# DUNIFIED LAND USE CODE

## ULUC Briefing

## **Bret Keast, AICP**





## City Council Briefing | 07.13.21

#### Agenda

- Revisit the project goals
- Summarize the work accomplished since June 7
  - Further staff review, study and refinement
  - Integration of Downtown regulations
  - Additional standards, e.g., carports
  - Legal review
  - Editorial work
- Discuss the ULUC by subject
- Review the nature of comments to date
- Outline the process and steps going forward







## **Project Goals**

- ✓ Preserve and enhance Community Character
- ✓ Implement the goals and policies of the Comprehensive Plan
- ✓ Reconcile the zoning districts with the Future Land Use and Character Plan
- ✓ Coordinate with the Transportation Master Plan (TMP) and other planning documents
- ✓ Integrate the Downtown Design Standards and Landscape Design Criteria Manual
- Update the Operating Procedures (Development Guidebook)
- ✓ Support the City's economic development and resiliency
- Mitigate or lessen nonconformities
- Preserve and sustain neighborhood integrity
- ✓ Streamline development procedures





## **Zoning Districts**

Action L&C 5: Pursue a character-based zoning approach, which factors into the stated purposes and design of zoning districts along with various specific regulating elements.

#### Future Land Use Map versus Zoning Map

Aspect	Future Land Use Map	Zoning Map			
PURPOSE	<ul> <li>Outlook for future use of land and character of particular areas of the community.</li> <li>Macro level, showing generalized development patterns.</li> </ul>	<ul> <li>Basis for applying different land use regulations and development standards in different areas of the community ("zones").</li> <li>Micro level, with an area- and site-specific focus.</li> </ul>			
USE	<ul> <li>Guidance for City's zoning map and related decisions (zone change requests, variance applications, etc.)</li> <li>Baseline for monitoring consistency of actions and decisions with the Comprehensive Plan.</li> </ul>	<ul> <li>Regulating development as it is proposed, or as sites are positioned for the future with appropriate zoning (by the property owner or the City).</li> </ul>			
INPUTS AND CONSIDERATIONS	<ul> <li>Existing land use in the city.</li> <li>The locational aspects of community planning priorities involving housing, economic development, infrastructure, parks and recreation, public facilities, etc.</li> </ul>	<ul> <li>Comprehensive Plan and future land use map for general guidance.</li> <li>Zoning decisions that differ substantially from the general development pattern depicted on the future land use map will indicate the need for some map adjustments during the next plan update.</li> </ul>			

- Land Use and Character Plan provides guidance for zoning decisions
- Cite conformance or nonconformance with the Plan as basis for recommendation and approval or denial
- The Plan must be adhered to or formally amended



## **Zoning Districts**

Action L&C 5: Pursue a character-based zoning approach, which factors into the stated purposes and design of zoning districts along with various specific regulating elements.

District	FLUCP Designation	Former District(s)
ACR, Acreage Residential	Estate Residential	A-1, R-S, R-L
LLR, Large Lot Residential	Suburban Residential	R-E, R-1
MLR, Medium Lot Residential	Auto-Oriented Residential	R-2
SLR, Small Lot Residential	Auto-Oriented Residential	R-3
MFR, Multi-Family Residential	Suburban Residential Multi-Family	R-3X, R-4, R-5, MH
NC, Neighborhood Commercial	Corridor Mixed Use	Т, В-1
CM, Corridor Mixed	Corridor Mixed Use	B-2, B-3
BC, Business Center	Suburban Commercial	PD-I, IP, B-P, STP
IP, Industrial Park	Suburban Business Park	I-1, I-2

- Reduced district count from 21 to 9
- Reconciled by use approval types and standards adjustments
- Greater flexibility
- Fewer applications
- Less process and time
- Fewer meetings

