$3,406.71		\$3,342.51	
Unpaid Delq Contract	\$0.00		\$0.00		\$0.00	
Total Owed	\$0.00		\$0.00		\$0.00	

Special Assessment Detail for 55-060 CINCINNATI - Urban Forestry

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Charge	\$0.00	\$0.00	\$64.20	\$0.00	\$0.00	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Paid	\$0.00		\$64.20		\$0.00	
Owed	\$0.00		\$0.00		\$0.00	

Payment Information for Current And Prior Year

Date	Half	Prior	1st Half	2nd Half	Surplus
6/14/2022	2 - 2021	\$0.00	\$0.00	\$3,342.51	\$0.00
1/28/2022	1 - 2021	\$0.00	\$3,406.71	\$0.00	\$0.00
6/9/2021	2 - 2020	\$0.00	\$0.00	\$3,346.24	\$0.00
2/5/2021	1 - 2020	\$0.00	\$3,410.44	\$0.00	\$0.00
7/15/2020	2 - 2019	\$0.00	\$0.00	\$1,474.35	\$0.00
6/1/2020	2 - 2019	\$0.00	\$777.48	\$2,010.00	\$0.00
1/31/2020	1 - 2019	\$0.00	\$2,834.44	\$0.00	\$0.00
6/20/2019	2 - 2018	\$0.00	\$0.00	\$3,486.14	\$0.00
1/31/2019	1 - 2018	\$0.00	\$3,543.04	\$0.00	\$0.00

Payment Information for Current And Prior Year

6/20/2018	2 - 2017	\$0.00	\$0.00	\$3,376.53	\$0.00
1/31/2018	1 - 2017	\$0.00	\$3,428.01	\$0.00	\$0.00
6/20/2017	2 - 2016	\$0.00	\$92.42	\$3,447.82	\$0.00
2/15/2017	2 - 2016	\$0.00	\$924.15	\$0.00	\$0.00
1/31/2017	1 - 2016	\$0.00	\$2,575.15	\$0.00	\$0.00

Information believed accurate but not guaranteed. Treasurer disclaims liability for any errors or omissions

Contact the County Treasurer with your tax bill questions at county.treasurer@hamilton-co.org
or 513-946-4800

Tax Distribution Information

Market Value		Assessed Value (35%)		Tax Rate Information	
Land	22,610	Land	7,910	Full Tax Rate (mills)	109.200000
Building	192,040	Building	67,210	Reduction Factor	0.185064
Total	214,650	Total	75,120	Effective Tax Rate (mills)	88.991088
				Non Business Credit	0.087234
				Owner Occupancy Credit	0.021808

Tax Calculations

Half Year Tax Distributions

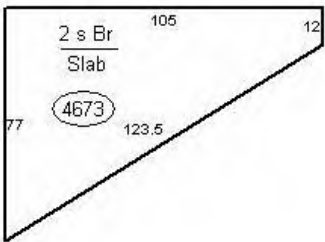
Gross Real Estate Tax	\$8,203.10	School District	\$2,125.17
- Reduction Amount	\$1,518.08	Township	\$0.00
- Non Business Credit	\$0.00	City/Village	\$430.81
- Owner Occupancy Credit	\$0.00	Joint Vocational School	\$0.00
- Homestead	\$0.00	County General Fund	\$84.89
Half Year Real Taxes	\$3,342.51	Public Library	\$69.04
- Sales Tax Credit	\$0.00	Family Service/Treatment	\$11.60
+ Current Assessment	\$64.20	HLTH/Hospital Care-Indigent	\$92.88
+ Delinquent Assessment	\$0.00	Mental Health Levy	\$79.48
+ Delinquent Real Estate	\$0.00	Developmental Disabilities	\$140.94
Semi Annual Net	\$3,406.71	Park District	\$70.94
		Crime Information Center	\$10.33
		Children Services	\$157.39
		Senior Services	\$53.70
		Zoological Park	\$15.34

This shows the most recent tax bill calculation which normally occurs in early December and May. However, adjustments or corrections may have been applied to the tax bill after the initial tax calculation. Go to the Payment Detail tab to view any corrections or adjustments occurring after the initial tax calculation.

Parcel Photo



Parcel Sketch



Special Assessments

Project	Ord/Res	Description	Certified	End Year	Payoff Amount
55-060		CINCINNATI - Urban Forestry	8/20/2019	2099	\$0.00

Related Names

Name	Relationship	Status
PLK COOPER LLC	Parcel Owner	Current
PLK COOPER LLC	Mail Name	Current

Dusty Rhodes, Hamilton County Auditor

generated on 6/24/2022 10:20:09 AM EDT

Property Report

Parcel ID	Address	Index Order	Tax Year
221-0013-0005-00	1613 BLUE ROCK ST	Parcel Number	2021 Payable 2022

Property Information

Tax District	001 - CINTI CORP-CINTI CSD	Images/Sketches 	
School District	CINCINNATI CSD		
Appraisal Area	03900 - NORTHSIDE		
Auditor Land Use	399 - OTHER INDUSTRIAL STRUCTUR		
Owner Name and Address	PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (call 946-4015 if incorrect)	Tax Bill Mail Address PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236 (Questions? 946-4800 or treasurer.taxbills@hamilton-co.org)	
Assessed Value	43,850	Effective Tax Rate 88.991088	Total Tax \$3,996.06

Property Description

BLUE ROCK ST 125 X 134 IRR LOTS 46-51 INC JACOB HOFFNERS SUB PARS 5-10 INC CONS

Appraisal/Sales Summary

Year Built	1900
Total Rooms	0
# Bedrooms	0
# Full Bathrooms	0
# Half Bathrooms	0
Last Transfer Date	8/6/2020
Last Sale Amount	\$1,500,000
Conveyance Number	241025
Deed Type	CCP - Court of Common Pleas (Conv)
Deed Number	
# of Parcels Sold	6
Acreage	0.361

Tax/Credit/Value Summary

Board of Revision	No
Rental Registration	No
Homestead	No
Owner Occupancy Credit	No
Foreclosure	No
Special Assessments	Yes
Market Land Value	31,270
CAUV Value	0
Market Improvement Value	94,030
Market Total Value	125,300
TIF Value	0
Abated Value	0
Exempt Value	0
Taxes Paid	\$3,996.06
Tax as % of Total Value	0.000%

Notes

Structure List

Structure Name	Use Code	Finished Sq. Ft.	Year Built
Structure 1	399 OTHER INDUSTRIAL STRUCTUR	7,907	1900

Commercial Appraisal Data

Section	Occupancy	Finished Area (sq. ft.)	Story Height	Stories
Section 1	344 Office Building	3,064	12	1
Section 1	326 Storage Garage	1,442	12	1
Section 2	326 Storage Garage	3,400	12	1

Improvements

Improvement	Measurements	Year Built
508-Chain Link Fencing, 8 Ft. w/Top Rail & B	400	1966

No Proposed Levies Found

Levies Passed - 2021 Pay 2022 Tax Bill

Levy	Levy Type	Mills	Current Annual Tax	Estimated Annual Tax	Note
Hamilton County - Children Services	Renewal	2.77	\$106.41	\$106.41	B
Hamilton County - Children Services	Additional	1.74	\$0.00	\$76.30	B
Great Parks - Parks & Recreation	Additional	0.95	\$0.00	\$41.66	B

This is an estimated levy payment based on the current value of your property. Actual tax amounts per tax year may vary based on changes in property valuation and based on whether a parcel receives any abatement, credit, or reduction during the levy period.

Effective for the tax year 2005, Ohio's biennial budget bill, Amended Substitute House Bill 66, signed by the Governor on June 30, 2005, terminates the 10 percent real property tax rollback for the commercial and industrial classes of property, and agricultural property used for the commercial production of timber.

Effective for the tax year 2013, Ohio's biennial budget bill, House Bill 59, signed by the Governor on June 30, 2013, terminates the 10 percent real property tax rollback and the 2.5 percent homestead credit on all additional or replacement levies passed at the November 5, 2013 election or after. As a result of this legislation, those same levies will not qualify for the stadium tax credit.

Existing and renewal levies, as well as levies passed at the May 7, 2013 and August 6, 2013 elections will qualify for the credits. Residential and most agricultural properties with qualifying levies will receive what is now the Non-Business Credit Rollback Factor. Owner occupied residential dwellings with qualifying levies will receive what is now the Owner Occupancy Credit Rollback Factor, as well as the stadium tax credit.

Transfer History

Year	Conveyance #	Selling Price	Transfer Date	Previous Owner	Current Owner
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Transfer History

2020	241025	1,500,000	8/6/2020	ADCO REALTY INC % PRODIGY PROPERTIES, RECEIVER	PLK COOPER LLC
1970	0	0	1/1/1970	<u>SEE OWNERSHIP CARD</u>	ADCO REALTY INC

Value History

Tax Year	Assessed Date	Land	Improvements	Total	CAUV	Reason for Change
2020	8/22/2020	31,270	94,030	125,300	0	120 Reappraisal, Update or Annual Equalization
2017	11/15/2017	30,070	90,410	120,480	0	120 Reappraisal, Update or Annual Equalization
2014	9/20/2014	30,160	69,790	99,950	0	120 Reappraisal, Update or Annual Equalization
2011	9/4/2011	32,080	74,240	106,320	0	120 Reappraisal, Update or Annual Equalization
2008	9/27/2008	33,380	68,220	101,600	0	120 Reappraisal, Update or Annual Equalization
2005	9/21/2005	32,100	65,600	97,700	0	120 Reappraisal, Update or Annual Equalization
2002	10/8/2002	24,000	71,100	95,100	0	120 Reappraisal, Update or Annual Equalization
1999	11/6/1999	23,000	68,000	91,000	0	120 Reappraisal, Update or Annual Equalization
1996	1/1/1996	23,500	52,100	75,600	0	110 Miscellaneous

Board of Revision Case History

Case Number	Date Filed	Withdrawn	**Counter Complaint Filed	*Hearing Date/Time	Value Challenged	Value Requested	Value Decided by BOR	***Date Resolved
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*Once your hearing has been scheduled, you will receive a **Notice of Hearing** by certified mail, and the Scheduled Hearing Date and Time will be populated on this page.

**A counter-complaint may be filed by a party with interest in the value of your property, such as the Board of Education, if you request a decrease of \$50,000 or more in market value.

***Please allow four to six weeks to receive your **Notice of Result** by certified mail and to see your result on this page. Your Notice will contain basic facts about appealing your Board of Revision decision, should you wish to do so.

