

July 29, 2024

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

Re: Supplemental Justification Letter  
PLN-MAR-24-00011: Beverly A. Chewning / 2090 Harrodsburg Road

Dear Members of the Planning Commission:

We submit this supplemental justification letter, for Victor R. Chewning's (together with its representatives, "Applicant") application for a zone map amendment request for 2090 Harrodsburg Road, to provide you additional information related to the application.

#### Public Engagement

As discussed in the justification letter dated June 4, 2024, Applicant had limited conversations with neighbors prior to filing the application, and Applicant had proposed a neighborhood meeting in mid-June. At the request of Tee Bergman of the Mitchell Avenue Neighborhood Association, Applicant postponed the neighborhood meeting (and the Zoning Sub-Committee Meeting) to permit neighbors additional time to review materials and provide feedback to Applicant prior to the Zoning Sub-Committee Meeting.

Applicant held a neighborhood meeting at the Good Foods Co-Op on July 11, 2024. The following were informed of the meeting: (1) representatives of Mitchell Avenue Neighborhood Association, Friends of Wolf Run, and Southland Park Neighborhood Association, (2) the Legislative Aide for the Council District 10, and (3) the immediate neighbors. Applicant also prepared a flyer for the neighborhood meeting to be shared with other interested groups and neighbors. Applicant, Vision Engineering, and Daniel Crum of the planning staff attended that meeting, along with 25 neighbors.

The Office of Councilmember Dave Seigny has included information related to this application in his Ten Things from the 10<sup>th</sup> (a monthly e-newsletter) that is emailed each month.

On July 18, 2024, Applicant had a follow-up meeting with the neighbors at 2091 and 2095 Spring Grove Avenue and Ms. Bergman. Applicant has also spoken with representatives of the owner of 2094 and 2098 Harrodsburg Road.

The following are the main concerns expressed to Applicant, and Applicant's responses thereto:

1. *Context/Character:* The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area with high density adjacent to single-family residences. Applicant has proposed to restrict this project with zoning restrictions to provide for (a) a 15' landscape buffer with a solid fence along the adjacent-existing single-family zones, (b) restrict restaurants from being permitted uses near the adjacent-existing single-family zones, and (c) limit outdoor amplified noise. With respect to request (b), Applicant has reduced the rear building to 5,400 SF to retain its operational design. Applicant has proposed zoning use restrictions later in this supplemental justification letter.

2. *Stormwater Management:*

a. Applicant has proposed an underground stormwater management system for both water quantity and water quality for mitigation. The proposed area for that system is shown on the revised preliminary development plan. Applicant will work with the Division of Water Quality to design that system at the final development phase.

b. Applicant has proposed permeable materials for parking spaces to mitigate stormwater.

c. Within the vehicle use area, This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation.<sup>1</sup> This project will increase tree canopy on the subject property by approximately 50%. Applicant will work with the city's divisions to plan and locate landscaping and trees (both new and preserved) at the final development phase.

3. *Traffic Impact:*

a. Vision Engineering submitted a traffic analysis to the Division of Traffic Engineering. That analysis demonstrated that peak AM and PM vehicle trips is approximately 50 and 40 vehicles per peak hour, respectively, for this project. The zoning ordinance and city's regulations do not require a full traffic impact study for such a small development.

b. Applicant has proposed a cross-connection to function as a service road with multi-modal improvements to separate pedestrians from that service road. Once fully connected, that service road will permit joint-commercial users, employees, and neighbors to access this project without traveling along Harrodsburg Road.

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<sup>1</sup> The square footage amounts used in this supplemental justification letter should be deemed as approximates, since they may adjust as the preliminary development plan is reviewed and revised through the process.

c. Applicant has proposed a two-lane to one-lane drive-through lane to ensure that there is adequate stacking for the drive-through facilities to avoid any stacking along the proposed service road or onto Harrodsburg Road.

## Comprehensive Plan

### Context/Character

Lexington is growing, but Lexington has chosen to control its outward growth. To accommodate this growth, development in Lexington will continue to need to identify parcels of land that are available for infill and redevelopment. Redevelopment opportunities are scarce, and it is imperative that the redevelopment integrate into the existing context/character of the surrounding area. The 2045 Comprehensive Plan is clear that increased density and intensity are important considerations along our corridors to accommodate population growth and land use efficiency, but the 2045 Comprehensive Plan does not relegate context/character to a second-class consideration. Within the Goals and Objectives of the 2045 Comprehensive Plan, density/intensity and context/character are equals to be balanced for each development.

At the request of planning staff, the following is additional discussion of Theme A, Goal 2.b., and Theme A, Density Policy #1, of the 2045 Comprehensive Plan.

