

Attachment A

ADDITIONAL CHANGES TO ZONING CODE UPDATE

A=Addressed
N=No change

DESCRIPTION	COMMENT	CONSULTANT RESPONSE	ADDITIONAL COMMENT	STAFF RESPONSE	STATUS
Ground area coverage vs lot coverage	Ground Area Coverage maximums of 60% are being introduced for the multifamily apartment zoning districts (MF2 and MF4). Our opinion is that this will prohibit an efficient parking garage layout for the typical Coral Gables development site. Setback and open space requirements, on their own, should be sufficient to achieve the goal of an appropriately scaled building at the ground level. Elimination of the ground area coverage requirement or, alternatively, confirmation that the Mediterranean Design Bonus exemption for "lot coverage" applies to the "ground coverage" requirement.	This is a matter that could influence the overall vision for the future redevelopment and ultimate buildout in the North Ponce Neighborhood. The Mediterranean Design Bonus exemption for "lot coverage" does apply to the "ground coverage" requirement (please note that the transfer of the old Mediterranean has many conflicts, which will be incorporated at a later date). Our studies show that parking is not the limiting factor, except in RIR because it provides an increase in density. Please produce design examples for your recommendations.		To be incorporated: Clarify in Mediterranean Bonus that "lot coverage" and "ground coverage" are the same.	A
Landscaped Open Space	The open space requirements for the multifamily apartment zoning districts (MF2 and MF4) are being increased from 25% to 30%. The existing 25% open space requirement has been very challenging to satisfy on the typical development site especially in light of requirement that all open space be provided at ground level. Recommendation: A 20% open space requirement at ground level and a 5% open space requirement for elevated spaces with properly designed paved surfaces at counting towards the ground level open space requirement.	25% open space can be allocated within the current setbacks. The additional 5% amounts to an extra 400 square feet (two parking spaces) in a 20,000sf site in MF2. This is part of the suggested response to the Commission request for additional open space. Please produce design examples for your recommendations	Status: Please see the proposed Code text attached as Exhibit A.	Reduced the required ground floor landscaped open space requirement. The City Commission may discuss and give direction as needed.	A
MF4 front setback	The proposed MF4 district requires a 20-foot front setback and 10-foot stepbacks are required in both the MF2 and MF4 districts. We feel that these requirements are too rigid and excessive to be successfully applied to the typical Coral Gables development site. Recommendation: A 10-foot setback would be appropriate for the MF4 district. Stepbacks should be tied to setbacks with the project architect and Board of Architects having discretion over the appropriate balance between the two dimensions.	This statement is incorrect, only MF4 has a 20-foot front setback, which is consistent with the regulations of former MFSA, which was the predominant zoning district for the Biltmore Way area. However, some of the lots along Biltmore Way were formerly designated as MF2, and for those lots, see excerpts listed under item #6. Most existing lots (now assigned as MF4) on Biltmore Way and Coral Way have a 20ft front setback, and we advise conforming to the prevailing setback.	Status: While required at present in many instances, relief is often granted pursuant to a PAD approval or the discretion of Board of Architects. This practice should be codified. Please see the proposed Code text attached as Exhibit B.	Existing setback conditions in Multi-Family Residential, which are not currently allowed to be reduced per Med Bonus Table 3. PAD still allows setback relief, no change is needed.	N
Stories	Regulation of height by stories as opposed to just linear feet. Doesn't this have the impact of reducing total floor area (i.e. 8 stories within 97 feet vs. 9 stories within 97 feet)? Does the exemption of parking levels from stories make up for this? The definition of story is a bit confusing. Recommendation: Due to property rights concerns and a preference to have the market regulate "floor to ceiling" heights, we would recommend that maximum height only be regulated by linear feet.	Stories is in the existing code and should not be removed. The definition of stories may be improved, but the main concept remains valid. Parking levels shouldn't be excepted from the maximum/ultimate height of the building.	Status: Further clarification required in proposed text. Stories should be applicable for Mediterranean Bonus Levels 1 and 2 and in the Design District only. Please see the proposed Code text attached as Exhibit C.	Clarified 'story' definition. Medium Density (MF2) is only allowed a 2 story increase total per Med Bonus (not 3 as suggested). Updated that story limitations only apply with using Med Bonus and added story limitation is per Site Specifics (which include 3 stories/45ft, 6 stories/70ft, and 13 stories/150ft).	A
