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**CITY OF ALBUQUERQUE  
CITY COUNCIL**

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**INTEROFFICE MEMORANDUM**

**TO: LUPZ Committee**

**FROM: Kara Shair-Rosenfield, Policy Analyst/Planning  
Andrew Webb, Policy Analyst/Planning**

**SUBJECT: Downtown Neighborhood Area Sector Development Plan  
(R-11-225) – Responses to and Recommendations for  
Requests for Individual Plan Amendments With Corresponding  
Recommended Changes to Proposed Zoning Map**

**DATE: November 30, 2011**

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*[NOTE: Staff presented a first draft of this memo to the Land Use, Planning and Zoning Committee on September 14, 2011. At that time, staff recommended a deferral of R-11-225 to the November 30, 2011, LUPZ meeting in order to allow time for interested parties to review the 9-14-11 memo and submit questions about, comments on, and/or rebuttals to any of the statements contained therein.*

*No comments were received in response to the analysis provided for the matters listed below. Staff's recommendations from the 9-14-11 memo remain unchanged for the specific properties discussed in this memo.]*

The EPC Draft (10.28.2010) of the DNASDP contained a Proposed Zoning Map showing recommended zone changes for all properties within the Plan area that were based on the goals and objectives developed during the planning process and are consistent with applicable goals and policies of the Comprehensive Plan and other adopted policies. As noted in the April 7, 2011, EPC staff report, "The proposed changes to the zoning for the DNA SDP do not single out any individual property; rather, the changes proposed are area wide. Changes are proposed to individual zones in the 1976 DNA SDP and to the entire sector plan map, rather than to individual properties."

Following the submittal of the official Draft DNASDP to the EPC, property owners who didn't agree with the proposed rezoning of their property began submitting letters and emails, requesting different zoning for their respective properties than what was proposed in the Draft Plan. During the EPC hearing process, Planning staff addressed these requests and, in many cases, depending on the arguments presented by the requestor, agreed that the application of a different zoning designation would be appropriate.

At its April 7, 2011, hearing, the EPC adopted twelve recommended Conditions of Approval amending the Proposed Zoning Map contained in the 10.28.2010

draft. Unfortunately, there was little, if any, substantive explanation of or justification per Resolution 270-1980 (which establishes the policies for justifying zone map amendments) provided for the recommended changes.

Council staff felt it appropriate to provide an analysis of each of the individual requested amendments to the Sector Plan and try to substantiate, with specific policy citations, whether or not the requests are more consistent with applicable City goals and policies than the rezoning that was proposed in the EPC Draft (10.28.2010). What follows is an analysis of the requests for changes to zoning that staff believes are sufficiently supported by adopted plans and policies and should be made, as well as additional plan amendments that Council staff is recommending.

**1. 1802, 1806, and 1808 Old Town Road, NW**

Existing Zoning: SU-2/TH (Townhouse) – 1976 Plan

Existing Land Use: Multi-family residential

EPC Draft (10.28.2010) Proposed Zoning: SU-2/SF (Single Family)

Requested Zoning: SU-2/MR or TH (Townhouse) – 2011 Plan

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of

Approval #83: SU-2/TH (only for 1808 Old Town Road because that was the only property owner who testified at the April 7, 2011 EPC hearing)

Discussion: Staff conducted a visit to the subject properties and verified that the existing land use is not, in fact, single family (this is reflected in the updated Existing Land Use map in C/S R-11-225). Based on the fact that there is a compact clustering of existing multi-family residential development in this area, staff supports changing the zoning of these properties from the proposed SU-2/SF to SU-2/TH, which is consistent with how similar multi-family properties throughout the 2011 DNASDP area are treated. Staff believes that the application of the SU-2/TH zone per the 2011 DNASDP in this location, as is the case throughout the DNASDP where the new SU-2/TH zone is proposed, is more advantageous to the community based on the following:

The SU-2/TH zone per the 2011 DNASDP furthers the following applicable Goals and Policies of the Comprehensive Plan:

▪ II.B.5 Land Use – Developing and Established Urban Areas Goal

- The SU-2/TH zone allows for residential development that supports overall gross densities of up to 5 du/acre (Policy a).
- The SU-2/TH zone will ensure that new development respects existing neighborhood values, natural environmental conditions and carrying capacities, scenic resources, and resources of other social, cultural, recreational concern. Specifically, this is accomplished through specifying development guidelines based on local environmental

