



## Interpretation of Zoning Ordinance

### Main Entrances Located in Façade of Principal Frontages

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**Note: As authorized by § 8.5.2.C.1 (p. 401), this interpretation is provided at the initiative of the Zoning Administrator for the purpose of providing clarification to property owners and improving administration of the Ordinance. Capitalized terms are defined in § 9.3 of the Ordinance. This interpretation may be appealed to the Board of Zoning Appeals per § 8.5.17 of the Ordinance.**

#### **Summary**

The building Façade standards in Tables 4.3.1-A - 4.3.1-U require a Main Entrance in the Façade of the Principal Frontage of all buildings. A Main Entrance, also referred to in the Zoning Ordinance is a Principal Entrance, provides pedestrian access to a building. In addition to the Main Entrance on the Façade, the Zoning Ordinance permits additional pedestrian access to a structure from non-façade elevations. However, placing Main Entrances on non-façade elevations may result in less-than-ideal outcomes for property owners and business tenants. Property owners and their professional consultants should be cognizant of other provisions of the Ordinance which reference the building façade.

#### **Rationale**

**A building Façade must bear a Main Entrance to the building.** Tables 4.3.1-A - 4.3.1-U of the zoning ordinance prescribe building design standards for each character district and special district. The prescriptions regulate various design elements including building height, ceiling height, vertical composition, roof pitch, and Façade design. The Ordinance provides detailed prescriptions for each component of the Façade.<sup>1</sup> The standards for each character district and special district state plainly that “Main Entrance must be in Façade of Principal Frontages.” Buildings in some character districts have further Main Entrance standards. Additionally, Table 4.3.8.B reiterates that for certain building types the Main Entrance must be located in the principal frontage (p. 210, p. 211,

**The Main Entrance is a main point of access for pedestrians into the building.** The Zoning Ordinance contains twenty-eight instances of the phrase *Main Entrance*. Although the term is always capitalized, the Ordinance does not define the phrase. The term *Principal Entrance* is defined at § 9.3 (p. 514). That phrase occurs only in article seven of the Zoning Ordinance, which regulates signage. The use of *Principal Entrance* in article seven, as well as the illustrative material in Table 7.1.2.B-2, makes clear that the terms are synonymous.

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<sup>1</sup> The Façade of a building is the elevation set along the principal frontage. See Zoning Administrator’s March 2023 interpretation clarifying the applicability of these requirements to elevations set along a frontage line.

**The Main Entrance prescriptions at § 4.3 of the Zoning Ordinance regulate Facades, not Main Entrances.**

The language requiring that a Main Entrance be located in the Façade of the principal frontage is contained within prescription related to the façade composition. The relevant section of the Ordinance does not directly regulate the location of Main Entrances; it regulates facades, which must include a Main Entrance. The only prescriptions indicating that Main Entrance must be in facades are located under subheadings regulating Facades and frontage types. These prescriptions do not extend to all aspects of site or building design.

**Additional pedestrian access to a structure is permitted on non-façade elevations.** The *Principal Entrance* is “the main point of access for pedestrians into a Building.” The use of the qualifier *principal* indicates that a building may have multiple points of access for pedestrians. Various textual and illustrative elements of the Ordinance indicate the intent of Planning Commission and City Council to permit multiple Main Entrances to a building.<sup>2</sup>

- Illustration 4.3.5.A-3 (p. 194) depicts a single structure with multiple pedestrian access points. Both are located in facades, but one is located on a secondary frontage. Similarly, Table 4.3.7.A (p. 203) shows a shopfront façade with multiple pedestrian entrances to a building.
- Various other illustrative materials show pedestrian accesses points to buildings which face secondary elevations, parking areas, and alleys (9.3.A-2, p. 480; 9.3.B-2, p. 482; 9.3.P-1, p. 512).
- The principle of layering which underlies many of the bulk and design standards of the ordinance requires the arrangement of sites in a manner that requires many users to enter buildings via non-façade elevations.<sup>3</sup>
- The Ordinance permits, and implicitly requires, that Main Entrances be located on secondary elevations for some building types, namely duplexes and mixed-use structures (Table 4.3.8.B, p. 211 and 217; 4.3.9.E.6.d(2), p. 244).

Furthermore, other overlapping regulations (e.g. the Fire Code and the International Building Code) require multiple points of egress. The designation of the pedestrian entrance located on the Façade of the Principal Frontage as the Main Entrance does not proscribe other pedestrian entrances to a building on non-façade elevations.

**Placing Main Entrances on non-façade elevation may not provide optimal outcomes for property owners and business tenants.** Various provisions of the Ordinance regulate building and site design by reference to the Façade. Prescriptions relating to signage are especially sensitive to façade orientation. Band Signs must be placed on the building Façade above the Main Entrance. Tenant spaces accessed from non-façade elevations will not be able to utilize Band Signs, Marquees, and Blade Signs (Table 7.1.2.B-1, p. 364 – 366; Table 7.1.2.B-2, p. 367 – 382). Sign types permitted on non-façade elevations are limited in size and placement and may not be ideal for retail businesses and other land users. Property owners and their professional consultants are advised to consider all implications of façade orientation and entrance placement when planning the development of a site.

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<sup>2</sup> § 1.14.2.B makes clear that illustrative material in the Ordinance is included for *explanatory* purposes and does not have regulatory effect. Where uncertainty exists, the Zoning Administrator utilizes this material to explain the meaning of regulatory text and tables as directed by § 8.5.2.A (p. 401) and § 8.2.1 (p. 392).

<sup>3</sup> See § 4.3.3.A (p. 208) and § 9.3 (p. 503) for an explanation of site layers.