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August 4, 2025

Lexington-Fayette Urban County Planning Commission  
Lexington-Fayette Urban County Government  
101 East Vine Street  
Lexington, KY 40507

**Zone Change Request for the Properties Located at 200, 201, 250, 251, and 301 Canebrake Drive**

Dear Members of the Planning Commission:

We represent the Baesler Family (“Baesler” or “Applicant”) and on his behalf have filed a zone change request the properties located at 200, 201, 250, 251, and 301 Canebrake Drive (the “Properties”). The Properties subject to this zone change request consists of 65.69 net (73.72 gross) acres currently zoned Agricultural-Rural (A-R) zone. The Applicant’s request is to rezone the Properties with a mix of proposed zones consisting of: 32.24 acres of the Property to Light Industrial (I-1) zone to allow for industrial flex-space consisting of 25 industrial buildings and 33.45 acres of the Property to Medium Density Residential (R-4) zone to allow for a variety of duplexes, quad-style units, and a multi-family development consisting of 7 apartment buildings 8 quad-plex units, and 46 duplexes (the “Development”).

The surrounding area is made up of complementary industrial, commercial, single-family residential uses, and the Sayre Athletic Complex. The Development is consistent with UGM Regulating Plan’s recommended uses within the Flex Space category which calls for “retail, restaurant, office, entertainment, industry, or recreation, with secondary residential uses.” It is also laid out in a manner to respect the surrounding uses with the proposed industrial areas directly adjacent to Blue Sky Industrial Park and other commercial users stepping down to the proposed residential directly adjacent to existing residential. This allows for the Development to come online with a proper transition of zoning to ensure that no existing neighbors are adversely impacted with a new type of use.

This request is in agreement with the Comprehensive Plan for the multitude of reasons outlined below. Primarily, the proposed zone changes offer a chance to develop existing vacant land inside the Urban Service Area for uses that focuses on small businesses and job creation along a major corridor with a complementary residential component in a manner that ensures the Development will assimilate into the surrounding area. This is an ideal property for the proposed flex space as the use is in great demand in our market and mirrors the recommendation of the UGM for these Properties. Further, by introducing additional residential uses in the area, the request offers a chance to implement one of the overarching themes of the Comprehensive Plan: to increase density along Lexington’s corridors. As noted in the Comprehensive Plan: “Studies such as Imagine Nicholasville Road and Imagine New Circle Road have concluded that increasing

the intensity of land use along these corridors, particularly for residential purposes, is necessary to accommodate population growth through more efficient land utilization.” The development will not put undue strain on the surrounding infrastructure as it implements the recommendation of the UGM that entailed a detailed study of required infrastructure to implement the recommended uses. We are not proposing to alter the existing access points on Athens-Boonesboro or change any of the existing landscape buffering that protects the Property’s neighbors. This project upholds the Urban Service Area preservation strategy, is appropriate use of vacant acreage in an area that already has demonstrated the ability to host the very types of uses requested, and offers additional land that truly generates jobs for our community as encouraged by our Comprehensive Plan.

This project aligns with the aspects of a desirable community and the place making concepts the Comprehensive Plan stresses such as openness, social offerings, and aesthetics with its open space areas, connections, and enhancement of the multi-modal facilities. The proposed development plan follows many of the specific recommendations of the Comprehensive Plan in its discussion on how to grow successful neighborhoods while protecting the environment as we are increasing density without directly impacting any of the existing single-family infrastructure adjacent to the Property; supporting density throughout the urban service area; increasing the residential units on a major corridor; and, providing a well-designed project that furthers the commitment to safe and positive social interactions for our residents and employees alike.