- characteristics and community values (Policy d, Possible Technique #2).
  - The SU-2/TH zone encourages housing to be oriented towards pedestrians through its requirement to have the primary building entry oriented towards the street (Policy f).
- II.C.8 Environmental Protection and Heritage Conservation – Developed Landscape Goal: The Goal is to maintain and improve the natural and the developed landscapes' quality.
  - The SU-2/TH zone contains landscaping and streetscape standards, including a street tree requirements and Street Tree Palette, that will help control water erosion and dust and create a pleasing visual environment (Policy d).
- II.C.9 Environmental Protection and Heritage Conservation – Community Identity and Urban Design Goal: The Goal is to preserve and enhance the natural and built characteristics, social, cultural and historical features that identify Albuquerque and Bernalillo County sub-areas as distinct communities and collections of neighborhoods.
  - The SU-2/TH zone contains zoning regulations and design standards, including setbacks, height and stepbacks, façade articulation, windows and doors, placement of entries, off-street parking standards, and landscaping, that are intended to ensure compatibility with the existing built environment (Policy b).

The SU-2/TH zone helps achieve the following Goals and Objectives of the 2011 DNASDP:

- Community Character Goal 1 – The Downtown Neighborhood Area will be a neighborhood characterized and defined by its tree-lined streets. *(The existing zoning does not contain a requirement for the installation and maintenance of street trees. The new SU-2/TH zone requires that a minimum of one street tree be provided per dwelling unit in order to create and maintain a continuous tree canopy in the neighborhood.)*
- Community Character Objective 1.1 – Create and maintain a continuous tree canopy along Lomas Boulevard, Central Avenue, and all residential streets with an existing parkway strip between the curb and the sidewalk. *(The existing zoning does not contain a requirement for the installation and maintenance of street trees. The new SU-2/TH zone requires that a minimum of one street tree be provided per dwelling unit in order to create and maintain a continuous tree canopy in the neighborhood.)*
- Community Character Goal 2 – The character-defining elements (e.g., architectural style and history, size and massing of buildings, landscaping, etc.) of the areas outside

of the Downtown Neighborhood Area's historic zones will be recognized and preserved. *(The existing, conventional zoning does not include adequate design standards to address the relationship between the established urban built environment and infill development. The new SU-2/TH zone will regulate design features in order to ensure compatibility of new and existing development and the preservation of the neighborhood's character-defining elements.)*

- Community Character Objective 2.1 – Develop design standards for the areas outside of the history overlay districts. *(The existing, conventional zoning does not include adequate design standards to address the relationship between the established urban built environment and infill development. The new SU-2/TH zone will regulate design features in order to ensure compatibility of new and existing development.)*
- Community Character Objective 2.2 – Revise zoning standards to ensure that infill development reflects and complements the neighborhood's history and immediate context; typical building height, size, scale, cadence, and massing; landscape, etc. *(The existing, conventional zoning does not include adequate design standards to address the relationship between the established urban built environment and infill development. The new SU-2/TH zone will regulate design features in order to ensure compatibility of new and existing development.)*

Staff does not support rezoning these properties to SU-2/MR, as staff believes that this would be in conflict with the following policies:

- Comprehensive Plan, Section II.B.5, Policy d: "The location, intensity, and design of new development shall respect existing neighborhood values, natural environmental conditions and carrying capacities, scenic resources, and resources of other social, cultural, recreational concern."

*While the existing development at these properties is multi-family in character rather than townhouse, it is low-impact multi-family in that structures are only 1-2 stories in height, and the number of units per lot is relatively low. To allow a small pocket of SU-2/MR in this location could potentially be injurious to surrounding single-family properties because the SU-2/MR zone allows heights of 40' permissively and contains no maximum floor area ratio, which means that very intense development could occur immediately adjacent to existing single-story, low-density, low-impact development. This would be in conflict with the neighborhood's goal of preserving and protecting the single-family character of the neighborhood, as articulated in the Plan's "Goals & Objectives" section (C/S R-11-225, p. 60).*

- Comprehensive Plan, Section II.B.5, Policy h: “Higher density housing is most appropriate in the following situations:
  - In designated Activity Centers.
  - In areas with excellent access to the major street network.
  - In areas where a mixed density pattern is already established by zoning or use, where it is compatible with existing area land uses and where adequate infrastructure is or will be available.
  - In areas now predominantly zoned single-family only where it comprises a complete block face and faces onto similar or higher density development; up to 10 dwelling units per net acre.
  - In areas where a transition is needed between single-family homes and much more intensive development: densities will vary up to 30 dwelling units per net acre according to the intensity of development in adjacent areas.”