*Theme A, Goal 2.b.: Support infill and redevelopment throughout the urban service area as a strategic component of growth; Respect the context and design features of areas surrounding development projects and develop design standards and guidelines to ensure compatibility with existing urban form.*

*Theme A, Density Policy #1: Locate high density areas of development along higher capacity roadways (minor arterial, collector), major corridors & downtown to facility future transit enhancements.*

The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area with medium or high-density commercial development adjacent to single-family residences. When commercial development abuts single-family residences, it is primarily low density. Applicant's proposed floor area ratio and lot coverage respects that context/character. This project is appropriate and does not create significant contrasts in scale, massing, and design and respects the context/character of the surrounding area.

Starting in the 1950s, the surrounding area on the east side of Harrodsburg Road was developed primarily for single-family residences and single-story commercial buildings. The lotting pattern for the single-family residences consists of 4-5 residences per acre with a floor area ratio and lot coverage of 10-12%. The Springs Motel, which is located to the immediate north of the subject property, was redeveloped in 2010s, has a floor area ratio and lot coverage of 17%. The house on the subject property (one acre lot) is only 2,080 SF, making its current lot coverage under 5%. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided.

Applicant has proposed to triple the current lot coverage with this project, which would align with the Springs Motel site. Applicant's project will match the context/character and urban form of the surrounding area.

Theme A, Density Policy #1, does not dictate high density for every development along a corridor. "High density development is not appropriate in every context" (Comprehensive Plan at Page 70). The Comprehensive Plan does not prohibit lower density developments along the corridors, and actually, Applicant has proposed to triple the current lot coverage with this project. The Urban Growth Management Zoning Ordinance Text Amendment confirms that fact by only permitting drive-through facilities along the city's corridors and arterial roadways. One of the purposes of that ZOTA was to relocate drive-through facilities from our local roadway systems to the city's corridors and arterial roadways. This project is an area for which the community has stated it wants to make available for drive-through facilities. As discussed above, the context/character and urban form of the surrounding area makes a low-density development appropriate at this location and at this time.

Theme A, Density Policy #1, also provides that intense uses along the corridor should transition from and mitigate intrusion to adjacent single-family residential zones. The proposed rear building and Applicant's proposed zoning restrictions provide that transition and buffering between the drive-through facilities and the single-family residences.

Planning staff raised questions regarding the amount of vehicle use area for this project. The vehicle use area for this project complies with the zoning ordinance and other regulations applicable to preliminary development plans, and Applicant has designed and mitigated it to further the Goals, Objectives, and Policies of the Comprehensive Plan: specifically, Theme A, Design Policy #2; and Theme B, Sustainability Policy #4.

*Theme A, Design Policy #2: Ensure proper road connections are in place to enhance service times & access to public safety, waste management and delivery services for all residents.*

The design shown on the preliminary development plan is a combination of the functional and practical designs necessary for this project to operate in an efficient and safe manner. Applicant has proposed a cross-connection (with multi-modal improvements) to serve as a service road to provide the ability of neighbors and joint-commercial users to access all three developments without traveling along Harrodsburg Road—dispersing traffic and creating connectivity. It is recommended that arterial development include service roads to reduce the impact on highway movement. Applicant has proposed a two-lane to one-lane drive-through lane to ensure that there is adequate stacking for the drive-through facilities to avoid any entry into the proposed service road or Harrodsburg Road. Applicant has proposed a by-pass lane to provide (a) access and parking to permit a use of the rear building, and (b) adequate auto-turning (Applicant provided that modeling to planning staff) to comply with the city's regulations for its fire and garbage trucks. Vehicle use areas are expensive to construct, and Applicant has only provided such area that it has determined is necessary for this project to practically operate.

*Sustainability Policy #4: Reduce and mitigate negative environmental impacts of impervious surfaces and vehicles uses areas.*

Applicant has proposed an underground stormwater management system for both water quantity and water quality for mitigation. The proposed area for that system is shown on the revised preliminary development plan. Applicant will work with the Division of Water Quality to design that system at the final development phase. This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%.

In this instance and at this time, a lower density development respects the context/character and urban form of the surrounding area, and the B-3 Zone would allow a denser development in the future. The revised preliminary development plan complies with the zoning ordinance and subdivision regulations applicable to preliminary development plans and this application. Applicant has proposed a project that will increase the density and utilization from what currently exists on the subject property. This project respects the scale, massing, and design of the surrounding area.

Based upon the justification letter and the information provided in this supplemental justification letter, the B-3 Zone for the subject property complies with the Goals, Objectives, and Policies of the 2045 Comprehensive Plan.

#### REVISED Conditional Zoning Restrictions

Applicant recognizes the unique nature of the subject property being located on a major commercial corridor immediately adjacent to single-family residences. In order to mitigate possible negative effects on the single-family residences, Applicant has proposed the following REVISED conditional zoning restrictions:

1. Miniature golf or putting courses.
2. Banquet Facilities.
3. Establishments and lots for the display and sale of farm equipment, contractor equipment, automobiles, motorcycles, trucks, boats, travel trailers, mobile homes, or supplies for such items.
4. Any building for eating and drinking establishments, with entertainment, and/or sale of alcoholic beverages, shall be located at least twenty-five (25) feet from any adjacent-existing single-family residential zone.
5. Nightclubs.