Payment Information

JILL A. SCHILLER, TREASURER

Tax Overview

Mail Payments to:	Hamilton County Treasurer 138 E. Court Street, Room 402 Cincinnati, Ohio 45202	Tax Lien Pending	No
Tax District:	001 - CINTI CORP-CINTI CSD	Tax Lien Sold	No
Current Owner(s)	PLK COOPER LLC	Full Rate	109.200000
Tax Bill Mail Address	PLK COOPER LLC 5905 E GALBRAITH RD #4100 CINCINNATI OH 45236	Effective Rate	88.991088
		Non Business Credit	0.087234
		Owner Occupancy Credit	0.021808
		Certified Delinquent Year	
		Delinquent Payment Plan	No
		TOP (Treasurer Optional Payment)	\$0.00
		Note: May represent multiple parcels	
Taxable Value			
Land	10,940		
Improvements	32,910		
Total	43,850		

Current Year Tax Detail

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Real Estate			\$2,394.21		\$2,394.21	
Credit			\$443.08		\$443.08	
Subtotal			\$1,951.13		\$1,951.13	
Non Business Credit			\$0.00		\$0.00	
Owner Occupancy Credit			\$0.00		\$0.00	
Homestead			\$0.00		\$0.00	
Sales CR			\$0.00		\$0.00	
Subtotal	\$0.00	\$0.00	\$1,951.13	\$0.00	\$1,951.13	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Real Estate Paid	\$0.00		\$1,951.13		\$1,951.13	
Real Estate Owed	\$0.00		\$0.00		\$0.00	
Special Assess Paid	\$0.00		\$93.80		\$0.00	
Special Assess Owed	\$0.00		\$0.00		\$0.00	
Total Due	\$0.00		\$2,044.93		\$1,951.13	
Total Paid	\$0.00		\$2,044.93		\$1,951.13	
Unpaid Delq Contract	\$0.00		\$0.00		\$0.00	
Total Owed	\$0.00		\$0.00		\$0.00	

Special Assessment Detail for 55-060 CINCINNATI - Urban Forestry

	Prior Delinquent	Adj. Delinquent	1st Half	Adj. 1st Half	2nd Half	Adj. 2nd Half
Charge	\$0.00	\$0.00	\$93.80	\$0.00	\$0.00	\$0.00
Interest/Penalty	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Paid	\$0.00		\$93.80		\$0.00	
Owed	\$0.00		\$0.00		\$0.00	

Payment Information for Current And Prior Year

Date	Half	Prior	1st Half	2nd Half	Surplus
6/14/2022	2 - 2021	\$0.00	\$0.00	\$1,951.13	\$0.00
1/28/2022	1 - 2021	\$0.00	\$2,044.93	\$0.00	\$0.00
6/9/2021	2 - 2020	\$0.00	\$0.00	\$1,953.31	\$0.00
2/5/2021	1 - 2020	\$0.00	\$2,047.11	\$0.00	\$0.00

Payment Information for Current And Prior Year

7/17/2020	2 - 2019	\$0.00	\$465.50	\$2,033.50	\$0.00
1/31/2020	1 - 2019	\$0.00	\$1,696.84	\$0.00	\$0.00
6/20/2019	2 - 2018	\$0.00	\$0.00	\$2,034.55	\$0.00
1/31/2019	1 - 2018	\$0.00	\$2,121.07	\$0.00	\$0.00
6/20/2018	2 - 2017	\$0.00	\$0.00	\$1,970.57	\$0.00
1/31/2018	1 - 2017	\$0.00	\$2,048.85	\$0.00	\$0.00
6/20/2017	2 - 2016	\$0.00	\$73.12	\$1,669.05	\$0.00
2/15/2017	2 - 2016	\$0.00	\$731.19	\$0.00	\$0.00
1/31/2017	1 - 2016	\$0.00	\$1,016.14	\$0.00	\$0.00

Information believed accurate but not guaranteed. Treasurer disclaims liability for any errors or omissions

Contact the County Treasurer with your tax bill questions at county.treasurer@hamilton-co.org
or 513-946-4800

Tax Distribution Information

Market Value		Assessed Value (35%)		Tax Rate Information	
Land	31,270	Land	10,940	Full Tax Rate (mills)	109.200000
Building	94,030	Building	32,910	Reduction Factor	0.185064
Total	125,300	Total	43,850	Effective Tax Rate (mills)	88.991088
				Non Business Credit	0.087234
				Owner Occupancy Credit	0.021808

Tax Calculations

Half Year Tax Distributions

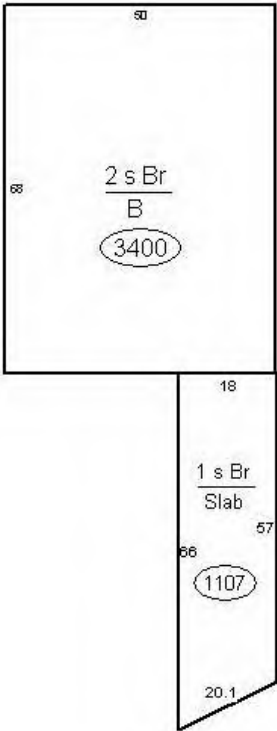
Gross Real Estate Tax	\$4,788.42	School District	\$1,240.53
- Reduction Amount	\$886.16	Township	\$0.00
- Non Business Credit	\$0.00	City/Village	\$251.48
- Owner Occupancy Credit	\$0.00	Joint Vocational School	\$0.00
- Homestead	\$0.00	County General Fund	\$49.54
Half Year Real Taxes	\$1,951.13	Public Library	\$40.30
- Sales Tax Credit	\$0.00	Family Service/Treatment	\$6.77
+ Current Assessment	\$93.80	HLTH/Hospital Care-Indigent	\$54.22
+ Delinquent Assessment	\$0.00	Mental Health Levy	\$46.40
+ Delinquent Real Estate	\$0.00	Developmental Disabilities	\$82.27
Semi Annual Net	\$2,044.93	Park District	\$41.41
		Crime Information Center	\$6.03
		Children Services	\$91.88
		Senior Services	\$31.34
		Zoological Park	\$8.96

This shows the most recent tax bill calculation which normally occurs in early December and May. However, adjustments or corrections may have been applied to the tax bill after the initial tax calculation. Go to the Payment Detail tab to view any corrections or adjustments occurring after the initial tax calculation.

Parcel Photo



Parcel Sketch



Special Assessments

Project	Ord/Res	Description	Certified	End Year	Payoff Amount
55-060		CINNINNATI - Urban Forestry	8/20/2019	2099	\$0.00

Related Names

Name	Relationship	Status
PLK COOPER LLC	Parcel Owner	Current
PLK COOPER LLC	Mail Name	Current

6/24/2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

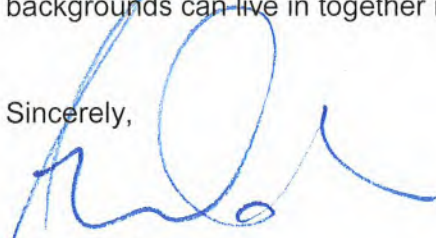
I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the Jimmy Heath House opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different backgrounds can live in together in harmony.

Sincerely,



Arlene Nolan
Executive Director
Shelterhouse
411 Gest Street, Suite 1
Cincinnati, OH 45203



6/21/2022

Re: Dunlap PSH

To Whom it May Concern:

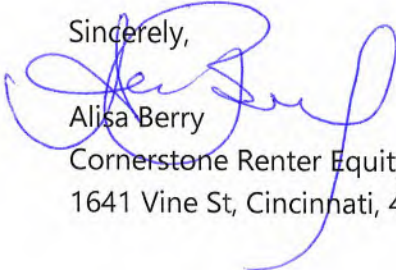
I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those in our community experiencing chronic homelessness.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

This city and the Over the Rhine community is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, people experiencing chronic homelessness. One hundred percent of the men and women moving into these apartments will be coming out of chronic homelessness. While each resident will sign a year's lease for their apartment, support services and support will be provided. This project will offer a full range of services meant to stabilize and improve the lives of residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony. Lastly, OTRCH is the only developer in the Over the Rhine community working to preserve and build true affordable housing in the community. This project will bring more affordable housing to a neighborhood and city that is not building affordable housing at the rate it is losing it. This fact is stressing an already fragile system. Projects like Dunlap are smart investments into our communities.

Sincerely,



Alisa Berry

Cornerstone Renter Equity
1641 Vine St, Cincinnati, 45202



4138 Hamilton Avenue
Cincinnati, OH 45223

513.761.1480
caracole.org

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June 23, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's (OTRCH) project at 2000 Dunlap St. I understand that OTRCH is proposing a 44-unit permanent supportive housing project that will serve those experiencing chronic homelessness.

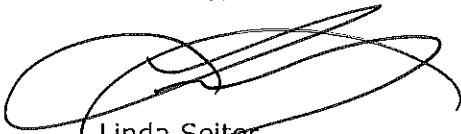
I have seen the design of the proposed building and I find it a great fit for the neighborhood. The scale, placement, massing, and density of the building are appropriate. I believe OTRCH has taken the right steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked. I believe that OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city. I have seen firsthand the honorable, honest and transparent way in which OTRCH operates. They are currently set to start a project in my neighbor which I totally support.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of these residents. This project will offer a full range of services that will stabilize and improve the lives of the residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with the Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010. Those fears have not materialized and JHH has provided a positive impact on the neighborhood and has been a model of how people of all incomes can coexist.

Sincerely,



Linda Seiter
CEO

From: [Justin Herald](#)
Sent: Friday, June 24, 2022 5:57 AM
To: [Conservator, Urban](#)
Subject: [External Email] Dunlap & Henry

[You don't often get email from jrherald@me.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

External Email Communication

Please move forward with affordable housing at Dunlap and Henry.

Affordable housing reduces crime and makes neighborhoods more vibrant.

Sent from my iPhone



LEGAL AID SOCIETY OF
SOUTHWEST OHIO, LLC

AN AFFILIATE OF THE LEGAL AID SOCIETY OF GREATER CINCINNATI

June 23, 2022

DONALD P. KLEKAMP
COMMUNITY LAW
CENTER BUILDING

215 East Ninth Street
Suite 500
Cincinnati, Ohio
45202

Telephone
(513) 241-9400
(800) 582-2682

Facsimile
(513) 241-0047

Re: Dunlap Street Supportive Housing
Over-the-Rhine Community Housing

To Whom It May Concern:

I am writing in support of Over-the-Rhine Community Housing's planned development of affordable supportive housing in Northside at 2000 Dunlap Street. The proposed 44-unit housing development will be a very good step in addressing the critical housing needs of Cincinnati's less fortunate people. The housing also will be an enhancement to the Dunlap Street area.

OTRCH is a leading nonprofit housing provider in Ohio and has an exceptionally positive record for developing and managing housing. As an example, several years ago, OTRCH developed the Jimmy Heath Housing on Odeon Street in Over-the-Rhine. Jimmy Heath House is a supportive housing development and has successfully provided excellent housing for over a decade. The Dunlap PSH will be just as successful.

Recent analysis of housing in Cincinnati shows the critical need for the type of housing the Dunlap PSH will provide. The 2020 Housing Our Future plan shows the huge gap in affordable housing in our community and the need for much more such housing. Dunlap PSH will be a small but important step in addressing the need.

Thank you for your consideration of this very important proposal.

Sincerely,

John E. Schrider, Jr.
Director
Attorney at Law
(513) 362-2851

LEGAL SERVICES IN

Brown County
Butler County
Clermont County
Clinton County
Hamilton County
Highland County
Warren County

JES/sb
Enclosure





June 23, 2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,

Paul Haffner
President & CEO

From: johnwalter@cinci.rr.com
Sent: Friday, June 24, 2022 10:00 AM
To: [Conservator, Urban](#)
Subject: [External Email] HCB - June 27th Input - 2000 Dunlap PSH - Against

You don't often get email from johnwalter@cinci.rr.com. [Learn why this is important](#)

External Email Communication

HCB Members,

I have lived and operated my business in the Mohawk area of OTR since 1984. I am a long time OTRCC member and currently serve as trustee and secretary. I strongly oppose the use and density of the 2000 Dunlap Project. My personal thoughts follow:

Being heavily involved in the OTRCC, I have witnessed an extreme lack of substantive community engagement by the developer. The developer has attended OTRCC meetings, but has been tone deaf to the very real concerns of the surrounding community.

The project is incompatible with Mohawk's Urban Mix District, which specifically doesn't allow transitional housing Program 5 and 6. This project by any objective measure should be categorized as transitional housing. Site selection for this project seemed like a matter of convenience for the developer to meet the state's early February site control requirement, at the expense of the Mohawk community over the coming decades.

At the January 10th OTRCC BOT meeting I asked OTRCH representatives the following question: How will residents be selected for occupancy in this facility? My understanding of their answer follows: All referrals are through the "Coordinated Entry System" run by Strategies to End Homelessness. Individuals are assessed on needs related to mental illness, substance abuse, and past trauma in their lives. Those that are deemed to be in the most need get highest priority for PSH throughout the area. This selection process along with the stated definition of Congregate Housing that "support services are not required as would be with Transitional Housing" is very troubling from our Mohawk neighborhood standpoint. The concern is magnified due to this project's extremely high density and lack of quality outdoor space where residents could realistically spend their idle time.

I would like to conclude my remarks on the reason I stated at the beginning, that this project is incompatible with Mohawk. This project is surrounded by an emerging entertainment district in OTR. Venues including the brand new Stillhouse, Northern Row, the Rhinegeist, Dunlap Café, Late Night slice Pizza, an axe throwing venue, the on-going \$30M redevelopment of three historic brewery buildings at McMicken and Stonewall, the Mohawk Theater under redevelopment and Findlay Market itself. Hanna Park only one block away is used frequently by African American families for birthday parties and family gatherings. The potential for economic growth in the Findlay Market/Mohawk area of OTR is in its infancy and this project would be a big setback for businesses and residents and for the overall OTR economy moving forward.