\* DT, Downtown Districts not included



## Land Use

Category	Specific Use	Downtown (DT)				Corridor Mixed Use Neighborhood (NB) (CMU)					IB)	Industry ( (BI)		Open	
		DNR	DTA	DMS	DMU	NC	СМ	ACR	LLR	MLR	SLR	MFR	BC	IP	
Residential Uses			<u>s (</u>			10		<u>x x</u>		e.	a 3		e -	3	<u>а – – – – – – – – – – – – – – – – – – –</u>
	Cottage Court Community	144	-	-			115	-		CS	CS	PS	344	322) 	1997
	Dwelling, Multi-Family (Apartment)		PS	-	PS	22	PS <sup>2</sup>	-	-	-	-	PS	-	<u>.</u>	
	Dwelling, Single- Family Attached / Duplex / Twin Home	PS	PS	-	PS	PS	PS <sup>2</sup>	-		-	-	PS	-		-
	Dwelling, Single- Family Detached	PS	PS	-	PS	Р	PS <sup>2</sup>	Ρ	Ρ	Ρ	Р		194	4	
Household Living	Live-Work		PS	-	PS	Ρ	PS <sup>2</sup>	-		t,		1	CS	-	-
	Manufactured Home Park	3.55		-		-		-	-	-	-	CS	200		-
	Mixed-Use Building (upper floor residential units)	-	PS	PS	PS	-	P²	1		1	-	PS	cs	1	-
	Multiplex	PS	PS		PS	-	P²	-		-	-	Ρ	875		
	Slot Home				-								275	1775.0	2772
	Tiny Home Community		-	-	-	-		-		-	-	С	375		-
	Townhome	122	PS	-	PS		PS <sup>2</sup>	-		-		PS	322	323	

#### • P - Permitted

- Use is permitted by-right
- Applies to all functionally similar land uses
- Zoning certificate (Sec 10-9-4.16, Zoning Certificate)
- C Conditional
  - Requires a public hearing
  - Standards (Sec. <u>10-1-1.5</u>, Conditional Use Standards)
  - Decision criteria (Sec. <u>10-9-5.4</u>, Conditional Use Permit)
- S Special Standards
  - Administrative determination
  - Standards (Sec. <u>10-1-1.4</u>, Land Use Standards)

## Land Use

Category	Specific Use		Corridor Downtown (DT) Use (CMU) DNR DTA DMS DMU NC CM ACR LLR MLR SLR MFR							Business and Industry (BI)		Open			
Desidential Llass		DNR	DTA	DMS	DMU	NC	СМ	ACR	LLR	MLR	SLR	MFR	BC	IP	
Residential Uses	Cattore Court	_				- 75		<u> </u>	_	-			e - 1	3 3	
	Cottage Court Community			-	-			-		CS	CS	PS	244		-
	Dwelling, Multi-Family (Apartment)		PS	-	PS	22	PS <sup>2</sup>	-		-	-	PS	-	120	
	Dwelling, Single- Family Attached / Duplex / Twin Home	PS	PS	-	PS	PS	PS <sup>2</sup>	-		-	-	PS		-	
	Dwelling, Single- Family Detached	PS	PS	-	PS	Ρ	PS <sup>2</sup>	Ρ	Ρ	Ρ	Р		-		-
Household Living	Live-Work		PS	1	PS	Ρ	PS <sup>2</sup>	-					CS	-	-
	Manufactured Home Park	3.55		T.	F.	-		-	-	-	-	CS	800		-
	Mixed-Use Building (upper floor residential units)		PS	PS	PS	-	P²	-		-	-	PS	CS		-
	Multiplex	PS	PS		PS	7	P²	-		-	-	Ρ	875		-
	Slot Home										-	>	2772		372
	Tiny Home Community			-	-	7	5720	-	77.	-	-	С	375		. 572
	Townhome	1 22	PS		PS		PS <sup>2</sup>	-				PS	844	3223	1

#### • Role of Public Officials

- Understand the nature of the use by referring to the definitions
- Identify the applicable districts shown for each use
- If "CS", review the conditional use standards (10-1-1.5)
- If "PS", review the land use standards (10-1-1.4)
- Determinations:
  - Is the use appropriate in the districts shown?
  - Do the standards provide the necessary safeguards for the use to be suitable in the respective districts?
  - Are there other districts where the use may be suitable and if so, what standards are necessary

## Housing

**Policy L&C 3:** Create a regulatory framework that encourages development of diverse and attainable housing options in Littleton in terms of type, size, and cost to buyers and renters.

