

June 3, 2024

Urban County Planning Commission
Division of Planning – Planning Services Section
101 E Vine Street, Floor 7
Lexington, KY 40507

Re: Justification Letter – Victor R. Chewning
2090 Harrodsburg Road / PIDN 10912100
From: Single-Family Residential (R-1C) Zone
To: Highway Service Business (B-3) Zone

Dear Members of the Planning Commission:

We submit this justification letter for Victor R. Chewning's ("Applicant") application for a zone map amendment request for 2400 Versailles Road from Single-Family Residential (R-1C) Zone to Highway Service Business (B-3) Zone. The Applicant is proposing a preliminary development plan for development of the property to allow for 950 SF and 6,000 SF retail buildings. As discussed below, the B-3 Zone is a natural fit for this particular property.

According to the PVA, the home located on the property was built around 1954 and currently provides ~0.037% of lot coverage. The property is an oddly shaped 1.0 acres (net). Mr. Chewning's family has owned this property since 1960. With his mother's passing in 2023, he and his siblings inherited the property. They believe that this property can be redeveloped to effectively serve the area in accordance with the goals and objectives of the 2023 Comprehensive Plan.

Applicant is proposing a preliminary development plan for the property. Mr. Chewning and his siblings have a letter of intent for Dutch Bros. to lease the property conditioned on a zoning approval. A user(s) for the 6,000 SF building has not yet been identified, and a preliminary development plan will give the family the ability to market the site to potential users. Applicant can then come forward with a final development plan in the future. We expect an application for a final development plan within the next year.

Since homes in this area were constructed, the character of the Harrodsburg Road corridor has changed markedly, particularly in this area. In 1966, directly across Harrodsburg Road from the subject parcels, the Turfland Mall was developed as a regional shopping center, opening to the public the next year. Though initially successful, the mall property declined over the years and its final interior retail unit within the mall closed in 2008. At present, a few retailers (Home Depot and Staples) remain on the property, as well as a Verizon store and several restaurants. These businesses primarily operate on the "outlots" of the Turfland Mall property, serving the traveling

public. UK Healthcare opened an 85,000 square foot facility on a portion of the Turfland Mall site. Likewise, the Springs Motel was a long-time fixture of Harrodsburg Road, which was located just to the northeast of the subject properties. The hotel was demolished, and new development has occurred on these B-3 parcels to include a pharmacy, restaurants, and a health clinic; all of which, serve the traveling public and neighborhood-vehicular customers. The character of this area of the Harrodsburg Road corridor primarily serves the traveling public and neighborhood-vehicular customers.

As discussed below, we believe that this rezoning request is in accord with many of the goals and objectives of the Comprehensive Plan. We further submit that this rezoning will actually enhance the area with additional commercial uses that will serve both the local residents and traveling public, while limiting such rezoning to the Harrodsburg Road corridor.

Comprehensive Plan

As discussed below, this project meets numerous goals and objectives of the Comprehensive Plan, and further complies with relevant standards articulated in “Placebuilder” included as part of the Comprehensive Plan.

This property is a natural fit for the B-3 Zone. As set forth in Section 8-20 of the Zoning Ordinance, the B-3 Zone is intended to provide uses that are “necessary to the economic vitality of the community but may be inappropriate in the other zones” and special consideration to the relationship to the other land uses in the area should be given. Harrodsburg Road is a major arterial highway that runs through Fayette County. As discussed above, this area of Harrodsburg Road is characterized by businesses that serve the traveling public, including, without limitation, gas stations, fast food and casual restaurants, a small retail stores. The Applicant will rely upon the existing street system, which is adequate to serve its traffic needs.