The Applicant is quite confident in calling this a well-designed project as it furthers many of the design and density policies laid out in the Comprehensive Plan. **By providing a people-first/pedestrian friendly design that will improve the area’s safety and connectivity and creating inviting streetscapes.** (Design Policy #1, #5, and #6). The Development is still early in the design phase, but will comply with the Multi-Family Design Standards upon submittal of the final development plan. (Design Policy #3). As the Comprehensive Plan stresses the need to increase density and intensity on our corridors, the Development is achieving this while still being sensitive to the surrounding context. (Design Policy #4; Density Policy #1 and #2). With the proposed improvements to Canebrake Drive, the proposed development plan is ensuring this section of Area 4 will be able to enhance the safety of the Canebrake residents. (Design Policy #7). The area surrounding the Property only contains single-family residences, this proposal will bring multi-family units into the immediate area to help diversify the housing stock. (Design Policy #8). The development is proposing new open space areas within close walking distance of the residents and employees of the Development. (Design Policy #9 and #12).

In summary, this well-designed project upholds the Urban Service Area preservation strategy, is appropriate development of a vacant acreage on a major corridor, provides an in-demand jobs creating use and additional housing units, encourages community interaction through pedestrian connectivity and useable open space, encourages a more comprehensive transportation system for future development, all while respecting its neighbors and protecting the environment with landscaping buffers and greenspace. As such, it is quite clear that the proposed zone change is in compliance with the 2045 Comprehensive Plan. As outlined above, the proposed project meets the following Goals and Objectives of the Comprehensive Plan:

**THEME A: GROWING & SUSTAINING SUCCESSFUL NEIGHBORHOODS.**

**GOAL 1: EXPAND HOUSING CHOICES.**

**OBJECTIVES:**

- b. Accommodate the demand for housing in Lexington responsibly, prioritizing higher-density and mixture of housing types.
- d. Create and implement housing incentives that strengthen the opportunities for higher-density and housing affordability.

**GOAL 2: SUPPORT INFILL AND REDEVELOPMENT THROUGHOUT THE URBAN SERVICE AREA AS A STRATEGIC COMPONENT OF GROWTH.**

**OBJECTIVES:**

- a. Identify areas of opportunity for infill, redevelopment, adaptive reuse, and mixed-use development.
- b. Respect the context and design features of areas surrounding development projects and develop design standards and guidelines to ensure compatibility with existing urban form.
- c. Incorporate adequate greenspace and open space into all development projects, which serve the needs of the intended population.

**GOAL 3: PROVIDE WELL-DESIGNED NEIGHBORHOODS AND COMMUNITIES.**

**OBJECTIVES:**

- a. Enable existing and new neighborhoods to flourish through improved regulation, expanded opportunities for neighborhood character preservation, and public commitment to expand options for mixed-use and mixed-type housing throughout Lexington-Fayette County.
- b. Strive for positive and safe social interactions in neighborhoods, including, but not limited to, neighborhoods that are connected for pedestrians and various modes of transportation.
- c. Encourage the use of neighborhood-enhancing elements, such as green infrastructure, street trees, neighborhood-serving businesses, gathering spaces and other types of community focal points.
- d. Improve Lexington's transportation network through ample street and sidewalk connections between new and existing development.
- e. Improve Lexington's transportation network through ample street and sidewalk connections between new and existing development.

**THEME C: CREATING JOBS & PROSPERITY.**

**GOAL 1: SUPPORT AND SHOWCASE LOCAL ASSETS TO FURTHER THE CREATION OF A VARIETY OF JOBS.**

**OBJECTIVES:**

- a. Strengthen efforts to develop a variety of job opportunities that support a living wage and lead to prosperity for all.

**GOAL 2: ATTRACT A WIDE ARRAY OF EMPLOYMENT OPPORTUNITIES THAT ENCOURAGE AN ENTREPRENEURIAL SPIRIT, AND**

**ENHANCE OUR ABILITY TO RECRUIT AND RETAIN A  
TALENTED, CREATIVE WORKFORCE BY ESTABLISHING  
OPPORTUNITIES THAT EMBRACE DIVERSITY, EQUITY, AND  
INCLUSION IN OUR COMMUNITY.**

**OBJECTIVES:**

- a. Prioritize the success and growth of strategically-targeted employment sectors (healthcare, education, high-tech, advanced manufacturing, agribusiness, agritourism, and the like), and enable infill and redevelopment that creates jobs where people live.
- f. Encourage land development that attracts, expands, and retains jobs in employment sectors that provide upward mobility and prosperity for all and prioritizes identifying land opportunities for job creation and housing needs.

