

# SEVERANCE OVERLAY ZONE: COMMENTS, QUESTIONS, AND CONCERNS

COMMENTS AND RESPONSES AS OF DECEMBER 22, 2025

NO.	SOURCE	LOCATION	FEEDBACK	RESPONSE
COMMENTS RECEIVED SINCE NOVEMBER PLANNING COMMISSION MEETING				
1	RESIDENT PUBLIC COMMENT	PAGE 3-4 CHAPTER 11491.11 B (5) DISTRICT STANDARDS MAP	<p>The NW traffic diamond is inefficient; MPACT is open to replacing it with a traditional roundabout, which is safer and more cost-effective. This change should be incorporated.</p> <p>The SW intersection by Home Depot would also function better and be safer as a roundabout, though this intersection is not described in the zoning plan.</p>	MPACT has redesigned this intersection to reflect what is often referred to a peanut roundabout. This accomplishes both the desire for the functionality and traffic calming of a roundabout while also aligning intersections efficiently.
2	PLANNING STAFF	PAGE 3 CHAPTER 1491.11 B DISTRICT STANDARDS LEGEND AND MAP	The "Buffer Area" should be rebranded as a "Conservation Area". This states the intent that this area will not be developed.	MPACT has agreed to rebrand and use the term "Conservation Area".
3	PLANNING COMMISSION	PAGE 4 CHAPTER 11491.11 B (5) DISTRICT STANDARDS MAP	I'd like to see an overlay of the standards map on top of the existing buildings. It's imperative that we have some sort of image that shows what these blocks cover. This is somewhat shown on the page on page 4 of the Severance overlay zone packet, but it's very hard to tell what	MPACT has placed the District Standards map on an aerial of Severance Town Center for review.

			is what. The underlay actually needs to be a bit darker. And the SO zones need to be delineated, not just the streets.	
<b>4</b>	<b>TRANSPORTATION AND MOBILITY COMMITTEE</b>	<b>PAGES 4-5 CHAPTER 1149.11 C &amp; D STREET TYPES MAP &amp; TABLE</b>	The community would benefit from both pedestrian and cyclist access on the Crest Road Connector and the Staunton Road Extension neighborhood connectors. Members of the committee are requesting that they be designated as roadway type <b>D-4</b> rather than <b>P</b> , which would allow bicycle access and still permit emergency vehicle passage, while disallowing private vehicle traffic.	MPACT has agreed to this change - this was the intention of Planning Commission.
<b>5</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 5 CHAPTER 1149.11 (D) STREET NAMES</b>	Are the street names indicated on the map final? I'd like to propose that streets remain unnamed and then the City could do a street naming contest or consider culturally relevant names to reflect the heritage and history of our city in this important area.	MPACT has stated that the street names are for convenience and NOT the final names.
<b>6</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 5 CHAPTER 1149.11 (D) STREET NAMES</b>	I want to make sure that we designated the Staunton Extension as a <b>D4</b> street. It's <b>D3</b> now which allows cars and I know we said we wanted that and the Crest Road access to be pedestrian only but I see there's a difference between a Pedestrian Path and <b>D4</b> , so I want to confirm how we communicated that to Council.	MPACT has agreed to this change.

7	STAFF COMMENTS	PAGE 6 CHAPTER 1149.12 STREET AND PUBLIC FRONTAGE STANDARDS	There should be flexibility built into the regulations for the Build-To-Line so that in the future (after initial development) if the street is reconfigured the existing buildings would not become nonconforming.	Additional language was added to Section 1149.12 D Build-to-Line (page 9):  <i>(c) Where an existing building is closer to the street than the designated Build-To-Line or Face of Curb, the Zoning Administrator has the authority to establish an alternate Build-To-Line and/or Face of Curb at a location to allow the existing Street Wall to remain within the Build-To-Zone.</i>
8	PLANNING COMMISSION	PAGES 6-9 CHAPTER 1149.12 STREET AND PUBLIC FRONTAGE STANDARDS	Is staff comfortable with the public frontage and build-to-line standards? I would like confirmation that the Planning staff is comfortable with the standards as articulated on pages 6-9.	Staff is comfortable with public frontage and build-to-line standards.
9	PLANNING COMMISSION	PAGE 10 CHAPTER 1149.13 CIVIC SPACE STANDARDS	I'm concerned about the fact that "Green" civic space is not explicitly delineated and is instead going to be left up to the developers and then it's not necessarily assured because they can purchase a reduction. I'm happy to talk to Ryan about this, but I'd like staff's recommendation for how we can incorporate a defined green space that will be on the part of the site that is not going to be occupied by a current building. There is a	MPACT is adjusting the Civic space requirements to ensure that a minimum of 20% of all civic space must include softscape or grass.

			<p>small green space where Dave's is if I'm relating to the map correctly but I don't think that conveys any reassurance that the rest of the site will actually have a community green space. Furthermore, I think a playground on this green space or a natural play area is essential. Leaving this up to piecemeal developers where the only playgrounds in this part of the neighborhood is a very diminished play area at Millikin and then none until Noble Elementary is a mistake. This is supposed to be a place where the community of CH converges and I don't see that communal space here. I appreciate that there's green space near City Hall and I'd like to understand from staff how we can utilize that in the redevelopment, but we need more centralized green space on the site and that's absent here. If we moved Block 12 to the green space between Block 16 and 17, poof, you have a green center. Even better - to run on blocks 7 and 12 that lead out from City Hall and that gives the city a space much like the National Mall (obviously much smaller and less grand!) but a public green space fronting a main government building is where democracy congregates and we need that. I feel strongly about</p>	
--	--	--	--	--

			this so let's talk quickly about how we can get to yes on this.	
10	PLANNING COMMISSION	PAGE 11 CHAPTER 1149.13 F CIVIC SPACE REQUIREMENT AND FEE-IN-LIEU	Are you comfortable with the fee-in-lieu set up? I think I would be more comfortable with it if we can create the green space I've discussed in the commentary on civic space standards.	Staff is comfortable with the fee-in-lieu of as this provides revenue that can be applied to creating civic/green space in the SOZ.
11	PLANNING COMMISSION	PAGE 11 CHAPTER 1149.13 F CIVIC SPACE REQUIREMENT AND FEE-IN-LIEU	The Fee-in-lieu of parking payments - I've heard conversations that we are looking for funds to repair all our city parking lots because we have made all parking free. I'd like your thoughts on directing the fee in lieu payments towards a general municipal parking maintenance fund instead of specifically for Severance. Thoughts?	This is not legally possible. Any fee-in-lieu of benefit/spending would need to remain within the SOZ district.
12	PLANNING COMMISSION	PAGE 12 CHAPTER 1149.21 A TABLE OF PERMITTED USES	Permitted uses - I've thought through this again and I'd like to make Catering Hall/Event Space a <b>CU</b> in <b>SO-3</b> . We have a huge church currently there and that, right off S. Taylor, could easily be an event hall or event space that could serve the entire community. I see no reason to not permit such a use, particularly if we are making it conditional on Planning Commission approval. The north side of the city is significantly	The concern is the conflict between the intensity of use of a catering facility and the desire to have <b>SO-3</b> (new development) be a lower density lower intense transition to the single family neighborhoods. This is a push and pull but we believe there is plenty of developable space in <b>SO-1</b> and <b>SO-2</b> and the focus of that intense a use should remain there. Obviously this does not impact existing users and

			lacking event or gathering spaces and we need to facilitate the development of more in this part of the city.	or development under the S-1 as an option.
13	STAFF COMMENT	PAGE 11 CHAPTER 1149.21A TABLE OF PERMITTED USES	<p>Research and Development should be Conditionally Permitted in the <b>SO-3</b></p> <p>Nursing/Assisted Living is similar to Residential Care Facility, both should be Conditionally Permitted in the <b>SO-3</b></p> <p>Hospital should be Conditionally Permitted in <b>SO-3</b></p>	MPACT agrees with these changes and have updated permitted each of these uses in the <b>SO-3</b> to be conditionally permitted.
14	RESIDENT PUBLIC COMMENT	PAGE 11 CHAPTER 1149.21 A TABLE OF PERMITTED USES	<p>The following uses should be changed from prohibited to conditionally permitted in <b>SO-3</b>: Multifamily, dormitories, Hospitals</p> <p>Low-rise multi-family buildings were just approved at Park Synagogue; dormitories can be part of adaptive reuse for education and can reduce vacancy and blight; a hospital already operates in the <b>SO-3</b> zone. Religious uses were already moved to conditional, hospitals should be treated similarly.</p>	<p>Under review but some changes have been made to the <b>SO-3</b> uses including:</p> <p>Religious/Charity - <b>CU</b></p> <p><i>See comment 13 responses</i></p>
15	RESIDENT PUBLIC COMMENT	PAGE 11 CHAPTER 1149.21 A	Several uses are banned outright in zone <b>SO-3</b> . This would likely be appropriate for the Millikin site, but is	Nursing/Assisted Living was change to be a Conditional Use ( <b>CU</b> ) in the <b>SO-3</b>

		<p><b>TABLE OF PERMITTED USES</b></p>	<p>inappropriate for the other <b>SO-3</b> zoned areas around Severance Circle, which are separated from single-family residential by a substantial permanent wooded buffer zone.</p> <p><i>To wit: several uses that currently exist in <b>SO-3</b> (blocks 38 and 39, pg. 3) are banned in this manner.</i></p> <p><b>Retail/Wholesale:</b> While it would not be appropriate at Millikin, in other currently paved parts of the Severance Site a wholesaler could be appropriate.</p> <p><i>Proposal:</i> Change from <b>X</b> to <b>CU</b> in <b>SO-3</b>.</p> <p><b>Office/R&amp;D:</b> While it would likely not be appropriate at Millikin, in other paved parts of the inner Severance Site a small R&amp;D facility could be appropriate.</p> <p><i>Proposal:</i> Change from <b>X</b> to <b>CU</b> in <b>SO-3</b>.</p> <p><b>Residential / Multifamily, Dormitory, Assisted Living:</b> Low-</p>	<p>Religious/Charity and Healthcare/Hospital were changed to be a Conditional Use (<b>CU</b>) in the <b>SO-3</b></p>
--	--	---------------------------------------	--	--