This is an opportunity to redevelop underutilized land within the Urban Service Boundary (Theme A, Goal 2a.). Notwithstanding the substantial redevelopment of this area, over the last several years, there remains a dearth of available B-1 and B-3 Zone parcels in this area. In fact, if you consider the area bounded by Harrodsburg Road, Clays Mill Road, and New Circle Drive, which consists of hundreds of residential parcels, there is no vacant commercial land fronting Harrodsburg Road available for development for new services. Allowing landowners to redevelop their underutilized land will contribute to ensuring the preservation of the Urban Service Area concept by relieving pressure on the perimeter of the boundary (Theme E, Goal 4.a). This project will provide an opportunity for an increase in services in the area that is caused by the scarcity of commercial properties available.

The Applicant’s proposal is in character with this portion of the Harrodsburg Road corridor (Theme A, Goal 2b.). The property sits between parcels that are B-3 Zone and R-3 Zone—both being utilized for commercial purposes. The home located on the property currently provides ~0.037% of lot coverage, and the proposal will increase that lot coverage 5x. That lot coverage aligns with the averages for the commercial development on the old Spring Motel site and the parcels to the south. The property sits between parcels that are B-3 Zone and R-3 Zone—both

being utilized for commercial purposes. There are no other residential land uses along this block of Harrodsburg Road. There will be no added vehicular traffic to any residential streets. The 6,000 SF retail building will buffer and isolate of the property will allow for a transition and step-down between the commercial and residential areas to the rear of the site (Theme A, Density Policy #1). The proposed 950 SF building is similar in size and design to the Human Bean located on Harrodsburg Road. The proposed development is smaller and less intensive than most quick-service concepts along the Harrodsburg Road corridor, and it will activate this small-underutilized property. The development is proposed to connect to the old Springs Motel site. This portion of the Harrodsburg Road corridor consists exclusively of low density uses, and this development will connect with the context and design of this area of Harrodsburg Road.

This development will not have a negative traffic impact on the corridor. Like most of Lexington's major arterial highways, Harrodsburg Road is heavily traveled in this location on a daily basis. Yet, the Comprehensive Plan states that the mere citation of traffic issues should not be the sole driver of opposition to infill (Comprehensive Plan at Page 55). Harrodsburg Road is a four-lane major arterial highway, but with the grassed median in this area, the proposal is for right/left turn lane in and out of the development. Further, we anticipate a substantial portion of customer- traffic to be during the AM hours with right turns in and out. To further reduce a traffic impact, the proposed development will provide for two drive-thru lanes with adequate stacking for its customers. The Applicant also intends to connect to the old Springs Motel site, which will allow local pedestrian and vehicular traffic to access the project without traveling on Harrodsburg Road (Theme A, Design Policy #2). This proposal will allow development of the property with only a minor traffic impact on the corridor.

As set forth above, the B-3 Zone change and this development will redevelop underutilized land within the Urban Service Boundary, is character with this portion of the Harrodsburg Road corridor, and would have minor traffic impact on the corridor and would activate underutilized land. The B-3 Zone agrees with the Goals and Objectives of the 2023 Comprehensive Plan.

KRS 100.213(1)(a)

KRS 100.213 provides that an applicant may argue that the existing classification is an inappropriate zoning classification, and the proposed zoning classification is appropriate (KRS 100.213(1)(a)). An applicant has the discretion to determine which of the aforementioned three statutory options it intends to use, and more importantly, an applicant is not obligated to provide for alternative justifications. If an applicant chooses to proceed under KRS 100.213(1)(a), then an analysis of the comprehensive plan is not applicable to its argument. In this instant case, the Applicant is proceeding under KRS 100.213(1)(a), as alternative to its 2023 Comprehensive Plan analysis. This does not even consider the substantial change in character of Harrodsburg Road itself. Once a two-lane highway, Harrodsburg Road is now one of the most significant arterial roads in all of Lexington. In fact, the subject parcels are less than one mile from the double-diamond crossover interchange at Harrodsburg and New Circle Roads. This interchange was installed to deal with "severe congestion" and "high accident rates" according to the Kentucky Transportation Cabinet. While once a desirable road for single-family residential development, the change in character to Harrodsburg Road makes this a much more appropriate corridor for