6. Automobile and vehicle refueling stations, excluding electric vehicle (EV) charging facilities. Automobile service stations may not include refueling facilities, excluding electric vehicle (EV) charging facilities.
7. Drive-in restaurants shall be located at least twenty-five (25) feet from any adjacent-existing single-family residential zone.
8. Carnivals, special events, festivals, and concerts.
9. Adult arcades, massage parlors, adult bookstores, adult video stores, adult cabarets, adult dancing establishments, adult entertainment establishments, and sexual entertainment centers.
10. Commissaries for preparation of food for restaurant use shall be located at least twenty-five (25) feet from any adjacent-existing single-family residential zone.
11. Outdoor athletic facilities.
12. Amusement parks, fairgrounds, or horse racing tracks.
13. Outdoor theaters.
14. Outdoor recreational facilities.
15. Passenger transportation terminals.
16. Mining of non-metallic minerals.
17. The above- or below-ground storage of any flammable material in gaseous form, including compressed natural gas.
18. Circuses.
19. Ecotourism activities.
20. Any Micro-Brewery, Micro-Distillery, or Winery shall be located at least twenty-five (25) feet from any adjacent-existing single-family residential zone.

Other Use Restrictions:

- a. A landscape buffer of at least fifteen (15) feet in width shall be provided along the boundary of the adjacent-existing single-family residential zone, with plantings as specified by Article 18-3(a)(1)2, along with a solid fence with a minimum six (6) feet height.
- b. Outdoor lighting shall be shielded and directed away from the adjacent-existing single-family residential zone. No outdoor lighting located within twenty-five (25) feet from



the adjacent-existing single-family residential zone shall exceed fifteen (15) feet in height.

- c. Exterior amplification systems shall be directed away from the adjacent-existing single-family residential zone. Exterior amplification systems shall use modern noise-reduction technology to the maximum extent feasible. No exterior amplification systems shall create a nuisance to the adjacent-existing single-family residential zone.

### This project Criteria / Placebuilder

#### Rational for Low Density Non-Residential / Mix Use Development Type

Applicant chose the Low Density Non-Residential / Mix Use Development Type, because that This project Type most closely aligns with the context/character and urban form of the surrounding area. There are very few multi-story commercial or apartment buildings within ¼ mile of the subject property, and almost none of those buildings abut single-family residences. To the immediate north, the Springs Motel development has a mix of commercial uses that include fast service restaurants and employment and community serving uses (such as a medical office and a pharmacy). To the immediate south, the properties are used as a daycare. The immediate area is a combination of both neighborhood-serving and community-serving businesses and places of employment. Further, this project abuts single-story residences. A Low Density Non-Residential / Mix Use Development Type is clearly in context/character urban form for the surrounding area and respects its scale, massing, and design.

The revised preliminary development plan complies with the zoning ordinance and subdivision regulations applicable to preliminary development plans, and it neatly fits within the suburban character of the surrounding area.

Similar to the immediate commercial uses, this project can serve both the neighborhood and community. Applicant has proposed a cross-connection to serve as a service road to provide the ability of neighbors and joint-commercial users to access all three developments without traveling along Harrodsburg Road. That service road connection will include multi-modal improvements. The rear building could be used for boutique-type establishments, dentists, medical offices, day cares, and small office users that serve both the neighborhood and community.

Unlike the immediate commercial uses, this project will have activated pedestrian-scale amenities. The coffee shop will have both a covered patio and a vegetative open space for its customers. The rear building will also have a covered patio or an open space for its users.

This is not an urban core area. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. This project will increase the utilization of the subject property, and it will triple its density. Low Density Non-Residential / Mix Use Development Type respects the context/character and urban form of the surrounding area.

The following are the criteria for which planning staff requested additional information:

Land Use:

D-CO3-1 The subject property is currently used as a single-family residence with a 5% lot coverage, and this project will redevelop an underutilized site and triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed a project that aligns with the two existing commercial areas and the surrounding residential neighborhoods. This project respects the context/character and urban form of the surrounding area. [Applies]

Transportation, Connectivity, and Walkability

D-CO2-2: The revised preliminary development plan shows sidewalks on both sides of the connection to Harrodsburg Road. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and indirect connections to the surrounding neighborhoods. [Applies]

A-EQ5-2: Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. The subject property is currently used as a single-family residence with a 5% lot coverage, and this project will redevelop an underutilized site and triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed a project that aligns with the two existing commercial areas and the surrounding residential neighborhoods. This project respects the context/character and urban form of the surrounding area. [Does Not Apply]

Environmental, Sustainability, and Resiliency

B-PR7-2: This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. At the time of final development, Applicant will collaborate with the Urban Forester to identify significant trees, if any, to be preserved at the final development phase. Applicant proposed a 15' landscape buffer (as described above), and that is an area in which existing and new trees should be grouped. [Applies]