#### What We Know

- Rents and home prices have risen faster than incomes in the last 15 years
- Relatively diverse housing stock: 61% single-family and 34% multi-family
- Disproportionate share (3%) of 2-4 unit single-family attached structures
- Affordability for those making 50% of the median family income
  - No homes available by 2027
  - Only 18% rental units available by 2032

#### **ULUC Response**

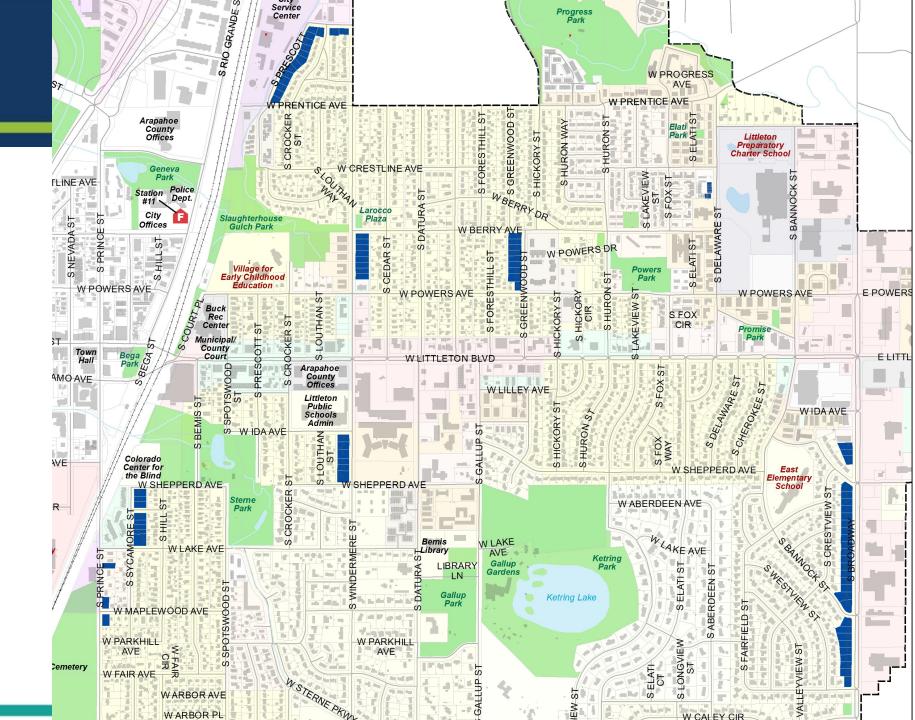
- 708 additional acres now available for residential use
- More defined types of housing (cottage court, twin home, live-work, mixed use, ADUs) Sec. <u>10-1-1.3</u>, Land Use Matrix
- Opportunities to:
  - Rezone the main corridors to Commercial Mixed (CM)
  - Mitigate nonconformities via lot area adjustments
  - Facilitate neighborhood reinvestment
  - Redevelopment, infill or adaptive reuse
  - Secure and stabilize the integrity of existing neighborhoods

Multiplex "The Missing Middle"

Sec. <u>10-3-2.2</u>, CMU Lot and Building Standards Sec. <u>10-4-2.2</u>, NB Lot and Building Standards Subsec. <u>10-4-3.2.F</u>, Neighborhood Conservation Sec. <u>10-1-3.3</u>, Adaptive Reuse Subsec. <u>10-4-3.2.C</u>, Contextual Development

## Housing

- Are these areas suitable for either adaptive reuse or redevelopment over the next 10+ years?
- Might these lots provide for a transition between use types/intensities?
- Why?
  - Lots face a nonresidential use
  - Lots face multi-family residential
  - Fronting on Broadway





## **Accessory Housing**

Action H&N 11: Evaluate best practices for regulating accessory dwelling units and short-term rentals, and parameters to prevent adverse neighborhood effects.

#### What We Know

- Accessory dwelling units (ADUs) exist now in the City
- ADUs provide a means of housing for aging parents, local college students, and local service employees
- ADUs contribute to sustainability
- With good design and proper criteria, ADUs may offer an alternative form of housing

#### ULUC Response (per current draft)

- 3 ADU types
- Standards apply to all types
- MLR / SLR ADUs permitted with alley access only
- Possible criteria:
  - District
  - Lot area
  - Building coverage
  - Ample off-street parking
- Accessory vs. conditional approval