Thank you for your consideration,

John Walter

524 Conroy



Over-the-Rhine Community Council
P.O. Box 662
Cincinnati OH 45201

April 26, 2022

Doug Owen
Urban Conservator
City of Cincinnati

Re: 2000 Dunlap Application for Certificate of Appropriateness and Variances

Dear Mr. Owen and Members of the Historic Conservation Board,

At our April 25, 2022 Over-the-Rhine Community Council meeting, the membership voted on a motion to send a letter regarding the Dunlap PSH project, including the project's request for a Certificate of Appropriateness and related variances. There were 30 votes in favor and 34 votes in opposition, which means the "opposition" had a majority of votes. The project was presented to the Council on the following dates:

- December 13, 2021 – Board of Trustees
- January 4, 2022 – Economic Development and Housing Committee
- January 10, 2022 – Board of Trustees
- March 1, 2022 – Economic Development and Housing Committee
- March 14, 2022 – Board of Trustees
- March 28, 2022 – Full Council Meeting
- April 5, 2022 - Economic Development and Housing Committee
- April 11, 2022 – Board of Trustees
- April 25, 2022 – Full Council Meeting

Respectfully,

A handwritten signature in dark ink, appearing to read "Maurice Wagoner". The signature is fluid and cursive.

Maurice Wagoner
President
Over-the-Rhine Community Council

cc: Mayor Pureval
City Manager John Curp
City Council

Owen, Douglas

From: edenpk2@aol.com
Sent: Tuesday, July 19, 2022 9:23 AM
To: Conservator, Urban
Subject: [External Email] Dunlap is a mistake

You don't often get email from edenpk2@aol.com. [Learn why this is important](#)

External Email Communication

I appreciate the need for affordable housing. I have been working in OTR for 40 years. Parking is a premium. The proof is that the existing parking lot makes 60K a year for OTR housing. Pick another location where the future tenants have some space to recover. The business in that area have rights also. They need to load and unload trucks. It is already way to crowded. There are many other locations .I have clients who would buy or trade the parking lot for a more suitable site. It is hard to understand why they are so determined to build there ? They could keep it and retain the income.

Our tax dollars should not be spent this way. How many millions are they spending ? There must be a way to provide more housing in a better location for that much money.

Eden Park Realtors
Karen Domine Broker
513 281-7888 476-6739

Owen, Douglas

From: Frederick C. Ellenberger <fellenberger@cinci.rr.com>
Sent: Tuesday, July 19, 2022 10:51 AM
To: Conservator, Urban
Subject: [External Email] 2000 Dunlap Street Case Number COA2022032

[You don't often get email from fellenberger@cinci.rr.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

External Email Communication

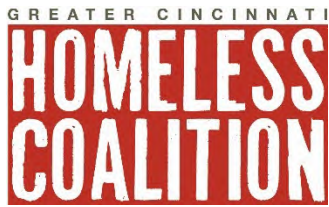
To Whom It May Concern,

I am writing to voice my opposition to this project. I have lived and worked in a building I've owned at 550 W. McMicken for over 30 years.

Over time I have seen the slow redevelopment of our neighborhood called Mohawk. The fact is, it has taken years for change to happen in this particular area. As has been discussed, this redevelopment is fragile. Adding in an institutional structure with such density, does not complement the hard work that has already been demonstrated by these pioneering urban owners.

Granting a variance in the desire to increase affordable housing does not fit/serve to enhance the this fragile neighborhood.

Sincerely,
Frederick C Ellenberger



June 23, 2022

RE: 2000 Dunlap PSH Project

To Whom It May Concern:

On behalf of our approximately sixty member organizations through the City of Cincinnati, I am writing in strong support of Over-the-Rhine Community Housing's (OTRCH) planned development at 2000 Dunlap. In Cincinnati, we are short more than 28,000 affordable homes. As a result, thousands of Cincinnatians are either living in shelters, outdoors or bouncing from couch to bridge, to car to couch, etc. This lack of affordable housing has continued for so long and had such a pervasive effect on peoples' lives, that eventually for many, their experience of homelessness becomes chronic and long lasting.

The experience of homelessness is traumatic and has long-term effects. In 2021, in our area, we had more than 152 people die young because of homelessness. Their average age was 52. In the last decade, we lost more than 1000 people to homelessness. These are just the people we know about.

I wish to be direct; those who are opposing this development say it would be too dense for the location. They say this will have a negative impact on the area and that it will be detrimental to people that would live in this new development. Let's be clear, we all know, that in reality, those opposing this development simply do not want people who have experienced homelessness and are dealing with disabilities, which includes, but is not limited to mental illness and addiction to live near themselves or their businesses. Generally, in Over-the-Rhine, people, organizations and businesses are supportive of increased density. Increased density makes sense for sustainability, and it matches the history of our neighborhood. Those opposing are not truly concerned with zoning or density. They wish to stop a certain group of people from living at 2000 Dunlap.

The proposed development at 2000 Dunlap would be Permanent Supportive Housing, as defined by the Department of Housing and Urban Development (HUD). In order to qualify for such housing, a person must have a confirmed disability. Per federal fair housing law, which is enforced by HUD, it is illegal to discriminate against a person or persons who have a disability.

I am confident the HCB is savvy enough to see through what the opposition is saying and to see it for what it really is: an attempt to discriminate and exclude a specific group of people. Don't vote in such a way that would uphold their indefensible position.

Sincerely,

A handwritten signature in blue ink, appearing to read "JS", written over a horizontal line.

Josh Spring LSW

Executive Director

Greater Cincinnati Homeless Coalition

117 EAST 12TH STREET | CINCINNATI OH | 45202 | 513.421.7803 | CINCIHOMELESS.ORG

Board of Directors | Bonita Campbell & Steve Gibbs, Co-Chairs • Chris Wilke, Secretary • June Alexander • Kate Bennett • Willis Nibert • Bill Joiner • Lawrence Taylor • Samantha Silverstein • Sr. Patricia Wittberg • Rev. Nelson Pierce • David Siders • Alice Skirtz • Steve Sunderland • Bary Klein

2021/2022 Membership | Affordable Housing Advocates • Applied Information Resources • Bellermino Chapel • Bethany House Services • Caracole • CDC Association of Greater Cincinnati • Center for Addictions Treatment • Center for Independent Living Options • Center for Respite Care • Charlie's ¾ House • Christ Church Cathedral • Christ Hospital Social Work • Churches Active in Nortsides • Cincinnati Health Department • Cincinnati Union Bethel • Cincy Smiles • Clifton United Methodist Church • DEBI Home • Dominican Sisters of Hope • Episcopal Church of the Redeemer • First Lutheran Church • First Step Home • Franciscan Haircuts from the Heart • Hamilton County Community Development Department • Hamilton County Public Health Department • Imani Family Center • Intercommunity Justice and Peace Center • Interfaith Hospitality Network • Joseph House • League of Women Voters • Legal Aid Society of Southwest Ohio • Lighthouse Youth Services • Lydia's House • Madisonville Education and Assistance Center • Mary Magdalen House • National Alliance on Mental Illness Southwest Ohio • National Church Residences • New Foundations Transitional Living • New Life Furniture • Our Daily Bread • Over-the-Rhine Community Housing • Over-the-Rhine Kitchen • Cancer Justice Network • Peaslee Neighborhood Center • Power Inspires Progress • Project Connect • Prospect House • Servants of the Least of These Homeless Outreach • Shelterhouse • Sisters of Charity of Cincinnati • Southwest Ohio Nurses Association • St. Francis Seraph Ministries • St. Francis/St. Joseph Catholic Worker House • St. Vincent De Paul • Tender Mercies • The Exit Program • UC College of Social Work • UpSpring • Urban Appalachian Community Coalition • Volunteers of America of Greater Ohio • West End Emergency Center • YWCA of Greater Cincinnati



Housing Opportunities Made Equal

2400 Reading Road, Suite 118
Cincinnati, Ohio 45202

Phone: 513-721-4663
Fax: 513-721-1642
www.homecincy.org

June 28, 2022

Re: Support for Dunlap Permanent Supportive Housing

To Whom it May Concern:

Housing Opportunities Made of Equal of Greater Cincinnati (HOME) writes in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. The proposed project is a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness. HOME is a nonprofit fair housing organization working to eliminate unlawful housing discrimination. We work to advocate and enforce housing regulations for all protected classes and promote stable, integrated communities.

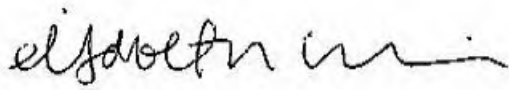
Cincinnati has a severe shortage of affordable housing. Many recent studies in the City of Cincinnati and Hamilton County point out the shortage of affordable housing units and the need for more resources for affordable housing, particularly for the lowest-income brackets (households with incomes 0-30% of the Area Median Income). This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Along with providing housing, the project incorporates supportive services that meet the needs of those residents leaving chronic homelessness and offers the greatest likelihood for long-term success for new residents. This type of supportive housing helps address the needs of at-risk populations, including people with disabilities.

The 2019 Fair Housing Assessment for Cincinnati and Hamilton County notes at-risk populations like people with disabilities are experiencing significant housing challenges and the most overt housing discrimination. The report also notes a lack of resources to serve those needs. The Dunlap project proposed by Over-the-Rhine Community Housing specifically addresses these needs and would provide both housing and support services to chronically homeless individuals, many of whom have disabilities. The Fair Housing Assessment includes specific goals to support agencies doing affordable housing development and agencies that provide supportive housing services, both of which are provided by Over-the-Rhine Community Housing. Further, the Fair Housing Assessment also includes a goal of elected and appointed officials throughout Hamilton County, including the City of Cincinnati, to weigh in and support housing projects that support protected classes, especially given the difficulty of development and community opposition.

Over-the-Rhine Community Housing has a track record of success in affordable housing development, including success with similar permanent supportive housing projects like with the Jimmy Heath House. This example shows that this type of development and project can work successfully with the residents and community members.

HOME supports the proposed project at 2000 Dunlap Street. We see the tremendous need for projects like this that provide safe, quality and affordable housing for the lowest-income population and chronically homeless individuals, as well as protected class populations. Thank you for your consideration.

Sincerely,



Elisabeth Risch
Executive Director

Housing Opportunities Made Equal, Inc. is a 501(c)(3) nonprofit organization.





Saint Francis SERAPH MINISTRIES

Caring for Community | Advancing Change

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap Street. I understand that Over-the-Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

I have seen the design of the proposed building and I find the scale, placement, massing, and density of the building are appropriate for the neighborhood. I believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House (JHH) on Odeon Street. Similar concerns were raised in the development of the Jimmy Heath House in 2010. Not only have those fears gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,

Mary Pat Raupach
Executive Director

Owen, Douglas

From: Jeff Luggen <JEFF@cia-auction.com>
Sent: Wednesday, July 27, 2022 4:56 PM
To: Owen, Douglas
Subject: [External Email] FW: Results from last night's vote on 2000 Dunlap PSH project

Follow Up Flag: Follow up
Flag Status: Flagged

External Email Communication

Hi Doug ,

Please include the below email in the information package for the August 8th HCB hearing. It show the results of the April 25th vote at OTRCC concerning the 2000 Dunlap PSH.

Thanks, Jeff

Jeffrey L. Luggen, Vice President

CIA Company | Auctions | Acquisitions | Appraisals | Since 1961

513-241-9701 Office | 513-702-4554 Cell | jeff@cia-auction.com

Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

From: President OTRCC <PresidentOTRCC@gmail.com>
Sent: Tuesday, April 26, 2022 11:53 AM
To: Jeff Luggen <JEFF@cia-auction.com>
Subject: Results from last night's vote on 2000 Dunlap PSH project



**At last night's meeting, we had a very large
turnout with both in-person and Zoom**

**participants. It took us some time to count votes
and verify the membership status of all the
members who voted.**

**The final vote was 34 in opposition and 30 in
support. Thank you to everybody for participating
and sharing their perspectives.**

OTRCC Letter regarding 2000 Dunlap



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You are receiving this email because of your interest in the Over-the-Rhine Community Council.

Our mailing address is:

Over-the-Rhine Community Council
P. O. Box 662
Cincinnati, OH 45201

[Add us to your address book](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).