Liner Requirement	In MF2, the requirement of 80% of each story of a building facing a street having to be lined with habitable residential space does not appear to be feasible for a practical parking garage design on the typical Coral Gables development site. Recommendation: Eliminate or lower this requirement and, instead, require appropriate treatment or screening of parking garage facades. Additionally, incentivizing liner spaces be exempting them from density or floor area calculations may be appropriate.	A city made of first floor parking garages, no matter how well screened, is an inferior vision. Incentives however may be appropriate.	Status: We need further clarification that this is only applicable to the ground floor. Please see the attached proposed Code text attached as Exhibit D.	Lowered requirement from 80% to 60% and incentivized with parking exemption.	A
Stepbacks	Additional stepbacks are being required above a 45' height for the MF2, and MF4, and MX districts. Are we confident that these stepbacks can be complied with? Recommendation: Elimination or reduction of the stepback requirement or, as mentioned in Item No. 3 above, tying it to the setback requirement	The current Code already requires stepbacks in MF2, MFSA and in MX. Upper floors have natural floorplate limits, which garage podiums do not need for access to light and air, and stairs and elevators, so this is not a problem	Status: While required at present in many instances, relief is often granted pursuant to a PAD approval or the discretion of Board of Architects. This practice should be codified. Please see the attached proposed Code text attached as Exhibit E.	Additional note of Med Bonus Table 3 allowances included as footnote on summary chart.	A
Transparency	Transparency: 40% to 60% transparency is being required on the ground floor of apartment buildings. Is this achievable? Recommendation: 40% transparency should be required in both MF2 and MF4.	The updated code reads minimum 40% and maximum 60%, so we agree.		To be incorporated: 40% transparency	A
Parking Setback	In MF2, parking can not be located on any above ground floor with 20 feet of the front setback line. When one factors in the rear and side setback requirements, can a workable parking garage layout still be designed considering the typical 100 foot depth of the standard Coral Gables property? Recommendation: Eliminate this requirement. Proper architectural screening should be required for parking areas within 20 feet of the front setback line and subject to approval by the Board of Architects.	Most lots in the North Ponce neighborhood are deeper than 100ft. The liner should be mandatory at the ground floor and recommended or possibly incentivized for the next two floors. Otherwise, for lots that are shallower a variance can be requested.		Current RIR regulations require a 30ft parking setback; no change at this time.	N

DESCRIPTION	COMMENT	CONSULTANT RESPONSE	ADDITIONAL COMMENT	STAFF RESPONSE	STATUS
Curbcuts	Curb cuts are being prohibited on East Ponce de Leon, Alhambra Circle, Le Jeune Road, and Douglas Road. If a property only fronts one of these streets, how can it be accessed? Midblock properties need to have access from principal frontages. The 11-foot limit for one-way drive is at odds with the 14-foot width typically required by Public Works. Recommendation: Permit midblock properties on these streets to have access from these streets. Reconcile Planning and PW requirements for lane width.	Our recommendations are appropriate for these areas. Except for Douglas Road, these streets have alleys. Most blocks along Douglas have their narrow end facing Douglas, so access from a side street is available.		PW allows narrower 1-way driveways when consistent with neighborhood context and required by Zoning; no change at this time	A
Mixed Use	In the MXD districts, office buildings would be required to have 15% of their floor area dedicated to retail space. Is that too much? Recommendation: Instead of having percentage requirements drive amount of retail space, require that the entire ground floor (less common areas and "back of house" spaces) be active commercial or live-work uses.	This is from the existing code. The recommendation is acceptable.	Status: This revision would require an amendment to the text of the Comprehensive Plan and we would recommend that such an amendment be initiated. "As per Comprehensive Plan" and that the relevant Code provision simply refer and default to the Comprehensive Plan. Please see the proposed Code language attached as Exhibit F.	Reference to Comp Plan mix of uses incorporated.	A