**THEME D: IMPROVING A DESIRABLE COMMUNITY.**

**GOAL 1: WORK TO ACHIEVE AN EFFECTIVE, EQUITABLE, AND  
COMPREHENSIVE TRANSPORTATION SYSTEM.**

**OBJECTIVES:**

- a. Implement the Complete Streets policy, prioritizing a pedestrian-first design that also accommodates the needs of bicycle, transit and other vehicles.
- b. Expand the network of accessible transportation options for residents and commuters, which may include the use of mass transit, bicycles, walkways, ride-sharing, greenways and other strategies.
- d. Improve traffic operation strategies, traffic calming, and safety for all users.

**GOAL 2: SUPPORT A MODEL OF DEVELOPMENT THAT FOCUSES ON  
PEOPLE-FIRST TO MEET THE HEALTH, SAFETY AND QUALITY  
OF LIFE NEEDS OF LEXINGTON-FAYETTE COUNTY'S  
RESIDENTS AND VISITORS.**

**OBJECTIVES:**

- a. Ensure built and natural environments are safe and accessible through activated and engaging site design.
- d. Monitor and evaluate newly passed parking regulations to ensure they are achieving more walkable, people-first development, and lowering development costs.

**THEME E: MAINTAINING A BALANCE BETWEEN PLANNING FOR URBAN  
USES AND SAFEGUARDING RURAL LAND.**

**GOAL 1: UPHOLD THE URBAN SERVICE AREA CONCEPT.**

**OBJECTIVES:**

- c. Ensure all types of development are environmentally, economically, equitably, and socially sustainable to accommodate the future growth needs of all residents while safeguarding rural land.
- d. Emphasize redevelopment of underutilized corridors.

- e. Maximize development on vacant land within the Urban Service Area and promote redevelopment of underutilized land in a manner that enhances existing urban form and/or historic features.

### **Placebuilder**

The Properties is located on a major corridor is adjacent to the existing Canebrake single-family neighborhood and the Blue Sky Industrial Park. Based on the location and type of development for the Properties, the Applicant proposes different Place Types for the different requested zones: 1) Industrial & Production Center with a Development Type of Industrial and Production Non-Residential and 2) New Complete Neighborhood with a Development Type of Medium Density Residential. The proposed zones are all suggested zoning categories for the different Place Types and nature zones for the project proposed within Area 4 that is flanked by industrial, commercial, and residential uses.

Also submitted with the Zone Map Amendment Request is the color-coded reflection of how the proposed project addresses the design criteria for the selected Development Types. Items highlighted in green are represented graphically on the submitted preliminary development plan; items in yellow are addressed in this letter, and items highlighted in orange are not applicable to this proposal.

### **Standards That Are Applicable to Our Proposal**

#### **Industrial & Production**

- LAND USE
- C-LI9-1 Development should be strategically located along freight networks and/or adjacent to established industrial.
  - C-PS8-1 Opportunities for industry and special trade employment should be increased.
  - D-PL7-1 Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application.

- TRANSPORTATION, CONNECTIVITY, AND WALKABILITY
- A-DS4-1 A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided. We are appropriately connecting with our neighboring developments.
  - A-DS5-2 Developments should incorporate vertical elements, such as street trees and buildings, to create a walkable streetscape. This is being done where feasible.
  - D-CO1-1 Rights-of-way and multi-modal facilities should be designed to reflect and promote the desired place-type. This is being done where feasible as the Properties are limited based on their size and connecting to the existing roadway system.
  - D-CO2-2 Development should comply with Lexington's Complete Streets Policy. Lexington does not have a Complete Streets Policy, but we submit that the Development complies with general concepts of complete streets.
  - D-CO4-1 Dead-end streets and cul-de-sacs should be discouraged. This is being done.
  - D-CO4-3 Street pattern and design should consider site topography and minimize grading where possible. This is being done where feasible.
  - D-CO5-1 Streets should be designed with shorter block lengths, narrower widths, and traffic

calming features. This is being done with short lengths and the proposed traffic circle.