commercial development. Though we are certainly cognizant that zoning lines have to be drawn somewhere, we believe the present zoning line is in an inappropriate location. It is in the middle of a block, across the street from the middle of the Turfland Mall development, and adjacent to the commercial development on the old Springs Motel site. The instant rezoning request will allow the expansion of the commercial land in the area within an appropriate boundary. The R-1C Zone is an inappropriate use of the property and the B-3 Zone is an appropriate use of the property (KRS 100.213(1)(a)).

Conditional Zoning Restrictions

We recognize the unique nature of these sites as residing on a major commercial corridor immediately adjacent to residential areas. In order to protect the neighborhood from uses that are too intensive or out of character with the existing area, we propose the following conditional zoning restrictions:

1. Establishments and lots for the display, rental, sale, service, and minor repair of farm equipment, contractor equipment, automobiles, motorcycles, trucks, boats, travel trailers, mobile homes, or supplies for such items.
2. Kennels, animal hospitals or clinics, including offices of veterinarians, provided that such structures or uses, not including accessory parking areas, shall be at least one hundred (100) feet from any residential zone.
3. Carnivals, special events, festivals and concerts on a temporary basis, and upon issuance of a permit by the Divisions of Planning and of Building Inspection, which may restrict the permit in terms of time, parking, access or in other ways to protect public health, safety, or welfare; or deny such if public health, safety or welfare are adversely affected. A carnival, special event, festival, or concert may not displace more than twenty-five percent (25%) of the minimum required parking for the site it occupies.
4. Pawnshops.
5. Parking lots and structures.
6. Adult arcades, massage parlors, adult bookstores, adult video stores, adult cabarets, adult dancing establishments, adult entertainment establishments, and sexual entertainment centers.
7. Retail sale of automotive parts with storage and distribution of inventory to other local establishments under the same ownership.
8. Automobile and vehicle refueling stations.
9. Commercial farm markets and market gardens.

10. Banquet Facilities.
11. Amusement parks, fairgrounds, or horse racing tracks.
12. Outdoor theaters.
13. Passenger transportation terminals.
14. Pawnshops.
15. Mining of non-metallic minerals.
16. The above- or below-ground storage of any flammable material in gaseous form, including compressed natural gas.
17. Circuses.
18. Ecotourism activities.

DEVELOPMENT CRITERIA / PLACEBUILDER

Placebuilder does not recommend the B-3 Zone for any areas of Lexington, but we submit that the project could be evaluated as the Corridor Place Type. This is buttressed by this body's adoption of a recommendation of approval of the Urban Growth Management ZOTA that recognized the necessity of revising to Placebuilder to recommend B-3 Zone as a recommended zone in the Corridor Place Type. Placebuilder permits low density along the Corridor Place Type, even though it is not a "most suitable development type," based upon its context sensitivity and character of the surrounding area. We have chosen the property to be classified as Low Density Non-Residential / Mixed Use Density, but the Corridor Place Type does not list that classification. Therefore, we have used Low Density Non-Residential / Mixed Use Density from the Enhanced Neighborhood Place Type for the sole purpose of demonstrating compliance with Placebuilder for this project. Attached hereto is a color-coded reflection of how we have addressed the design criteria listed in that Placebuilder category. Items highlighted in green are represented graphically on our amended preliminary development plan, items in yellow are addressed in this letter, and items highlighted in orange we do not believe are applicable to our proposal.

Standards That Are Applicable

SITE DESIGN, BUILDING FORM, & LOCATION

A-DS4-2 That lot coverage aligns with the averages for the commercial development on both adjacent parcels. Both adjacent parcels that face Harrodsburg Road are commercial users. There will be no added vehicular traffic to any residential streets, and Applicant is proposing cross-access for the commercial parcels (present and future opportunity). The buffering and isolation of the property will allow for a transition and step-down between the commercial and residential

areas toward the rear of the property. All of the immediate structures in the vicinity are less than 2 stories.

