

THE CITY OF SAN DIEGO

REPORT TO THE PLANNING COMMISSION

DATE ISSUED:

March 28, 2008

REPORT NO. PC-08-029

ATTENTION:

Planning Commission

Agenda of April 3, 2008

SUBJECT:

Process 5 - Amendment to the Mid-City Communities Planned

District Ordinance (MCCPDO) for an Interim Height Limitation in

the Uptown Community

REFERENCE:

Planning Commission hearing of March 6, 2008; Report No. PC-08-029

SUMMARY

<u>Issue</u> – Should the Planning Commission RECOMMEND for adoption by the City Council, an amendment to Chapter 15, Article 12, Division 2 of the San Diego Municipal Code, relating to the Mid-City Communities Planned District Ordinance?

Staff Recommendation:

RECOMMEND the proposed amendment for adoption by the City Council.

Community Planning Group Recommendation – At the regularly scheduled and noticed planning committee meeting of November 6, 2007, Uptown Planners voted 11-3-1 to support the proposed amendment with conditions.

Environmental Impact – The proposed amendment is exempt from CEQA pursuant to Sections 15061(b)(3) and 15308 of the State CEQA Guidelines.

Fiscal Impact - None.

Housing Impact Statement – The request to amend the MCCPDO would not result in a loss of existing for-sale or affordable housing, the creation of additional units beyond what is currently allowed under existing regulations, or preclude the ability of meeting the minimum residential densities recommended in the Uptown Community Plan. The proposed amendment would result in multi-family development with smaller units and with multiple dwelling units per floor compared to existing developments that have built



to the maximum building height allowed by the current zoning. The proposed amendment would still allow the maximum density of the base zone to be reasonably achieved and therefore would not preclude the use of affordable housing density bonus regulations.

BACKGROUND

On October 14, 2006, the City Planning & Community Investment Department, Uptown Planners, Council Districts 2 and 3 sponsored an Uptown Community Plan Issues Workshop to hear issues from the community, developers, and residents regarding the impacts of new development, updating the Uptown Community Plan, historic preservation, density and building height, preserving community character, concerns over traffic and mobility, and the need for more public facilities. Of the issues that were discussed, the desire to update the community plan and establish an "interim height ordinance" were consistently raised as measures for the community to seek relief from high-rise development in the core of Hillcrest that they considered out of scale with the existing character of the surrounding neighborhood and responsible for the exacerbating deficiencies in public facilities. The community had expressed that the current community plan, which was adopted in 1988, and the associated zoning neither reflected the current sentiment of the community nor contributed to enhancing the quality of life of the Uptown community.

As a follow-up to the Uptown Community Plan Issues Workshop, City Planning & Community Investment Department staff announced at the June 5, 2007 Uptown Planners meeting that an update to the Uptown Community Plan would commence in spring 2008 and that an amendment to the Mid-City Communities Planned District Ordinance (MCCPDO) to impose an interim height restriction would be pursued during the plan update process. It was also communicated to the community that while most of the development that the community had been concerned with were projects that would undergo a discretionary review process under current regulations, the proposed amendment would ensure that all large-scale projects in the core area would undergo discretionary review. In addition, the community was informed that such an ordinance would not reduce allowable housing capacity, include a sunset provision, and that the State Density Bonus regulations would still apply.

An initial draft of the proposed amendment to the MCCPDO was introduced and discussed as an informational item at two public meetings of the Uptown Planners on September 4, 2007 and October 2, 2007. City staff's initial draft took into consideration the areas recommended by the community. These areas were located along portions of Washington Street between Ibis and Dove Streets in the Mission Hills neighborhood and properties primarily along portions along Robinson Avenue between 4th and 7th Avenues, University Avenue between Front Street and Park Boulevard, Washington Street between Dove Street and 5th Avenue, 5th Avenue between Washington and Kalmia Streets, and 6th Avenue between Walnut Avenue and Laurel Street, and 6th Avenue between University and Pennsylvania Avenues within the Park West/Bankers Hill neighborhood of the Uptown Community. Properties within these areas are zoned CN-1, (Commercial Node), CN-1A, CN-2A, CV-1 (Commercial Village), and MR-400 (Multi-Family Residential. These zones allow maximum building heights of 100 and 150 in the CN-1A, CV-1,

and MR-400 zones, and 200 feet in the CN-2A zone. The CN-1 zone does not have an associated maximum building height (See Attachment 1).