Owen, Douglas

From: Jeff Luggen <JEFF@cia-auction.com>
Sent: Thursday, July 28, 2022 3:11 PM
To: Owen, Douglas
Subject: [External Email] FW: Emailing: OTR Parking Shortage
Attachments: OTR Parking Shortage.pdf

External Email Communication

Hi Doug,

Please include the attached into the information packet for the August 8th Hearing. Alexis Marsh a resident of OTR by Findlay Market made this presentation to the OTRCC on July 25th. The report points out the shortage parking in OTR. This situation will only get worse. All developers must shoulder the responsibility in solving this problem.

Thanks, Jeff

Jeffrey L. Luggen, Vice President
CIA Company | Auctions | Acquisitions | Appraisals | Since 1961
513-241-9701 Office | 513-702-4554 Cell | jeff@cia-auction.com Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

-----Original Message-----

From: Christine Oliver <christine@cia-auction.com>
Sent: Thursday, July 28, 2022 2:55 PM
To: Jeff Luggen <JEFF@cia-auction.com>
Subject: Emailing: OTR Parking Shortage

Your message is ready to be sent with the following file or link attachments:

OTR Parking Shortage

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

OVER THE COMMUNITY COUNCIL RHINE

July 25th, 2022 Membership Meeting Agenda

6 PM – 7:30 PM held Hybrid (Zoom and In Person at OTR Recreation Center)

1. Welcome to this meeting (1 min)
 - a. **Motion** to approve the agenda.
2. Community Updates
 - a. District 1 – Police report (5 min)
 - b. TruPartner Credit Union – Faleisa Marshall (5 min)
3. Officer Reports
 - a. President – Maurice Wagoner (5 min)
 - b. Secretary – John Walter (10 min)
 - i. **Announcement** of 3 board vacancies

This is the official announcement that there are currently three vacancies on the board of trustees. We encourage you to nominate someone that you believe will be a good addition to the BOT. You are also welcome to nominate yourself.

Attached is a copy of the nomination form. The nomination window will open July 25th and remain open until 4:00 p.m. on August 8. Nomination forms should be sent to presidentOTRCC@gmail.com. Please consider submitting your nomination forms well before the August 8 deadline.

On August 8 at 6:30 p.m., the board of trustees will begin interviewing candidates. The board will select up to three candidates whose names will be forwarded to the membership for ratification at the August 22nd membership meeting.

If you have any questions, please direct them to presidentotrcc@gmail.com

- ii. **Motion** to approve the June 27th, 2022 membership meeting minutes (attached)
 - c. Treasurer – Mike Bootes (10 min)
 - i. **Motion** to approve the June 27th, 2022 Treasurer's report (attached)
 - ii. **Motion** to approve the May 23, 2022 Treasurer's report (attached)
4. Voting Business
 - a. **Presentation** (5 min) and **Motion** to support implementation of a Residential Parking Permit Program in OTR north of Liberty Street, in order to relieve the increasingly difficult parking burden faced by residents. The OTRCC asks that the City expedite the implementation of such a program. (Board approved this motion on July 11).
 - b. **Presentation** (5 min) and **Motion**: 8K for proposed residential project at 129-131 W. Elder. Motion is to send a letter of support to DCED regarding the project. See [Project overview](#), [Developer's Questionnaire](#), and [Equitable Development Rubric](#). (Board approved this motion on July 11).
 - c. **Presentation** (5 min) and **Motion**: The Children's Theatre of Cincinnati is requesting \$1 million in TIF District Funds from the OTR/Downtown East district. The project is focused on the restoration of the 1,600-seat Emery Theater space. Motion is to send a letter of support to DCED and City Council regarding the project. See [Emery Presentation Powerpoint](#). (Board approved this motion on July 11).

5. Non-Voting Business

- a. **Community Budget Requests:** Virtual CBR Information Session "Kick off" – Wednesday, July 27, 2022 from 5:30 - 6:30 p.m. ([Zoom link](#)). Any proposals Community councils must initiate contact with City Project Managers by **end of August**. Community councils must submit CBR request forms through the online portal by **end of September**. OTRCC Board of Trustees will review proposals at August meeting. See here for [Community Budget Request general info](#).
- b. **Major Streets Pedestrian Improvements:** OTRCC Board of Trustees will review proposals at our August 8 meeting and membership will vote at the August 22 meeting. Each community council may submit up to two locations for consideration for traffic calming/pedestrian safety. This program is for "major" streets carrying more than 5,000 cars a day. If you are interested in requesting speed humps on a smaller residential street, please contact streetcalming@cincinnati-oh.gov. If you are unsure which program to apply for, reach out to Melissa.McVay@cincinnati-oh.gov. The locations for consideration should be no more than ¼ mile long, or you can send a specific address or intersection. It's also helpful to include a short sentence for each location explaining why traffic calming should be prioritized here. For example, is the location adjacent to a school or community center, or on a heavily traveled walking route to a popular destination? Funding is limited, so this is a competitive program. Your request will be scored based on speed data and the presence of or proximity to pedestrians.

6. Committee Reports

- a. Economic Development and Housing Committee – John Wulsin
- b. Membership Committee – No Report
- c. Neighborhood and Outreach Committee - Stephan
- d. Quality of Life and Transportation Committee – **Vacancy**
- e. Operations and Structure Committee – Danny

7. NSP Report – Mike Bootes

8. New Business

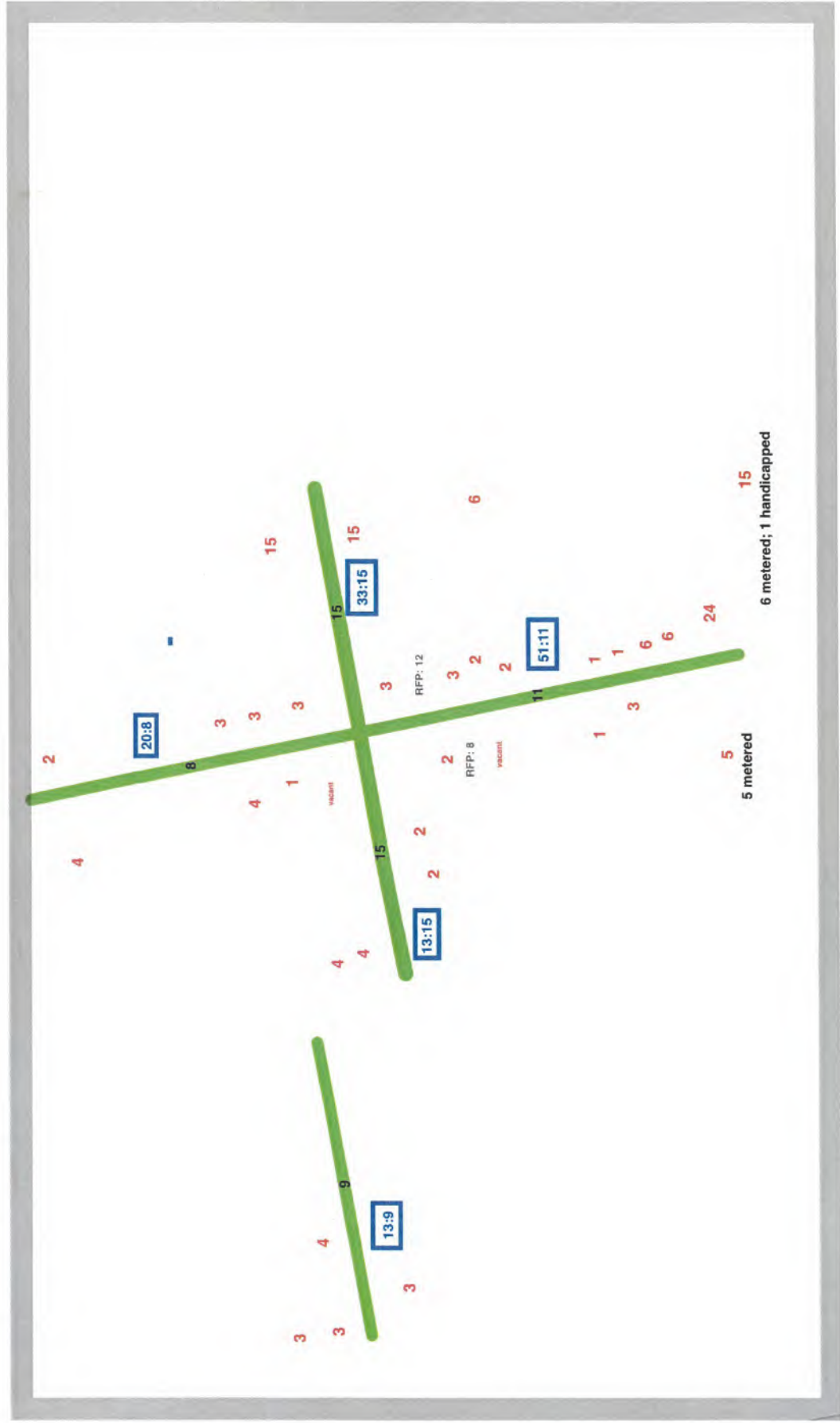
9. Motion to Adjourn

RPPP for Pleasant St & Green St

Residents of Pleasant St. and Green St. north of Liberty between Logan St. and Race St. are seeking an RPPP to provide safe, accessible parking to this district.



Number of households without access to off-street parking: 130
Number of on-street parking spots: 58



On-street parking currently open & free to:

Findlay Market Visitors: peak on Saturday/Sunday: 10,000; Tuesday: 2500; increasing to Friday: 5500
Available parking for Findlay Market visitors: 270 paid spots across 4 lots. Monthly passes are waitlisted but offer parking m-f for \$55/month.
New garage: 515; 200 reserved for Model & Findlay will discontinue monthly passes to other surface lots.

Findlay Market Vendors & Employees: 270 on weekends; 130 on weekdays.

FCC Fans:

Surface lots at Pleasant and Liberty are waitlisted and do not guarantee spots. Cost: \$80 monthly. During FCC games, cost is \$20 for the evening & is at capacity.

Rhinegeist customers:

Rhinegeist customers frequently utilize Findlay Market lots, causing overflow for Findlay lots.

Options for tourists, non-residential customers of FCC, Findlay, and Over-The-Rhine:

Riverfront Garages + free streetcar: 7,000 spots at \$12/day

Streetcar hours: 7:30 a.m. - 11:30 a.m., Monday - Saturday, 7:30 a.m. - 9:30 p.m., Sunday

Why residents have cars:

- Safety
- Time
- Comfort
- Children
- Seniors
- Disability
- Healthcare
- Food access: Findlay and restaurants closed on Mondays; Kroger is too far to walk to for residents (because of heat or cold or distance); residents are driving out of OTR to find cheaper access to groceries (Costco, Sam's Club, Family Dollar)
- Public transportation is too limited for access to the whole of Cincinnati: for work, for family, for accessibility.
- Cars are more sustainable and easy to buy than 10 years ago.
- Access the rest of Cincinnati, the city of *seven* hills.
- Travel
- Work

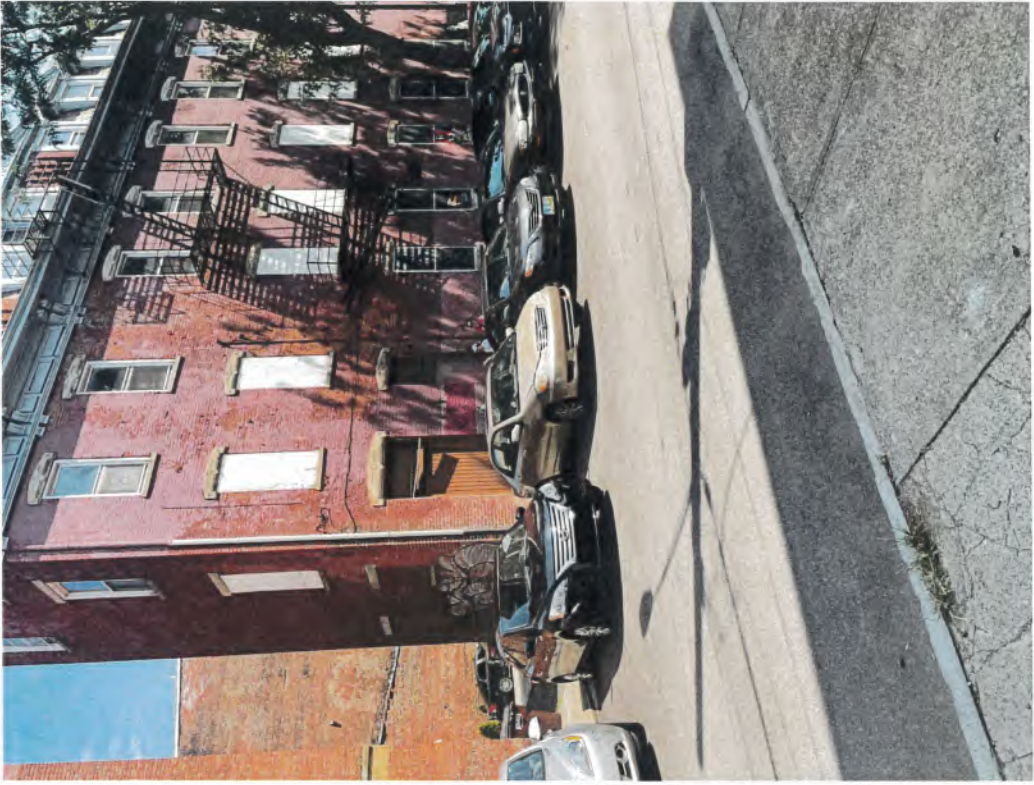
Why parking near one's residence matters:

- Ease traffic and accidents caused by cruising for open street spots; residents report driving around for 45 min looking for a spot.
- Safety - limiting parking access to force walkability works for residents who are able-bodied, male, childless, young, and have excess time.
- Unloading groceries, house goods.
- Residential turn-over: residents moving after a year because of the parking stress; home-owners considering selling because of parking stress.
- Building community by balancing infill & development with parking amenities, making OTR an easy place to live & have family visit.