			<p>rise uses similar to those in the Park Synagogue plans – especially low-traffic options like Assisted Living – could fit well in <b>SO-3</b>. The height cap in <b>SO-3</b> is similar, so permitting them by conditional review would allow future development consistent with recent Planning Commission approvals.</p> <p><i>Proposal:</i> Change from <b>X</b> to <b>CU</b> in <b>SO-3</b>.</p> <p><b>Institutional/Religious, Hospital:</b> While it would likely not be appropriate at Millikin, both religious buildings and a hospital already exist in the proposed <b>SO-3</b> district. Banning an existing land use seems unnecessarily restrictive and counter to the intention of this code. This seems like an oversight and should be fixed.</p> <p><i>Proposal:</i> Change from <b>X</b> to <b>CU</b> in <b>SO-3</b>.</p>	
16	STAFF COMMENT	PAGE 12 CHAPTER 1149.21 B PROGRAM THRESHOLD	<p>Statement explaining thresholds and how they impact development need to be added as well as a statement on how multiple applications for the same use would be processed</p>	<p>MPACT has agreed to add language clarifying that any project can utilize density in Threshold 1 and Threshold 2 as long as the Threshold 1 requirements have been met and that applications should be</p>



				processed on a first come first served basis.
17	RESIDENT PUBLIC COMMENT	PAGE 12 CHAPTER 1149.21 B PROGRAM THRESHOLDS	As Cleveland Heights continues to deal with significant retail vacancies in all historic business districts, we should seek to protect those districts from further harm by adding too much retail to Severance such that it cannibalizes existing retail opportunities throughout the rest of the city. I would suggest lowering the proposed <b>Retail / Restaurant / Entertainment</b> limit from 175,000 sq ft to 100,000 sq ft, and reallocating that space to increase the limits of <b>Office / Professional / Medical</b> and/or <b>Light Industrial /Artisan Production</b> .	This change was not incorporated in order to allow large entertainment uses to potentially be located here.
18	RESIDENT PUBLIC COMMENT	PAGE 13 CHAPTER 1149.22 SITE DEVELOPMENT STANDARDS AND INCENTIVES	In an attempt to alleviate concerns expressed by residents of overly dense tower apartments, I recommend bringing the max Building Height of <b>SO-1</b> Development Standard 3 in line with Development Standard 2. This has the primary impact of lowering the maximum allowable height anywhere in the SOZ to 6 stories/75 ft max elevation.	MPACT believes this is the appropriate transect for transition to the single-family neighborhood.

19	RESIDENT PUBLIC COMMENT	PAGE 13 CHAPTER 1149.22 SITE DEVELOPMENT STANDARDS AND INCENTIVES	<p>Several existing <b>SO-3</b> buildings already exceed two stories, including the northeast townhomes, the Cleveland Clinic building, and the MetroHealth complex.</p> <p>A two-story cap is inconsistent with current development patterns.</p> <p>The city should consider allowing up to 3 stories /42 ft in <b>SO-3</b> districts.</p>	MPACT believes this is the appropriate transect for transition to the single-family neighborhood.
20	RESIDENT PUBLIC COMMENT	PAGE 13 CHAPTER 1149.22 SITE DEVELOPMENT STANDARDS AND INCENTIVES	<p>The single-family homes surrounding the <b>SO-3</b> districts have a height limit of 35 feet and <b>SO-3</b> buildings are limited to a maximum of 2 stories. This should be changed to match single-family homes: a maximum elevation of 35 feet and 2 ½ stories.</p>	MPACT will make this change.
21	PLANNING COMMISSION	PAGE 13 CHAPTER 1149.22 SITE DEVELOPMENT STANDARDS AND INCENTIVES	<p>Development Standards - I'm concerned about the max elevations in <b>SO-1</b> that allow up to 8 stories for Development Standard 3 and then 6 stories. We already have very tall apartment buildings on the outside of Severance and I'm concerned that such allowable elevations will create this up down up horizon on the size AND incent developers to just build high-density apartment buildings with retail on the first floor which I'm not convinced we need more of given the vacancies at the Ascent and</p>	<p>Maximum heights are given. Further discussion with the Planning Commission considering the heights of the new buildings in the Van Aken District compared to the surrounding community and the height of the current apartment buildings along South Taylor Road removed the stated concern about the maximum heights. (see <i>Comment 18 and 64</i>).</p>

			on Lee Road currently. Thoughts on this?	
22	RESIDENT PUBLIC COMMENT	PAGE 14 CHAPTER 1149.22 C AFFORDABLE HOUSING REQUIREMENT	<p>As proposed, I worry that the affordable housing requirement may slow down development on site, further exacerbating supply constraints that contribute to rapid housing market price appreciation and affordability concerns. Instead of the proposed minimum 20% of units to be affordable at up to 80% AMI, I propose a slightly more modest requirement of 10% of units to be affordable at up to 80% of AMI and an additional 10% at up to 100% AMI. This balance closely matches a recent mixed-use mixed-income development in Shaker Heights that serves as a useful model of local inclusive development.</p> <ul style="list-style-type: none"> <li>• A separate approach would be to use similar affordability levels as outlined above, but incentivize them to be included as a portion of individual buildings instead of the 3 proposed unit thresholds. The City of Cleveland requires multi-family developments seeking abatement to include various percentages of affordable units based on the strength</li> </ul>	<p>Affordable housing requirement will be updated to 10% of units being affordable up to 80% AMI, and 10% of units being affordable up to 120% AMI. MPACT incorporated language that would allow the threshold to be pierced if additional studies requested by the Zoning Administrator and reviewed by the Planning commission are completed.</p> <p>See Section 1149.21B items (5) and (6), page 13.</p>

			<p>of the market. For a comparable "middle-market" area, this translates to a minimum of 15% of units to be affordable at up to 100% of AMI to access the standard abatement. Higher levels of abatement are available for projects that include steeper discounts. This would be my preferred method, and to deal with it during the financial incentive stage of this project vs including it in the zoning code.</p> <ul style="list-style-type: none"> <li>• Emphasis should be put on achieving affordability levels by design through flexibility in minimum unit size.</li> </ul> <p>The examples listed above use 15-20 year terms, vs the more restrictive 30 year term proposed in the SOZ.</p>	
23	<p><b>PLANNING COMMISSION</b></p>	<p><b>PAGE 20 CHAPTER 1149.26 PARKING</b></p>	<p>Parking - I'd like Ryan to provide some visual assistance so we can see what parking could look like on the site given the district parking standards and placement. 1149.26A(3) says there shall be no open or enclosed parking at the sidewalk level within 16 feet of the Build To Line. But what does that actually look like? I also don't see a specific prohibition on parking</p>	

			garages or surface lots fronting the sidewalk (unless the provision I just cited means that). I'd like Ryan to go through this on the 10th and assure us that the streets won't be lined with parking. Instead I'd like to see it much like Crocker Park where the parking is on the street or hidden behind the main thoroughfares.	
24	<b>RESIDENT PUBLIC COMMENT</b>	<b>PAGE 20 CHAPTER 1149.26 PARKING</b>	<p>Bundling parking with multifamily units distorts both housing and transportation markets, but is often used as a marketing tool for developers. It has the following negative impacts: Raises housing costs by forcing every household to pay for parking, whether they own a car or not; places a disproportionate burden on vulnerable residents – including low-income households, seniors, and people with disabilities – who are least likely to own cars yet still subsidize parking; encourages higher car ownership and traffic because “free” bundled parking hides the true cost of driving; and undermines walkability and transit goals by steering development toward auto-oriented designs instead of compact, people-first neighborhoods.</p> <p>The city should seriously consider adding the following as 1149.26A (5):</p>	Parking regulations will remain uniform to the balance of the city at this time.