Additionally, a portion of 4th Avenue between Upas and Maple Streets was also included within the amendment area. This portion is currently zoned NP-1 (Neighborhood Professional). Although the existing zoning for this portion allows a maximum building height of 50 feet and 60 feet where a building is above enclosed parking, it was included at the request of the community in order to account for potential rezone requests by potential applicants to develop at higher development intensities attributed to adjacent properties.

The initial draft established a Process 4 discretionary approval process and additional findings of approval for projects with structures greater than 50 feet in height primarily in the Mission Hills neighborhood and 65 feet in height in the Hillcrest and Bankers Hill/Park West neighborhoods. In response to the initial draft, residents and members of the community expressed that creating an overall discretionary process would still allow multiple-story buildings that were significantly out of scale with the surrounding neighborhood based on the existing regulations and adopted policies. Residents also expressed that the sunset provision could upset the plan update process if 30 months had gone by and the adoption of the plan update was delayed.

On September 27, 2007, staff met with representatives of the community and advocates for the interim height ordinance to discuss bifurcating the overall height limitation area within the community. This new proposal would establish a Process 4 discretionary review for projects greater than 65 feet south of Upas Street and restrict buildings over 50 and 65 feet north of Upas Street in specified areas. Staff considered this request and revised the ordinance to designate Brookes Avenue instead of Upas Street as the dividing line between the two interim height areas. Brookes Avenue was chosen out of fairness to projects applicants with development proposals south of Brookes Avenue that staff was aware of. Also included in this draft was an extension of up to two 180-day extensions to the provisions of the interim height ordinance through a majority vote of the City Council in case the Uptown Community Plan update could not be adopted prior to the expiration of 30 months. This proposal was presented to the Uptown Planners on November 6, 2007, and was supported by a vote of 11-3-1 with conditions (See Attachment 2).

On March 6, 2008, the proposed amendment was presented to the Planning Commission for consideration and was continued by a vote 4-0-0 so that staff could return with additional analysis that would address several issues. These issues are addressed in the discussion section of the staff report and include:

- The purpose of the interim height ordinance
- The advantages and disadvantages of allowing exceptions within the strict height limitation area
- What the timeline and appropriate duration of the ordinance should be
- The advantages and disadvantages of selecting Upas Street over Brookes Avenue as the boundary between the strict height limitation areas and discretionary review areas
- The rationale for having two distinct height limitation areas

- Considering whether "height" or "stories" should be the appropriate measure within the ordinance
- The economic impact of the proposed ordinance, and
- The justification as to why the proposed ordinance is exempt from CEQA. These issues are addressed in the discussion section of the staff report.

On March 12, 2008, CPCI presented the proposed amendment to the Land Use and Housing Committee to solicit input and direction on whether an alternative ordinance should be presented to the Planning Commission. Upon consideration, the Land Use and Housing Committee voted 3-0-0 to recommend that the City Council adopt the proposed amendment to the MCCPDO and that the ordinance include exceptions to the strict height limitation for sustainable development measures, elevator overrides, enclosed stairways, and other non-habitable spaces, and move the boundary that delineates the proposed strict height limitation areas and the discretionary review areas from Brookes Avenue to Upas Street.

DISCUSSION

The proposed amendment to the MCCPDO would amend Chapter 15, Article 12, Division 2 of the San Diego Municipal Code, relating to the Mid-City Communities Planned District Ordinance. In summary the, amendment would do the following (See Attachment 3):

- 1. Require a Mid-City Communities Development Permit in accordance with Process 4 for any structure south of the centerline of Brookes Avenue which exceeds a building height of 65 feet in Area 'B' as shown on Figure 1512-03A, as depicted on Map C-928.
- 2. Projects exceeding 65 feet in Area 'B' would require the decision maker to approve or conditionally approve a Mid-City Communities Permit if the decision maker finds that the proposed building height is appropriate because of the location of the site, existing neighborhood characteristics and project design including massing, stepbacks, façade compositions and modulations, material and fenestration patterns when considered together, would ensure the project's compatibility with the existing and intended character of Uptown, in addition to the general findings for Site Development Permits.
- 3. Restrict maximum buildings heights to 50 and 65 feet in Area 'A' north of the centerline of Brookes Avenue, as shown on figure 1512-03A, as depicted on Map C-928.
- 4. Maintain this provisions in the proposed amendment for 30 months or until the Uptown Community Plan is updated whichever occurs first.
- 5. Allow the City Council through a majority vote to extend these provisions for up to two 180-day periods in accordance with Process 5, should the 30-month limitation expire prior to the adoption of the Uptown Community Plan Update.
- 6. Provide an exception to the provisions of the proposed amendment for projects *deemed* complete prior to the adoption of this ordinance.