B-PR7-3: This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. At the time of final development, Applicant will collaborate with the Urban Forester to identify significant trees, if any, to be preserved at the final development phase. Applicant has proposed a 15' landscape buffer (as described above), and that is an area in which preserved and new trees should be grouped. [Applies]

B-SU4-1: The vehicle use area shown on the revised preliminary development plan complies with the zoning ordinance and other regulations applicable to preliminary development plans. Vehicle use areas are expensive to construct, and Applicant has only provided such area that it has determined is necessary for this project to practically operate. Applicant has proposed an underground stormwater management system for both water quantity and water quality for mitigation. The proposed area for that system is shown on the revised preliminary development plan. Applicant will work with the Division of Water Quality to design that system at the final development phase. This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. [Applies]

### Site Design

A-DS5-4: It is anticipated that this project will enhance pedestrian access along Harrodsburg Road with wider sidewalks and street trees. It is recommended that arterial development include service roads to reduce the impact on highway movement, and this project includes such a service road. That service road makes activating Harrodsburg Road impractical. To meet this policy, Applicant has proposed to locate the coffee shop within 10' of the service road, with a covered patio and vegetative open space for customers. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road. This project will have ADA accessible facilities. Both buildings will have bike parking. [Applies]

### Building Form

A-DS4-2: The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. It will increase the utilization of the subject property, and it will triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is neither an urban core area nor has direct connection to a residential neighborhood. Starting in the 1950s, the surrounding area on the east side of Harrodsburg Road was developed primarily for single-family residences and single-story commercial buildings. The lotting pattern for the single-family residences consists of 4-5 residences per acre with a floor area ratio and lot coverage of 10-12%. The Springs Motel,

which is located to the immediate north of the subject property, was redeveloped in 2010s, has a floor area ratio and lot coverage of 17%. The house on the subject property (one acre lot) is only 2,080 SF, making its current lot coverage under 5%. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed to triple the current lot coverage with this project, which would align with the Springs Motel site. Applicant's project will match the context/character and urban form of the surrounding area. This project is appropriate and does not create significant contrasts in scale, massing, and design and respects the context/character of the surrounding area. [Applies]

A-EQ5-1: The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is neither an urban core area nor has direct connection to a residential neighborhood. Applicant has proposed zoning restrictions to further the transition between the more intensive uses on the corridor and the single-family residences. The existing utility easement is only 5' on the subject property. The rear building and 15' landscaping buffer and the solid fence will provide a transition and buffer between the drive-through facilities and the adjacent single-family residences. Applicant intends to preserve trees along the boundary, and there is space to comply with the landscaping requirements of Article 18. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment), and this project is true to that context/character and urban form. [Applies]

For the above stated reasons, a Low Density Non-Residential / Mix Use Development Type is an appropriate This project Type at this location.

#### Medium Density Non-Residential / Mix Use Development Type

At the request of planning staff, and as an alternative to Low Density Non-Residential / Mix Use Development Type, Applicant provides the following discussion of this project under the Medium Density Non-Residential / Mix Use Development Type. Attached hereto is a color-coded reflection of how Applicant has addressed the design criteria listed in that Placebuilder category. Items highlighted in green are represented graphically on the revised preliminary development plan, items in yellow are addressed in this supplemental justification letter, and items highlighted in orange Applicant does not believe are applicable to its proposal.

#### Land Use

A-DS12-1 The subject property is located between two commercial areas that have both neighborhood-serving and community-serving commercial uses, and it is not located within a residential neighborhood. Applicant has proposed a cross-connection (with multi-modal improvements) to serve as a service road to provide the ability of neighbors and joint-commercial users to access all three developments without traveling along Harrodsburg Road—dispersing traffic and creating connectivity. [Applies]

A-DN2-1: Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. [Does Not Apply]

A-DN3-1: The subject property is located between two commercial areas that have both neighborhood-serving and community-serving commercial uses, and it is not located within a residential neighborhood. Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will have ADA accessible facilities. Both buildings will have bike parking. [Does Not Apply]

A-DN3-2: Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. Further, the immediate neighbors desire that this project be limited to single-story buildings, which would make denser residential development or mixed-use development impractical. [Does Not Apply]

C-LI7-1 The subject property is located between two commercial areas that have both neighborhood-serving and community-serving commercial uses, and it is not located within a residential neighborhood. This project will interconnect the two existing commercial areas to create a space that has additional greenspace, employment, business, and shopping opportunities. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). [Applies]

C-PS9-1: There is no existing office space on the subject property. The end-user(s) for the rear building is not known, and there is an opportunity for office users. Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. [Does Not Apply]

C-PS15-2 The end-user(s) for the rear building is not known, and there is an opportunity for a retail user that provides affordable and nutritious food. There are existing restaurants and grocery stores within one mile of this project. [Does Not Apply]