A-DS5-3 The buildings orient toward Harrodsburg Road. Applicant is proposing pedestrian and vehicular access to Harrodsburg Road and the adjacent commercial parcels (present and future opportunity).

A-DS5-4 Applicant is proposing pedestrian and vehicular access to Harrodsburg Road and the adjacent commercial parcels (present and future opportunity). Applicant is proposing outdoor areas—patio seating—for both buildings.

A-DS7-1 Applicant is splitting the parking between the front and rear of the property for each building. Applicant will have landscaping along the corridor to soften that parking area. The rear parking is behind the smaller building, and due to this location, the rear parking will have a limited streetscape view from Harrodsburg Road. Applicant will have boundary vegetative screening along the property that will screen most of the parking from the streetscape view and adjacent properties.

A-DS7-2 Applicant will have boundary vegetative screening along the property that will screen most of the parking from the streetscape view and adjacent properties.

A-DN2-2 All of the immediate structures in the vicinity are less than 2 stories. There should not be any significant contrasts in scale, massing, or design. That lot coverage aligns with the averages for the commercial development on the old Spring Motel site and the parcels to the south.

B-SU11-1 Applicant intends to have impervious paving for the parking spaces. With respect with submitting its improvement plans, the Applicant will also work with the Division of Engineering and Division of Water Quality on other possible green infrastructure in relation to the greenspace.

C-DI1-1 The B-3 Zone will allow a wide range of jobs. In addition to the employment opportunities at a Dutch Bros. The 6,000 SF retail building could be used by a number of different users: insurance agency, banks, groceries, independent retail, etc.

C-L17-1 It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas.

C-PS10-3 The project only has 20 proposed parking spaces.

D-PL2-1 This project will bring additional commercial services to the area, but as stated above, this entire commercial area is neighbor-vehicle serving and not neighborhood-pedestrian scale.

D-PL7-1 Applicant has had preliminary conversations with the neighbors, and it will have additional conversation with them between now and the sub-committee meetings. We will supplement this information with an update to planning staff.

D-SP3-1 There are adequate right-of-way and easements for this property.

E-GR9-4 The home located on the property currently provides ~0.037% of lot coverage, and the proposal will increase that lot coverage 5x. The property will also have an increased intensity.

E-GR10-2 It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

A-DS1-2 The project will have direct pedestrian access to Harrodsburg Road and the adjacent commercial property. The transit stop is located in front of the McDonald's. There is no plan to relocate it to this property.

A-DS4-1 There are no direct access to the residential neighborhoods within the immediate vicinity of the property. It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas.

A-DS5-1 There are no direct access to the residential neighborhoods within the immediate vicinity of the property. It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas. There are currently no dedicated bicycle lanes in this area.

A-DS5-2 Applicant intends to create a vertical edge of the roadway with landscaping and street trees.

D-CO1-1 The Applicant is not providing any new rights-of-way. It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas.

D-CO2-1 It is anticipated that the project will enhance pedestrian access along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will also have internal pedestrian markings for safety.

D-CO2-2 It is anticipated that the project will enhance pedestrian access along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will also have internal pedestrian markings for safety.

GREENSPACE & ENVIRONMENTAL HEALTH

B-PR7-2 Applicant will collaborate with the Urban Forester to preserve certain trees at the final development stage. Applicant intends to plant street trees, and there may be opportunity to plant additional tree groupings. The B-3 Zone will require twenty percent (20%) tree canopy. The Vehicle Use Area ZOTA also requires additional tree canopy for vehicle use areas with more than 5,000 SF or 15 or more parking spaces.