#### ENVIRONMENT

- B-PR7-1 Developments should be designed to minimize tree removal and to protect and preserve existing significant trees. This is being done where feasible.
- B-PR9-1 Minimize grading and topsoil disturbance by utilizing the existing topography to the greatest extent possible and preserving key natural features. This is being done where feasible.
- B-PR10-1 Development should avoid overlighting and upward directed lighting. This project complies with new lighting provisions in the Zoning Ordinance
- B-SU4-1 Development should minimize and/or mitigate impervious surfaces. This is being done where feasible.
- B-SU11-1 Development should incorporate low impact landscaping and native plant species. This is being done where feasible.
- B-RE1-1 Developments should improve the tree canopy. This development will meet all requirements for tree canopy for new development. There are several sections of fence row trees and brush that are in poor condition not suitable for retention.
- B-RE5-1 Dividing floodplains into privately owned parcels with flood insurance should be avoided. This is not being proposed with the Development.
- B-RE5-2 Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them. This is being done where feasible.
- BD-SP10-1 Prioritize street trees in the planting strip. This is being done where feasible as shown on the development plan.

#### SITE DESIGN

- C-LI8-1 Development should enhance a well-connected and activated public realm. This is being done where feasible with the existing connection to Canebrake and stubbing into the Sayre Athletic Complex property.
- C-PS10-2 Over-parking of new developments should be avoided. The Development is appropriately parked.
- D-SP3-1 Adequate right-of-way, lease areas and easements for infrastructure, with emphasis on wireless communication networks should be provided to create reliable service throughout Lexington. v
- E-ST5-1 Increased intensity in the Rural Activity Centers should not negatively impact surrounding rural areas. The Development helps to increase industrial uses in and around Blue Sky RAC while also providing much needed housing to support the active RAC.

### **New Complete Neighborhood**

#### LAND USE

- A-DN2-1 Infill residential should aim to increase density. The proposed Development will increase density in comparison to the existing single-family residential uses.

- B-SU3-1 Development should provide compact and/or mixed use development. The Development is proposing a mix of uses with compact residential areas.
- C-LI7-1 Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment. The Development is proposing industrial flex space with compact residential areas featuring safe connections to proposed open space.
- D-PL7-1 Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application. While there was not a neighborhood meeting, Mayor Baesler has been in close communication with the surrounding neighbors throughout the Urban Growth process and the formulation of the proposed development plan.
- E-ST8-2 Development should provide community oriented places and services. The Development features open and visible open space areas.

#### TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

- A-DS4-1 A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided. The Development features open and visible open space areas with any required multi-modal infrastructure.
- A-DS5-1 Safe multi-modal facilities should be provided to ensure vehicular separation from bicycles, pedestrians and other modes of transport. This is being done.
- A-DS5-2 Developments should incorporate vertical elements, such as street trees and buildings, to create a walkable streetscape. This is being done, especially in the residential areas.
- A-DS11-1 Street layouts should provide clear, visible access to neighborhood focused open space and greenspaces. The Development features open and visible open space areas with any required multi-modal infrastructure.
- D-CO1-1 Rights-of-way and multi-modal facilities should be designed to reflect and promote the desired place-type. The Development features open and visible open space areas with any required multi-modal infrastructure throughout the residential areas.
- D-CO2-1 Development should create and/or expand a connected multi-modal transportation network that satisfies all users' needs. The Development features open and visible open space areas with any required multi-modal infrastructure.
- D-CO2-2 Development should comply with Lexington's Complete Streets Policy. Lexington does not have a Complete Streets Policy, but we submit that the Development complies with general concepts of complete streets.
- D-CO4-1 Dead-end streets and cul-de-sacs should be discouraged. This is being done.
- D-CO4-3 Street pattern and design should consider site topography and minimize grading where possible. This is being done where feasible.
- D-CO5-1 Streets should be designed with shorter block lengths, narrower widths, and traffic calming features. This is being done with shorter block lengths and the proposed traffic circle.

#### ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

- B-PR2-1 Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site. This is being done where feasible.

- B-PR2-2 Development should include regularly spaced access with an adequate width to the greenway network and conservation areas. The Development features open and visible open space areas with any required multi-modal infrastructure.
- B-PR7-1 Developments should be designed to minimize tree removal and to protect and preserve existing significant trees. This is being done where feasible.
- B-PR9-1 Minimize grading and topsoil disturbance by utilizing the existing topography to the greatest extent possible and preserving key natural features. This is being done where feasible.
- B-PR10-1 Development should avoid overlighting and upward directed lighting. The lighting study details the Development's compliance with all application regulations.
- B-SU4-1 Development should minimize and/or mitigate impervious surfaces. This is being done where feasible.
- B-SU11-1 Development should incorporate low impact landscaping and native plant species. This is being done.
- B-RE1-1 Developments should improve the tree canopy. This development will meet all requirements for tree canopy for new development. There are several sections of fence row trees and brush that are in poor condition not suitable for retention.
- B-RE2-1 Lexington's green infrastructure network, including parks, trails, greenways, or natural areas should be highly visible and accessible. While the Properties do not contact any public parks or trails, the Development features open and visible open space areas.
- B-RE5-1 Dividing floodplains into privately owned parcels with flood insurance should be avoided. This is not being proposed with the Development.
- B-RE5-2 Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them. The Development features open space areas connected to the adjacent floodplain.
- D-SP10-1 Prioritize street trees in the planting strip. This is being done where feasible as shown on the development plan.

#### SITE DESIGN

- A-DS5-4 Development should provide a pedestrian-oriented and activated streetscapes. This is being done where feasible as shown on the development plan.
- A-DS7-1 Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments. This is being done as shown on the development plan.
- A-DS9-2 Where neighborhood open space or parks are not located within walking distance of a new development, applicants should incorporate these facilities. The Development features open and visible open space areas within walking distance.
- A-EQ9-2 Shared open spaces should be easily accessible and clearly delineated from private open spaces. This is being done where feasible.
- C-LI8-1 Development should enhance a well-connected and activated public realm. The Development proposes to enhance the infrastructure on the Properties to improve Canebrake Drive.



- C-PS10-2 Over-parking of new developments should be avoided. The Development is appropriately parked.
- D-SP3-1 Adequate right-of-way, lease areas and easements for infrastructure, with emphasis on wireless communication networks should be provided to create reliable service throughout Lexington. The Development proposed adequate right-of-way for the required infrastructure.

#### BUILDING FORM

- A-DS3-1 Multi-family residential developments should comply with the Multi-Family Design Standards in Appendix A. The Development is still early in the design phase but will comply with the Multi-Family Design Standards upon submittal of the final development plan.
- A-DS4-2 New construction should be at an appropriate scale to respect the context of neighboring structures; however, along major corridors, it should set the future context. This development is of an appropriate scale to help transition between the employment area and the existing single-family areas.
- A-DS5-3 Building orientation should maximize connections with the street and create a pedestrian-friendly atmosphere. This is being done where feasible.
- A-DN2-2 Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods. This development is of an appropriate scale to help transition between the employment area and the existing single-family areas.

### **Standards Not Applicable**

#### **Industrial & Production**

##### LAND USE

- C-PS3-1 Development potential in the Rural Activity Centers should be maximized. The Properties are not in Blue Sky, but we submit we are maximizing the development area in an appropriate manner.
- E-ST8-2 Development should provide community oriented places and services. While the Development is not providing community oriented places or services, this Development contains public facing open space and much needed jobs land for our community.
- E-GR3-1 Development should meet recreational needs by following the recommendations of the Parks Master Plan. The Properties are not part of the Parks Master Plan.

##### TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

- A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. The Properties are not along an existing transit route.
- A-DS1-2 Accessible pedestrian linkages to transit should be provided. The Properties are not along an existing transit route.
- A-DS5-1 Safe multi-modal facilities should be provided to ensure vehicular separation from bicycles, pedestrians and other modes of transport.

- A-DS13-1 Stub streets should be connected. There are not any stub streets, but we are proposing one as called for in the UGM.
- C-PS10-1 Flexible parking and shared parking arrangements should be utilized. There is not a need for shared parking arrangements, as the site is appropriately parked.
- D-CO2-1 Development should create and/or expand a connected multi-modal transportation network that satisfies all users' needs. The Development is limited based on the existing Canebrake Drive, but we are proposing any and all required multi-modal infrastructure to meet our residents and employees' needs.
- D-CO4-2 Provide multiple route options (grid type structure) to alleviate congestion in lieu of additional lanes upon existing roadways. The Properties are not large enough to provide for a true grid pattern, but our proposed road system achieves this concept.

#### ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

- B-PR2-1 Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site. There is not an environmentally sensitive area on the Properties.
- B-PR2-2 Development should include regularly spaced access with an adequate width to the greenway network and conservation areas. The Development is not adjacent to a greenway network or conservation area, but it does connect with proposed open space and floodplain area.
- B-PR3-1 Minimize impact of development adjacent to land conservation properties through buffering. The Development is not adjacent to land conservation properties.
- B-SU5-1 Developments should incorporate energy efficient systems and renewable energy resources (i.e. wind, solar, etc.). The Development is still in the early planning phase, the Applicant does not know enough about the proposed users to commit to renewable resources being utilized at the site.
- B-SU9-1 Green Stormwater Infrastructure (GSI) should be implemented in new development. The Development is still in the early planning phase, the Applicant does not know enough about the infrastructure systems to commit to specific Green Stormwater Infrastructure at this time.
- B-RE2-1 Lexington's green infrastructure network, including parks, trails, greenways, or natural areas should be highly visible and accessible. The Development is not adjacent to a greenway network or conservation area, but it does connect with proposed open space and floodplain area.
- B-RE5-3 Developments within the Royal Springs Aquifer should consult with the Royal Springs Water Supply Protection Committee. The Properties are not within the Royal Springs area.

#### SITE DESIGN

- A-EQ9-2 Shared open spaces should be easily accessible and clearly delineated from private open spaces. There is only one type of open space as shown on the development plan.
- C-LI2-1 The design should not obstruct the view of the gateway features of the three existing gateways mapped in the Rural Land Management Plan (RLMP). The Development is not a featured gateway.

- C-LI2-2 Non-agricultural uses at or near potential and existing gateways, as mapped in the Rural Land Management Plan, should be buffered. The Development is not a featured gateway.
- C-LI2-3 Design should create a positive gateway character at existing and proposed gateways as identified in the Rural Land Management Plan. The Development is not a featured gateway.
- C-LI2-4 Setbacks, signage, and screening should complement the iconic Bluegrass landscape along Historic Turnpikes, Scenic Byways, Turnpikes, and other scenic roads listed in the RLMP.
- D-PL4-1 Enhance open space through the provision of programmatic elements and amenities. The Development is still in the early planning phase, the Applicant does not know enough about the end design to specify what types of uses or amenities will occur in the proposed open space.
- D-PL10-1 Activate the streetscape or publicly visible areas by designating public art easements in prominent locations. There is not a public art easement contemplated within the Development.
- D-SP3-2 Cellular tower antennae should be located to minimize intrusion and negative aesthetic impacts, and stealth towers and landscaping used to improve the visual impact from the roadway and residential areas. There is not a cell tower proposed.

#### BUILDING FORM

- E-GR4-1 Developments should incorporate reuse of viable existing structures. There are no structures on the Properties viable to be reused.
- E-GR5-1 Structures with demonstrated historic significance should be preserved or adapted. There are no historic structures on the Properties.