The subject properties do not meet any of the tests of Section II.B.5, Policy h and, therefore, should not be considered an appropriate location for higher density housing.

Recommendation: Rezone 1802, 1806, and 1808 Old Town Road to SU-2/TH rather than SU-2/SF in the 2011 DNASDP.

**2. 317 and 319 16<sup>th</sup> St., NW**

Existing Zoning: SU-2/SU-1 for Bed & Breakfast

Existing Land Use: Single Family and Commercial

EPC Draft (10.28.2010) Proposed Zoning: SU-2/SU-1 for B&B

Requested Zoning: SU-2/MUM (Mixed Use Medium)

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of

Approval #28: SU-2/MUM

Discussion: The EPC approved a zone change request for the subject properties from SU-1 for B&B to SU-2/RC on January 13, 2011. The SU-2/MUM zone is intended to replace SU-2/RC zoning from the 1976 DNASDP. Since the subject properties now contain SU-2/RC zoning, it follows logically that they should be rezoned to SU-2/MUM in the same way that other properties in the vicinity with existing SU-2/RC zoning are rezoned. (See Complete Record, DNASDP Comments spreadsheet, line 54, p. 374, and p. 1122-1124.)

Recommendation: Rezone 317 and 319 16<sup>th</sup> Street, NW, to SU-2/MUM in the 2011 DNASDP.

**3. 1201 Lomas Blvd., NW**

Existing Zoning: SU-2/NC (Neighborhood Commercial) – 1976 Plan

Existing Land Use: Office

EPC Draft (10.28.2010) Proposed Zoning: SU-2/MUM (Mixed Use Medium)

Requested Zoning: SU-2/NC (Neighborhood Commercial) – 2011 Plan

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of

Approval #33: SU-2/NC

Discussion: The property owner testified at the December 2, 2010, EPC hearing that his major concern about the SU-2/MUM zone is that it does not permissively allow restaurant development, which is why he

is requesting to be zoned SU-2/NC in the 2011 DNASDP (Complete Record, EPC Minutes, December 2, 2010, p. 1048-1049). There is really very little difference between the SU-2/MUM and SU-2/NC zones, and staff believes that zoning the subject property SU-2/NC rather than SU-2/MUM is appropriate given that the property across the street on the northeast corner of 12<sup>th</sup> and Lomas is proposed to be SU-2/NC.

Recommendation: Rezone 1201 Lomas Blvd., NW, to SU-2/NC rather than SU-2/MUM in the 2011 DNASDP.

#### 4. 715 Marquette NW

Existing Zoning: SU-2/HDA (High Density Apartments)

Existing Land Use: Office

EPC Draft (10.28.2010) Proposed Zoning: SU-2/MR (Mixed Residential)

Requested Zoning: SU-2/OR (Office Residential)

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of Approval #30: SU-2/OR

Discussion: At the April 7, 2011, EPC hearing, Planning staff noted that a mistake had been made when conducting the existing land use survey that served as the basis for new proposed zoning. The mistake was that the subject property was noted as being "single family" where, in actuality, it is and has been in use as an office. (See Complete Record, EPC Minutes, April 7, 2011, p. 291-292, and DNASDP Comments spreadsheet, line 59, p.375).

Staff believes that applying the SU-2/OR zone rather than the SU-2/MR zone to this property is more advantageous to the community based because it will further, in particular, the following applicable policy of the Comprehensive Plan:

- Section II.B.7, Policy f: "The most intense uses in Activity Centers shall be located away from nearby low-density residential development and shall be buffered from those residential uses by a transition area of less intensive development" (Section II.B.7, Policy f).

*The subject property is located within one block of the western boundary of the Downtown 2010 Plan and the Downtown Major Activity Center (MAC). Rezoning the subject property to SU-2/OR rather than SU-2/MR will help to establish an appropriate mixed-use transition area between the Downtown MAC and the Downtown Neighborhood's residential areas, thus furthering the above-cited policy of the Comprehensive Plan.*

Given the direction provided by the Comprehensive Plan, the property's existing land use as an office, its proximity to the Downtown MAC, and the fact that the property faces other properties across Marquette that are in use as offices and proposed to be SU-2/OR, staff agrees that applying the SU-2/OR is appropriate in this location.