B-PR7-3 We anticipate that the project will have the same or more tree canopy at the final development stage. Applicant will collaborate with the Urban Forester to preserve certain trees at the final development stage. Applicant intends to plant street trees, and there may be opportunity to plant additional tree groupings. The B-3 Zone will require twenty percent (20%) tree canopy. The Vehicle Use Area ZOTA also requires additional tree canopy for vehicle use areas with more than 5,000 SF or 15 or more parking spaces.

B-RE1-1 Applicant intends to install street trees.

Standards Not Applicable

SITE DESIGN, BUILDING FORM, & LOCATION

A-DS10-1 There are no proposed residential units for the property.

A-DS11-1 There are no proposed common public uses for the property, but there will be two outdoor seating/patio areas.

A-DS12-1 There are no proposed residential units for the property.

A-DN2-1 There are no proposed residential units for the property.

A-DN3-1 There are no direct access to the residential neighborhoods within the immediate vicinity of the property. It is anticipated that the project will enhance pedestrian access and streetscape along Harrodsburg Road. There will be a connection from the buildings to the public sidewalk and adjacent commercial property. The project will have bike parking and two outdoor patio/seating areas.

A-DN3-2 This is not a commercial center project.

A-EQ7-1 There are no proposed schools for the property.

B-PR9-1 There are no environmentally sensitive areas on the property.

- C-DI5-1 The property is not in an Opportunity Zone.
- C-LI6-2 This is not a single-family residential development.
- C-PS9-2 This project does not current office space.
- C-PS10-2 The project only has 20 proposed parking spaces.
- D-PL9-1 There are no historically significant structures on the property.
- D-PL10-1 Applicant is not proposing public art along the corridor.
- D-SP1-1 No schools are being proposed.
- D-SP2-1 No schools are being proposed.
- D-SP3-2 There are no proposed cellular tower antennae on the property.
- D-SP9-1 There are no proposed housing units on the property.
- E-GR4-1 The existing home is small and in need a substantial deferred maintenance. It is not a viable candidate for reuse within this project.
- E-GR5-1 There are no historically significant structures on the property.
- E-GR9-1 This is not a residential development.
- E-GR9-3 There are no direct access to the residential neighborhoods within the immediate vicinity of the property. It is anticipated that the project will enhance pedestrian access along Harrodsburg Road and to the adjacent commercial property.
- E-GR10-3 The Applicant is not proposing any common space for the property, but the project will have two outdoor patio/seating areas.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- A-DS1-1 The project will have direct pedestrian access to Harrodsburg Road and the adjacent commercial property. The transit stop is located in front of the McDonald's. There is no plan to relocate it to this property.
- A-DS10-2 The Applicant is not proposing any new focal points; provided, Applicant is proposing two patio/seating areas.
- A-DS13-1 The Applicant is not proposing any new streets at the property.
- B-SU4-1 Given the small site, Applicant is not proposing any new greenspace/community space; provided, Applicant is proposing two patio/seating areas.

C-PS10-1 The project has only 20 parking spaces, and it does not intend to have park sharing.

D-CO4-1 No new roadways are proposed for the property.

D-CO4-2 No new roadways are proposed for the property. There is plenty of capacity on existing roadways.

D-CO4-3 No new roadways are proposed for the property.

D-CO5-1 No new streets are proposed for the property.

D-SP1-3 There are no proposed schools for the property.

D-SP6-1 Applicant does not anticipate social services and community facilities being at the property, but those services could be provided in the 6,000 SF building in the future.

GREENSPACE & ENVIRONMENTAL HEALTH

A-DS4-3 There are no key natural features on the property.

A-EQ7-3 There are no proposed community open spaces; provided, Applicant is proposing two patio/seating areas.

B-PR2-1 There are no environmentally sensitive areas on the property.

B-PR2-2 There is no flood plain on the property.

B-PR2-3 There is no flood plain on the property.

B-PR7-1 The property is land-locked from the greenspace network.

B-RE2-1 The property is land-locked from the greenspace network.

