October 20, 2016

Cincinnati City Planning Commission
Two Centennial Plaza
805 Central Avenue, Seventh Floor
Cincinnati, OH 45202

Re: Proposed Elm & Liberty Development in Over-the-Rhine

Dear Planning Commission Members:

The Over-the-Rhine Community Council (OTRCC), the city’s designated voice for the Over-the-Rhine community, is opposed to the proposed development project at Elm & Liberty and the Planned Development District (PDD) designation for said project.

On October 5, the Over-the-Rhine Community Council held a special meeting on the Elm & Liberty project. A representative of Source3 presented the project, providing visuals of what the project would look like to the community for the first time as well as specifics on parking, residential units, and rents. Members were then able to ask questions of the developer and make comments on the project. At the conclusion of this meeting, the OTRCC as a body voted overwhelmingly (31-5) to oppose the proposed project for the following reasons:

The project is not consistent with the community’s plan

The Over-the-Rhine Comprehensive Plan identifies numerous development goals of the Over-the-Rhine community. Two of the central goals are preservation of Over-the-Rhine’s historic character, and equitable housing development that results in a mix of both affordable and market rate housing. The proposed project is a 100% market rate project that ignores the community’s most pressing needs in reaching the established housing targets. It is also out of scale and character with the neighborhood’s historic buildings. It is therefore inconsistent with our community plan.

The project is not in keeping with the community’s historic character

The project is out of scale and out of character with Over-the-Rhine, the largest collection of Italianate architecture in the country and a national treasure that has always been accessible to residents across a spectrum of income and wealth. This historic character is very important to the community and inspires residents, draws visitors, and promotes investment in our city. The proposed project would have a negative impact on Over-the-Rhine’s historic character, resulting in a reduction in the neighborhood’s special sense of place. The project needs to have a smaller stature that respects the surrounding historic buildings, a design that is worthy of the quality of the existing architecture, and price points that carry on the tradition of economic inclusivity.

The project does not promote equitable housing development
The project will not include any affordable units of approximately 90 proposed housing units. Rents are projected at approximately $1.75 per square foot, resulting in estimated rents ranging from $900 for a studio to $1,700 for a two-bedroom apartment. These rents are too expensive for most long-standing community members, and for most people in the city as a whole. Maintaining a diverse, integrated, equitable neighborhood with housing for families and low-wage workers is an important value to the people of this community, and this project works directly against that goal. According to the 2015 Housing Inventory conducted by the Community Building Institute, more than 2,300 low-income units have been lost in Over-the-Rhine in the last 15 years. Held up against the Over-the-Rhine Comprehensive Plan, this places us around 1,600 units shy of our affordable housing targets for 2020, with the greatest need at the lowest income tier of 0 - 30% AMI. Against this backdrop, this project-- which is seeking public benefits-- simply fuels the powerful market forces already targeting highly profitable housing to the very wealthy.

Projects of this size and scope are uniquely positioned to create some percentage of units affordable to low-income residents alongside market rate units. Without leveraging these opportunities, our neighborhood will never be able to reach the mixed-income housing goals outlined in our comprehensive plan, and we will continue on a market-driven trajectory of economic-- and, by consequence, racial-- exclusivity.

The project has not committed to including neighborhood-serving businesses or jobs

Businesses that meet the needs of neighborhood residents – including low-income residents – have been lacking as part of the development that is occurring in Over-the-Rhine. Services such as laundry, dry-cleaning, and lower-cost restaurants have gone by the wayside in favor of higher priced bars and restaurants. While there is a place for these types of establishments, a balanced neighborhood needs businesses for all of its residents. This is currently lacking from the proposed plan. Moreover, the plan does not include a commitment to offer quality jobs that pay enough for workers to support basic needs, spending that will recirculate in the neighborhood. Also, there is no commitment to hiring residents for these jobs.

The project is seeking public benefits without giving equal community benefits in return

The project is seeking a special PD zoning designation that represents a significant economic benefit to the developer. In addition, the developer will seek valuable property tax abatement incentives from the city. These benefits should be met with an equal benefit given in return to the community, in terms of helping the community meet its goals and objectives, as set by a city-facilitated planning process. In its present form, the project neglects the fundamental goals that are of most importance to community members. While we support development on this site, we as a body oppose this specific project for all of the above reasons. We encourage the developers and the city to work much more closely with the community to create a plan that is compatible with stated community goals.

We respectfully ask the city and its representatives, commissions, and bodies to deny approvals and incentives to this project until major changes have been made and a comprehensive commitment to engage with the community has been put in place.

Sincerely,

Bob Selhorst, on behalf of the Community Council Board of Trustees
Facilitator of Special Meeting in President’s Absence

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