D-CO3-1 The subject property is currently used as a single-family residence with a 5% lot coverage, and this project will redevelop an underutilized site and triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed a project that aligns with the two existing commercial areas and the surrounding residential neighborhoods. This project respects the context/character and urban form of the surrounding area. [Applies]

D-PL7-1 Applicant had limited consultation with neighbors prior to filing the application. Applicant has provided a robust discussion of additional contacts with neighbors at the beginning of this supplemental justification letter. [Applies]

E-ST8-2 This project will have flexibility to have both neighborhood and community commercial services. Applicant has proposed a cross-connection (with multi-modal improvements) to serve as a service road to provide the ability of neighbors and joint-commercial users to access all three developments without traveling along Harrodsburg Road—dispersing traffic and creating connectivity. The end-user(s) for the rear building is not known, and there is an opportunity for community services to use that space. [Applies]

E-GR3-1: The subject property has not been identified for a future park. Applicant has proposed a covered patio area and vegetative open spaces for its customers and users. [Does Not Apply]

E-GR10-1: Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). The subject property is currently used as a single-family residence with a 5% lot coverage, and this project will redevelop an underutilized site and triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed a project that aligns with the two existing commercial areas and the surrounding residential neighborhoods. This project respects the context/character and urban form of the surrounding area. [Does Not Apply]

#### Transportation, Connectivity, and Walkability

A-DS1-1: This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). There is no plan to relocate the transit stop. [Does Not Apply]

A-DS1-2: This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). [Applies].

A-DS4-1: This project will interconnect the two existing commercial areas to create a space that has additional greenspace, employment, business, and shopping opportunities. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. [Applies]

A-DS5-1: This project will include sidewalks along roads and drive lanes between the three commercial areas and (and along) Harrodsburg Road and indirect connections to the

neighborhoods. Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Applies]

A-DS5-2: This project will improve the sidewalks and incorporate street trees along Harrodsburg Road to create a more walkable streetscape. The cross-access for vehicles and pedestrians between the three commercial areas and indirect access to the neighborhoods will run parallel to Harrodsburg Road. Applicant has proposed to locate the coffee shop and its covered patio within 10' of the service road. [Applies]

A-DS10-1: There are no community anchors in the immediate area to which to directly connect. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. [Does Not Apply]

A-DS11-1: The street layouts have existed in this area for decades, and Applicant is not proposing any new public streets. This project will interconnect the two existing commercial areas to create a space that has additional greenspace, but Applicant has not proposed any large neighborhood-focused greenspace. However, the covered patio and vegetative open space at the coffee shop will be neighborhood-serving. There will be multi-modal connections to provide neighbors access to those spaces. [Does Not Apply]

A-DS13-1: The Applicant has not proposed any new streets at this project. There will be cross-access between the three commercial areas and access to Harrodsburg Road and indirect connections to the neighborhoods. [Does Not Apply]

A-EQ5-2: Applicant has not proposed residential units in this project; provided, however, the B-3 Zone would allow that option and denser development in the future. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. The subject property is currently used as a single-family residence with a 5% lot coverage, and this project will redevelop an underutilized site and triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is not an urban core area. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed a project that aligns with the two existing commercial areas and the surrounding residential neighborhoods. This project respects the context/character and urban form of the surrounding area. [Does Not Apply]

C-PS10-1: This project will not have shared parking. Applicant has proposed only 20 parking spaces. [Does Not Apply]

D-CO1-1: The Applicant has not proposed any new rights-of-way. This project has the flexibility to include both neighborhood-serving and community-serving commercial uses. This

project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Applies]

D-CO2-1: It is anticipated that this project will enhance pedestrian access along Harrodsburg Road with wider sidewalks and street trees. This project will create multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will have ADA accessible facilities. Both buildings will have bike parking. Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Applies]

D-CO2-2: It is anticipated that this project will enhance pedestrian access along Harrodsburg Road with wider sidewalks and street trees. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods—dispersing traffic and increasing connectivity. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will have ADA accessible facilities. Both buildings will have bike parking. Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Applies]

D-CO5-1: No new streets are proposed for this project. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods—dispersing traffic and increasing connectivity. Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Does Not Apply]

D-SP6-1: The end-user(s) for the rear building is not known, and there is an opportunity for social services and community facilities in that building. To the extent this project has social services and community facilities, those services will have pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. [Applies]

### Environmental Sustainability and Resiliency

B-PR2-1: There are no environmentally sensitive areas on the subject property, but it is within the Wolf Run watershed basin (along with this entire area of the city). Applicant has



proposed an underground stormwater management system for both water quantity and water quality and permeable materials for parking spaces for stormwater mitigation. The proposed area for that system is shown on the revised preliminary development plan. Applicant will work with the Division of Water Quality to design that system at the final development phase. This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. [Does Not Apply]

B-PR2-2: There are no greenway or conservation areas to which to connect. [Does Not Apply]

B-PR3-1: There is no adjacent land conservation properties. [Does Not Apply]