D-SP2-1 There are no school sites.

D-SP2-2 There are no school sites.

E-GR3-1 The property is land-locked from the greenspace network.

E-GR3-2 There are no geographic features on the property.

Sincerely,



P. Branden Gross

LOW DENSITY NON-RESIDENTIAL / MIXED-USE

SITE DESIGN, BUILDING FORM, & LOCATION

- 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 in accordance with other Imagine Lexington corridor policies and Placebuilder priorities.
- A-DS5-3** Building orientation should maximize connections with the surrounding area and create a pedestrian-friendly atmosphere.
- A-DS5-4** Development should provide a pedestrian-oriented and activated ground level.
- A-DS7-1** Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments.
- A-DS7-2** Any non-residential or multi-family parking not buffered by a building should be screened from the streetscape view and adjacent properties.
- A-DS10-1** Residential units should be within reasonable walking distance to a focal point.
- A-DS11-1** Common public uses that serve as neighborhood focal points, such as parks and schools, should be on single loaded streets.
- A-DS12-1** Medium-high density development should be located nearest to neighborhood-serving commercial areas.
- A-DN2-1** Infill residential should aim to increase density.
- A-DN2-2** Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods. (D-PL9, E-GR6)
- A-DN3-1** Pedestrian-oriented commercial opportunities should be incorporated within residential neighborhoods.
- A-DN3-2** Development should incorporate residential units in commercial centers with context sensitive design.
- A-EQ7-1** School sites should be appropriately sized.
- B-PR9-1** Minimize disturbances to environmentally sensitive areas by utilizing the existing topography to the greatest extent possible.
- B-SU11-1** Green infrastructure should be implemented in new development. (E-GR3)
- C-D11-1** Consider flexible zoning options that will allow for a wide range of jobs.
- C-D15-1** In Opportunity Zones with a clearly defined local context, consider adaptive reuse to enhance the existing context.
- C-LI6-2** ADUs and/or affordable housing options should be incorporated into existing and new single-family residential development. (A-DN5)

- C-LI7-1** Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment.
- C-PS9-2** Modify current office space to include complementary uses.
- C-PS10-2** Developments should explore options for shared and flexible parking arrangements for currently underutilized parking lots.
- C-PS10-3** Over-parking of new developments should be avoided. (B-SU5)
- D-PL2-1** Developments should aim to provide a neighborhood-serving use that does not already exist in the vicinity, or that fills a specific need.
- D-PL7-1** Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application.
- D-PL9-1** Historically significant structures should be preserved.
- D-PL10-1** Activate the streetscape by designating public art easements in prominent locations.
- D-SP1-1** Elementary and middle schools should be located within residential neighborhoods, and high schools primarily along collector streets. (A-EQ7)
- D-SP1-2** An open and inviting school campus/locale should utilize frontage on single-loaded streets (also true for other support facilities, like parks, community centers, social services, healthcare).
- 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.
- D-SP3-2** Cellular tower antennae should be located to minimize intrusion and negative aesthetic impacts, and stealth towers and landscaping should be used to improve the visual impact from the roadway and residential areas.
- 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-GR4-1** Developments should incorporate reuse of viable existing structures.
- E-GR5-1** Structures with demonstrated historic significance should be preserved or adapted.
- E-GR9-1** Live/work units should be incorporated into residential developments.
- E-GR9-2** Low-intensity business uses that will provide neighborhood amenities should be incorporated into existing neighborhoods.
- E-GR9-3** Less intense multi-family residence types (duplexes, four-plexes, courtyard apartments, etc.) should be incorporated into primarily single-family areas.

ENHANCED NEIGHBORHOOD

Theme Letter - Pillar Abbreviation & Policy Number - Criteria Number
 Ex: from Theme A - Design Pillar & Policy #1 - Criteria #1 = A-DS1-1. Full decoder on page ###

Criteria that include additional policy items in parentheses refer to companion policies that will provide additional context to the related criteria.