Community Plan Analysis

The Uptown Community Plan designates the areas within the proposed height limitation area for Mixed-Use development at 44 to 110 dwelling units per acre, Commercial-Residential development at 44 to 110 dwelling units per acre, Very High Residential development at 73 to 110 dwelling units per acre and Office Residential development 44 to 73 dwelling units per acre (See Attachment 4).

The proposed amendment to the MCCPDO would not result in the amendment, modification, or change to the City of San Diego Progress Guide and General Plan or the Uptown Community Plan. In addition, the proposed amendment would not change planned residential densities or rezone any property within the Uptown community. The amendment's incorporation of a Process 4 approval process and strict height limit where they are applied, would ensure discretionary review which would meet several objectives of the community plan for preserving the diverse and unique character of each neighborhood in the Uptown community, ensuring that development is compatible in character and scale, preserving and enhancing the pedestrian scale and orientation within the Hillcrest neighborhood, and limiting the intensity of development in areas subject to airport noise and where structures may obstruct flight operations.

Density Analysis

Staff conducted a general density analysis in order to determine whether the maximum density of the base zones affected by the proposed height limitations, could reasonably be achieved. For this analysis staff contemplated potential mixed-use developments which considered typical lot sizes within the areas affected by the ordinance, current zoning and parking regulations in the municipal code, and factored in general assumptions for building efficiency ratio, and square footage needed for internal plumbing, elevator shafts, and other internal equipment.

In regards to potential floor-to-ceiling heights, staff considered 15 feet for ground floor commercial-retail, 10 feet for each residential floor, and 5 feet to account for rooftop equipment screening. In areas where the proposed ordinance applied a 50-foot height limit, staff calculated 3 floors of residential use and in areas and where the ordinance applied a 65-foot height limit, 4 floors of residential were calculated.

Based on the density analysis staff conducted, the maximum density allowed by the zone could be met or exceeded. In one scenario, staff considered a 20,000 square foot site (200'x100') along Washington Street within the CN-2A zone where the proposed ordinance would establish a strict 50-foot height limit. Based on the zone's maximum density of 1 unit per 800 square feet, the maximum number of dwelling units on site would be 25 dwelling units. Assuming total site coverage of 20,000 square feet, an assumption of 3,200 square feet for elevator shafts, stairs, plumbing, and internal equipment, and a building efficiency ratio of 75 to 85 percent for total for-sale or leasable residential area, approximately 12,600 to 14,280 square feet would remain for the total area attributed to dwelling units per floor. Based on staff's consideration that each dwelling unit could be at least 1,000 square feet, approximately 12 to 14 dwelling units could be available on each building floor. Given 3 floors of residential under this scenario, 36 to 42 dwelling units could be available on site.

Staff also considered another scenario involving a 40,500 square foot site (300'x135') along 4th Avenue within the CN-1A zone where the proposed ordinance would establish a strict 65-foot height limit. Based on the zone's maximum density of 1 unit per 400 square feet, the maximum number of dwelling units allowed on site would be 101 dwelling units. Again, considering the same assumptions as in the previous example, approximately 27,975 to 29,840 square feet would remain for the potential area dedicated to dwelling units per floor. Utilizing the same consideration of 1,000 square foot units, approximately 28 to 31 units could be available for each building floor. Given the possibility of having 4 residential floors under the 65-foot height limit scenario, 112 to 124 dwelling units could be available on site.

Since off-street parking requirements are a significant factor in the feasibility of development projects, staff took into account the number of bedrooms per unit, minimum area for commercial-retail space, plumbing and internal equipment, required dimensions for parking spaces and drive aisles, and concluded that at least one floor of underground parking would be necessary in addition to ground-level or multi-level, above-ground parking. Additionally, given the results of staff's density analysis, it could be possible for project applicants to include affordable housing within their project and request incentives provided through the density bonus regulations to address any off-street parking deficiencies.