Why public transportation & downtown parking doesn't work for residents:

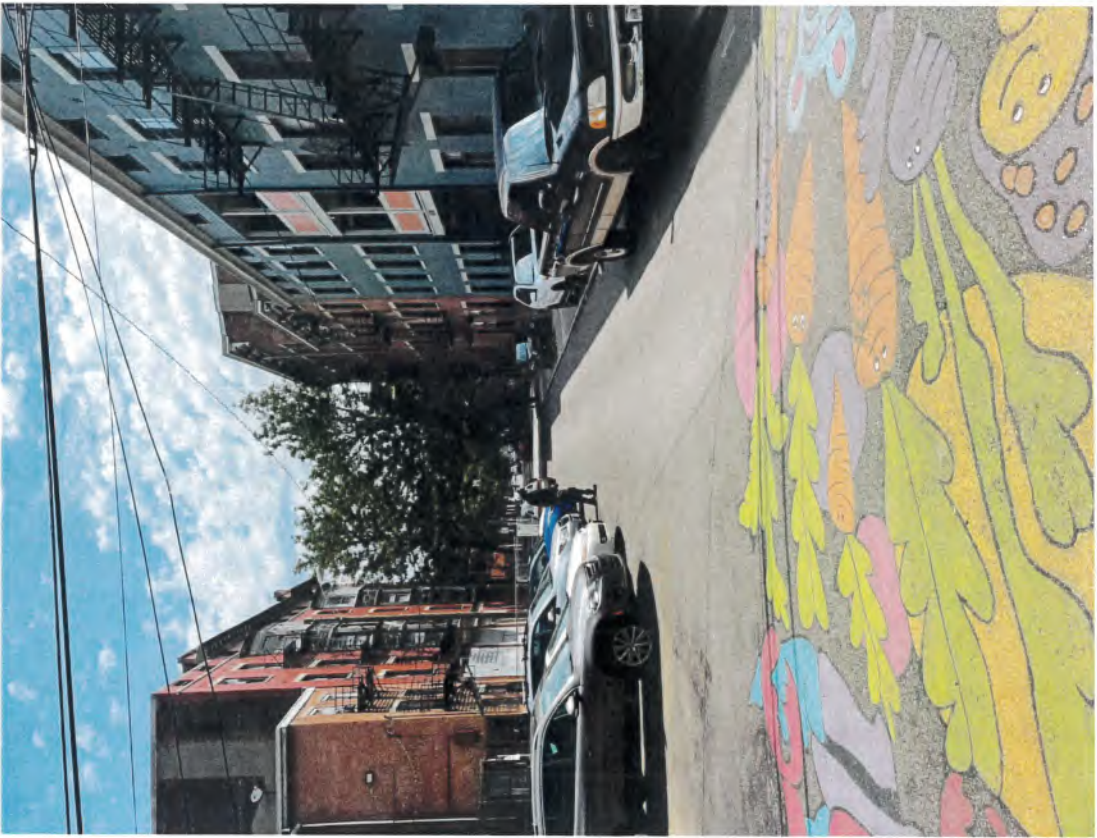
- Limited & unreliable street-car hours & service - does not work for families who drive their children to school if service starts at 7:30 a.m. (travel time to riverfront from Findlay is approx. 20 min if running on time)
- Prohibitive cost (\$110 - \$155 - \$180 monthly), limited access during Bengals games & other events.
- Does not work for families that transport children and children's activity gear.
- Does not work for workers who require vehicles for gear (tools, instruments, etc.)
- Does not work for residents with disabilities.
- Is not safe in extreme heat or cold.
- Limited for folks who work late nights; places safety concerns walking through the neighborhood before and after shifts.











PLEASANT STREET RESIDENTIAL PARKING PETITION

	Address	Name	Signature	Phone Number	FOR	AGAINST
1	1625 Pleasant	DAN DORFF JR	[Signature]	513-608-9121	✓	
2	1626 Pleasant	Thomas Smith	[Signature]	513-999-4524	✓	
3	1629 Pleasant	Tamara Smith	[Signature]	513-251-5124	✓	
4	1629 Pleasant St #3	Stolonsky Howard	[Signature]	513-382-3270	✓	
5	1616 Pleasant St. A	Clare Schaboneau	[Signature]	734-344-9542	✓	
6	1612 Pleasant St	Monica Wasaroth	[Signature]	513-965-4611	✓	
7	1618 Pleasant St	Lucas Field	[Signature]	317-748-7313	✓	
8	1629 Pleasant St	David Fission	[Signature]	657-861-5264	✓	
9	1703 Pleasant St	Leanne Madden	[Signature]	317-410-6019	✓	
10	1627 Pleasant St	Matt Anthony	[Signature]	513-214-7732	✓	
11	1615 Pleasant St	Matt Kotlarecz	[Signature]	513-235-8526	✓	
12	1718 Pleasant St	Chal Lockey	[Signature]	415-637-8501	✓	
13	1608 Pleasant	Mark Bruggeman	[Signature]	612-315-1780	✓	
14	1610 Pleasant	Mark Bruggeman	[Signature]	612-315-1780	✓	
15	1614 Pleasant	Katie Westbrook	[Signature]	513-702-1055	✓	
16	1622 West 1st St	May Stone	[Signature]	513-401-1701	✓	
17	1621 West 1st St	Keisha Nelson	[Signature]	513-904-9924	✓	
18	1600 Pleasant	Flannery	[Signature]	513-315-1062	✓	
19	1600 Pleasant	Cheryl Hader	[Signature]	513-321-0820	✓	
20	1432 Race St.	Katie Spensler	[Signature]	513-484-4265	✓	
21	1709 Race St apt. 2K	Kristen Cross	[Signature]	480-490-7857	✓	
22	1616 Pleasant	Tina Stehr	[Signature]	419-509-2425	✓	
23	1600 Pleasant	Christopher Joyce	[Signature]	513-591-9158	✓	
24	1611 Pleasant	Terry Peters	[Signature]	413-887-4311	✓	
25	1614 Pleasant	Miriam Lopez	[Signature]	513-400-3157	✓	
26	1604 Pleasant	Brett Herley	[Signature]	347-226-6417	✓	
27	1621 Pleasant	Wade Chapman	[Signature]	513-488-9721	✓	
28	1616 Elm St.	Junghin Kim	[Signature]	607-879-1688	✓	
29	1723 Pleasant	Fr. Myung Bae	[Signature]	513-218-7215	✓	
30		Francisco	[Signature]	513-703-8553	✓	
31	1720 Pleasant	Jennifer L. Mackswitz	[Signature]	513-703-8553	✓	
32	1701 Pleasant	Jennifer L. Mackswitz	[Signature]	513-703-8553	✓	
33	1725 Pleasant	Jennifer L. Mackswitz	[Signature]	513-703-8553	✓	
34	1716 Pleasant	Jennifer L. Mackswitz	[Signature]	513-703-8553	✓	
35	1630 Pleasant	Margaret Hayes	[Signature]	513-400-9146	✓	
36	41 W. Milwaukee	Woo Jen Young	[Signature]	513-519-1617	✓	
37	1700 S. 1st St	NELISSA HODG	[Signature]	513-972-1925	✓	
38	1624 Pleasant St	Amalia Miller	[Signature]	618-235-0974	✓	
39	1624 Pleasant St	Christina Horton	[Signature]	937-304-1739	✓	
40	1623 Race St	Michelle White	[Signature]	513-751-2311	✓	
41	1526 Pleasant Apts	Germane Harris	[Signature]	513-914-9248	✓	
42	1622 Pleasant #1R	Cory E. Brown	[Signature]	513-578-5273	✓	
43	1118 Pleasant	Tom Mazarati	[Signature]	513-972-1925	✓	
44	1600 Pleasant St.	Chase Gaby	[Signature]	765-744-7835	✓	
45	1606 Pleasant P	Worick Brook	[Signature]	507-381-7212	✓	
46	1600 Pleasant	Anthony	[Signature]	513-621-7141	✓	
47	1707 Pleasant St. Apt 2	Jennifer Dickhaus	[Signature]	513-885-2269	✓	
48	1717 Pleasant	Pat Hunter	[Signature]	513-501-6076	✓	
49	1624 Pleasant	Robert Ferguson	[Signature]	513-535-3523	✓	
50	121 Green St	Robert Ferguson	[Signature]	617-868-8076	✓	
51	1706 Elm St	Miguel - speedhumps	[Signature]		✓	

504

301

- park & spot guidelines
- handicap spots.
- updated & clearly marked one-way signs.

Residential Street Parking Checklist

Step 1: What area? Alert our office of the boundaries so Planning can approve

Step 2: The individual must make a list of at least 50 households in the area.

Step 3: Attain signatures from the 50+ households on a petition for the Residential Parking Permit. We have a sample petition. Sixty percent (60%) of the 50+ households on the list must agree to the RPP application.

Step 4: DOTE will then survey the designated area to ascertain whether 70% or more of the parking is already taken.

Step 5: Applicant must attain letter of support from the Community Council for a RPP in that designated area

Step 6: Councilmember requests the ordinance from the City Solicitor's Office.

Step 7: Council votes on the ordinance.

Step 8: DOTE installs signage and issues permits.

NOTE: The process takes at least 6 months.

Owen, Douglas

From: Jeff Luggen <JEFF@cia-auction.com>
Sent: Thursday, July 28, 2022 3:25 PM
To: Owen, Douglas
Subject: [External Email] FW: 2000 Dunlap Street PSH Project

External Email Communication

Hi Doug,

Please include the below email from David Foust with OFHA into the info packet for the August 8th HCB Hearing.

Thanks, Jeff

From: Foust, David <DFoust@ohiohome.org>
Sent: Thursday, June 9, 2022 2:36 PM
To: Jeff Luggen <JEFF@cia-auction.com>
Subject: RE: 2000 Dunlap Street PSH Project

Jeff,

Sorry for the delay. I was recently out of the office for unexpectedly.

The answer to your first two questions can be found in our QAP:
<https://ohiohome.org/ppd/documents/2022-2023-QAP.pdf>

On page 44 you will find information regarding Special Allocations. In short: Special Allocation scenarios may occur if a development is unable to proceed due to the actions of unrelated parties. The developer may apply for a special allocation of credits within three years following the return of their original allocation of competitive tax credits.

On page 41 you will find the scoring criteria for Service-Enriched Housing.

Opponents of a particular development are permitted to speak at the OHFA Multifamily Committee meeting during which the Committee is presented the project in question. As I said before, we do not have a date when this project will be presented to the Multifamily Committee just yet. It will likely be sometime late fall or winter this year when the project is ready to go in front of the committee.