Design District Height	In the Design District, maximum height presently permitted is 10 stories / 100 feet. Proposed change is to 8 stories / 97'. Loss of two stories is significant. 120 feet is presently permitted in the Northern Design District pursuant to City Commission approval. Recommendation: Height should be regulated only by linear feet and the maximum permitted height should be	This is from the existing code. DPZ recommends maintaining as it is, see Section 2-406(B)(4)(c).		To be incorporated: Correct to 97 feet and 10 stories. (D.)	A
Ground Floor Height	Minimum height for ground floor retail is 17 feet. Recommendation: Eliminate. Design professional and market should drive appropriate "floor to ceiling" heights.	There should be a minimum, could be as low as 15ft.		To be incorporated: 15 feet minimum in Design & Innovation District standards.	A
North Ponce MXD Rear Height	A rear setback of over 100 feet is being required in some circumstances within the North Ponce overlay. This seems excessive considering most Coral Gables sites are approximately 100 feet in depth. This appears to have the practical effect of reducing height on North Ponce to 70 feet. Recommendation: Eliminate	This is from the existing code. Assumed to be a result from precedent project/ public hearing decisions.	Status: This rear setback requirement still appears to be excessive. Please see proposed Code text attached as Exhibit G.	Current and recently-added language in Zoning Code. This setback is only applicable when abutting the Conservation District to transition to the abutting MF2 properties (not a rear property setback), which is usually 200ft or more from Ponce de Leon.	A
Variances in North Ponce	There is a prohibition on setback variances in the North Ponce Overlay. Is this legal? What happens in the case of hardship? Recommendation: Variances should be allowed for cases of hardship	This is from the existing code	Status: Our understanding is that the position of the City Attorney is that this language should be revised. Please see proposed Code language attached as Exhibit G.	Current and recently-added language in Zoning Code; removed restriction for variance for setbacks and stepbacks.	A
Parking Setback in North Ponce MXD	The parking setback for the North Ponce Overlay is 40 feet. This is too much considering other setback requirements. Recommendation: Replace with a requirement for architectural screening and / or certain amount of line space	This is from the existing code, relates to front setback and liner. Under RIR this becomes 30ft.		To be incorporated: 30 foot parking setback.	A
PAD FAR	The floor area regulations for PADs continue to be confusing. Recommendation: Would it not be easier to just state that the underlying FAR applies?	This is from the existing code		To be incorporated: FAR pursuant to underlying districts.	A
Hotels in PAD	The PAD regulations incorrectly state that there is a density limit for hotel units. There is no such density limit in Coral Gables. Recommendation: Modify accordingly.	This is from the existing code		To be incorporated: Remove this language.	A
PAD height	In the PAD regulations, the height should conform with both underlying zoning and any applicable overlay district. Recommendation: Modify accordingly.	This is from the existing code		To be incorporated: Height also conforms to district overlay.	A
Transition in PADs	The height limitation of 3 stories / 45 feet for PAD's within 100 feet of residentially zoned property should be clarified to read within 100 feet of SFR or MF1 as is utilized in the rest of the Zoning Code. Recommendation: Modify accordingly. [Section 2-500(B)(3)(9)] Additionally, the currently existing similar restriction in the existing MXD regulations is only a linear foot limitation of 45 feet. The new proposed MXD regulations also include a 3 story limitation. Recommendation: Keep the height limitation strictly to 45	This is from the existing code. We disagree with removing the stories	Status: Please see proposed Code language attached as Exhibit H.	Updated 'residential' to SFR or MF-1; and updated MX to only 45ft (no story limitation when abutting SFR)	A
PAD setbacks/stepbacks	In PAD's, it should be clear that there are not minimum requirements for setbacks and setbacks. Recommendation: Modify accordingly.	This is from the existing code		To be incorporated: Include setbacks and stepbacks.	A
Bed & Breakfasts	Has a Bed and Breakfast Establishment ever been approved pursuant to the existing regulations? Recommendation: If not, these regulations need to be reconsidered.	This is from the existing code. If changes are required, we can assist in reconsideration		Current and recently-added language in Zoning Code; no change at this time	N