Specific Use	Do	Downtown (DT)				Corridor Mixed Use (CMU)		Neighborhood (NB)					Business and Industry (BI)		
	DNR	DTA	DMS	DMU	NC	CM	ACR	LLR	MLR	SLR	MFR	BC	IP	(OS)	
Accessory Dwelling Unit		e s	-	30.					-				2		
- Attached ADU	A	-	-		AS	AS	AS	CS	AS1	AS1			-	220	
- Detached ADU			122				AS	CS	CS1	CS1		- 11 S	1000		
- Internal ADU		-	-			-	AS	AS	AS1	AS1			-		



# **GOAL H&N 4:** Neighborhoods that maintain their character or are carefully managed when headed toward transition.

#### What We Know

- Key Issues and Considerations:
  - Concerns over residential density and effects on area character as neighborhoods evolve with new or more intensive housing forms.
  - Concern for a potential loss of demographic diversity (by age, race/ethnicity, income level, etc.) driven by unattainable housing choices and/or neighborhood gentrification in Littleton
- To What We Strive For Going Forward: Maintain the integrity of established neighborhoods and historic areas.

#### **ULUC Response**

- Protection
  - Bulk plane standards
  - Bufferyard protection
- Conformity
  - Neighborhood conservation alternative compliance
  - Lot area adjustments
- Reinvestment
  - Contextual standards maintain pattern, scale and design character
  - Neighborhood convenience

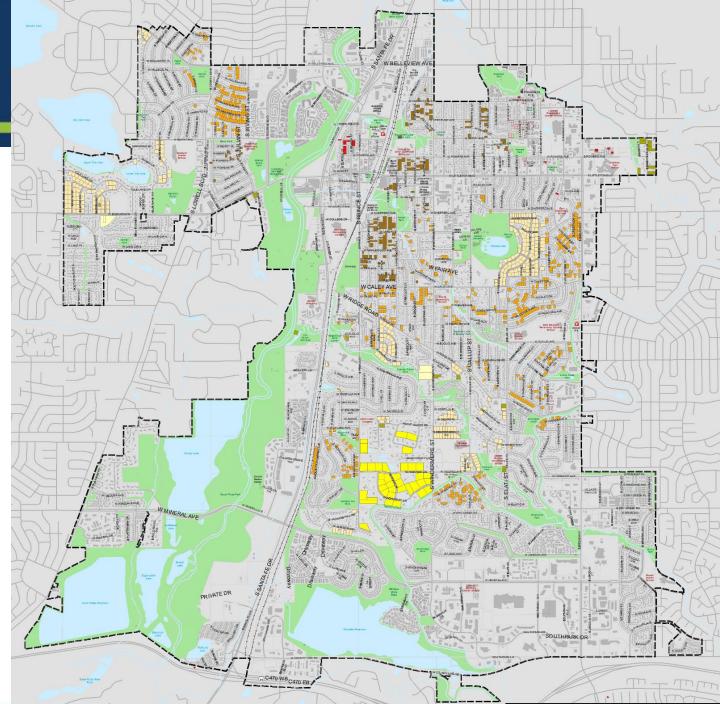
Sec. <u>10-1-3.5</u>, *Transition Standards* Subsec. <u>10-1-3.6.F</u>, *Bufferyard Requirements* 

Subsec. <u>10-4-3.2.F</u>, Neighborhood Conservation Sec. <u>10-4-2.2</u>, NB Lot and Building Standards

Subsec. <u>10-4-3.2.C</u>, *Contextual Development* Subsec. <u>10-4-3.2.G</u>, *Neighborhood Convenience* 

### Nonconformities

- Existing lots do not meet the minimum lot area requirements of the current zoning districts
- Causes these lots to be nonconforming
- Requires a variance process to make improvements to the property
- Reduced lot areas in line with what's on the ground





#### Measured from the property line

- Purpose = Control the height of uses adjoining or adjacent to low-density neighborhoods
- Applications:
  - Building stepbacks apply in
     Downtown given the use of building types
  - Elsewhere, bulk plane ratios are commonly used to manage the scale of adjoining and adjacent buildings
- Scenarios:
  - Buildings share a common lot line
  - Buildings are separated by rights-ofway or common open space
  - Different use types
    - Multi-family
    - Civic / Commercial
    - Industrial