David Foust / Director of Multifamily Housing

Ohio Housing Finance Agency
57 E Main Street Columbus OH 43215
Phone 614.387.1646
Email DFoust@ohiohome.org
www.ohiohome.org

STAY CONNECTED...



We open the doors to an affordable place to call home.

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

From: Jeff Luggen <JEFF@cia-auction.com>

Sent: Tuesday, June 7, 2022 11:32 AM

To: Foust, David <DFoust@ohiohome.org>

Subject: 2000 Dunlap Street PSH Project

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to or click the Phish Alert Button if available.

Hi David,

If HCB does not approve the variances for the 2000 Dunlap Street, can OTRCH use the approved funding for another location?

Can you send me a Scoring Criteria for the PSH project?

When will the neighborhood opposition be able to voice their opinion?

Thanks for your help,

Jeff

Jeffrey L. Luggen, Vice President

CIA Company | Auctions | Acquisitions | Appraisals | Since 1961

513-241-9701 Office | 513-702-4554 Cell | jeff@cia-auction.com

Mailing Address: 2020 Dunlap St., Cincinnati, Ohio 45214

6/27/2022

Re: Dunlap PSH

To Whom it May Concern:

I am writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. I understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

Everyone needs safe, decent, stable housing. All people have worth and for the most vulnerable people in America, people with mental illness, chronic health conditions, histories of trauma, and other struggles — a home helps them to get adequate treatment and start on the path toward recovery. Supportive Housing combines affordable housing with supportive services that help individuals who face the most complex challenges to live with stability, autonomy, and dignity.

Many people mistakenly think that the folks who need supportive housing are substance abusing derelicts, but according to data collected in 2021 by the Cincinnati/ Hamilton County Continuum of Care, more than half (51%) of our local homeless population is 35 years or younger, dispelling that myth.

Evidence based research has shown that supportive housing is a highly effective strategy that combines affordable housing with intensive coordinated services to help people struggling with addictions, disabilities, and chronic physical health/mental health issues which in turn reduces the homeless population.

This city is in dire need of affordable housing. This project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Sincerely,
Sheila Quarles, LSW
1616 Race
Cincinnati, OH 45202

Owen, Douglas

From: Robert Sehlhorst <robertsehlhorst@gmail.com>
Sent: Thursday, July 28, 2022 9:32 AM
To: Conservator, Urban
Subject: [External Email] Petition Opposing 2000 Dunlap Street Project COA2022032
Attachments: 2000 Dunlap Street PSH Development Opposition Petition 4-11-2022.pdf

You don't often get email from robertsehlhorst@gmail.com. [Learn why this is important](#)

External Email Communication

Dear Mr. Owens,

My name is Robert Sehlhorst and I reside at 2019 Elm Street. My rear property line is within 200 feet of the proposed OTRCH project at 2000 Dunlap Street. My neighbors, nearby business owners and I are deeply opposed to this project. Attached is a petition signed by 106 residents and business owners near and around 2000 Dunlap Street stating our opposition. We are opposed to this project for the following reasons.

1. This proposed project is Institutional Housing that is clearly not permitted in the Urban Mix Zoning governing this portion of the Mohawk Neighborhood. For that reason alone I urge the HCB to vote no.

2. The applicant is seeking a zoning density of 44 units on a 100' x 100' lot that is zoned for 14 units. They are seeking a zoning variance that is more than three times permitted density. That amount of density cannot be found on Dunlap Street or on adjacent streets. If that variance is granted, it would completely change the historic character of Dunlap Street and the Mohawk Neighborhood. Cincinnati City Council in 2022 decided to maintain current density requirements. This zoning variance request by the applicant is directly counter to the vision outlined by City Council. Granting this density variance would open the flood gates for future developments.

3. The building is too tall and large for that lot. Nearby buildings are 1-3 stories high. If this proposed building is constructed it will create a monolithic structure that will tower over nearby homes and businesses. This proposed plan will undermine the historic character of Dunlap and Henry Streets and the Mohawk Neighborhood and is not appropriate.

4. A March, 2022 study conducted by the City of Cincinnati showed that over the last five years 75% of the affordable housing developments have gone into 4 neighborhoods; Avondale, Walnut Hills, West End and **OTR**. Our small compact Mohawk Neighborhood is over saturated with institutional housing of this type. Adding 44 institutional units to this neighborhood would create 262 institutional beds. How many institutional beds can a fragile, transitional neighborhood absorb?

5. Nearby families with children and businesses are deeply concerned that this project will only add to the number of convicted sex offenders residing in our neighborhood. One block away from 2000 Dunlap Street is the Volunteers of America (VOA). VOA provides 130 beds for convicted criminals completing their sentences. According to the Hamilton County Sheriff's Department website there are 62 sex offenders housed at VOA. How many sex offenders will be residing at 2000 Dunlap Street?

6. The OTR Community Council membership in April voted to oppose this project. Mohawk Neighborhood CDC does not support this project in its current form. All nearby neighbors and businesses, with very few exceptions, are deeply opposed to this project.

For these reasons and many more outlined on our attached neighborhood petition, I urge the Historic Conservation Board to vote no on this project.

Respectfully,
Robert Sehlhorst

STOP OTRCH's 2000 Dunlap Street PSH Development

About this petition

OPPOSITION PETITION

STOP OTRCH's 2000 Dunlap Street PSH Development

Over The Rhine Community Housing (OTRCH) of Cincinnati, Ohio has proposed a PSH development, targeted to serve individuals experiencing chronic homelessness and have a history of mental health illnesses and drug and alcohol addiction, at 2000 Dunlap Street in the Mohawk Neighborhood of OTR. This development will consist of a four-story building with (44) studio apartments on a 100' x 100' Lot with zero lot line construction.

Residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas OPPOSE THIS PROJECT for the following reasons:

- This proposed project is seeking a zoning variance that would permit 44 units on a lot zoned for 14 units. This is three times the zoned density for this lot and results in too many units crammed into a small parcel in a busy, highly congested area that serves low density residential housing, commercial businesses, light industry, entertainment businesses, breweries, bars, night clubs and restaurants. Cincinnati City Council recently voted NO to increase density ensuring that existing zoning restrictions for density remain in place.
- This project will change the character of our neighborhood by adding another institutional/transitional type housing facility to our neighborhood that already has several, including the Volunteers of America that is less than 1-block and is a (130) Bed facility for sex offenders and other criminals finishing their sentences, Logan Towers is less than 2-blocks and is a (63) Bed facility for individuals experiencing chronic homelessness with a history of mental health or substance use disorders, OTRCH's Jimmy Heath House, (25) Bed facility for individuals experiencing chronic homelessness. The addition of this project will result in a total of 262 institutional beds in our small pocket neighborhood. Institutional housing will outnumber market rate housing more than 2 to 1. This is NOT affordable housing. This is institutional transitional housing.
- Placing 44 clients with mental health illnesses and drug and alcohol addiction in a neighborhood with open drug sales and prostitution, gun violence and a plethora of drinking establishments does NOT set up the chronic homeless for success. No more institutional projects need to be shoehorned into our small neighborhood which is trying to evolve from past neglect.
- Within a 10-minute walk of this project low-income government subsidized housing out numbers market rate housing almost 10 to 1. We support mixed housing, combination of market rate, low income, and workforce housing. Workforce housing for people who live, work, and generate payroll taxes in our city is what is needed to move the city and our neighborhood forward. Why is government subsidized housing limited to a handful of Cincinnati neighborhoods? The other 52 neighborhoods should be considered to disperse affordable housing throughout Cincinnati.
- There are absolutely no policies or guarantees in place to ensure that the clients of this facility are actually from this neighborhood or the city. Clients can and will come from nearby cities,

- other states, and regions. This will only increase the workload on the overburdened city services at the expense of the taxpayers of Cincinnati.
- There are no policies or guidelines in place that will prohibit additional sex offenders from being housed in this project. At last count on April 6th, 2022, there were 62 convicted sex offenders residing at Volunteers of America, 115 W. McMicken, a 1-minute walk from this proposed facility.
- The zero-lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street are already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
- No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
- Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.
- 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type. The Urban Mix Zoning was adopted in 2007 to pave the way for housing in this industrial/warehouse without detriment to existing businesses and jobs. Urban Mix Zoning has no reference to PSH, but specifically excludes Transitional Housing of the type the developer wants to put in (#5 and #6) is specifically excluded:
:§ 1401-01-T. - Transitional Housing.
- SHARE LINK TO SECTIONPRINT SECTIONDOWNLOAD (DOCX) OF SECTIONSEMAIL SECTION"Transitional housing" means housing designed to assist persons in obtaining skills necessary for independent living in permanent housing, including homes for adjustment and halfway houses. Transitional housing is housing in which:
 - An organization provides a program of therapy, counseling, or training for the residential occupants.
 - The organization operating the program is licensed or authorized by a governmental authority having jurisdiction over operation; and
 - The program is for the purpose of assisting the residential occupants in one or more of the following types of care:
 - Protection from abuse and neglect.
 - Developing skills necessary to adjust to life.
 - Adjusting to living with the handicaps of physical disability.
 - Adjusting to living with the handicaps of emotional or mental disorder or mental retardation.
 - Recuperation from the effects of drugs or alcohol, even if under criminal justice supervision; or
 - Readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release, and probationary programs.

The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas Oppose the 2000 Dunlap Street PSH Development.

Signatures

1. Name: Kristen Bonavita (kristen@cia-auction.com) on 2022-04-13 19:32:34
Comments:

2. Name: Jeffrey M Luggen (jeffrey.michael23@gmail.com) on 2022-04-13 19:34:50
Comments: 2037 Elm St.

3. Name: Christine Oliver (christine@cia-auction.com) on 2022-04-13 19:38:02
Comments: 3707 Vollmer Place, Cincinnati, OH

4. Name: jeff luggen (jeff@jluggen.com) on 2022-04-13 19:39:30
Comments: 2020 dunlap street

5. Name: Robert Sehlhorst (robertsehlhorst@gmail.com) on 2022-04-13 20:23:45
Comments:

6. Name: Ryan Luggen (ryan@cia-auction.com) on 2022-04-14 18:08:54
Comments:

7. Name: Stuart Schulman (sschulman@dltdelivers.com) on 2022-04-15 16:58:30
Comments: 225 Stark Street Cincinnati, Ohio 45214

8. Name: Joseph M Vallo (jvallo@vallomanagement.com) on 2022-04-15 17:35:55
Comments:

9. Name: Nick Caruso (ncar7623@gmail.com) on 2022-04-15 18:53:51
Comments: I am a resident of Dunlap Street. This is not the right location for this project due to several factors in the immediate area surrounding the proposed location. This is a great project, but the people utilizing the service would be better served if this project was built in a location that doesn't promote and surround them with the very things that likely contributed to their situation.

10. Name: Michael Basch (squirrelweddingfilms@gmail.com) on 2022-04-15 20:05:39
Comments:

11. Name: Alfred J Berger Jr (dsiltd@fuse.net) on 2022-04-15 20:32:30
Comments: Warehousing the poor or the sick is a sick policy

12. Name: Deborah Johnson (djohnson@robinimaging.com) on 2022-04-15 21:09:11
Comments: As co-owner of Robin Imaging Services and resident in The Mohawk Neighborhood, I strongly disagree to add another institutional transitional housing facility where this is proposed. There are many other choices in Cincinnati to better support this need. Those of us in The Mohawk Neighborhood have been working to build affordable

housing here so that those who work here or in OTR can live here.

13. Name: Carol Ann schulman (gardenroselady@yahoo.com) on 2022-04-15 21:20:26
Comments:

14. Name: Kim McCarty (kimhalemccarty@gmail.com) on 2022-04-16 00:27:48
Comments: The placement of this project at 2000 Dunlap is predictably discriminatory and will have a disparate impact on the Disabled and African Americans. It will steer poor, disabled, predominately black people to a poor, predominately black community.

It is inhumane to provide housing for the targeted population in a low opportunity community that is infested with open-air drug markets, prostitution, chronic blight and uncontrollable crime.

15. Name: john valentine (johnv913@gmail.com) on 2022-04-16 01:07:23
Comments: We have had enough of this in our neighborhood!