			<p><i>"Off-street parking spaces provided in conjunction with multi-family dwelling units shall not be included in the rental or sales agreement for the dwelling unit. Parking spaces shall be offered for rent or sale through a separate, independent agreement at a fair market price. All prospective tenants or purchasers must be provided with a clear and transparent disclosure of the availability, location, and cost of all available parking spaces, and they shall have the option to lease or purchase a space separately."</i></p>	
25	<p><b>RESIDENT PUBLIC COMMENT</b></p>	<p><b>PAGE 20 CHAPTER 1149.26 A (3) (b) DISTRICT PARKING STANDARDS &amp; PLACEMENT</b></p>	<p>Counting on-street parking toward minimums creates perverse incentives, encouraging curb clutter, subsidizing developers at public expense, and diverting street space from safer, more productive uses.</p> <p>This practice distorts transportation choices by favoring car use, undermining the city's inclusive mobility and sustainability goals.</p> <p>Section (3)(b) should be removed; on-street parking should not count toward parking minimums.</p> <p>Parking minimums should be moderately reduced overall to offset</p>	<p>Removed residential uses from being able to count on-street parking towards parking requirements.</p> <p>Section 1149.26A item (3)(b) on street parking spaces located along the frontage of a lot may be credited toward satisfying the total parking demand for a site; however, such credit shall apply only to non-residential uses.</p>

			the removal of this credit and avoid creating an oversupply.	
26	RESIDENT PUBLIC COMMENT	PAGE 21 CHAPTER 1149.25 B SCHEDULE OF DISTRICT PARKING & LOADING STANDARDS	<p>Two parking minimums seem to have been missed during revisions, and are inconsistent with each other.</p> <p><b>Office &gt; Research &amp; Development</b>  <i>Issue:</i> The parking minimums for type <b>Office &gt; R&amp;D</b> are too high. <b>R&amp;D</b> buildings generally have fewer employees per square foot than generic office buildings, and mix office settings with light machinery and R&amp;D equipment.</p> <p><i>Solution:</i> Parking minimum should be between <b>Office</b> (1sp/600sf) and <b>Light Industrial</b> (1sp/1,000sf). Suggest revising current number (1sp/400sf) to (1sp/800sf) or greater.</p> <p><b>Office &gt; Professional Service</b>  <i>Issue:</i> The parking minimums for type <b>Office &gt; Professional Service</b> are too high. These types of offices generally have combined parking needs similar to or less intense than those of medical offices.</p> <p><i>Solution:</i> Parking minimum should not exceed the minimum for <b>Medical Office</b> (1sp/450sf). Suggest revising</p>	MPACT agrees that this change should be made for consistency.

			current number (1sp/400sf) to (1sp/450sf) or greater.	
<b>27</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 21 CHAPTER 1149.26 B SCHEDULE OF DISTRICT PARKING &amp; LOADING STANDARDS</b>	Parking - the schedule in 1149.26B has to be updated to remove the Data Information Center. And the new permitted uses we are allowing need to be added in their respective categories.	Data Center was removed as a potential use in any of the SOZ districts in both 1149.21 A Table of Permitted Uses) and related 1149.26B Schedule of District Parking & Loading Standards.
<b>28</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>PAGE 23 CHAPTER 1149.26 D (5) DISTRICT PARKING STANDARDS</b>	<p>Maximum parking reduction is currently capped at 50% in CH code, but the draft lowers it to 30%, unnecessarily limiting Planning Commission discretion.</p> <p>After discussing with Ryan, we agree the cap should be restored to 50% to align with existing city code and maintain needed flexibility.</p>	MPACT agrees that this change should be made for consistency.
<b>29</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 24 CHAPTER 1149.31 (A) SITE PLAN SUBMISSION REQUIREMENTS</b>	1149.31(A) only says that the Commission can approve or deny the plan. Can the Commission revise the plan? If so, then we should add that language in to ensure that authority is appropriately granted.	As is the case with other zoning in the City an as of right development should be approved and can have certain conditions. We are setting up clear rules upfront to encourage investment to occur with transparency of outcomes being available.



<b>30</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 24 CHAPTER 1149.31 (B) SITE PLAN SUBMISSION REQUIREMENTS</b>	I don't see anything in this section about requiring a civic space description or any information about how the applicant has either addressed the civic space requirement or decided to pay for a reduction. I think this needs to be added unless you have a strong rationale for why not.	MPACT will take another look at clarifying language.
<b>31</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 25 CHAPTER 1149.36 SITE PLAN AMENDMENTS</b>	Site Plan Amendments - are there definitions of "major amendments" and "minor amendments" - if not, I'd like outside counsel's opinion on definitions of this and I'd like to require that these decisions are also approved by either the Planning Commission chair or the Chair of the Council's Planning and Development Committee. There's a decision point here that I'm not comfortable leaving just to the Zoning Administrator although I understand the need for flexibility.	Section 1149.36 was updated and Section 1149.31 E was added to describe the amendment process and define major and minor changes.
<b>32</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 25 CHAPTER 1149.33 OFFICIAL PLAN SUBMISSION REVIEW</b>	I'd like to consider a notice requirement in 1149.33 that would require citywide notice via electronic channels of the plan submission. Alternatively, I'd be ok with a notice requirement in 1149.31 as (D) as a public notice that the Planning Commission is hearing the plan. Although that is probably too late to	Notice requirement should be uniform across the Zoning Code. Notice requirements for all Planning Commission cases will be reviewed as part of the 2026 zoning review.

			do anything with public comment unless the Planning Commission is able to revise a submitted plan as part of the review.	
33	PLANNING COMMISSION	PAGES 29-32 CHAPTER 1149.43 B STREETS A-1, A-2, & B-1	I'm concerned about the narrowing of the <b>A-1</b> and <b>A-3</b> street type. These are all currently at least two lanes in and out and it seems that if we are trying to build a vibrant city center we want to make it easy to get in and out of all the main roads to the site. Thoughts on this? Maybe we need to discuss this in a meeting just us so I can understand the rationale here. Same with the <b>B-1</b> designation for what looks like the center street.	The goal is to create a more walkable pedestrian friendly environment. The roads and entrances as designed are materially larger than needed even at buildout. MPACT strongly believes that calming these roads is essential to creating that sense of place and to pedestrian and multi modal safety.
34	RESIDENT PUBLIC COMMENT	PAGES 29-43 CHAPTER 1149.43 A STREETS	<p><b>Bike Lanes:</b> Several streets have buffered bike lanes (<b>A-1, A-2, B-2</b>). These streets need (<b>BL:</b> Min 6') added to align with the visual provided and national recommendations from NACTO.</p> <p><b>Drive Lane Widths:</b> Several streets have drive lane widths wider than recommended in commercial/ residential areas (10'). This will lead to speeding and increased danger for road users. Since the roadway gutter is included in the "<b>DL</b>" category throughout this document, the width of the following streets</p>	MPACT worked collaboratively with both Active Transportation advocates and the City's hired transportation engineer consultant of the revised street layouts.

		<p>should be modified to read: "(<b>DL</b>: <i>Max 11'</i>)"</p> <p><b>A-3, B-1, C-1, C-2, C-3, C-4, D-1 B-1, "Phase 2 Main Street" Issues:</b> Excessive parking, 2x what is present in any other CH business district, detracts from a sense of place and crowds out other street uses. Excessive lane width (14') encourages speeding; insufficient planting zone (4' ornamental tree pots, similar to Cedar-Fairmount) will not grow to full-size shade trees, very small for a road this wide (Recommend 10' planting zones for full-size shade trees); dangerous lack of protected bike lanes in a busy district (NACTO recommends bike lanes anywhere with "high curbside activity.)</p> <p>TMC has specifically requested protected bike lanes; Minimal public sidewalk space (<b>PF</b>) limits possibilities for outdoor dining. See <i>attachment for updated visualization.</i></p> <p><b>C-4, "Phase 1 Main Boulevard"</b> <b>Issues:</b> Same overparking, lane width, small planting zone, bike lane, and PF issues as <b>B-1</b>. See <i>attachment</i></p>	
--	--	---	--

			for visualization. TMC requests changes.	
35	PLANNING COMMISSION	PAGE 25 SEVERANCE ZONING ORDINANCE EXHIBIT A	On page 25 of Zoning Ordinance Exhibit A (the code redline) - it has the Council approving a development plan in an S-1 District or S-2 or the Severance Overlay District. Is that right? I thought we were reverting that all to the Planning Commission. I see later on that it also requires Council approval. Explain the rationale for this please? I thought we are trying to expedite? Or are we trying to have more community input? Either way - none of that will actually make any difference if Council and the Commission can't actually revise the plan.	<p>The S-1 District development plan is Council approved "Severance Preliminary Land Use Plan" The SOZ development plan is SOZ District Standards Map.</p> <p>MPACT intent is that the planning commission have the site plan approval responsibility.</p>
36	PLANNING COMMISSION	PAGE 25 SEVERANCE ZONING ORDINANCE EXHIBIT A	On page 25 in 1115.09 - it says that application for a development "within any Special District shall first require the submission and approval of a development plan". The term "Special District" is not defined in the code definitions. Is it somewhere else? What does this actually mean?	The term "Special District" is being defined in an updated Exhibit A , Title V Special Districts.
37	PLANNING COMMISSION	GENERAL SEVERANCE ZONING	There is no definition of civic space in the zoning code redline. This is an important term and I think we need to define that in the code and not just	Civic space is defined at 1149.13 Civic Space Standards item B Minimum Civic Space Standards items (1) , (2), ad (3).

		<b>ORDINANCE EXHIBIT A</b>	rely on the extensive descriptions in the overlay zone packet. Can you please ask outside counsel to draft a definition and have staff and Ryan review and approve before the meeting on the 10th?	
<b>38</b>	<b>MAYOR</b>	<b>GENERAL</b>	Request for the survey of the infrastructure we discussed (and how it comports with the zoning overlay)	<p>We did not do a formal engineering survey of the infrastructure. We did field observations, GIS review, meetings with City departments, meetings with NEO Sewers etc. we can produce a simple overlay of our assumptions for discussion. Please keep in mind that while streets are set in place to start 1. The City can always make changes to the zoning hopefully in collaboration with our team and the NCA board I am looking to set up, 2. The Zoning Admin has the authority to adjust street locations during the review process if needed and 3. For SAG's concerns we are adding language to the zoning that allows civic spaces (parks) to re-align the street grid. There is nothing in the code that prevents Larry from getting his central park if that is proven to be the right thing and it can be financed.</p>

39	MAYOR	GENERAL	Request for the balance between commercial and residential in your zoning proposal (%)	<p>Assuming around 900 sf per unit the following is the % breakdown. For context this is a very typical split (approx. 80/20) to any revitalization effort for a walkable downtown. It was also largely based upon the housing market study the City commissioned which I have attached for convenience (<i>Appendix B</i>). Below is also a retail table showing estimated demand for new retail based upon existing city demand and the potential new residents of Severance. There is a very consistent theme in real estate that has proven true for most projects which is "Retail follows Rooftops".</p> <p>In fact in an area like Cleveland Heights it can take approximately 300 households to support 1000 SF of new retail space. We look at the combo of existing and new households. The remainder of the uses other than hotel will primarily not be spec built and will need specifically identified users. I'd be happy to go through this math in more detail with you. Please also remember these are code max densities not exactly what will be built.</p>
----	-------	---------	--	--