B-PR7-1: Applicant intends to preserve trees along the eastern/southern boundary. Applicant will collaborate with the Urban Forester to identify significant trees, if any, to be preserved at the final development phase. [Applies]

B-PR9-1: There are no key natural features at this project. Applicant will work with the city's divisions on its grading plan at the final development phase. [Does Not Apply]

B-PR10-1: Lighting will be directed downward and shielded to prevent light spillage onto adjoining properties and reduce light pollution. Free-standing lighting will be no taller than twelve (12) feet in height. No outdoor lighting located within twenty-five (25) feet from the adjacent-existing single-family residential zone shall exceed fifteen (15) feet in height. [Applies]

B-SU4-1: This project will include an underground stormwater management system for both water quantity and water quality and permeable materials for all parking spaces for stormwater mitigation. This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. [Applies]

B-SU5-1: At this preliminary development phase, Applicant does not know how energy efficient systems and renewable energy resources will be incorporated into the buildings; provided, however, newer development incorporates modern technology and systems to increase energy-efficiencies. Applicant will work with the city's divisions on opportunities for energy efficient systems and renewable energy resources at the final development phase. [Does Not Apply]

B-SU9-1: This project will include an underground stormwater management system for both water quantity and water quality for mitigation and permeable materials for all parking spaces. This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the

B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. [Applies]

B-SU11-1: At this preliminary development phase, Applicant does not know what landscaping will be used for this project; provided, however, newer development often incorporates low-impact landscaping and native plant species. Applicant will work with the city's divisions on the landscaping plan (and opportunities for low-impact landscaping and native plant species) at the final development phase. [Does Not Apply]

B-RE1-1: This project is proposed to have 2,328 SF of landscaping area and 9 large trees (vehicle use area has a 30% tree canopy minimum equal to 6,104 SF) within the vehicle use area, and the B-3 Zone requires an additional 20% tree canopy (8,713 SF) on the subject property which will assist with stormwater and heat mitigation. This project will increase tree canopy on the subject property by approximately 50%. Applicant will work with the city's divisions to plan and locate landscaping and trees (both new and preserved) at the final development phase. [Applies]

B-RE2-1: There will be no green infrastructure network on this project that is highly visible or accessible. This project will include an underground stormwater management system for both water quantity and water quality for mitigation and permeable materials for all parking spaces. [Does Not Apply]

B-RE5-1: There is no flood plain on this project. [Does Not Apply]

B-RE5-2: There is no flood plain on this project. [Does Not Apply]

B-RE5-3: This project is not within the Royal Springs Aquifer. [Does Not Apply]

D-SP10-1: This project will include street trees. [Applies]

### Site Design

A-DS5-4: It is anticipated that this project will enhance pedestrian access along Harrodsburg Road with wider sidewalks and street trees. It is recommended that arterial development include service roads to reduce the impact on highway movement, and this project includes such a service road. That service road makes activating Harrodsburg Road impractical. To meet this policy, Applicant has proposed to locate the coffee shop within 10' of the service road, with a covered patio and vegetative open space for customers. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road. This project will have ADA accessible facilities. Both buildings will have bike parking.

A-DS7-1: Half of the parking will be located in the rear of this project. [Applies]

A-DS9-1: Applicant expects that the covered patio and vegetative open space at the coffee shop will be neighborhood-focused amenities. There will be multi-modal connections to provide neighbors access to those spaces. This is a small site with a small population in the immediate area, and it is not practical to provide standalone neighborhood focused open spaces. [Does Not Apply]

A-DS9-2: Applicant expects that the covered patio and vegetative open space at the coffee shop will be neighborhood-focused amenities. There will be multi-modal connections to provide neighbors access to those spaces. This is a small site with a small population in the immediate area, and it is not practical to provide standalone neighborhood focused open spaces. [Does Not Apply]

A-EQ9-1: There are no proposed schools on this project. [Does Not Apply]

A-EQ9-2: The covered patio and vegetative open space at the coffee shop will be neighborhood-focused amenities, and the vegetative open space at the rear building will be used by its users with patio or picnic furniture. There will be multi-modal connections to provide neighbors access to the covered patio and vegetative open space at the coffee shop, and Applicant has proposed a sidewalk for the vegetative open space at the rear building. Applicant will clearly delineate these spaces, along with who is permitted use and times of use. [Applies]

C-LI2-2: This project is not located along any of those areas. [Does Not Apply]

C-LI2-3: This project is not located along any of those areas. [Does Not Apply]

C-LI2-4: This project is not located along any of those areas. [Does Not Apply]

C-LI8-1: This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. That service road makes activating Harrodsburg Road impractical (beyond wider sidewalks and street trees). To meet this policy, Applicant has proposed to locate the coffee shop within 10' of the service road, with a covered patio and vegetative open space for customers. [Applies]

C-PS10-2: This project is not overparked. Applicant has proposed 20 parking spaces. [Does Not Apply]

D-PL4-1: Applicant expects that the covered patio and vegetative open space at the coffee shop will be those amenities. [Applies]