Recommendation: Rezone 715 Marquette NW, to SU-2/OR rather than SU-2/MR in the 2011 DNASDP.

#### 5. 712 Marquette, NW

Existing Zoning: SU-2/HDA (High Density Apartments)

Existing Land Use: Office

EPC Draft (10.28.2010) Proposed Zoning: SU-2/MR (Mixed Residential) and SU-2/OR (Office Residential)

Requested Zoning: SU-2/OR (Office Residential)

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of Approval #77: SU-2/OR

Discussion: Planning staff noted the following about the subject property in the DNASDP Comments spreadsheet that was prepared for the EPC: "712 Marquette is shown on the proposed zoning map with the MR zone at the front and OR to the rear. A mistake was made on the Existing land use map showing the building facing Marquette as a single family house, which led to an incorrect proposed zoning designation of MR for the two parcels along Marquette. The law office operates legally and the rear yard is a parking lot. Staff proposes that the zoning at the front be changed to OR, consistent with the rear lot zoning designation" (see Complete Record, DNASDP Comments spreadsheet, line 333, p. 416).

Staff believes that applying the SU-2/OR zone rather than the SU-2/MR zone to this property is more advantageous to the community based because it will further, in particular, the following applicable policy of the Comprehensive Plan:

- Section II.B.7, Policy f: "The most intense uses in Activity Centers shall be located away from nearby low-density residential development and shall be buffered from those residential uses by a transition area of less intensive development" (Section II.B.7, Policy f).

*The subject property is located within one block of the western boundary of the Downtown 2010 Plan and the Downtown Major Activity Center (MAC). Rezoning the subject property to SU-2/OR rather than SU-2/MR will help to establish an appropriate mixed-use transition area between the Downtown MAC and the Downtown Neighborhood's residential areas, thus furthering the above-cited policy of the Comprehensive Plan.*

Given the direction provided by the Comprehensive Plan, the property's existing land use as an office, its proximity to the Downtown MAC, and the fact that the property faces other properties across Marquette that are in use as offices and proposed to be SU-2/OR, staff agrees that applying the SU-2/OR is appropriate in this location.

Recommendation: Rezone 712 Marquette NW, to SU-2/OR rather than SU-2/MR in the 2011 DNASDP.

**6. 415 and 417 7<sup>th</sup> St., NW**

Existing Zoning: SU-2/HDA (High Density Apartments)

Existing Land Use: Office and Parking Lot

EPC Draft (10.28.2010) Proposed Zoning: SU-2/MR (Mixed Residential)

Requested Zoning: SU-2/OR (Office Residential)

Post EPC Draft (6.9.2011) Recommended Zoning per Condition of Approval #79: SU-2/OR

Discussion: Planning staff noted the following about the subject property in the DNASDP Comments spreadsheet that was prepared for the EPC: "...paperwork was faxed to the Planning Department showing that in 2002 Mr. Prichard [the owner of 417 7<sup>th</sup> St.] received a letter from the Zoning Department stating that Mr. Prichard resided at 417 7th and operated a law office under a Home Occupation license from the same address. It appears to staff that the property is now entirely in use as an office. This is not a permitted use under the current SU2 HDA zone. However, staff recognizes [sic] that the character of 7th Street differs from that of Roma, and Mr. Prichard's property is oriented towards 7th Street. Mr. Prichard's property is predominantly surrounded by offices and commercial parking lots. The property to the north is a single family house and is oriented towards Roma. Staff proposes that the proposed zoning for 417 7th and the commercial parking lot between his property and the alley be both changed to SU2 OR." (See Complete Record, DNASDP Comments spreadsheet, lines 379 and 380, p.428)

Staff believes that applying the SU-2/OR zone rather than the SU-2/MR zone to this property is more advantageous to the community because it will further, in particular, the following applicable policy of the Comprehensive Plan:

- Section II.B.7, Policy f: "The most intense uses in Activity Centers shall be located away from nearby low-density residential development and shall be buffered from those residential uses by a transition area of less intensive development" (Section II.B.7, Policy f).