				<p>Use Category &amp; % of Total Program SF</p> <p><b>Residential:</b> 77.30%</p> <p><b>Hotel/Hospitality:</b> 7.70%</p> <p><b>Retail/Restaurant/Entertainment:</b> 6.00%</p> <p><b>Office/Professional/Medical:</b> 2.90%</p> <p><b>Arts &amp; Culture:</b> 1.70%</p> <p><b>Institutional/Civic /Educational:</b> 2.60%</p> <p><b>Light Industrial/Artisan Production:</b> 1.70%</p> <p><i>Details attached: Appendix A</i></p>
<b>40</b>	<b>MAYOR</b>	<b>GENERAL</b>	Request for the balance between owner-occupied residential and rental property in your zoning proposal (%)	<p>The Zoning does not control homeownership vs rental. Zoning can regulate the form and use of buildings, but it cannot typically regulate who owns them—rental vs. ownership is a financing and market choice, not a zoning category. I don't believe your current code does either. To be clear I am going to pursue both and many typologies of both. The market study outlines these demand parameters for both.</p>

<b>41</b>	<b>MAYOR</b>	<b>GENERAL</b>	Request for the reasoning behind a zoning administrator replacing the Severance Board of Control in your zoning proposal	I just got a similar question from Council President Larson. I would imagine this is coming from Ms. Winterer. As for the Board of Control my understanding is that it is an antiquated process that was not very functional. I am sure Eric can speak further on this but I believe the staff is simply using this opportunity to remove that layer from the underlying zoning having nothing to do with our new zoning. My perspective is that there is no logical connection between a board for the underlying S-1 zoning and our zoning. We are proposing a new code that is entirely different. We are proposing a new process that is largely different. Why would the process for the zoning we are getting away from dictate the new code? In conclusion we are not usurping the Board of Control as it is a process requirement for the underlying zoning not ours and staff is recommended removing it from the underlying having nothing to do with my proposal.
<b>42</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	The new chapter pretty much eliminates the review and approval function of the city	This is fully incorrect. The SOZ has a detailed outline review, with multiple layers of oversight. We have also been very clear from day 1 that we



				<p>are trying to create an expedited as of right condition.</p> <p>Facts:</p> <ul style="list-style-type: none"><li>• The SOZ is 100% optional. All underlying zoning review procedures remain in full force. Developers can only use SOZ standards if they voluntarily opt in.<ul style="list-style-type: none"><li>- SOZ 1149.03(A)-(C) explicitly states this.</li></ul></li><li>• Site Plan Review is still required. Every project using the SOZ must go through Zoning Administrator review + Architectural Review Board (ARB) (Commenting) + Planning Commission approval (all explicitly retained in 1149.3 "Administration").</li><li>• The SOZ adds new forms of review:<ul style="list-style-type: none"><li>- Build-to-line compliance</li><li>- Frontage standards</li><li>- Active edge retail/entryway spacing</li></ul></li></ul>
--	--	--	--	---

				<ul style="list-style-type: none"> <li>- Civic space compliance</li> <li>- Street wall/street type requirements</li> <li>- Stepback requirements</li> </ul> <p>These regulate building form and street quality in ways the current code never has.</p> <p>Bottom line:</p> <p>The testimony presents an inaccurate impression that oversight disappears – in reality, the SOZ has layers of review and more objective standards than the current code has ever provided. It does create an as of right scenario which is very standard in zoning codes and I believe exists in other existing portions of the CH zoning.</p>
<b>43</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	The proposed zoning does not call for creation of a comprehensive plan.	<p>The SOZ is itself a regulating plan – not a single master plan submitted by a developer that will inevitably be obsolete as markets shift.</p> <p>The current code requires a one-time, static “detailed development plan” by a single developer. The</p>

				<p>zoning proposal took into account the City's existing Master Plan goals.</p> <p>The SOZ replaces the failed models of the past with:</p> <ul style="list-style-type: none"> <li>• A District Standards Map that lays out: <ul style="list-style-type: none"> <li>- Street network</li> <li>- Civic spaces</li> <li>- Required frontage types</li> <li>- Block structure (See 1149.11B(5))</li> </ul> </li> </ul> <p>This is the comprehensive plan – it is simply delivered as form-based zoning standards, which is the modern national best practice.</p> <p>It allows incremental development by multiple builders while preserving a cohesive plan under specific rules.</p>
<b>44</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	<p>Developers have the right to build what they want with minimal city oversight.</p>	<p>The SOZ introduces more constraints than the current code, not fewer.</p> <p>Under the current code:</p> <ul style="list-style-type: none"> <li>• There are no frontage occupancy requirements</li> <li>• No build-to-lines</li> <li>• No active edge requirements</li> </ul>

				<ul style="list-style-type: none"> <li>• No glazing transparency requirements</li> <li>• No stepbacks</li> <li>• No maximum street wall heights</li> <li>• No civic space standards</li> <li>• No minimum floor heights for storefronts</li> <li>• No street type standards</li> <li>• No district buffer protections</li> </ul> <p>Under the SOZ, all of these become mandatory.</p> <p>Developers have far less freedom under the SOZ than they do today.</p>
45	RESIDENT PUBLIC COMMENT	GENERAL	The only real development limitation will be the street and block layout.	<p>The testimony ignores entire sections of the code.</p> <p>Here are 9 categories of mandatory limitations:</p> <ol style="list-style-type: none"> <li>1. Permitted use restrictions – 1149.21</li> <li>2. Height minimums and maximums – 1149.22B(2)</li> <li>3. Stepbacks – 1149.23E</li> <li>4. Private frontage types – 1149.23A-C</li> <li>5. Active frontage/entryway spacing – 1149.23G</li> </ol>

				<p>6. Glazing % requirements – 1149.23H</p> <p>7. Street wall requirements – 1149.23D</p> <p>8. Civic space mandates – 1149.13</p> <p>9. Side/rear yard buffers protecting neighborhoods – 1149.22B(2)</p> <p>It is objectively incorrect to claim the block layout is the only control.</p>
<b>46</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	We will only get a few green spaces; the code removes green space.	<p>The SOZ requires green space for the first time in Severance’s history.</p> <ul style="list-style-type: none"> <li>• 10% civic space requirement on every development site – 1149.13F(1)</li> <li>• Civic spaces designated on the District Standards Map that must be built – 1149.11B(5)</li> <li>• Adjacent-site contribution requirement if a site borders a designated civic space – 1149.13F(2)</li> </ul> <p>The fee-in-lieu is not the default. We have outlined nearly 3 acres of green space before the 10% requirement and while people can reduce that requirement it will still create multiples on what other</p>

				<p>developments in Northeast Ohio have created. By way of example Crocker park only has 1 ¾ acre green space and about ½ acre of hard scape space. Van Aken has virtually no green space and about 10,000 SF of hardscape and about 6,000 SF of turf.</p> <p>**The current zoning has zero requirement for parks or civic space.</p> <p>The SOZ is the first code to ever mandate green space at Severance.**</p>
47	RESIDENT PUBLIC COMMENT	GENERAL	The fee-in-lieu amount is too low; it only produces \$152,460 per acre for civic space.	<p>I am not sure what it is “too low” for. This was never intended to pay for everything. Does the commenter have backup for the costs? There seems to be a misunderstanding.</p> <ul style="list-style-type: none"> <li>• The fee is not intended to purchase raw land</li> <li>• It is intended as kickstarter funds for improvements. SAG has claimed they can finance a park before any of our proposed fees were even on the table so it seems we are only helping.</li> <li>• If the fee is too high there will be 0 buy out and thus no funds to help finance improvements</li> </ul>

				<ul style="list-style-type: none"> <li>The fee also scales: large sites cannot buy out more than 50% of their obligation for the first 100,000 sq ft.</li> </ul> <p>In short the likely path is:</p> <ul style="list-style-type: none"> <li>Land = created by subdivision and dedication.</li> <li>Fee = funds improvements.</li> </ul> <p>This dramatically expands the City's funding for public realm improvements compared to the current code, which has no public space requirement or funding mechanism at all.</p>
48	RESIDENT PUBLIC COMMENT	GENERAL	Use limits are restrictive and prevent institutions or major employers from locating at Severance.	<p>The testimony misquotes the code and omits key facts. Can the commenter provide a suggested MAX amount of these uses and reasons for them. We suggested these uses based on our 20 years of experience with healthy mixes for thriving walkable districts.</p> <ul style="list-style-type: none"> <li>Institutional uses (e.g., education, medical, government, community facilities) are permitted in <b>SO-1</b> and <b>SO-2</b> (the main</li> </ul>

				<p>redevelopment districts). – See 1149.21A (Institutional)</p> <ul style="list-style-type: none"> <li>Major research, medical office, and professional office uses are fully permitted.</li> <li>The thresholds are sitewide caps, not per-tenant caps. They ensure balanced mixed use, which is exactly what the City's Master Plan and market studies say is needed.</li> </ul> <p>Also:</p> <ul style="list-style-type: none"> <li>The code does allow data centers, artisan production, and renewable energy uses.</li> <li>Claims that the code "bans institutions" are simply factually false.</li> </ul>
<b>49</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	<p>The code calls for 2,500 units and 175,000 SF of retail, which is unrealistic.</p>	<p>The SOZ does not require these numbers – they are maximum caps, not mandates.</p> <p>The code does NOT:</p> <ul style="list-style-type: none"> <li>Force 2,500 units to be built...IT IS A MAX</li> <li>Require 175,000 SF of retail</li> </ul> <p>The thresholds are simply the maximum allowable across 30+ years of phased redevelopment so that:</p>