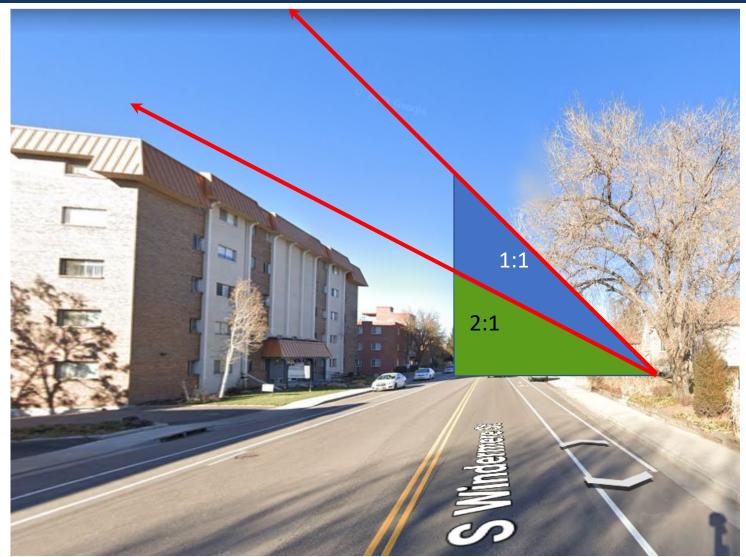




#### Measured from the front setback

#### • Direction Needed:

- Use current examples to establish the standards
- Only apply standards when uses directly adjoining one another (not when separated by right-of-way or open space)
- Apply more rigid standards when the adjoining use is \_\_\_\_\_
- Allow for a greater variance in building height to accommodate larger buildings and more leasable square footage
- Use bufferyards in lieu of bulk plane standards





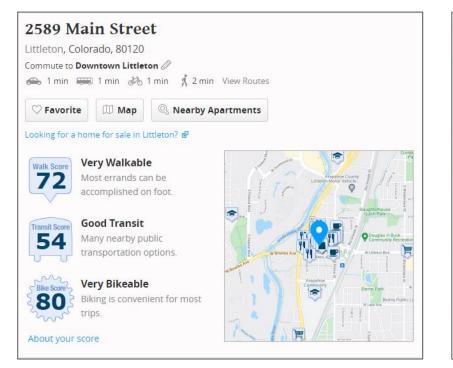
# Measured from the allowable building height at the front setback

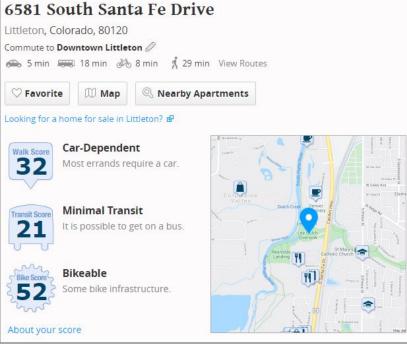
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## Mobility | Walkability





90-100	Walker's Paradise
	Daily errands do not require a car
70-89	Von Walkohla
10-05	Very Walkable Most errands can be accomplished on foot
50-69	Somewhat Walkable
	Some errands can be accomplished on foot
25-49	Car Dependent
23-43	Car-Dependent Most errands require a car
0-24	Car-Dependent
	Almost all errands require a car



## **Alternative Mobility**

**POLICY TMP 14**: Consider including bicycle and pedestrian facility upgrades as part of every infrastructure project.

#### What We Know

- There is a high propensity for walking within Downtown yet more may be done to improve walkability
- The most common reference for a walking radius around transit stations is one-quarter mile (1,320')
- There are opportunities for compact, walkable development in proximity to the current transit stations and the potential bus rapid transit routes.

#### **ULUC Response**

- Required pedestrian improvements and connectivity
- Required bicycle parking
- Transit access and improvement standards
- Transit shed requirements
- Sustainable building design
- Crime prevention
- Required pedestrian and bicycle plan

Subsec. <u>10-1-3.8.A</u>, *Circulation* Subsec. <u>10-1-3.8.B</u>, *Bicycle Parking* Subsec. <u>10-1-3.8.C</u>, *Transit Access* Subsec. <u>10-1-3.7.A</u>, *Parking and Loading* Sec. <u>10-1-3.4</u>, *Sustainable Building Design* Subsec. <u>10-1-3.2.B</u>, *CPTED* Sec. <u>10-6-2.9</u>, *Pedestrian and Bicycle Improvements* 



## Parking

**ACTION S&D 5**: Especially for Downtown, revisiting the overall zoning approach to parking management to support desired character, and given the many changes in this area of planning practice in recent years.