*The subject properties are located directly across the street from the western boundary of the Downtown 2010 Plan and the Downtown Major Activity Center (MAC). Rezoning the subject properties to SU-2/OR rather than SU-2/MR will help to establish an appropriate mixed-use transition area between the Downtown MAC and the Downtown Neighborhood's residential areas, thus furthering the above-cited policy of the Comprehensive Plan.*

Given the direction provided by the Comprehensive Plan, the properties' existing land uses as an office and parking lot, their proximity to the Downtown MAC, and the fact that the properties face another non-residential use across 7<sup>th</sup> Street, staff agrees that applying the SU-2/OR is appropriate in this location.

Recommendation: Rezone 415 and 417 7<sup>th</sup> St., NW, to SU-2/OR rather than SU-2/MR in the 2011 DNASDP.

**Additional Council Staff Recommended Plan Amendments:**

**1. 1213 Granite NW and 900 and 906 Brother Mathias NW**

Existing Zoning: SU-2/TH (Townhouse) – 1976 Plan

Existing Land Use: Single Family

EPC Draft (10.28.2010) Proposed Zoning: SU-2/TH – 2011 Plan



Council Staff Recommended Zoning: SU-2/SF (Single Family)

Discussion: The subject properties are located in the first block south of Mountain Road across the street from a retirement home.

Properties in similar locations as the subject properties (i.e., in the first block south of Mountain Road) and that are currently developed and used as single family residences are proposed to be rezoned from the existing SU-2/TH (per the 1976 DNASDP) to SU-2/SF in the 2011 DNASDP. Throughout the rest of the DNASDP area, SU-2/TH (Townhouse) zoning is only being retained or applied where existing townhouse or multi-family development exists. Staff is recommending this change in order to maintain consistency in the application of the SU-2/TH and SU-2/SF zones and offers that the proposed rezoning to SU-2/SF is more advantageous to the community based on the following:

- R-270-1980, Policy (B): “Stability of land use and zoning is desirable; therefore the applicant must provide a sound justification for the change. The burden is on the applicant to show why the change should be made, not on the city to show why the change should not be made.” [Note: In the case of Sector Development Plans, the City is the applicant.]

*The existing land use of the subject properties is single-family residential development, while the existing zoning is SU-2/TH (Townhouse). It should be noted that the existing zoning has been in place for 35 years, but townhouse development has not occurred on any of the subject properties. Given the discrepancy between existing land use and existing zoning, staff believes that protecting the stability of existing land use, which is less intense than what existing zoning allows, is what will help to “promote the health, safety, convenience, and general welfare of the citizens of the city,” which is the stated intent of the Zoning Code (§ 14-16-1-3 (A)), and, therefore, outweighs the need to preserve the existing zoning, which, as noted above, has never been utilized.*

- Comprehensive Plan, Section II.B.5, Policy h: “Higher density housing is most appropriate in the following situations:
  - In designated Activity Centers.
  - In areas with excellent access to the major street network.
  - In areas where a mixed density pattern is already established by zoning or use, where it is compatible with existing area land uses and where adequate infrastructure is or will be available.
  - In areas now predominantly zoned single-family only where it comprises a complete block face and faces onto similar or higher density development; up to 10 dwelling units per net acre.
  - In areas where a transition is needed between single-family homes and much more intensive development: densities will vary up to 30 dwelling units per net acre according to the intensity of development in adjacent areas.”

The subject properties do not meet any of the tests of Section II.B.5, Policy h and, therefore, should not be considered an appropriate location for higher density housing.

- Comprehensive Plan, Section II.B.6: “\*NOTE: The Central Urban Area is a portion of the Established Urban Area and as such is subject to policies of Section II.B.5... Development intensities in the Central Urban Area should generally be higher than in other portions of Established Urban.” Section II.B.5 – Developing and Established Urban Areas – provides as Policy a: “The Developing Urban and Established Urban Areas as shown by the Plan map shall allow a full range of urban land uses, resulting in an overall gross density up to 5 dwelling units per acre.”

The subject properties provide 3 dwelling units on 0.364 acres, or an average density of 8+ du/acre. This is consistent with what the Comprehensive Plan envisions for the Central Urban Area.

- Section II.D.4, Policy c: “In order to add to transit ridership, and where it will not destabilize adjacent neighborhoods, additional dwelling units are encouraged close to Major Transit and Enhanced Transit streets.”