### **New Complete Neighborhood**

#### LAND USE

- A-DS12-1 Development should be located nearest to neighborhood serving commercial areas.
- C-PS15-2 Improve options for affordable and nutritious food where not currently available.
- D-SP1-1 Elementary and middle schools should be located within residential neighborhoods, and high schools primarily along collector streets.
- D-SP9-1 Encourage co-housing, shared housing environments, planned communities and accessory dwelling units for flexibility and affordability for senior adults and people with disabilities.
- E-GR3-1 Development should meet recreational needs by following the recommendations of the Parks Master Plan. The Properties are not part of the Parks Master Plan.

#### TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

- A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. The Properties are not along an existing transit route.
- A-DS1-2 Accessible pedestrian linkages to transit should be provided. The Properties are not along an existing transit route.

- A-DS10-1 New developments should incorporate clear and dedicated connections to nearby community anchors. There is not an adjacent community anchor, but the Properties are well connected to the surrounding uses and within the Development.
- A-DS13-1 Stub streets should be connected. There are not any stub streets, but we are proposing one as called for in the UGM.
- C-PS10-1 Flexible parking and shared parking arrangements should be utilized. There is not a need for shared parking arrangements, as the site is appropriately parked.
- D-CO4-2 Provide multiple route options (grid type structure) to alleviate congestion in lieu of additional lanes upon existing roadways. The Properties are not large enough to provide for a true grid pattern, but our proposed road system achieves this concept.

#### ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

- B-PR3-1 Minimize impact of development adjacent to land conservation properties through buffering. The Development is not adjacent to land conservation properties.
- B-SU5-1 Developments should incorporate energy efficient systems and renewable energy resources (i.e. wind, solar, etc.). The Development is still in the early planning phase, the Applicant does not know enough about the proposed users to commit to renewable resources being utilized at the site.
- B-SU9-1 Green Stormwater Infrastructure (GSI) should be implemented in new development. The Development is still in the early planning phase, the Applicant does not know enough about the infrastructure systems to commit to specific Green Stormwater Infrastructure at this time.
- B-RE5-3 Developments within the Royal Springs Aquifer should consult with the Royal Springs Water Supply Protection Committee. The Properties are not within the Royal Springs area.

#### SITE DESIGN

- D-SP3-2 Cellular tower antennae should be located to minimize intrusion and negative aesthetic impacts, and stealth towers and landscaping used to improve the visual impact from the roadway and residential areas. There is not a cell tower proposed.
- A-DS9-1 Development should provide active and engaging amenities within neighborhood focused open spaces. The Development is still in the early planning phase, the Applicant does not know enough about the end design to specify what types of uses or amenities will occur in the proposed open space.
- A-EQ9-1 School sites should be appropriately sized. This is not a school site.
- D-PL4-1 Enhance open space through the provision of programmatic elements and amenities. The Development is still in the early planning phase, the Applicant does not know enough about the end design to specify what types of uses or amenities will occur in the proposed open space.
- D-PL10-1 Activate the streetscape or publicly visible areas by designating public art easements in prominent locations. There is not a public art easement contemplated within the Development.
- D-SP1-2 School design should prioritize a high percentage of open and accessible street frontage. This is not a school site.

- D-SP2-1 Visible, usable greenspace and other natural components should be incorporated into school sites. This is not a school site.

**BUILDING FORM**

- A-DS8-1 Where single family detached residential units are provided, a variety of other housing types should be regularly interspersed along the street frontage. The Development does not propose SF detached units.
- D-PL2-1 Development should provide active first floor uses whenever adjacent to a street, pedestrian facility, or community focused open space. The Development is residential and industrial in nature as opposed to a commercial serving use for pedestrians. However, the structures will meet any requirements for first floor activation or applicable Multi-Family Design Standards.
- E-GR4-1 Developments should incorporate reuse of viable existing structures. There are no structures on the Properties viable to be reused.
- E-GR5-1 Structures with demonstrated historic significance should be preserved or adapted. There are no historic structures on the Properties.

We will be at the September public hearing in order to make a complete presentation of this application and request your favorable consideration.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink, appearing to read 'N. Nicholson', is positioned above the printed name.

Nick Nicholson