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Setback Reduction in Med Bonus	Why aren't the building setback reduction provisions of the Mediterranean Design Ordinance applicable to residential buildings?	This is from the existing code. We agree that this should apply to residential also; a reduction to a minimum setback of 8ft may be applied to MF2 and MF3 (but not MF4).		No change at this time; Mediterranean Bonus standards to be updated at a later date	N
Historic petitions	The Historic Preservation regulations continue to give any resident the right to petition that another person's property be designated historic. This is problematic. Recommendation: Right to propose designation should be limited to City staff and property owners within standard 1,000 foot notice radius of property.	This is from the existing code. Why is this problematic? Please explain		No change at this time.	N
Office Parking	Retail parking requirements are being decreased. Why are office parking requirements staying the same? Recommendation: Appropriate parking ratio for office use would be 1 space per 500 square feet.	If Parking Department Director agrees, we will recommend.		To be incorporated: 1 space per 500 square feet.	A
Multi Family Parking	Recommendation: Parking requirement for multifamily apartments of two or more bedrooms should be 1.5 spaces	If Parking Department Director agrees, we will recommend.		To be incorporated: 1.5 spaces per 2+	A
Back of House Parking	Recommendation: "Back of house" storage areas also be exempted from parking requirements?	We need more explanation. Back of house is exempted for Residential and Non-residential buildings	Status: Storage areas should be added to list of exempted spaces. Please see proposed Code language attached as Exhibit I.	Updated to include "storage" to be exempted from parking requirements	A
Parking for bikes	A bicycle parking requirement of one bicycle parking space per unit seems high. Recommendation: 1 bicycle parking space for every 10 units.	Recommendation to be considered		Current MXD requirement. To be incorporated: 1 space per 4 units.	A
PAD Major Amendments	Major amendments to PADs are limited to one per year. Recommendation: A waiver for this limit for good cause shown or public need.	This is from the existing code. This is a City policy decision.		To be incorporated: Add unless good cause or public need.	A
Balconies	We should make clear that portions of balconies which are recessed within the exterior perimeter walls are still considered part of the balcony and excluded from FAR. Recommendation: If balcony space is exterior and unenclosed it should not count towards FAR. [FAR definition]	Recommendation to be considered.	Status: Please see the proposed Code text attached as Exhibit J.	Updated to exclude recessed balconies from FAR limitations	A
Mezzanines	Why can't there be mezzanine levels within parking garages? Recommendation: As long as the parking mezzanine level is lined by habitable space it should be permitted consistent with the concept that a parking level does not count as a story. [Story definition]	Recommendation to be considered. 3-stories of habitable space may be equivalent to 4-stories of parking as long as it is lined with 3-stories of habitable space.		No change at this time; to be discussed further.	N
Site Specifics	Have the previous conflicts between site specific regulations and other sections of the Code been resolved?	We tried to resolve the conflicts.		No change at this time; Site Specifics will be addressed and updated at a later date.	N
Additional changes	The memo attached as Exhibit D defers several topics for future Code amendments. What type of amendments are anticipated for these topics?	—		To be discussed further.	N
Rezoning	The proposed new designations for the CBD look like a patchwork and appear to follow existing land use designations and can, perhaps, be made more uniform.	We agree.		No change at this time; all development rights are to remain the same in Zoning Code Update.	N
TDRs in Design District	The Design District should be a receiver site for TDRs.	Recommendation to be considered.		To be incorporated: Also allow TDRs in Design & Innovation	A
Med Bonus	There should be design bonuses for high quality non-Mediterranean architecture.	Mediterranean Bonus has established specific criteria for judging quality. Non-Mediterranean lacks specific criteria for judgement.		No change at this time; Mediterranean Bonus standards to be updated at a later date.	N
SFR rear alley setback	Remove different rear setback for SFR			To be incorporated: Current 10ft rear	A
TDR Process	Require TDR to be adopted by Commission via Resolution (instead of Ordinance)			To be incorporated: TDR transferred via Resolution.	A