16. Name: Sherri King (sherribarberphotography@gmail.com) on 2022-04-16 03:50:18
Comments:

17. Name: Kenneth Klabunde (k.klabunde@gmail.com) on 2022-04-16 11:16:01
Comments:

18. Name: Rebecca Klabunde (rebecca.klabunde@gmail.com) on 2022-04-16 11:25:58
Comments:

19. Name: Mikey Sorboro (mikey@latenightslice.com) on 2022-04-16 14:33:36
Comments: Business owner in neighborhood. Late Night Slice & Oddfellows

20. Name: Hal Lorton (notrollah@gmail.com) on 2022-04-16 21:20:09
Comments:

21. Name: Tara Lorton (4holytara@gmail.com) on 2022-04-16 22:34:30
Comments:

22. Name: Jerome Luggen (jerome@cia-auction.com) on 2022-04-18 12:38:12
Comments: 2020Dunlap Street

23. Name: John Walter (johnwalter@cinci.rr.com) on 2022-04-18 22:55:25
Comments: I am against this project for all the reasons argued in this petition.

24. Name: Paul Bauer (bauerp674@gmail.com) on 2022-04-20 15:29:43

Comments:

-
25. Name: Daniel Bascone (dfb1143@gmail.com) on 2022-04-20 15:41:23
Comments:
-
26. Name: Dale Anderson (daleanderson323@gmail.com) on 2022-04-20 16:13:38
Comments:
-
27. Name: Logan Reynolds (loganpreynolds@gmail.com) on 2022-04-20 16:14:03
Comments:
-
28. Name: Jenny Miller (jenny_miller4@aol.com) on 2022-04-20 17:14:31
Comments:
-
29. Name: Ethan Anost (ethananost2843@yahoo.com) on 2022-04-20 17:23:20
Comments:
-
30. Name: Jasmine Wells (jasmine.kww@gmail.com) on 2022-04-20 17:26:21
Comments:
-
31. Name: Sarah Harlow (sarahwv26@gmail.com) on 2022-04-20 17:32:06
Comments: 216 Klotter Ave
-
32. Name: Renee Miller (thespeckledwren@aol.com) on 2022-04-20 17:32:29
Comments:
-
33. Name: Julie Miller (millerjulie50@yahoo.com) on 2022-04-20 17:35:06
Comments:
-
34. Name: Colin Barge (bargecolin@gmail.com) on 2022-04-20 17:38:50
Comments: This is NOT in the best interest of the neighborhood and will have a negative impact.
-
35. Name: Jennifer Jill Cummins (jenjillj@gmail.com) on 2022-04-20 17:43:14
Comments:
-
36. Name: Evan Cummins (evan.cummins@gmail.com) on 2022-04-20 17:45:21
Comments:
-
37. Name: Blake Baxter (baxter.blake@gmail.com) on 2022-04-20 17:48:09
Comments:
-

38. Name: Kristina Elaine LaScalea-Sehlhorst (tinalascalea@gmail.com) on 2022-04-20 17:55:21
Comments:
-
39. Name: Caitlin Cummins (cjj.cummins@gmail.com) on 2022-04-20 18:10:16
Comments:
-
40. Name: Joseph Luggen (buckeyemachinery@hotmail.com) on 2022-04-20 18:16:17
Comments:
-
41. Name: David Macejko (overtherhinecigars@gmail.com) on 2022-04-20 18:39:04
Comments: Over the Rhine is Cincinnati's highest crime neighborhood of all kinds. according to Cincinnati Police. I've been a victim. This project will do nothing to mitigate that reality and will likely exacerbate problems with theft, breaking and entering, and violence between Liberty, and McMillan.
-
42. Name: Andy Smith (smith.andrew.lynn@gmail.com) on 2022-04-20 18:54:16
Comments:
-
43. Name: Matt Jacob (mattjjacob@gmail.com) on 2022-04-20 22:57:52
Comments:
-
44. Name: Elliott Culter (eculter@sugarcreek.com) on 2022-04-21 14:34:01
Comments: Signing on behalf of Southern Ohio Holding Organization which owns properties on Mohawk and McMicken.
-
45. Name: Bradley Rusk (ruskb34@gmail.com) on 2022-04-21 15:39:37
Comments:
-
46. Name: Frederick C Ellenberger (fellenberger@cinci.rr.com) on 2022-04-21 15:41:04
Comments:
-
47. Name: Brent Rohr (brent.rohr@gmail.com) on 2022-04-21 15:46:56
Comments:
-
48. Name: Rebecca Restrepo (restreeppo@gmail.com) on 2022-04-21 15:55:30
Comments:
-
49. Name: Carley Atchison (carley.atchison@gmail.com) on 2022-04-21 16:12:45
Comments:
-
50. Name: Liz Yauch (lizebear18@gmail.com) on 2022-04-21 17:00:16
Comments:
-

51. Name: Vincent Harnett (vincent.harnett@gmail.com) on 2022-04-21 21:06:03
Comments: I am against OTRCH's 2000 Dunlap Street PSH Development
-
52. Name: Ron Rowe (rhrproperties@gmail.com) on 2022-04-21 22:15:08
Comments:
-
53. Name: Patricia Berger (cinti1pa@aol.com) on 2022-04-22 13:04:02
Comments: This will increase insecurity and bad image to an already tainted neighborhood
-
54. Name: James Hautz (jjhautz@gmail.com) on 2022-04-22 13:06:45
Comments:
-
55. Name: Richard Cedar (rdcmole@aol.com) on 2022-04-22 13:19:21
Comments:
-
56. Name: Mary Fox (MARYFOX522@GMAIL.COM) on 2022-04-22 14:13:45
Comments: 522 CONROY ST
-
57. Name: Diego Jordan (arch_terra@hotmail.com) on 2022-04-22 16:21:31
Comments: Wrong proposal. Wrong place for this type of facility.
-
58. Name: Douglas Wainz (wanderlust@fuse.net) on 2022-04-22 16:40:21
Comments:
-
59. Name: Sandy Wainz (cityview@fuse.net) on 2022-04-22 16:41:48
Comments:
-
60. Name: David Reid (hman@h david.com) on 2022-04-22 16:47:43
Comments: We have enough social agencies in our neighborhood!
-
61. Name: Michael Fox (michaeljfox522@gmail.com) on 2022-04-22 17:01:48
Comments:
-
62. Name: Cherie Senger (cherie.senger@gmail.com) on 2022-04-22 21:35:30
Comments:
-
63. Name: Mitul Dadhania (mituldadhania@hotmail.com) on 2022-04-23 11:04:31
Comments:
-
64. Name: Kate Hensler (hensler.ka@gmail.com) on 2022-04-23 22:41:56
Comments:

-
65. Name: Nathan Baugh (nbaughlv@yahoo.com) on 2022-04-24 08:07:47
Comments:
-
66. Name: Molly Kirleis (mfk0220@gmail.com) on 2022-04-24 08:08:21
Comments:
-
67. Name: Craig Herget (craig.herget@gmail.com) on 2022-04-24 20:15:59
Comments: I oppose this project.
-
68. Name: Willim Johnson (BJohnson@RobinImaging.com) on 2022-04-25 12:42:14
Comments: The Mohawk neighborhood is trying very hard to move forward. We have enough mental health and homeless problems now and do not need more.
-
69. Name: steven fink (sfink@bangzoomdesign.com) on 2022-04-26 20:44:36
Comments: I am opposed to this project.
-
70. Name: Alex Dieterle (adieterle@bangzoomdesign.com) on 2022-04-26 21:32:44
Comments: 1415 Central PKWY
-
71. Name: Steve Casino (tamer-boa-0k@icloud.com) on 2022-04-26 22:06:13
Comments: 1415 Central Parkway
-
72. Name: Kimberly Starbuck (kimstarbuck9@gmail.com) on 2022-04-27 02:54:50
Comments:
-
73. Name: Michael Hoeting (MHOETING@GMAIL.COM) on 2022-04-27 19:43:44
Comments:
-
74. Name: Carol Schulte (carolnschulte@gmail.com) on 2022-04-27 19:45:02
Comments:
-
75. Name: Cary Satch Travis (carytravis@gmail.com) on 2022-04-27 23:05:27
Comments:
-
76. Name: Julie Fay (jdfayotr@gmail.com) on 2022-04-29 02:25:45
Comments: Too dense for the location, zoning and clientele served.
-
77. Name: Neil Marquardt (neil.marquardt@gmail.com) on 2022-04-29 12:23:01
Comments: This project makes NO sense at this location. Density issues, parking challenges, safety concerns, property values, putting at-risk people in the middle of this neighborhood are some of my tops concerns.

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78. Name: Joe Maas (maas2212@gmail.com) on 2022-04-29 18:15:39
Comments: 10750 Mockernut Dr
Harrison. Ohio 45030
-
79. Name: David Berger (davidb@msdf1.com) on 2022-04-30 18:07:16
Comments:
-
80. Name: Nancy P Berger (Nancyb@northernrow.com) on 2022-04-30 20:13:25
Comments: 2567 Queen City Ave
-
81. Name: Josh Quattlebaum (Joshq@northernrow.com) on 2022-05-01 16:58:04
Comments:
-
82. Name: Karen Domine (edenpk2@aol.com) on 2022-05-02 12:41:13
Comments:
-
83. Name: Brenden Douglass (brendend@northernrow.com) on 2022-05-02 13:07:56
Comments: As someone who works in OTR and already deals with the current homeless situation I can see how a new homeless shelter in our neighborhood can negatively effect the company I work for and the guests we accommodate. Moreover, many people visiting Cincinnati come to OTR to enjoy themselves and this potential shelter would reflect poorly on our city
-
84. Name: Cody R Jackson (cjackson@bangzoondesign.com) on 2022-05-02 16:37:30
Comments:
-
85. Name: Alex Hutchins (alexh@northernrow.com) on 2022-05-03 17:33:54
Comments:
-
86. Name: Jonathon Pettit (tungstenx3@hotmail.com) on 2022-06-02 23:18:47
Comments:
-

OPPOSITION PETITION

STOP OTRCH's 2000 Dunlap Street PSH Development

April 11th, 2022

Over The Rhine Community Housing (OTRCH) of Cincinnati, Ohio has proposed a PSH development, targeted to serve individuals experiencing chronic homelessness and have a history of mental health illnesses and drug and alcohol addiction, at 2000 Dunlap Street in the Mohawk Neighborhood of OTR. This development will consist of a four-story building with (44) studio apartments on a 100' x 100' Lot with zero lot line construction.

Residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **OPPOSE THIS PROJECT** for the following reasons:

1. This proposed project is seeking a zoning variance that would permit 44 units on a lot zoned for 14 units. This is three times the zoned density for this lot and results in too many units crammed into a small parcel in a busy, highly congested area that serves low density residential housing, commercial businesses, light industry, entertainment businesses, breweries, bars, night clubs and restaurants. Cincinnati City Council recently voted NO to increase density ensuring that existing zoning restrictions for density remain in place.
2. This project will change the character of our neighborhood by adding another institutional/transitional type housing facility to our neighborhood that already has several, including the Volunteers of America (130) Bed facility for sex offenders and other criminals finishing their sentences, Logan Towers (63) Bed facility for individuals experiencing chronic homelessness with a history of mental health or substance use disorders, OTRCH's Jimmy Heath House, (25) Bed facility for individuals experiencing chronic homelessness. The addition of this project will result in a total of 262 institutional beds in our small pocket neighborhood. Institutional housing will outnumber market rate housing more than 2 to 1. This is NOT affordable housing. This is institutional transitional housing.
3. Placing 44 clients with mental health illnesses and drug and alcohol addiction in a neighborhood with open drug sales and prostitution, gun violence and a plethora of drinking establishments does NOT set up the chronic homeless for success. No more institutional projects need to be shoehorned into our small neighborhood which is trying to evolve from past neglect.
4. Within a 10-minute walk of this project low-income government subsidized housing out numbers market rate housing almost 10 to 1. We support mixed housing, combination of market rate, low income and workforce housing. Workforce housing for people who live, work and generate payroll taxes in our city is what is needed to move the city and our neighborhood forward. Why is government subsidized housing limited to a handful of Cincinnati neighborhoods? The other 52 neighborhoods should be considered to disperse affordable housing throughout Cincinnati.
5. There are absolutely no policies or guarantees in place to ensure that the clients of this facility are actually from this neighborhood or the city. Clients can and will come from nearby cities, other states and regions. This will only increase the workload on the overburdened city services at the expense of the taxpayers of Cincinnati.
6. There are no policies or guidelines in place that will prohibit additional sex offenders from being housed in this project. At last count on April 6th, 2022, there were 62 convicted sex offenders residing at Volunteers of America, 115 W. McMicken, a 1-minute walk from this proposed facility.