				<ul style="list-style-type: none"> <li>• Data-driven market checks and</li> <li>• Infrastructure capacity checks can occur as growth proceeds.</li> <li>• The market study only projected for a limited period of time approximately 10 years and the full buildout of 60+ acres will take longer than that. I remind everyone that Croker park took approximately 20 years to reach full buildout.</li> </ul> <p>The testimony conflates:</p> <ul style="list-style-type: none"> <li>• Absorption projections with</li> <li>• Zoning capacity ranges</li> </ul> <p>If the code capped development at 837 units (today's absorption), growth would be mathematically impossible in the future.</p>
50	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	Mandating ground-floor retail is unwise and we see vacancies at Top of the Hill.	<p>The SOZ does not mandate ground-floor retail across the entire site.</p> <p>It only requires active frontage in very specific locations:</p> <ul style="list-style-type: none"> <li>• Along B-type streets (future "main street")</li> </ul>

				<ul style="list-style-type: none"><li>• At key corners</li><li>• On designated pedestrian corridors<ul style="list-style-type: none"><li>- See 1149.23G</li></ul></li><li>• Where retail or office is required we did very specific projections at average retail and office depths to calculate retail numbers that are in line with our market analysis which called for about 95k SF of retail absorption at full buildout. That table is published in the RAP from Jan</li></ul> <p>And importantly:</p> <ul style="list-style-type: none"><li>• Office use can substitute for retail in required retail areas.</li><li>• Active frontage does not mean “storefront retail” – it can be office, lobbies, fitness centers, co-working, etc.</li></ul> <p>The testimony is misreading the table.</p> <p>This is a modern approach: require street activation where needed but allow flexibility.</p>
--	--	--	--	--

51	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	<p>The SOZ distracts from important issues by focusing on minutiae like street widths and corners.</p>	<p>These standards are the important issues – they are the foundation of all functioning walkable districts.</p> <p>The current zoning code never addressed:</p> <ul style="list-style-type: none"><li>• Block size</li><li>• Street wall</li><li>• Stepbacks</li><li>• Sidewalk zones</li><li>• Transit frontage</li><li>• Corner treatments</li><li>• Pedestrian paths</li><li>• Active frontage</li><li>• Street type hierarchy</li><li>• These “details” are exactly what determine:</li><li>• Walkability</li><li>• Retail success</li><li>• Safety</li><li>• Aesthetics</li><li>• Property values</li></ul> <p>Cities from Cincinnati (OTR) to Columbus (Short North) to Lakewood, Boulder, and Arlington use precisely these regulations.</p>
----	--	----------------	--	--

				This is how modern zoning enables development rather than obstructs it.
52	RESIDENT PUBLIC COMMENT	GENERAL	I am concerned about being forced out of my home due to the potential for new zoning affecting my condominium building. I am against adopting a new Optional Overlay Form-Based Zone to ensure that no changes to the buildings of private property owners occur. I would like to continue living where I currently am after the revitalization project is complete with no redevelopment of my building and no raises in my rent due solely to the redevelopment project.	<p><b>1. The SOZ is completely optional for all private property owners.</b> Nothing in the SOZ forces redevelopment of any existing condominium, apartment, or commercial building. Property owners retain all rights under today's zoning unless they voluntarily choose to "opt in" to use the new optional rules. This is stated directly in the Applicability section of the ordinance:</p> <ul style="list-style-type: none"> <li>• "The Severance Overlay Zone...does not replace the underlying zoning... This Chapter provides an <b>alternative option</b> for developing and redeveloping the land..."</li> <li>• "All existing rights, allowable uses, and approval procedures...remain in full force and effect, <b>except when an applicant elects to proceed</b> under the provisions of the Severance Overlay Zone."</li> </ul>

				<p>This means your condominium building cannot be redeveloped unless the private owners choose to pursue that themselves.</p> <p><b>2. The City cannot require or initiate redevelopment of privately owned residential buildings through this zoning.</b> The SOZ only creates a new pathway <i>if</i> a private owner wants to use it. If an owner does nothing, their property continues exactly as it is today.</p> <p><b>3. The SOZ has no authority over rents, pricing, or lease terms.</b> Zoning laws—whether the current zoning or the proposed overlay—do not regulate rent levels or allow the City to raise or otherwise influence rents. The commenter’s concern about rent increases “due solely to the redevelopment project” is understandable, but importantly, rent levels are set by private landlords, not by zoning regulations.</p> <p><b>4. The SOZ does not displace or remove current residents.</b> Because opting in is voluntary and the underlying zoning remains fully intact, no existing household is forced out of their home as a consequence of the ordinance.</p>
--	--	--	--	--

<b>53</b>	<b>CITY COUNCIL</b>	<b>GENERAL</b>	<p>Would you be amenable to removing the 'buffer zone' along the edge of the Severance ring that includes Millikin? I am particularly concerned about this ecosystem being destroyed if it becomes subject to historic patterns of reducing our Watersheds to culverts and build overs.</p>	<p>I think there may be confusion here. The buffer zones purpose is to prevent development from encroaching upon these areas and protect the natural ecosystem. The buffer zone actually exists today under the S-1 zoning and we simply expanded upon that to protect additional areas from development.</p>
<b>54</b>	<b>CITY COUNCIL</b>	<b>GENERAL</b>	<p>You have often described "hidden parking". Yet, the cross sections of streets that are offered in the legislation include multiple parking spaces for vehicles. When we are talking about walkability, and safety for pedestrians and those who need to use wheels and those who choose to use wheels, the multiple vehicle spaces seems to contradict those goals. Have you considered other alternatives than on street parking without increasing the concrete footprint of a parking lot?</p>	<p>When we speak to hidden parking we are speaking about off street parking. How the SOZ hides off-street parking: "The SOZ is designed so that parking lots and garages cannot sit directly on the street; instead, buildings must line the street and keep any parking at least 16 feet behind the Build-To-Line, which effectively hides parking from public view (Section 1149.26A(3)(a))."</p> <p>Why on-street parking is important:</p> <p>"On-street parking slows traffic, buffers pedestrians and bike lanes from moving cars, and provides the most convenient short-term parking for shops and services, which helps support walkability and business activity. The exact amount and configuration of on street parking (angled, reverse angled and parallel) can vary. Many of the street</p>

				<p>typologies just completed redesign to reduce the on street parking, change travel lanes and adjust bike lanes per discussions with staff and Chris repping the transportation committee" These changes will be published in the fin draft post the December 10 planning commission meeting and prior to the December 15 hearing. That said all comments being addressed have and will continue to be published by the planning department on the city website. I can walk you through these if you would like.</p>
55	<p><b>RESIDENT PUBLIC COMMENT</b></p>	<p><b>GENERAL</b></p>	<p>I haven't been involved in the new plans for the Severance Mall property but I wrote a note to City Council expressing concern that historically the Severance property is slowly being erased from Cleveland Heights's past:</p> <p>The Severance home was called Longwood.</p> <p>I don't know if I'm exaggerating but it seems like Severance history is slowly disappearing as a piece of Cleveland Heights history.</p> <p>Cleveland will always have Severance Hall but with new</p>	<p>MPact has discussed this concern with the resident.</p>

			<p>donations other names are being used to advertise concerts.</p> <p>The stables are worth saving. I don't know if they are being protected or just used for storage. Worth a serious look to keep them from being demolished.</p> <p>The fountain was moved to the Mayfield entry next to City Hall.</p> <p>The gardens, ponds and streams are gone.</p> <p>The Historical Center at the Schoolhouse may have more information on what still exists.</p> <p><a href="https://clevelandhistorical.org/items/show/471">https://clevelandhistorical.org/items/show/471</a></p> <p>Can the Landmarks Committee take the memory of Severance on as a project or has that already happened?</p> <p>The physical items that exist are the fountain, the barns, the name, and that may be it.</p> <p>I spoke with Tony Cuda and he is checking if the Landmarks Committee has any insights about historical protection for some of the Severance land.</p>	
--	--	--	--	--



			Will the Severance legacy be acknowledged in any way as this project moves ahead with Zoning changes?	
56	RESIDENT PUBLIC COMMENT	GENERAL	Why does the planning commission believe it appropriate to include privately owned properties, as indicated on the MPACT maps published, in Severance rezoning consideration?	<p>The Severance Overlay Zone is <b>strictly optional</b> and <b>does not change the underlying zoning</b> for any private property.</p> <p>As described in §1149.03(B)-(C), all existing rights and all current zoning remain fully in effect unless a property owner <b>voluntarily elects</b> to develop under the SOZ. The maps simply show the <i>boundary of the overlay option</i>, not mandated redevelopment. No private property is required to participate, and no changes occur without a property owner choosing to opt in and applying for site plan review.</p> <p>The purpose of including all parcels within the boundary is to:</p> <ul style="list-style-type: none"> <li>• Provide a consistent long-term planning framework,</li> <li>• Ensure that any future redevelopment—<i>if and only if initiated by an owner</i>—meets higher form-based standards, and</li> </ul>