Preservation of trees	Require community vision to guide the redevelopment of parcels			To be incorporated: Existing trees to be preserved in public spaces as part of community visioning and planning efforts.	A
Seawall Height	Current regulation of 5ft USED is outdated			To be incorporated: Minimum height of 6 ft, and structurally support 7.5 feet NAVD as recommended in Sustainability Plan.	A
Design & Innovation District	Rename proposed Design / Industrial District as Design & Innovation District			To be incorporated: 'Design & Innovation' District Overlay	A

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Townhouse parking	Currently townhouse requirement is higher than single family as 2 per unit			To be incorporated: 1 space per townhouse unit.	A
Townhouse garage	Allow front-access townhouse in MF3			MF3 may also redevelop as small-scale apartment buildings that may be side-	N
MF3 Density	Increase density in MF3 to be financially viable			Density is regulated in the Comprehensive Plan	N
MX Open Space	Open Space requirement for small MX properties is too difficult			Reduction to 5% is proposed to be required for small parcels	N
Parking for small parcels	Consider changing parking exemption from 3 stories to square feet (FAR)			To discuss further	N
MF3 Transparency	Clarify transparency requirements for MF3 (curtains, etc)			To update accordingly	A
Multifamily Parking Reduction	Consider including location requirement to not reduce parking in dense areas			To discuss further	N
Ground Floor commercial requirement	Consider updating ground floor commercial requirement to not be tied to percentage and not compete with existing commercial on Miracle Mile.			To discuss further. Live/work units are proposed to be commercial.	N
Private open space	Require usable open space for public use when assembling properties with max floor plate or building size			Incorporated that location, scale, and public access to open space shall be subject to site plan review by Staff in MF2, MF3, MF4, MX, and RIR.	A
US-1 Vision	Create a vision for US-1 to have more cohesive development along the corridor			To discuss further. A mandatory setback is proposed along major thoroughfares, including US1	N
Remote Parking	Add language for how to determine 1000ft requirement between business and parking location. Front door?			Will clarify distance to be consistent with other distance requirements in Code of nearest point to nearest	A
Parking reductions	Consider limiting parking reductions to not include dense areas like North Ponce			Multi-family parking applies to all multi-family parcels citywide	N
Bike Parking	Families need to store bikes outside of their units			To incorporate 1 space per 4 units	A
Townhouse parking	Consider not reducing parking for large townhouses			Parking is a minimum and SFR currently only requires 1 space	N
LEED requirement	Offer bonus for smaller parcels to receive LEED designation			To discuss further. DPZ will update the Sustainability article at a future date.	N
Off-site parking	Track existing and future remote parking agreements			Currently filed as restrictive covenants and administered through Parking Dept	N
Live/Work Units	Allow office on ground floor with living above (live/work unit)			Live/Work is proposed to be allowed as commercial soft on ground floor MXD	N
Reduce Building Scale	Reduce building scale or incentivize smaller development to encourage pedestrian activity			Reduction in parking and additional 10,000 sf category	N
Private open space	Private open space should only be required to be public with large developments			Only conditions of approval with large projects may require publicly accessed open space. Added language to MF2, MF3, MF4, MX, and RIR that open space is subject to site plan review.	A
Large MX Approval	Clarify approval of 20,000 sf MX projects to be conditional use review			To incorporate by replacing "Commission Approval" with "Conditional Use"	A

DESCRIPTION	COMMENT	CONSULTANT RESPONSE	ADDITIONAL COMMENT	STAFF RESPONSE	STATUS
Carport definition	Clarify carport definition			Incorporate previous definition	A
Townhouses	In the MX1 district, townhomes should be permitted for the sake of appropriate transition and scale and there should be an ability to relax retail requirements.		Status: Please see the proposed Code text attached as Exhibit K. Retail and non-residential use requirements will be addressed as part of a Comprehensive Plan text amendment.	Incorporated	A
Design District Height	At present, 100 feet is the "base" permitted height in the Mixed Use/Design District. This is proposed to be decreased to 97 feet which is problematic.		Status: Please see the proposed Code text attached as Exhibit L.	The Industrial and mid-rise land uses in the Comprehensive Plan only allow 70ft, plus Med Bonus to be 97ft	N