#### What We Know

- There is a high degree of sensitivity in the feasibility of development in Downtown based upon the minimum required parking.
- The placement and design of parking areas are major determinates of community character.
- Especially along primary corridors, parking consumes a greater amount of land area than the principal use/building, leading to an auto-urban character.

#### **ULUC Response**

- Reduced off-street parking for sustainable development
- Parking lot landscaping and screening
- Off-street parking requirements
- Shared parking allowance
- Downtown parking requirements
- Parking lot design standards and dimensions
- Use and maintenance

Sec. <u>10-1-3.4</u>, Sustainable Building Design Subsec. <u>10-1-3.6.D</u>, Landscape Requirements Subsec. <u>10-1-3.7.A</u>, Parking and Loading Subsec. <u>10-1-3.7.A</u>, Parking and Loading Subsec. <u>10-1-3.7.B</u>, Parking and Access in the DT Districts Subsec. <u>10-1-3.7.C</u>, Parking and Loading Design Sec. <u>10-1-3.7.D</u>, Use and Maintenance

## **Shared Parking**

- Applies to mixed use and multi-tenant buildings when the peak parking periods of their uses don't overlap, e.g., office and movie theater
- Requires a shared parking plan
- Shared parking agreement required for multiple ownerships
- Calculations:
  - Determine required number of spaces for each use
  - Multiply the total spaced by the respective percentages
  - Calculate total for each time period
  - Use the column with the greatest number of required spaces

Shared Parking Weekday Weekend									
(A) Use Categories	(B) (C) Day Evening (9 am to 4 pm) (6 pm to 12:00 am)		(D) Day (9 am to 4 pm)	(E) Evening (6 pm to 12:00 am)	(F) Night (12:00 pm to 6 a.m.)				
Office, Civic and Institutional	100%	10%	10%	5%	5%				
General Retail	60%	90%	100%	70%	5%				
Overnight Accommodations	75%	100%	75%	100%	75%				
Restaurant	50%	100%	100%	100%	10%				
Entertainment	40%	100%	50%	100%	10%				
All Other Uses	100%	100%	100%	100%	10%				

#### Table 10-1-3.7.A.3

#### Illustrative Shared Parking Credit Calculation

EXAMPLE: A mixed-use building or site has 20 apartment units, 9,000 square feet of general office space, and 5,000square feet of retail space. Separately, these uses would require 85 parking spaces (20 units. x 1.5) + (9,000 sf. / 300) + (5,000 sf / 200) = 85). In this example, the minimum number of parking spaces required is 66, a 22% reduction.

		Weekday	Weekend				
(A) Use Category	(B) Night (12 AM to 6 AM)	(C) Day (6 AM to 6 PM)	(D) Evening (6 PM to 12 AM)	(E) Day (6 AM to 6 PM)	(F) Night (6 PM to 12 AM)		
Apartments 30 Spaces	30	18	27	24	27		
Office30 Spaces	2	30	3	3	2		
Retail25 Spaces	2	18	18	25	18		
Column Totals	34	66	48	52	47		



## Design

**GOAL L&C 4**: A more attractive community, based on quality design and character of both private development and the public realm.

#### What We Know

• The current zoning ordinance has very limited design standards, mainly relying on the site development plan and planned development processes.

#### **ULUC Response**

- Design standards applicable to all districts
  - Non-residential and mixed use
  - Adaptive reuse
  - Sustainable buildings
  - Landscape
  - Signs
  - Building and site lighting
- Design standards applicable to all districts
  - Corridor Mixed Use (CMU)
  - Neighborhoods
  - Business and Industry

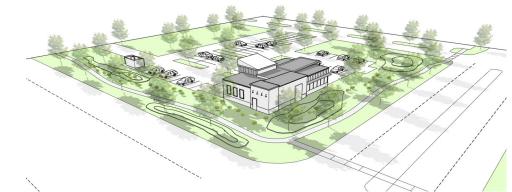
Sec. <u>10-1-3.2</u>, Non-Residential and Mixed Use Design Standards Sec. <u>10-1-3.3</u>, Adaptive Reuse Sec. <u>10-1-3.4</u>, Sustainable Building Design Sec. <u>10-1-3.6</u>, Greenspace Design Standards Sec. <u>10-1-3.10</u>, Sign Standards Sec. <u>10-1-3.11</u>, Outdoor Lighting Standards