D-PL10-1: Applicant has not proposed public art along the corridor. [Does Not Apply]

D-SP3-1: No cellular tower antennae is proposed. [Does Not Apply]

D-SP3-2: There are adequate easements and rights-of-way for infrastructure. [Applies]

Building Form:

A-DS3-1: No multi-family residential is proposed; provided, however, the B-3 Zone would allow that option and denser development in the future. [Does Not Apply]

A-DS4-2: The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. It will increase the utilization of the subject property, and it will triple its density. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is neither an urban core area nor has direct connection to a residential neighborhood. Starting in the 1950s, the surrounding area on the east side of Harrodsburg Road was developed primarily for single-family residences and single-story commercial buildings. The lotting pattern for the single-family residences consists of 4-5 residences per acre with a floor area ratio and lot coverage of 10-12%. The Springs Motel, which is located to the immediate north of the subject property, was redeveloped in 2010s, has a floor area ratio and lot coverage of 17%. The house on the subject property (one acre lot) is only 2,080 SF, making its current lot coverage under 5%. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has proposed to triple the current lot coverage with this project, which would align with the Springs Motel site. Applicant's project will match the context/character and urban form of the surrounding area. This project is appropriate and does not create significant contrasts in scale, massing, and design and respects the context/character of the surrounding area. [Applies]

A-DS5-3: This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. That service road makes activating Harrodsburg Road impractical. To meet this policy, Applicant has proposed to locate the coffee shop within 10' of the service road, with a covered patio and vegetative open space for customers. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). Applicant will work with the city's divisions on details of elevated crosswalks, surface markings, signs, and other safety measures at the final development phase. [Applies]

A-DN2-2: The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is neither an urban core area nor has direct connection to a residential neighborhood. Starting in the 1950s, the surrounding area on the east side of Harrodsburg Road was developed primarily for single-family residences and single-story commercial buildings. The lotting pattern for the single-family residences consists of 4-5 residences per acre with a floor area ratio and lot coverage of 10-12%. The Springs Motel, which is located to the immediate north of the subject property, was redeveloped in 2010s, has a floor area ratio and lot coverage of 17%. The house on the subject property (one acre lot) is only 2,080 SF, making its current lot coverage under 5%. A universal comment of the neighbors was that they lived in this area to avoid living on top of each other and enjoyed the sense of private space that the context/character of this area provided. Applicant has

proposed to triple the current lot coverage with this project, which would align with the Springs Motel site. Applicant has proposed zoning restrictions to further the transition between the more intensive uses on the corridor and the single-family residences. Applicant's project will match the context/character and urban form of the surrounding area. This project is appropriate and does not create significant contrasts in scale, massing, and design and respects the context/character of the surrounding area. [Applies]

A-EQ5-1: The subject property is currently used as a single-family residence, and this project will redevelop an underutilized site. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment). This is neither an urban core area nor has direct connection to a residential neighborhood. Applicant has proposed zoning restrictions to further the transition between the more intensive uses on the corridor and the single-family residences. The existing utility easement is only 5' on the subject property. The rear building and 15' landscaping buffer and the solid fence will provide a transition and buffer between the drive-through facilities and the adjacent single-family residences. Applicant intends to preserve trees along the boundary, and there is space to comply with the landscaping requirements of Article 18. The context/character and urban form of the surrounding area is suburban and fully developed (this is a small redevelopment), and this project is true to that context/character and urban form. [Applies]

D-PL2-1: Applicant has proposed to locate the coffee shop within 10' of the service road, with a covered patio and vegetative open space for customers. Applicant has proposed single-story building to conform with the context/character and urban form of the surrounding areas. This project will include multi-modal improvements, with cross-access for vehicles and pedestrians between the three commercial areas and Harrodsburg Road and indirect connections to the neighborhoods. This project will include pedestrian access to Harrodsburg Road and the existing LexTran stop to the north of the subject property (near McDonald's). This project will have ADA accessible facilities. Both buildings will have bike parking. The vegetative open space at the rear building will be used by its users with patio or picnic furniture. [Applies]

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. [Does Not Apply]

E-GR5-1 There are no historically significant structures on this project. [Does Not Apply]

Sincerely,



P. Branden Gross

# CORRIDOR

## CORRIDOR - MEDIUM DENSITY NON-RESIDENTIAL/MIXED USE

### LAND USE

- A-DS12-1** Development should be located nearest to neighborhood serving commercial areas.
- A-DN2-1** Infill residential should aim to increase density.
- A-DN3-1** Pedestrian-oriented commercial opportunities and other services should be incorporated within residential neighborhoods.
- A-DN3-2** Development should incorporate residential units in commercial centers.
- C-L17-1** Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment.
- C-PS9-1** Where possible, developments should modify current office space to include complementary uses, with a specific focus on the inclusion of residential.
- C-PS15-2** Improve options for affordable and nutritious food where not currently available.
- D-CO3-1** Development should increase density and intensity adjacent to transit.
- D-PL7-1** Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application.
- E-ST8-2** Development should provide community oriented places and services.
- E-GR3-1** Development should meet recreational needs by following the recommendations of the Parks Master Plan.
- E-GR10-1** Transit oriented development (TOD) should be provided.

### TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

- A-DS1-1** Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes.
- A-DS1-2** Accessible 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-DS5-1** Safe multi-modal facilities should be provided to ensure vehicular separation from bicycles, pedestrians and other modes of transport.

## CORRIDOR - MEDIUM DENSITY NON-RESIDENTIAL/MIXED USE

- A-DS5-2** Developments should incorporate vertical elements, such as street trees and buildings, to create a walkable streetscape.
- A-DS10-1** New developments should incorporate clear and dedicated connections to nearby community anchors.
- A-DS11-1** Street layouts should provide clear, visible access to neighborhood-focused open space and greenspaces
- A-DS13-1** Stub streets should be connected.
- A-EQ5-2** Development should be transit-oriented (dense & intense, internally walkable, connected to adjacent neighborhoods, providing transit infrastructure & facilities).
- 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** Development should create and/or expand a connected multimodal transportation network that satisfies all users' needs.
- D-CO2-2** Development should comply with Lexington's Complete Streets Policy.
- D-CO5-1** Streets should be designed with shorter block lengths, narrower widths, and traffic calming features.
- D-SP6-1** Social services and community facilities should be accessible via mass transit, bicycle and pedestrian transportation modes.

### ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

- B-PR2-1** Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site.
- B-PR2-2** Development should include regularly spaced access with an adequate width to the greenway network and conservation areas.
- B-PR3-1** Minimize impact of development adjacent to land conservation properties through buffering.
- B-PR7-1** Developments should be designed to minimize tree removal and to protect and preserve existing significant trees.
- B-PR9-1** Minimize grading and topsoil disturbance by utilizing the existing topography to the greatest extent possible and preserving key natural features.
- B-PR10-1** Development should avoid overlighting and upward directed lighting.
- B-SU4-1** Development should minimize and/or mitigate impervious surfaces.



## CORRIDOR - MEDIUM DENSITY NON-RESIDENTIAL/MIXED USE

- B-SU5-1** Developments should incorporate energy efficient systems and renewable energy resources (i.e. wind, solar, etc.).
- B-SU9-1** Green Stormwater Infrastructure (GSI) should be implemented in new development.
- B-SUI1-1** Development should incorporate low impact landscaping and native plant species.
- B-RE1-1** Developments should improve the tree canopy.
- B-RE2-1** Lexington's green infrastructure network, including parks, trails, greenways, or natural areas should be highly visible and accessible.
- B-RE5-1** Dividing floodplains into privately owned parcels with flood insurance should be avoided.
- B-RE5-2** Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them.
- B-RE5-3** Developments within the Royal Springs Aquifer should consult with the Royal Springs Water Supply Protection Committee.
- D-SPI0-1** Prioritize street trees in the planting strip.

### SITE DESIGN

- A-DS5-4** Development should provide a pedestrian-oriented and activated streetscapes.
- A-DS7-1** Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments.
- A-DS9-1** Development should provide active and engaging amenities within neighborhood focused open spaces.
- A-DS9-2** Where neighborhood open space or parks are not located within walking distance of a new development, applicants should incorporate these facilities.
- A-EQ9-1** School sites should be appropriately sized.
- A-EQ9-2** Shared open spaces should be easily accessible and clearly delineated from private open spaces.
- C-LI2-2** Non-agricultural uses at or near potential and existing gateways, as mapped in the Rural Land Management Plan, should be buffered.
- C-LI2-3** Design should create a positive gateway character at existing and proposed gateways as identified in the Rural Land Management Plan.

## CORRIDOR - MEDIUM DENSITY NON-RESIDENTIAL/MIXED USE

- 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.
- C-LI8-1** Development should enhance a well-connected and activated public realm.
- C-PS10-2** Over-parking of new developments should be avoided.
- D-PL4-1** Enhance open space through the provision of programmatic elements and amenities.
- D-PL10-1** Activate the streetscape or publicly visible areas by designating public art easements in prominent locations.
- 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 used to improve the visual impact from the roadway and residential areas.

### BUILDING FORM

- A-DS3-1** Multi-family residential developments should comply with the Multi-family Design Standards in Appendix A.
- 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.
- A-DS5-3** Building orientation should maximize connections with the street and create a pedestrian-friendly atmosphere.
- A-DN2-2** Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods.
- A-EQ5-1** Development should create context sensitive transitions between intense corridor development and existing neighborhoods.
- D-PL2-1** Development should provide active first floor uses whenever adjacent to a street, pedestrian facility, or community focused open space.
- E-GR4-1** Developments should incorporate reuse of viable existing structures.
- E-GR5-1** Structures with demonstrated historic significance should be preserved or adapted.