LOW DENSITY NON-RESIDENTIAL / MIXED-USE

SITE DESIGN, BUILDING FORM, & LOCATION (CONT.)

- E-GR9-4** Development should intensify underutilized properties and develop vacant and underutilized gaps within neighborhoods. (E-GR6)
- E-GR10-2** Developments should provide walkable service and amenity-oriented commercial spaces.
- E-GR10-3** Shared common space in commercial developments should be provided to encourage experiential retail programming.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- A-DS1-1** Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. (A-EQ7).
- A-DS1-2** Direct pedestrian linkages to transit should be provided.
- A-DS4-1** A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided. (A-DS2, A-DN1, B-SU1, B-SU2, C-L17, E-AC5)
- A-DS5-1** Adequate multi-modal infrastructure should be provided to ensure vehicular separation from other modes of transport.
- A-DS5-2** Roadways should provide a vertical edge, such as trees and buildings.
- A-DS10-2** New focal points should be designed with multi-modal connections to the neighborhood.
- A-DS13-1** Stub streets should be connected. (D-CO4)
- B-SU4-1** Where greenspace/community centers are not located within walking distance of a new development, applicants should attempt to incorporate those amenities. (A-DS9)
- C-PS10-1** Flexible parking and shared parking arrangements should be utilized.
- D-CO1-1** Rights-of-way and multimodal facilities should be designed to reflect and promote the desired place-type.
- D-CO2-1** Safe facilities for all users and modes of transportation should be provided.
- D-CO2-2** Development should create and/or expand a safe, connected multimodal transportation network that satisfies all users' needs, including those with disabilities.
- D-CO4-1** Dead-end streets and Cul-de-sacs should be discouraged except where connections are not topographically or environmentally feasible.
- D-CO4-2** Roadway capacity should be increased by providing multiple parallel streets, which alleviate traffic and provide multiple route options, in lieu of additional lanes.

GREENSPACE & ENVIRONMENTAL HEALTH

- D-CO4-3** Street pattern and design should consider site topography and minimize grading where possible.
- D-CO5-1** Streets should be designed with shorter block lengths, narrower widths, and traffic calming features.
- D-SP1-3** Developments should provide multi-modal transportation infrastructure to school sites, including sidewalks, shared-use paths, and roadways that can accommodate the bus and vehicle traffic associated with the site.
- D-SP6-1** Social services and community facilities should be accessible via mass transit, bicycle and pedestrian transportation modes. (A-EQ7)

- A-DS4-3** Development should work with the existing landscape to the greatest extent possible, preserving key natural features.
- A-EQ7-3** Community open spaces should be easily accessible and clearly delineated from private open spaces.
- B-PR2-1** Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site.
- B-PR2-2** Dividing floodplains into privately owned parcels with flood insurance should be avoided.
- B-PR2-3** Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them.
- B-PR7-1** Connections to greenways, tree stands, and stream corridors should be provided.
- B-PR7-2** Trees should be incorporated into development plans, prioritize grouping of trees to increase survivability.
- B-PR7-3** Developments should improve the tree canopy.
- B-RE1-1** Developments should incorporate street trees to create a walkable streetscape.
- B-RE2-1** Green infrastructure should be used to connect the greenspace network.
- D-SP2-1** Visible, usable greenspace and other natural components should be incorporated into school sites.
- D-SP2-2** Active and passive recreation opportunities should be provided on school sites.
- E-GR3-1** Physical and visual connections should be provided to existing greenway networks.
- E-GR3-2** New focal points should emphasize geographic features unique to the site.

Theme Letter - Pillar Abbreviation & Policy Number - Criteria Number
 Ex: from Theme A, Design Pillar, Policy #1, Criteria #1: A-DS1-1. Full decoder on page ###

Criteria that include additional policy items in parentheses refer to companion policies that will provide additional context to the related criteria.