				<ul style="list-style-type: none"> <li>• Avoid piecemeal or incompatible development around the mall.</li> </ul> <p>Participation is always voluntary.</p>
57	RESIDENT PUBLIC COMMENT	GENERAL	How does the planning commission believe that the trees and wetlands surrounding Severance will not be affected by the new and/or expanded roads and paths, also indicated by the maps published by MPACT?	<p>Protection of natural areas is explicitly built into the SOZ:</p> <ul style="list-style-type: none"> <li>• <b>Conservation Areas cannot be developed.</b></li> </ul> <p>The District Standards Map (§1149.11B(5)) designates the natural wooded and wetland areas as <b>Conservation Areas</b>, where <b>no development of any kind is allowed</b> except street typologies required for emergency or public access (§1149.22B, Conservation Area rule). This preserves tree canopy and environmentally sensitive land.</p> <p><b>We have updated the plans to remove the roads connected to the neighborhoods leaving only the existing paths and have removed a road abutting the conservation area.</b></p>
58	RESIDENT PUBLIC COMMENT	GENERAL	Many new streets and pedestrian walkways are shown on some of the maps. I think these are unnecessary	We are suggesting new road networks that stay out of all conservation areas so as not to

			<p>and potentially harmful to the environment and to the nearby neighborhoods. Showing these on a map that will be approved implies community endorsement, despite assurances that these are not necessarily intended to be built. I believe these should be removed from the map.</p> <p>I specifically object to these new streets and pathways because they are unnecessary to redevelopment, since all parcels already have extensive access to Severance Circle itself, and because they encourage future encroachment on the woodlands rather than respecting them as an important part of our future.</p> <p>Streets named Dobama Ave, Ben Brea Blvd, and Medical Ctr Way are unnecessary for redevelopment, and promote future encroachment on the woodlands.</p> <p>The Staunton Road Extension, whether as a road or as a pedestrian pathway runs through the woods, and parallels the already existing road from the Millikin School parking lot to the stables near the Walkway. We might want to consider working with the schools in the future for a pedestrian pathway along the</p>	<p>impact the natural environment. We have removed the vehicle connections to the neighborhoods and only left the existing pedestrian paths.</p> <p>I have met with several members of that neighborhood. That led to the removal of the suggested road connections and an additional road that was running behind the current post office.</p> <p>We have removed this road and have been collaborating with the schools. I have presented at 3 school board meetings and just yesterday spoke with their counsel. As with all properties the zoning is optional for them to participate.</p>
--	--	--	--	--

			<p>existing road. But there is no room to run another road or pathway where the map shows the extension.</p> <p>Two other pedestrian pathways are shown connecting from Severance Circle to the proposed Staunton extension and to the existing school road. I have seen no explanation of the need or purpose of these pathways, but they would pass through the woodlands. The overall urban forest is my larger concern. Our city would be well served by a comprehensive plan to preserve and enhance this unique area. The rezoning process should embrace this as an explicit goal.</p>	
<b>59</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	<p>The woodlands surrounding Severance are a unique environmental resource which should be understood as vital to our future. Any plan for our community should treat this area as an asset to our community. Many of us choose to live here because the woodlands provide a better quality of life to our neighborhood and to Cleveland Heights in general. These are not just a lot of trees. This is an ecosystem. There is about a mile long corridor stretching east from South Taylor to Millikin School and then north to Mayfield. Including the Millikin</p>	<p>This area will remain undeveloped as a conservation area.</p>

			School and Playground, this area is the headwaters area of a major branch of Dugway Brook and includes vernal pools and other features of a wetlands environment. We should be planning a future to preserve and enhance this environment for our future.	
60	RESIDENT PUBLIC COMMENT	GENERAL	The MPact plan does not create a desirable community where any of us would want to raise a family.	<p>The SOZ is specifically written to <i>raise</i> the quality of life at Severance by requiring:</p> <ul style="list-style-type: none"> <li>• <b>Walkable mixed-use blocks</b> (Intent &amp; Purpose §1149.02; District Map §1149.11).</li> <li>• <b>Significant public realm investments</b> through civic space requirements (10% on-site minimum or contributions to major public parks) (§1149.13F).</li> <li>• <b>Safer, pedestrian-oriented streets</b> with regulated widths, sidewalks, and frontage standards (§1149.12; §1149.45).</li> <li>• <b>A wide mix of housing types</b> including multi-family, senior housing, townhomes, live-work units (§1149.21A).</li> </ul> <p>These are the same design principles used successfully in</p>

				family-oriented redevelopment projects nationally. The SOZ raises design and public-space expectations far above current zoning.
61	RESIDENT PUBLIC COMMENT	GENERAL	The plan does not provide for a spacious, central community park.	<p>The SOZ requires <b>10% civic space on every development site</b>, plus designated civic spaces on the District Standards Map (§1149.13; §1149.11B(5)).</p> <p>Further:</p> <ul style="list-style-type: none"> <li>• <b>A civic space may be re-aligned, enlarged, or shaped</b> to better form a central green (§1149.11B(6)).</li> <li>• At least <b>20% of all civic space must be softscape</b> (§1149.13B(3)).</li> <li>• Sites adjacent to a designated park <b>must contribute directly</b> to improvements of that shared civic space (§1149.13F(2)).</li> <li>• The fees associated also will provide seed dollars for larger public spaces.</li> </ul> <p>The code ensures a large, high-quality central green is achievable—and explicitly allows flexibility to shape it as the community prefers.</p>

62	RESIDENT PUBLIC COMMENT	GENERAL	The plan is overrun with vehicle roads rather than pedestrian walkways and green space.	<p>This is incorrect. The SOZ introduces:</p> <ul style="list-style-type: none"><li>• <b>Five different street types</b> including <i>Pedestrian Paths (P-streets)</i> that do not allow vehicle traffic (§1149.11C(1), §1149.12A).</li><li>• All streets are designed with input from the Transportation committee with high quality safe design. The streets are simply a fraction of the overall site area and are needed to create a connected environment. I encourage you to look at the street designs.</li><li>• <b>Multiple pedestrian mews and walkways</b> required on the regulating plan (e.g., Aria Mews, Juni Path, Liora Mews) (§1149.11C(2)).</li><li>• <b>Transition zones, pedestrian clearways, and furnishing zones</b> that create safe, wider sidewalks (§1149.12B; §1149.45).</li><li>• <b>Stormwater-sensitive streets and landscape areas</b> encouraged (§1149.42G).</li></ul>
----	-------------------------------	---------	---	---

				The street grid eliminates superblocks and makes Severance walkable for the first time.
63	RESIDENT PUBLIC COMMENT	GENERAL	The plan includes many unsightly, environmentally harsh surface parking lots.	<p>The SOZ <i>dramatically restricts</i> surface lots and requires them to be hidden:</p> <ul style="list-style-type: none"> <li>• <b>No parking (open or enclosed) is allowed within 16 feet of the build-to line</b> (§1149.26A(3)(a)).</li> <li>• <b>Street-facing parking structures must be lined with active uses or architectural treatments</b> (§1149.23A(4)(b)(1)).</li> <li>• <b>Shared parking, reduced parking requirements, valet, car-share, off-site parking, and fee-in-lieu tools</b> all reduce the need for surface lots (§1149.26D).</li> <li>• All surface parking must be hidden behind buildings by code.</li> </ul> <p>The outcome is that parking is tucked behind buildings or in structures—not visible from primary streets or civic spaces.</p>



64	RESIDENT PUBLIC COMMENT	GENERAL	The plan allows buildings much taller than those in the Macy's/Target complex in University Heights.	<p>The SOZ height limits are moderate and context-sensitive:</p> <ul style="list-style-type: none"> <li>• <b>SO-1: 5-8 stories max</b>, with <i>mandatory stepbacks</i> after 4-5 stories (§1149.22B(2), §1149.23E). Less than the 9 stories currently on the circle and Taylor</li> <li>• <b>SO-2: 4-6 stories</b>, also with required stepbacks.</li> <li>• <b>SO-3</b> (adjacent to homes): <b>2-story maximum</b>.</li> </ul> <p>Stepbacks of <b>8-12 feet</b> ensure upper floors visually recede (§1149.23E).</p> <p>Heights are carefully calibrated to protect nearby residential neighborhoods while supporting economic revitalization.</p>
65	RESIDENT PUBLIC COMMENT	GENERAL	The plan does not prevent the blight of unprofitable retail spaces such as Coventry Road.	<p>The SOZ avoids retail oversupply by:</p> <ul style="list-style-type: none"> <li>• <b>Capping retail at 175,000 sq ft total</b> for the entire overlay (§1149.21B(3)).</li> <li>• Requiring retail only <b>in limited mapped locations</b>, not everywhere (§1149.11B; §1149.23G).</li> </ul>

				<ul style="list-style-type: none"> <li>Enforcing <b>Frequent Entry</b> and <b>Active Edge</b> requirements to ensure storefront quality and visibility (§1149.23G) without requiring retail everywhere.</li> <li>Allowing many alternative uses—office, medical, arts, housing—so spaces do not sit vacant (§1149.21A).</li> <li>The Retail projections call for approximately 95,000 sf at full buildout and the density caps are simply a cap and not what must be built.</li> </ul> <p>This is the opposite of the overly retail-heavy Coventry-era zoning approach.</p>
66	RESIDENT PUBLIC COMMENT	GENERAL	The plan is a deficient and vision-less form-based plan.	<p>The SOZ is one of the most detailed form-based codes in Ohio:</p> <ul style="list-style-type: none"> <li>It creates <b>three distinct districts</b>, each with tailored height, frontage, and use rules (§1149.21A, §1149.22B).</li> <li>It includes <b>a regulating plan, street type plan, frontage standards, stepback rules, block structure, significant corners, and terminating</b></li> </ul>