7. The zero-lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street are already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
8. No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
9. Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will **prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.**
10. 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type. The Urban Mix Zoning, was adopted in 2007 to pave the way for housing in this industrial/warehouse without detriment to existing businesses and jobs. Urban Mix Zoning has no reference to PSH, but specifically excludes Transitional Housing of the type the developer wants to put in (#5 and #6) is specifically excluded:

Transitional Housing		
Programs 1—4	P	
Program 5, 6	—	

: § 1401-01-T. - Transitional Housing.

11. SHARE LINK TO SECTIONPRINT SECTIONDOWNLOAD (DOCX) OF SECTIONSEMAIL SECTION

"Transitional housing" means housing designed to assist persons in obtaining skills necessary for independent living in permanent housing, including homes for adjustment and halfway houses. Transitional housing is housing in which:

- (a) An organization provides a program of therapy, counseling or training for the residential occupants;
- (b) The organization operating the program is licensed or authorized by a governmental authority having jurisdiction over operation; and
- (c) The program is for the purpose of assisting the residential occupants in one or more of the following types of care:
 - (1) Protection from abuse and neglect;
 - (2) Developing skills necessary to adjust to life;
 - (3) Adjusting to living with the handicaps of physical disability;
 - (4) Adjusting to living with the handicaps of emotional or mental disorder or mental retardation;
 - (5) Recuperation from the effects of drugs or alcohol, even if under criminal justice supervision; or
 - (6) Readjusting to society while housed under criminal justice supervision including, but not limited to, pre-release, work-release and probationary programs.

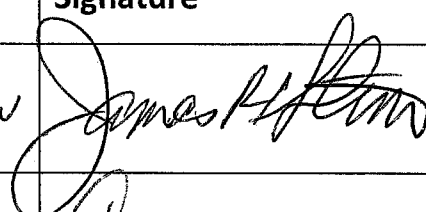
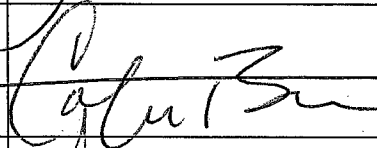
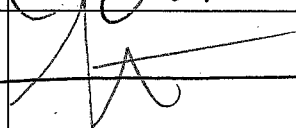
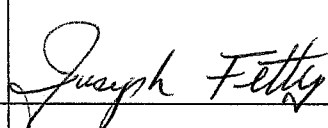
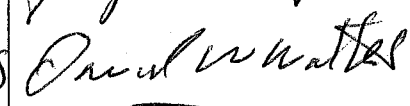
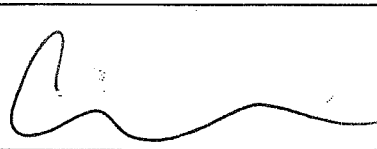
The Dunlap Neighbors do not oppose the mission of providing housing support for our low-income families and brothers and sisters. But we believe this specific project is the wrong project in the wrong place.

We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
MARK GATHERWRIGHT	Mark Gatherwright	2025 ELM ST. 45202
Janet Gatherwright	Janet Gatherwright	2025 Elm St 45202
Juliana Lemen	Juliana Lemen	2023 Elm St 45202
Mike Fitzgerald	Mike Fitzgerald	2023 Elm St 45202
Kyle Stein	Kyle Stein	2023 Elm St 45202
Beth Ali Munzio	Beth Ali Munzio	2023 Elm St 45202
Patricia Greene	Patricia Greene	2023 Elm St 45202
Gerald Manies	Gerald Manies	enabler 2025 Elm
Joanne Farmer	Joanne Farmer	2035 ELM ST #84 45202
Kelly Johnson	Kelly Johnson	1885 1885 Forestview Ct. 45233
Cherie Antorum	Cherie Antorum	1926 Dunlap 45202

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We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
JAMES R. STERN		2020 DUNLAP ST (CINT/ INDUSTRIAL AUCTIONEERS)
Colm Borge		2031 Dunlap St Cinci 45214
Steven Fink		1908 Dunlap St #2 Cincinnati OH 45214
Joseph V Fetti		242 STARK ST CINT OH 45214
David Walters		260 STARK ST CINC OH 45214
Mamad SHALAS I.		2020 Central Pkwy CIN OH 45214
John Philkovic		235 Stark St. Cincinnati OH 45214
Cosin		2020 Puler St. Cincinnati, OH 45214

Signal
Electrical
Sign
Electrical

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We, the residents, property owners, businesses, and employees of the Mohawk Area of OTR and surrounding areas **Oppose the 2000 Dunlap Street PSH Development.**

Name	Signature	Address
CHRIS BURNS	Chris Burns	2016 Elm St. Cincinnati, OH 45202
Chris Helmers	Chris Helmers	2023 Elm St. Cincinnati Ohio 45202
Adam Dehn	Adam Dehn	2023 Elm St Cincinnati Oh, 45202 Cincinnati
JIM MARTIN	JIM MARTIN	1528 Elm St Cincinnati Ohio 45202

7. Due to the extreme concentration of warehouses and other businesses on this street an overly dense project of this nature will prevent these businesses from conducting business and could jeopardize 50 to 60 jobs.
8. The zero lot line construction allows for only two designated parking places and inadequate outdoor space for the intended occupants. Parking and congestion on Dunlap Street is already very limited and inadequate parking for staff, service providers, occupants, and visitors will create more problems.
9. No traffic studies have been commissioned to study the traffic patterns/road closures during construction and after operation. Additional traffic and demand for parking from this project will negatively affect the quality of life for residents and the ability of businesses to operate.
10. 2000 Dunlap Street is zoned Urban Mix. This zoning code strictly prohibits transitional housing of this type.

We, the residents, property owners and businesses of the Mohawk District and surrounding areas
Oppose this Project.

[illegible]

YWCA IS ON A MISSION

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Rebeca Arbona
Julie Courtney
Brandi Elliott
Michele Hawkins
Sheri Harper
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Diane Jordan
Steve Kenat
Virginia Kuertz
Christie Kuhns
Sophia Lake
Aswad Mack
Anitra Marsh
Carolyn Pione Micheli
Dave Palm
Aaron Parker
Paaras Parker
Jackie Reau
Crystal Steele
Alicia Townsend
Pam Weber
Craig Young

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M. Denise Kuprionis
Nancy A. Lawson
Penny Pensak
Francie Pepper
Digi Schueler
Patricia Mann Smitson

June 24, 2022

Re: Dunlap PSH

To Whom it May Concern:

YWCA Greater Cincinnati is writing in support of Over-the-Rhine Community Housing's project at 2000 Dunlap St. We understand that Over the Rhine Community Housing is proposing a 44-unit permanent supportive housing project that will provide housing for those experiencing chronic homelessness.

We have seen the design of the proposed building and find it attractive. The scale, placement, massing, and density, of the building are appropriate for the neighborhood. We believe OTRCH has taken appropriate steps to assure the new building maintains the social and visual contexts of the existing community.

OTRCH has met with the community on at least eight occasions and provided honest and thorough answers to questions asked about this project. OTRCH remains committed to an ongoing dialog with stakeholders who may have interest in the design of this building. This type of honest and transparent engagement is what is needed when development is done in our city.

This city is in dire need of affordable housing. YWCA Greater Cincinnati is extensively involved in finding solutions to end the affordable housing crisis in our community and we believe this project reaches those who are most in need of affordable housing, the chronically homeless. One hundred percent of the men and women entering this housing program will be coming out of chronic homelessness. Programming in this project has been designed to meet the needs of those residents leaving chronic homelessness. This project will offer a full range of services meant to stabilize and improve the lives of new residents.

OTRCH has demonstrated success throughout the neighborhood and specifically with its Jimmy Heath House on Odeon Street. Similar concerns were raised prior to the JHH opening in 2010, not only have those fears have gone unrealized, but, JHH has provided a positive impact on the neighborhood and has been a model of how people of all different background can live in together in harmony.

Please join us in supporting OTRCH and their continued efforts to make a positive impact surrounding homelessness and affordable housing in Cincinnati, OH.

Sincerely,

Debbie Brooks

Debbie Brooks
YWCA Executive Vice President
dbrooks@ywcacin.org



Downtown Center
898 Walnut Street
Cincinnati, Ohio 45202

P 513.241.7090
F 513.241.7231

ywcacincinnati.org

eliminating racism
empowering women
ywca
Greater Cincinnati

In earlier communication on The Enquirers' Greater Cincinnati Politics page Mohawk and Over the Rhine residents and businesses called into question issues regarding the proposed Over the Rhine Community Housing development at 2000 Dunlap Street. Our words were respectful reflecting facts and perspectives of a large group of residents and business owners. We acknowledged the work OTRCH performs especially in Over the Rhine, and Mohawk. To a degree OTRCH has been true to its mission;

TO DEVELOP AND MANAGE RESIDENT CENTERED AFFORDABLE HOUSING TO BUILD AN INCLUSIVE COMMUNITY. AT OVER THE RHINE COMMUNITY HOUSING, WE DEVELOP AND MANAGE RESIDENT CENTERED AFFORDABLE HOUSING TO BUILD AN INCLUSIVE COMMUNITY AND BENEFIT LOW INCOME RESIDENTS.

We believe variances sought for this project, along with the planned use of the facility, fall well outside the definition of affordable housing for low income residents and will not serve to build an inclusive community. The Dunlap project is positioned as low income housing, yet it will serve 44 single men and women with alcohol and dependency issues. The density variance sought for the Dunlap facility is more than 3 times the norm of 14. OTRCH lacks licensure and fundamental skills needed to design and operate a dependency clinic. That alone makes this development inappropriate. 2000 Dunlap is a rehab facility, not low income housing for families.

OTRCH's is a well-financed leader in the "Homeless Industrial Complex" largely funded by Federal, State and Local taxes. OTRCH adheres to the "Housing First" philosophy espousing shelter for **ALL** as solution for homelessness. Homelessness has increased in Cincinnati since 1978 when OTRCH began its mission to solve homelessness. Homelessness has not declined elsewhere to a meaningful degree if at all. Reality is OTRCH generates operating revenue over \$7.2 million dollars annually and has amassed assets in excess of \$16 million. Why do the majority of OTRCH's real estate holdings rest in the Urban Core? Is there some greater return on investment for dependency housing versus low income housing?

Over the Rhine and Mohawk have the highest crime rates in the City. More than 720 rental units, largely managed/owned by OTRCH, fall within the Over the Rhine and Mohawk boundaries. In the first 6 months of 2022 Cincinnati Fire and Emergency Squads made 150+ trips to three alleged low income housing projects a short distance from 2000 Dunlap. Exact numbers of Police calls have not been included in analysis, but parallel true public service demands. Existing homeless housing projects are taxing our fire and police assets within the City's core without OTRCH shouldering any responsibility for the services their residents trigger.

Residents and businesses who have respectfully opposed the Dunlap Project have been vilified by representatives of OTRCH and homeless advocates who are confused by the purpose to 2000 Dunlap. The pejorative acronym NIMBY- Not In My Back Yard has been applied to those who hold a different perspective than OTRCH and its acolytes. This derogatory and disrespectful acronym must be amended to reflect the reality of our neighborhoods, "No **MORE** in **OUR** Back Yard". We are your neighbors. Respect what we have contributed to the community just as we have respected organizations similar OTRCH who follow their mission. Respect the fact Over the Rhine Community Council voted **NOT** to support the development of 2000 Dunlap by OTRCH.

The nation is aware of the flawed concept of "Housing First" an apparent OTRCH objective. The recent change in leadership in San Francisco's Prosecutor's Office is another strong indicator "Housing First" for the drug and alcohol dependent homeless is a failure. If citizens within the Urban Core or Delhi or Hyde Park or anywhere within Cincinnati truly have interest in dealing with homelessness we recommend they read "San Fransicko" written by Progressive Author Michael Shellenbeger. We are well on our way to making Over the Rhine and

Mohawk another crime ridden “San Francisco Tenderloin District”. Do not approve OTRCH’s variance requests and the 2000 Dunlap Street Rehab Facility.

David Macejko

Decades long resident and business owner in Over the Rhine