> Sec. <u>10-3-3.2</u>, CMU Standards of Design Sec. <u>10-4-3.2</u>, NB Standards of Design Sec. <u>10-5-3.2</u>, BI Standards of Design

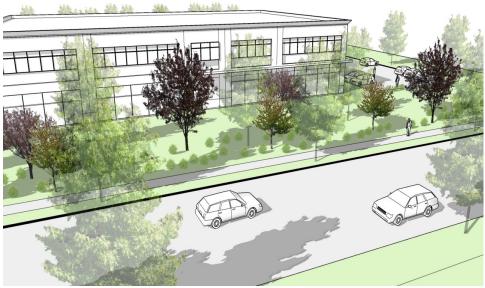


## **CMU** Design

- Building Materials:
  - Types (masonry, metal, siding, stucco, glass, roofing)
  - Specified by NC and CM districts
- Standards
  - Site orientation
    - Street-facing entrance
    - Parking setback
    - Side and rear elevations
    - Service areas
  - Building design
    - Unified
    - Bulk and scale (partitioning)
    - Articulation
    - Entrances
  - Street frontages
    - Develop in context
    - Determined through pre-application or review of preliminary project plan



#### Build-To Frontage



#### **Green Frontage**



## **CMU** Design



Parking Court Frontage



Shopfront Frontage



Yard Frontage



#### Stoop Frontage



## **NB Design**

- Building Materials: None
- Standards provided for:
  - Cottage court community
  - Duplex conversion (image to right)
    - Doors on separate facades
    - Enclosed stairways, or conditional approval
    - Single garage facing the street
    - One additional parking space
  - Contextual development
    - Average front and corner side setbacks
    - No greater than one story more than the tallest building within three lots on either side (in lieu of 115% of average heights); or
    - Use of a landscape transition (image to right)
  - Manufactured home park
  - Multi-family
  - Neighborhood conservation (next slide)
  - Neighborhood convenience
  - Single-family attached dwellings



#### **Duplex Conversion**



#### **Building Scale Transitions**



## **NB Design**

- Neighborhood Conservation (Subsec. <u>10-4-3.2.F</u>)
  - Purpose
    - Encourage reinvestment
    - Preserve character
    - Alternative compliance (in lieu of a variance)
  - Conformance
    - Lawfully existing buildings are "conforming"
    - Nonconformance remains if:
      - Constructed without or in violation of permits
      - Proposed addition cannot demonstrate conformance with these alternative standards
  - Alternative standards
    - Average front setback
    - Addition or enclosure of front porch
    - Reduced corner side setback subject to conditions
    - Reduced side or rear setbacks if abutting permanent open space
    - Reduced rear setback to 10' subject to standards