				<p><b>vistas</b> (§1149.11B; §1149.12; §1149.23).</p> <ul style="list-style-type: none"> <li>It includes a <b>full design standards manual</b> governing materials, street walls, architectural expression, signage, and more (§1149.4).</li> </ul> <p>It is vision-rich, implementable, and aligned with the City’s adopted Master Plan (§1149.02C).</p>
67	RESIDENT PUBLIC COMMENT	GENERAL	The plan downplays and defers utilities, sewage, and stormwater solutions.	<p>The SOZ requires infrastructure analysis <b>up front</b> at the site plan stage:</p> <ul style="list-style-type: none"> <li>All applications must show utility locations and demonstrate authority to connect (§1149.31B(12)).</li> <li>Stormwater must comply with the existing <b>Chapter 1335 Stormwater Management</b> requirements (§1149.31B(12)).</li> <li>The TAC includes <b>Public Works and the Fire Chief</b>, ensuring infrastructure review before approval (§1149.32).</li> <li>Streets are encouraged to incorporate <b>natural drainage</b></li> </ul>

				<p><b>and green infrastructure</b> (§1149.42G).</p> <ul style="list-style-type: none"> <li>Ultimately the next phase of this will include deeper infrastructure analysis to set fee structures to prepare for the future.</li> </ul> <p>Nothing is deferred—utilities must be resolved before approval of a building and long term larger solutions are being planned for but would not be addressed in zoning.</p>
68	RESIDENT PUBLIC COMMENT	GENERAL	The plan opens direct Severance traffic onto nearby residential streets.	<p>The SOZ does not require opening any new connections to residential streets. What it does require:</p> <ul style="list-style-type: none"> <li>A <b>coherent internal street network</b> to break up superblocks (§1149.11C; §1149.12A).</li> <li>Emergency access and safe circulation <b>within the site</b>, not onto neighborhoods (§1149.12A(3)).</li> <li>Any access changes must be reviewed by <b>TAC, Public Works, and Fire</b> (§1149.32).</li> <li>The original proposed neighborhood connections have been removed and only</li> </ul>

				<p>the existing ped paths remain.</p> <p>No new neighborhood cut-throughs are mandated. Access decisions are case-by-case and subject to City approval.</p>
<b>69</b>	<b>RESIDENT PUBLIC COMMENT</b>	<b>GENERAL</b>	Namdar has been fined \$29M and criminally charged—therefore the plan is bad.	<p>MPact has partnered with Namdar but is leading the development effort. Ultimately partner developers and investors will come in to build the buildings with MPact. Namdar's role is contemplated only to be a contributed land participant. They are not developers. PS we have spent 2 years working with Namdar and the City staff fixing many of the issues. There is still work to do but happy to dive into the details further if so desired.</p>
<b>70</b>	<b>PLANNING COMMISSION</b>	<b>GENERAL</b>	Request for a visual illustrating proposed review process vs. conventional review process	<p>Planning Staff has created a graphic explaining the two processes: <a href="#">SOZ &amp; Conventional Development Plan Review Processes</a></p>
<b>71</b>	<b>PLANNING COMMISSION</b>	<b>GENERAL</b>	Request to link information about the rezoning and public hearing in the Friday news blast	<p>Planning Staff coordinated with the Communication Department to publish this information in the Friday, December 12, 2025 news blast.</p>

72	RESIDENT PUBLIC COMMENT	GENERAL	Desire to have a central park feature	<p>MPact has updated the code to allow the reconfiguration of roads for planning civic and green space.</p> <p>1149.11 (B) Block Identification Table: <i>Civic Spaces designated on the District Standards Map may be re-aligned or adjusted to better coordinate with the street grid, block structure, or site layout, subject to review and approval by the Zoning Administrator. Any such realignment shall maintain the overall intent, accessibility, and minimum dimensional requirements of Section 1149.13</i></p>
73	RESIDENT PUBLIC COMMENT	GENERAL	I know I'm late to the planning. But a street of affordable ranch style homes for buy/rent for age 55 years and up would be great as well somewhere on the spacious lot	Single family is permitted in the <b>SO-3</b> district and it could be 55 and older.

# APPENDIX

## Appendix A:

REFERENCED IN COMMENT NO. 34

CATEGORY	EXISTING DEMAND	EXISTING SALES	SALES LEAKAGE	CAPTURE RATE	DEMAND FROM NEW RESIDENTS	CAPTURE RATE	DEMAND CAPTURE	SALES PER SF	SF
Food and Beverage Retailers	\$110,629,054	\$39,165,000	\$71,464,054	20%	\$4,268,845	40%	\$16,000,349	\$500	32,001
Furniture, Home Furnishings, Electronics, and Appliance Retailers	\$15,040,491	\$69,302,000	\$ (54,261,509)	20%	\$562,993	40%	\$225,197	\$300	751
General Merchandise Retailers	\$9,672,923	\$5,751,000	\$3,921,923	20%	\$370,993	40%	\$932,782	\$300	3,109
Health and Personal Care Retailers	\$15,526,644	\$41,170,000	\$(25,643,356)	20%	\$615,208	40%	\$246,083	\$300	820
Clothing, Clothing Accessories, Shoe, and Jewelry Retailers	\$32,984,398	\$14,313,000	\$18,671,398	20%	\$1,288,805	40%	\$4,249,801	\$300	14,166

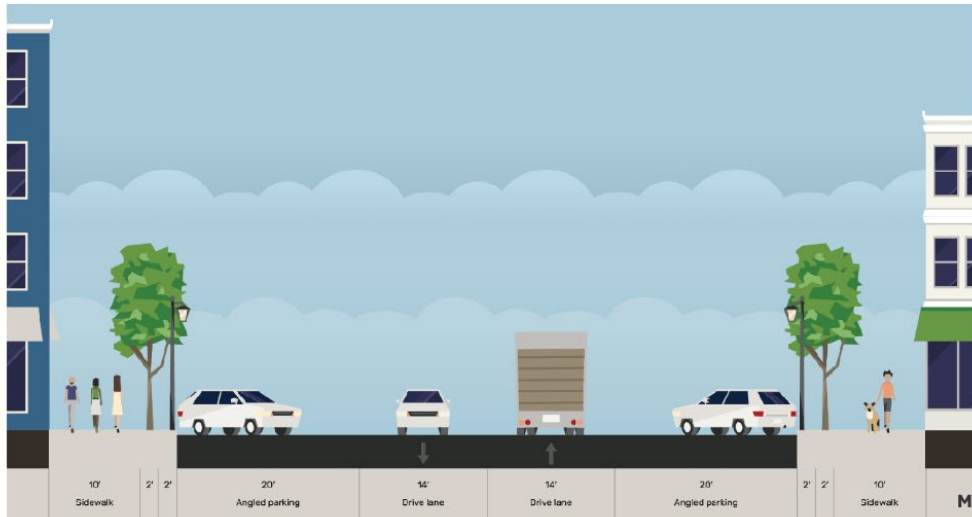
<b>Sporting Goods, Hobby, Musical Instrument, Book, and Miscellaneous Retailers</b>	\$1,785,749	\$14,485,000	\$ (12,699,251)	20%	\$67,363	40%	\$26,945	\$300	90
<b>Arts, entertainment, and recreation</b>	\$62,604,753	\$4,820,000	\$57,784,753	20%	\$2,505,217	40%	\$12,559,037	\$300	41,863
<b>Accommodation and food services</b>	\$63,277,866	\$84,400,000	\$ (21,122,134)	20%	\$2,516,110	40%	\$1,006,444	\$600	1,677
<b>TOTAL: 94,478</b>									



# Appendix B:

## Severance B-1 Design Comparison

MPACT Proposed Design



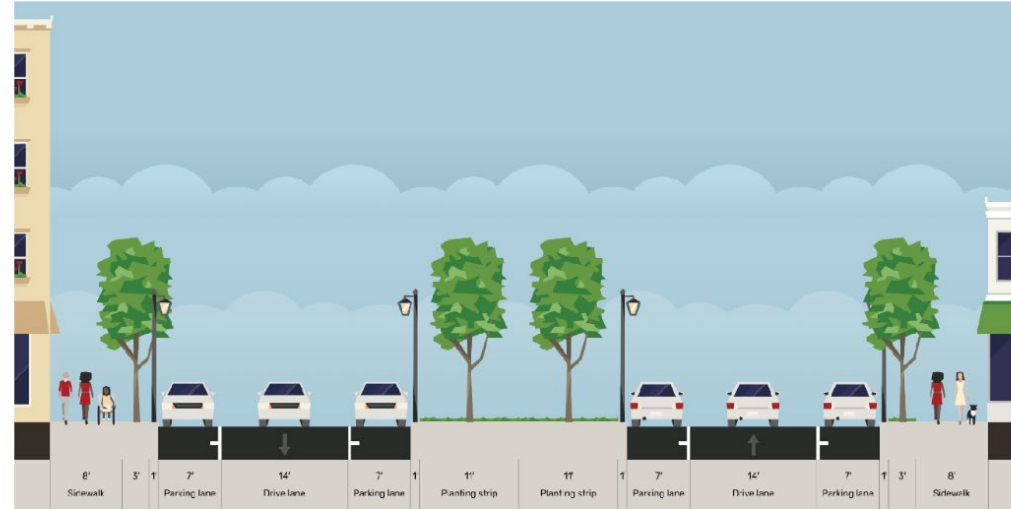
TMC Proposed Design



REFERENCED IN COMMENT NO. 39

## Severance C-4 Design Comparison

MPACT Proposed Design



TMC Proposed Design



# COMMENTS DISCUSSED AT NOVEMBER PLANNING COMMISSION MEETING

NO.	SOURCE	LOCATION	FEEDBACK	RESPONSE
1	PLANNING STAFF	GLOBAL WITHIN CHAPTER 1149	Capitalize <b>Zoning Administrator</b>	MPACT will change
2	CITY LEGAL COUNSEL	PAGE 1 CHAPTER 1149.02	<p>A revision to the following sentence might be considered: <i>"The language of the Severance Overlay Zone and its defined district(s) shall be in alignment with the City of Cleveland Heights' adopted Master Plan"</i>. Use of the word "shall" means mandatory alignment with the Master Plan. Master Plans are meant to be a guide to zoning regulations and not a mandate to be strictly followed.</p> <p>Proposed new sentence: <i>"The language of the Severance Overlay Zone and its defined district(s) may be in alignment with the City of Cleveland Heights' adopted Master Plan."</i></p>	MPACT will change
3	PLANNING STAFF	PAGE 1 CHAPTER 1149.03	E. says <i>"The option to develop under Chapter 1149 is deinfed"</i> - should say "defined" instead	MPACT will change
4	PLANNING STAFF	PAGE 1 CHAPTER 1149.03	<p>The first sentence may be confusing to the reader.</p> <p>Proposed new sentence: <i>"The</i></p>	MPACT will change