Potential Modifications

During staff's drafting of the proposed amendment, several issues have been raised by the community as well as developers and architects regarding considering flexibility towards the proposed strict height limitation north of Brookes Avenue, as well as the designating Upas Street instead of Brookes Avenue, as the boundary street that would delineate areas where the strict height limit and discretionary process would be applied. Although these issues are not formally part of staff's amendment to the Mid-City Communities Planned District Ordinance, staff requests that the Planning Commission consider the following potential modifications and any others not currently identified in the amendment proposal:

1. Height Exceptions and Flexibility

Incorporating height exceptions in areas where the strict height limitation would be applied could address instances where building constraints would force functional stairway, elevator access, and elevator overrides beyond the roofline as well as accommodate the installation of sustainable development measures such as green roofs or photovoltaic technology. Exceptions could also be considered for the provision of public and/or on-site amenities that lend to active use of roofs, the provision of useable public park space and the preservation of potential historic resources. Public support of a project, especially one that poses clear benefits to the community could also constitute a mechanism for exceeding the proposed strict height limitations of the proposed amendment. On March 12, 2008, the Land Use and Housing Committee recommended that height exceptions be included in the proposed ordinance. A draft of what these exceptions could allow is included as Attachment 5. This draft language allows a 15 foot height allowance for stairways, mechanical equipment screening, decks, sustainable

development features, and enclosed communal space. The draft also provides that such allowances not exceed 20 percent of the total roof area. Although staff considers the draft language specific and definitive, members of the community have expressed that such allowances should be considered only through a discretionary process.

2. Delineation of the proposed strict height limit and discretionary review areas

The centerline of Brookes Avenue is currently proposed as the boundary street that would differentiate the strict height limit and discretionary review areas of the proposed amendment. It has been expressed by the community that the boundary should be at Upas Street since it is the boundary street between the Hillcrest and Bankers-Hill/Park West neighborhoods as depicted by the Uptown Community Plan. Staff had designated Brookes Avenue as the boundary out of fairness to the project applicants who had development proposals south of Brookes Avenue that staff was aware of. Since the selection of Brookes Avenue as the boundary street, one of the two proposed projects between Brookes Avenue and Upas Street has already undergone ministerial review for building permits. The remaining project proposal, which had submitted a development proposal for preliminary review in May 2007, has not since returned with a new proposal or redesign (See Attachment 6).

Additional Analysis Requested by the Planning Commission

On March 6, 2008, the Planning Commission continued the proposed amendment to the MCCPDO and requested that staff address the following issues:

1. Establish the purpose for interim height ordinance.

Given the recent development activity with the Mission Hills, Hillcrest, and Bankers Hill/Park West neighborhoods and the upcoming update to the Uptown Community Plan, the proposed interim height ordinance would ensure that high-rise developments would not circumvent the debate on height, neighborhood scale, and character during the update process. Within the proposed strict height limitation areas proposed by the amendment, particularly in the Mission Hills neighborhood, the ordinance would allow development that would compliment the existing heights of lower-scale buildings. The selection of a strict height limitation of 50 feet would complement adjacent zones that allow maximum buildings heights from 30 to 40 feet and up to 50 feet where portions of buildings would be above enclosed parking. Similarly, the same situation exists in the core of Hillcrest where a 65-foot strict height limit would complement adjacent zones that allow a maximum building height of 50 feet and up to 60 feet where a building is above enclosed parking.

Within the discretionary review areas proposed by the amendment, which are primarily located in the Bankers Hill/Park West neighborhood, the ordinance would allow the opportunity for potential high-rise developments to be reviewed within the context of a neighborhood that has both high-rise buildings interspersed with lower scale development. Also, with current regulations that allow for ministerial processing of high-rise development and project applicants continuing to submit development applications,

this process would ensure that both the project applicants and the community could have an opportunity to engage in a dialogue regarding new high-rise development within an already built-out community.

2. Advantages and disadvantages of including height exceptions within the strict height limitation area proposed in the ordinance.