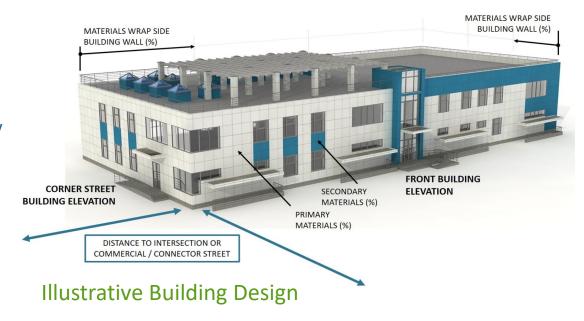


Front Setback Averaging



## **BI Design**

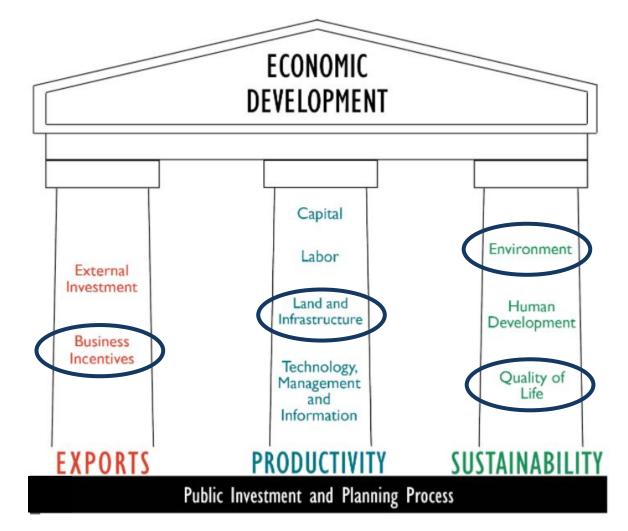
- Business Center (Sec. <u>10-5-3.2.A</u>)
  - Site orientation same as CMU
  - Building design
    - Street-facing elevations within 350' of intersection of 250' of commercial and connector streets
      - 100% / 75% primary material on front, respectively
      - Primary material wraps 25% / 20% of side wall, respectively
    - Distant street-facing elevations
      - 50% primary / secondary material on front, respectively
      - Primary material wraps 10 of side wall
  - Four-sided architecture
  - Articulation design elements required each 50'
  - Overhead doors must be perpendicular to a commercial street





## **Economic Resilience**

- Support for Economic Development
  - Fewer, more flexible districts
  - Less applications and time
  - Articulate standards
  - Care not to overdo conditional uses
- Downtown Standards Adjusted according to development feasibility model
- Reduced parking provisions:
  - Downtown
  - Within transit sheds
  - Shared parking
- More acres available for mixed use
  - Increased population supports local business
  - Greater heights and floor areas in suitable locations increases taxable values
- Character enhancement
  - Maintains community identity and sense of place





## Sustainability

**POLICY I&S 6**: Be a leader among Colorado cities in managing and maintaining public infrastructure and facilities, and in learning about and adopting best practices, green infrastructure, and new technologies.

#### What We Know

- The City is active in its green/environmental programs.
- The ULUC provides a significant opportunity to take a leap forward to ensure responsible, sustainable development.

#### **ULUC Response**

- Preservation
- Neighborhood value and integrity
- Mixed Use
- Tree protection and canopy coverage
- Sustainable building design
- Alternative modes or transportation
- Environmental protection

Sec. <u>10-1-3.3</u>, Adaptive Reuse Sec. <u>10-1-3.4</u>, Sustainable Building Design *Ch. <u>8</u>*, Historic Preservation Subsec. <u>10-4-3.2.F</u>, Neighborhood Conservation Subsec. 10-1-3.2.D, Mixed Use Subsec. <u>10-1-3.6.C</u>, Protection and Preservation Subsec. <u>10-1-3.6.E</u>, Tree Canopy Coverage Requirements Sec. <u>10-1-3.4</u>, Sustainable Building Design Sec. <u>10-1-3.8</u>, Alternative Mobility Sec. <u>10-7-3.2</u>, Environmental Performance Standards



## What we're hearing, thus far

- Maintain beekeeping ordinance as-is
- Expanded use of and obstacles for ADUs; divided opinion as to use for short-term rental
- Desire for more by-right accessory uses
- Expanded list of uses for neighborhood convenience, e.g., retail, restaurants, drug stores, nursery or garden, etc. Others by conditional use.
- Need for better and more strict enforcement.
- Allowance for six instead of four chickens (Colorado Cottage Foods Act); allow for ducks, too.
- Concern as to what's required to comply with conditional use standards





## **Commenting on the Draft ULUC**

#### • Envision Littleton Webpage

- Public comment landing page
  - Organization

**Boards and** 

General

**Public** 

Commissions

- 4 Building Blocks
- Historic Preservation
- Standards for all Districts
- Special topics
- How to comment
  - Name, address
  - Section by section
  - Specific references (paragraph, sentence)
- What happened next?
  - Comments catalogued
  - Review by staff
  - Identify edits or changes
  - Republish with track-changes
- Rules for commenting
  - Specific references
  - Detail requests

Comments on 21.18.00 Sta	7 Parking Lot Lan Indards	dscaping
Name:		
Email:		
Comment:		
		I
		I
		I
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## **Next Steps**

- July 30
- Aug. 24
- Sept. 13
- Sept. 27
- Oct. 5
- Oct. 19
- Oct. 25

- End of Public Comment Period (began June 7)
- **City Council Study Session**
- **Historical Preservation Board Public Hearing** 
  - TUESDAY WEDNESDAY THURSDAY FRY Planning Commission Public Hearing
- **City Council First Reading** 
  - **City Council Public Hearing**
  - Final ULUC Published

# THANK YOU

# Bret Keast, AICP