			<i>Severance Overlay Zone and the defined district(s) within in it do not replace the underlying zoning rules and regulations that currently exist in Cleveland Heights except where an application to proceed with development under Chapter 1149 is approved by the Planning Commission.</i>	
5	PLANNING STAFF	PAGE 1 CHAPTER 1149.03	Proposed insertion: add at the end of that sentence, "...and the application is approved pursuant to Chapter 1149."	MPACT will change
6	PLANNING STAFF	PAGE 3 CHAPTER 1149.11 B(1)	Format so it is clear that the District Standards Legend is 1149B (1) and the additional statements above the District Standards Map are 1149B(2), 1149B(3), and 1149B(4)	MPACT will change
7	PLANNING STAFF	PAGE 3 CHAPTER 1149.11 B DISTRICT STANDARDS MAP	<p>Format to make the District Standards Map more readable by having the Map and the Legend symbols and colors match:</p> <p>The colors for the <b>Severance Overlay Zone Boundary</b> and <b>Retail or Office Required</b></p> <p>The size of the dashes for <b>Pedestrian Path Required</b></p> <p>The color and symbology for <b>Protected Area</b></p>	MPACT will change

			<p>The shades of purple for <b>SO-1</b> and <b>SO-2</b> are very close and could become an accessibility issue if printed in black and white; change the colors</p> <p>The shades of purple for <b>SO-1</b> and <b>SO-2</b> are very close and could become an accessibility issue if printed in black and white</p>	
8	PLANNING STAFF	PAGE 4 CHAPTER 1149.11 C (2) STREET TYPES MAP	Change the roadway types for the Staunton Road Extension and connector to Crest Road to a <b>P Street (Pedestrian Path)</b> ; rename roadways accordingly	MPACT will change
9	PLANNING STAFF	PAGE 7 CHAPTER 1149.12 B	In the Public and Private Frontage Standards table, Street Types, Add a statement making it clear that the <b>Street Type A</b> standards applies to all <b>A</b> streets, <b>A1, A2, A3</b> and <b>A4</b> ; and that the <b>Street Type C</b> standards applies to all <b>C</b> streets <b>C1, C2, C3</b> and <b>C4</b> ; and that <b>Street Type D</b> standards applies to all <b>D</b> streets <b>D1, D2 D3</b> and <b>D4</b> ” and that the <b>Street Type P</b> standards apply to all <b>P</b> streets <b>P1, P2</b> , and <b>P3</b> .	MPACT will change
10	PLANNING STAFF	PAGE 11 CHAPTER 1149.21 A TABLE OF	<p>Under <b>Office</b> change <b>Research and Development</b> from a <b>P (Permitted Use)</b> to <b>CU (Conditionally Permitted Use)</b> in the <b>SO-1/SO-2</b> districts</p> <p>Under <b>Residential</b> add Single-</p>	MPACT will change and for the single family allowability in <b>SO-3</b> we will utilize the B-2 existing single family zoning.

		<b>PERMITTED USES</b>	<p>family/detached and Two Family in <b>SO-3</b> as <b>CU (Conditionally Permitted)</b> (MPACT to develop standards before next Planning Commission Meeting)</p> <p>Under <b>Residential</b> add Community Room as <b>A (Accessory Use)</b> in <b>SO-1/SO-2</b> and <b>SO-3</b></p> <p>Under <b>Arts &amp; Culture</b> change <b>Museum</b> and <b>Art Gallery</b> from a <b>P (Permitted Use)</b> to <b>CU (Conditionally Permitted Use)</b></p> <p>Under <b>Institutional</b> change <b>Religious/Charity</b> from <b>X (Not Allowed)</b> to <b>CU (Conditionally Permitted)</b> in the <b>SO-3</b> District; change it from <b>CU</b> to <b>P</b> in the <b>SO-1</b> and <b>SO-2</b> Districts to be consistent with other Institutional Uses</p> <p>Under <b>Light Industrial</b> remove <b>Data Information Center</b> (not to be allowed in any of the districts)</p>	
<b>11</b>	<b>PLANNING COMMISSION</b>	<b>PAGE 11 CHAPTER 1149.21 A TABLE OF PERMITTED USES</b>	<p>There is already a church located in the <b>SO-3</b> district, so religious/charity institutional uses should be conditionally permitted in the <b>SO-3</b> district.</p>	MPACT will change

12	PLANNING STAFF	PAGE 12, 14 CHAPTER 1149.21 B	<p>It is not immediately clear that this table is referring to affordable housing requirements until page 14. A statement referring to 1149.22 should be added.</p> <p>The program thresholds section states that residential development is governed by cumulative unit thresholds. The threshold numbers should be updated to be cumulative.</p>	MPACT will change
13	PLANNING COMMISSION	PAGE 11 CHAPTER 1149.21 A TABLE OF PERMITTED USES	Single-family residences should be permitted in the <b>SO-3</b> district.	MPACT will change
14	PLANNING STAFF	PAGE 20 CHAPTER 1149.26 A (3) (b) DISTRICT PARKING STANDARDS & PLACEMENT	<p><i>"On-Street parking spaces along the frontage of a lot, shall count towards satisfying total parking demand for a site."</i></p> <p>Add <i>"for non-residential uses"</i> to this sentence.</p>	MPACT will change
15	PLANNING STAFF	PAGE 22 CHAPTER 1149.26 D(4)	<i>"The following parking space reductions from the total requirements may be granted by the Planning Commission (not Zoning Administrator)...."</i>	MPACT will change

16	<b>PLANNING COMMISSION</b>	<b>PAGE 24 CHAPTER 1149.26 D (4)</b>	<p>Add B.(12) <i>"Encroachments into the Public Right-of Way. If a site plan includes any amenity, structure, use, feature or similar such items that would encroach into the public right-of-way, a license agreement between the property owner and the City of Cleveland Heights in a form provided by the City shall be included in the site plan application. Such license agreement shall be required to be executed by the parties upon the site plan receiving final approval."</i></p> <p>Revise C to read: <i>"The Zoning Administrator may waive certain submission requirements that are not applicable to the proposed development."</i></p>	MPACT will change
17	<b>PLANNING STAFF</b>	<b>PAGE 24 CHAPTER 1149.32 PRELIMINARY APPLICATION PROCESS</b>	<p>Add the definition of <b>TAC</b> should to Section 1103.03(b) [Exhibit A]</p> <p>Add composition of the <b>TAC</b>:</p> <p><i>"The TAC will consist of: the Zoning Administrator, the Public Works Director, the Fire Chief, the Police Chief, the Chair of the Planning Commission, Council Planning and Development Committee Chair, and the Chair of the Architectural Board of Review. TAC members may elect to send a representative in their place."</i></p>	MPACT will change

18	PLANNING STAFF	PAGE 25 CHAPTER 1149.33	<p>Section C states that the ABR provides written comments and recommendations to the Planning Commission. The Planning Commission should be allowed to impose design review conditions based on comments from the ABR.</p> <p>Add this power for the Planning Commission in Section 1111.06(b)(12).</p>	MPACT will change to the planning commission can carry forward ABR design suggestions but cannot deny plans that adhere to the as of right code.
19	PLANNING STAFF	PAGE 25 CHAPTER 1149.33	<p>Section D states that the Planning Commission shall render a decision to approve, approve with procedural conditions, or deny the Site Plan with forty-five days.</p> <p>Revise D to read <i>"Planning Commission Decision. The Planning Commission shall render a decision to approve, approve with conditions, or deny the Site Plan within sixty (60) days of the later of:..."</i></p>	MPACT will change
20	PLANNING STAFF	PAGE 26 CHAPTER 1149.35	Chapter amendments should follow the established Zoning Code Amendment process, Chapter 1119.	MPACT will change
21	PLANNING STAFF	PAGE 29 CHAPTER 1149.43 A STREET A-1	There should be a dimension on the bike lane (BL) in the graphic. The standards call out a dimension for <b>PB</b> . The graphic and the dimensions should be consistent.	MPACT will change



22	PLANNING STAFF	PAGE 37-49 CHAPTER 1149.43 A - 1149.43M STREET A-2	Recommend Drive Lane (DL) should have maximum width of 10 feet.  <i>(diagram is Appendix B)</i>	MPACT will change
23	PLANNING STAFF	PAGE 51 CHAPTER 1149.45 B PEDESTRIAN CLEARWAY DESIGN STANDARDS	Remove Note (3) stating "Pavement materials shall be approved by the Architectural Board of Review."	MPACT will change
24	PLANNING STAFF	PAGE 66 CHAPTER 1149.48 I EDGING ELEMENT DESIGN STANDARDS	Correct numbering: Landscape Edge should be EE-5.88	MPACT will change