With the proposed reduction in building height, project applicants would be interested in maximizing building square footage for residential uses and therefore, would be relegating accessory features to the roof. The inclusion of height exceptions within the proposed ordinance would serve to provide a limited level of flexibility in cases where accessory features such as rooftop equipment would need to exceed the height limits set forth in the proposed. Exceptions to the strict building height limit could also allow for enclosed stairways and elevator overrides in order to provide access to the roof and promote roofs as an open space amenity for residents. Height exceptions could further allow the use of rooftops for non-habitable, communal gathering spaces which could provide additional on-site amenities for residents. Additionally, with the City's promotion of sustainable development policies, exceptions could allow the provision of sustainable development features as defined by such as green roofs and photo-voltaic devices.

The Land Development Code (LDC) currently does not have regulations that allow exceptions to building height. Typically, any request to exceed the maximum building height of a particular base zone would be sought through the application of a variance or deviation associated with a development proposal. A possible disadvantage of incorporating height exceptions within the ordinance could be the use of existing height exceptions to justify even greater height exceptions for newer development. However, this could be countered by the establishment of a defined height allowance, specific criteria, and or specific accessory uses.

3. Advantages and disadvantages to moving the boundary between the strict height limitation areas and the discretionary review areas from Brookes Avenue to Upas Street.

The advantage to moving the boundary from Brookes Avenue to Upas Street would be to bring the height limitation areas consistent with neighborhood boundaries as identified in the Uptown Community Plan, and allow clear understanding as to which neighborhoods in the Uptown Community would be subject to a strict height limitation and which ones would be subject to a discretionary review process. The disadvantage would be that project applicants and property owners interested in constructing high-rise developments north of Upas Street and south of Brookes and not in any other areas, would be restricted to a maximum building height of 65 feet and would not receive the opportunity of building significantly higher structures through a discretionary review process.

4. Timeline of the proposed ordinance and appropriate duration.

Should the proposed ordinance be approved by City Council, the ordinance would go into effect 30 days after its second reading. The second reading would occur at City Council after a minimum of 12 days after the initial City Council hearing according to the City

Charter. The ordinance would be in effect for 30 months or until the update to the Uptown Community Plan is adopted, whichever occurs first. Should the plan update not be adopted after 30 months after the ordinance goes into effect, the City Council may extend the duration of the ordinance for up to two 180-day extensions. Based on this limit, the proposed amendment would not exceed 3 years and 6 months. This timeframe for the ultimate duration of the proposed ordinance would be appropriate since the update to the Uptown Community Plan is scheduled to take 2 and a half years to complete. The extra year afforded by the City Council's ability to extend the ordinance would allow for any unanticipated delays in the plan update process.

5. Rationale for having two distinct limitation areas.

The two distinct height limitation areas reflect a compromise between City staffs' initial proposal to establish an overall discretionary process for the entire subject area and the community's desire to have an overall strict height limitation. The strict height limitation was relegated north of Brookes Avenue within the Mission Hills and Hillcrest neighborhoods since the existing development within this portion of the Uptown community was predominantly low-scale and where proposed high-rise developments would have the potential to conflict with the existing scale and character of existing development. In contrast, the area south of Brookes Avenue already had existing high-rise developments that were part of a growing characteristic of the Bankers Hill/Park West neighborhood. Therefore, a discretionary process would be more appropriate in this area, so that potential high-rise projects could be reviewed in the context of a neighborhood with varied scales of development.

6. The consideration of utilizing "height" or "stories."

Although the utilization of building stories allows flexibility to how tall building can appear or how interior building spaces can be designed, height is more definitive for use in an ordinance. The use of building stories can also be ambiguous since the actual floor to ceiling distance of a building story typically could range in height. Currently, there is no utilization of building stories in the Land Development Code to measure how tall a building can be or appear. The current Land Development Code utilizes height as opposed to building stories in determining how tall a particular building can be for a particular zone. The use of the building stories would be more appropriately used within a community plan where the end result of a desired building form is a plan objective or design recommendation.