The subject properties are located approximately ¼ mile away from the closest Enhanced Transit corridor (Lomas). ¼ mile is considered a realistic “pedestrian shed” or “walking catchment,” meaning the average distance one is most likely to walk in order to access transit service. The ¼ mile stretch between the subject properties and the Enhanced Transit corridor is predominantly lined by existing single-family development and proposed SU-2/SF zoning, meaning that to provide increased density at the furthest point away from the Enhanced Transit corridor along 13<sup>th</sup> Street within the DNASDP area would be inconsistent with the Comprehensive Plan policy cited above.

Recommendation: Rezone the properties (1213 Granite NW and 900 and 906 Brother Mathias NW) from SU-2/TH (1976 Plan) to SU-2/SF rather than SU-2/TH (2011 Plan).

**2. 1519 Fruit Ave., NW and 306, 310, 312, 314, 316, and 320 16<sup>th</sup> St., NW**

Existing Zoning: SU-2/TH (Townhouse) – 1976 Plan

Existing Land Use: Single Family

EPC Draft (10.28.2010) Proposed Zoning: SU-2/TH – 2011 Plan

Council Staff Recommended Zoning: SU-2/SF (Single Family)

Discussion: The subject properties are located in the first block south of Lomas Boulevard across the street from single-family and townhouse development. Properties in similar locations as the subject properties (i.e., in the first block south of Lomas Boulevard) and that are currently developed and used as single family residences are proposed to be rezoned from the existing SU-2/TH (per the 1976 DNASDP) to SU-2/SF in the 2011 DNASDP. Throughout the rest of the DNASDP area, SU-2/TH (townhouse) zoning is only being retained or applied where existing townhouse or multi-family development exists. Staff is recommending this change in order to maintain

consistency in the application of the SU-2/TH and SU-2/SF zones and offers that the proposed rezoning to SU-2/SF is more advantageous to the community based on the following:

- R-270-1980, Policy (B): "Stability of land use and zoning is desirable; therefore the applicant must provide a sound justification for the change. The burden is on the applicant to show why the change should be made, not on the city to show why the change should not be made." [Note: In the case of Sector Development Plans, the City is the applicant.]

The existing land use of the subject properties is single-family residential development, while the existing zoning is SU-2/TH (townhouse). It should be noted that the existing zoning has been in place for 35 years, but townhouse development has not occurred on any of the subject properties. Also, the first of the "Major Planning Themes" listed in the Executive Summary of the Plan is "Matching the zoning with the existing land use for properties within the Downtown Neighborhood Area" (C/S R-11-225, p. 4).

Given the discrepancy between existing land use and existing zoning, staff believes that protecting the stability of existing land use, which is less intense than what existing zoning allows, is what will help to "promote the health, safety, convenience, and general welfare of the citizens of the city," which is the stated intent of the Zoning Code (§ 14-16-1-3 (A)), and, therefore, outweighs the need to preserve the existing zoning, which, as noted above, has never been utilized.

- Comprehensive Plan, Section II.B.5, Policy h: "Higher density housing is most appropriate in the following situations:
  - In designated Activity Centers.
  - In areas with excellent access to the major street network.
  - In areas where a mixed density pattern is already established by zoning or use, where it is compatible with existing area land uses and where adequate infrastructure is or will be available.
  - In areas now predominantly zoned single-family only where it comprises a complete block face and faces onto similar or higher density development; up to 10 dwelling units per net acre.
  - In areas where a transition is needed between single-family homes and much more intensive development: densities will vary up to 30 dwelling units per net acre according to the intensity of development in adjacent areas."

The subject properties do not meet any of the tests of Section II.B.5, Policy h and, therefore, should not be considered an appropriate location for higher density housing.

- Comprehensive Plan, Section II.B.6: "\*\*NOTE: The Central Urban Area is a portion of the Established Urban Area and as such is subject to policies of Section II.B.5... Development intensities in the Central Urban Area should generally be higher than in other

portions of Established Urban.” Section II.B.5 – Developing and Established Urban Areas – provides as Policy a: “The Developing Urban and Established Urban Areas as shown by the Plan map shall allow a full range of urban land uses, resulting in an overall gross density up to 5 dwelling units per acre.”

The subject properties provide 5 dwelling units on 0.535 acres, or an average density of 9+ du/acre. This is consistent with what the Comprehensive Plan envisions for the Central Urban Area.

Recommendation: Rezone the properties (1519 Fruit Ave., NW and 306, 310, 312, 314, 316, and 320 16<sup>th</sup> St., NW) from SU-2/TH (1976 Plan) to SU-2/SF rather than SU-2/TH (2011 Plan).