7. Economic analysis on the impact of the proposed ordinance.

In order to determine the practical, economic impacts of the proposed ordinance on future development, a thorough economic analysis would need to be conducted on a case-by-case basis taking into consideration existing conditions. At this time staff does not have the necessary resources to conduct such a study. However, given the provisions of the proposed ordinance, high-rise developments with 1 to 2 units per floor that capitalize on views could continue to proceed in the discretionary review areas within the Bankers Hill/Park West neighborhood as the market dictates. Currently, existing regulations do allow high-rise projects to be processed under ministerial review. With the application of a Process 4 discretionary review for projects exceeding a maximum building height of 65

feet, additional staff time and processing fees could be incurred for projects that would have been able to be processed through ministerial review under the current regulations.

Within the strict height limitation areas of the proposed ordinance, it can be reasonably assumed that housing units would be smaller, with multiple units per floor in order for project applicants to maximize the density on site. Contrary to large, high-rise units where views are charged at a premium, smaller units could be more affordable and attractive to a larger spectrum of potential residents. Also, based on staffs' density analysis, the proposed ordinance would not reduce the maximum residential densities allowed by the zones affected by this ordinance, and therefore would not preclude project applicants and property owners from building to those densities. Additionally, under a reduced height limit, expensive building frame-type construction costs would be deferred by project applicants, since it would not be necessary to require expensive steel frame construction that is characteristic of high-rise development. With the upcoming plan update, a more comprehensive economic analysis would be conducted on the potential design conditions that are produced during the update process.

8. Justify the conclusion that the proposed action is exempt under CEQA.

CEQA is triggered when a discretionary project may result in physical impacts on the environment. The Environmental Analysis Section (EAS) of the Development Services Department reviews each project to determine whether or not implementation of the project could potentially result in a significant environmental impact. If it is determined that no significant impacts would result, then a CEQA exemption may be prepared.

In this case no direct impacts would result from the proposed amendment to the PDO because it is an implementing ordinance and not a specific development project. However, CEQA does require that reasonably foreseeable impacts be evaluated.

The project is an amendment to the Mid-City Communities Planned District Ordinance; and the amendment would implement a temporary interim height limit. Currently, the areas to be affected by the amendment have height limits that range from 50 feet to 200 feet or have no height limit. The amendment would limit heights to 50 or 65 feet depending upon the area of implementation.

While staff has determined that the proposed height limits would not result in a loss of units or a decrease in plan or zone density, due to the constraints of the height limitation, it is feasible that the design of future projects could result in buildings with a reduced density or smaller units with fewer bedrooms. Since required parking is calculated based on the number of bedrooms, it is likely that the amendment could result in a decrease in Transportation and Air Quality impacts related to the number of cars associated with new buildings. It is also anticipated that a reduction in impacts to Visual Effects and Neighborhood Character could result with the proposed height limitation as the resulting projects would likely be in keeping with the bulk and scale of the existing physical form of the community.

New projects allowed under the proposed height limit would be reduced in scale and would be subject to the regulations of the PDO and the LDC regarding setbacks and floor area ratio, etc. Numerous factors enter into the decisions related to the eventual size of buildings proposed. Therefore, EAS considers it speculative to conclude that any significant increased impacts would result from the implementation of this amendment.

EAS has determined that two CEQA exemptions would apply to this project:

CEQA Section 15061(b)(3): This exemption is called the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

CEQA Section 15308: This exemption is used for actions taken by regulatory agencies to protect the environment where the regulatory process involves procedures for protection of the environment. In this case, it is anticipated that potential impacts related to visual quality, as well as transportation and air quality would be reduced.

CONCLUSION

As discussed previously, City Staff will begin updating the Uptown Community Plan and MCCPDO in the coming months to address land use policies and regulations such as those related to transportation and land use connections, historic preservation, urban design, etc. The proposed amendment would address the community's concerns over the compatibility of new development and ensure that during the community plan update process new development would not adversely affect the community's efforts in the creation of design objectives and the reevaluation of the overall vision of the community.

ALTERNATIVES

- 1. Recommend that the City Council **adopt** the proposed amendment to the Mid-City Communities Planned District Ordinance with modifications.
- 2. Recommend that the City Council **deny** the proposed amendment to the Mid-City Communities Planned District Ordinance.

Respectfully submitted,

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- Attachments: 1. Existing Zoning Map
 - 2. Uptown Planners meeting minutes of November 6, 2007
 - 3. Draft Amendment to the Mid-City Communities Planned District Ordinance
 - 4. Uptown Community Plan Map5. Draft height exception language

 - 6. Hillcrest Development North of Upas Street and South of Brookes Avenue