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Date: September 5, 2023

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

Re: **Zone Change Request for 2156, 2184 Liberty Road**

Dear Members of the Planning Commission:

We represent Red Draw Development, LLC (“Applicant”) and on its behalf have filed a zone change request for the properties located at 2156, 2176, and 2184 Liberty Road (Property). The Property consists of 7.44 net (8.20 gross) acres and currently zones as R1-B and R-3 zone with one single family resident. The Applicant’s request is to rezone the Property to Medium Density Residential (R-4) zone to construct seven apartment buildings and Club House.

The Property is located south of the intersection of Liberty Road and Fortune Drive. The proposed development consists of 168 apartment units or 288 beds in seven (7) buildings. The surrounding area is made up of single-family residential areas, a townhouse complex across Liberty Road east of Fortune drive, a duplex complex across Liberty west of Fortune drive.

The proposed development is consistent with the existing land use north of the property and will complete the residential areas that surround the Property. This will ensure that much-needed residential development on underutilized land.

This request is in agreement with the Comprehensive Plan for multiples of reasons outlined below. Primary the Zone Map Amendment Request offers a chance to intensify underutilized properties and develop gaps within neighborhoods inside the Urban Service Area for much needed residential use. This is an ideal property for the proposed multi-family residential use as it will maximize the use of the property for residential use rather than a lower density residential use on a very challenging site for development.

This well-designed project upholds the Urban Service Area varied housing choices with the adjacent residential development which meet several community needs, encourages community interaction through pedestrian connectivity, and while respecting its neighbors with landscaping buffer and useable greenspace.

This project aligns with the aspects of a desirable community and the place making concepts that the Comprehensive Plan stresses such as openness, social offerings, aesthetics, amenities, and tie-ins

to adjacent pedestrian facility and future connection to the bike lanes with the widening of Liberty Road that is at the right of way acquisition phase.

The proposed development follows many of the specific recommendation of the Comprehensive Plan in its discussion on how to grow successful neighborhoods while protecting the environments as we expanding the housing types and choice in the area by providing multi-family units without impacting adjacent neighborhood; supporting infill and redevelopment throughout the Urban Service Area providing well designed community that furthers the commitment to mixed type housing with locations for safe and positive social interactions. The proposed development is located along a mass transit route, where the site is located approximately 400 feet from cover bus stop along Fortune Drive. In addition to increasing the density of residential land along Liberty Road for an underutilized property. The proposed development will not put an undue strain to the surrounding infrastructure, the site will be access from an existing signal at the intersection of the Fortune Drive and Liberty Road and the proposed entrance to the site will have a boulevard setting.

The proposed development is well designed project as it exceeds many of the design policies presented in the Comprehensive Plan. By providing ample pedestrian and bike connection within the apartment complex and the surrounding area. The proposed development presents a pedestrian friendly network of sidewalks within the complex, Fortune Drive, and to the future widening of Liberty Road, while creating an inviting streetscape (Design Policy # 1, 2, 5, 6, and 13). The parking areas for the multi-family are mainly interior to the development, they aren't a primary visual component to the neighbors, or we are proposing enhances landscaping to help buffer the area (DP #7). As previously stated, the proposed development will be well connected to the amenity area and open space for the residents and located within the center of the property.

In summary, this well-designed project upholds the Urban Service Area preservation strategy, is appropriate development of a long-underutilized parcel, provides additional housing units with a mix of housing types, encourage community interaction through pedestrian connectivity, encourage a more comprehensive transportation system, all while respecting its neighbors and protecting the environment with landscaping buffers and useable green space. As a result, the proposed zone change is in compliance with the 2018 Comprehensive Plan. As mentioned above, the proposed zone change meets the following Goals and Objectives of the Comprehensive Plan.

Theme A-Growing Successful Neighborhoods

Goal 1: Expand housing choices.

Objectives:

- b. Accommodate the demand for housing in Lexington responsibly, prioritizing higher density and mixture of housing types.
- c. Plan for safe, affordable, and accessible housing to meet the needs of Lexington's aging population residents with disabilities.

Goal 2: Support infill and redevelopment throughout the Urban Service Area as a strategic component of growth.

Objectives:

- a. Identify areas of opportunity for infill, redevelopment, adaptive reuse, and mixed-use development.

- b. Respect the context and design features of areas surrounding development projects and develop design standards and guidelines to ensure compatibility with existing urban forms.
- c. Incorporate adequate greenspace and open space into all development projects, which serve the needs of the intended population.

Goal 3: Provide well-designed neighborhoods and communities.

Objectives:

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

Goal 4: Address community facilities at a neighborhood scale.

Objectives:

- c. Establish and promote road network connections in order to reduce police, EMS, and fire response times.

Theme B - Protecting the Environment

Goal 2: Identify and mitigate local impacts of climate change by tracking and reducing Lexington-Fayette County's carbon footprint and greenhouse emissions.

Objectives:

- d. Prioritize multi-modal options that de-emphasize single-occupancy vehicle dependence.

Goal 3: Apply environmentally sustainable practices to protect, conserve and restore landscapes and natural resources.

Objectives:

- b. Identify and protect natural resources and landscapes before development occurs.

Theme D - Improving a Desirable Community

Goal 1: Work to achieve an effective and comprehensive transportation system.

Objectives:

- a. Support the Complete Streets concept, prioritizing a pedestrian-first design that also accommodates the needs of bicycle, transit, and other vehicles.
- b. Expand the network of accessible transportation alternatives for residents and commuters, which may include the use of mass transit, bicycles, walkways, ridesharing, greenways and other strategies.

Goal 2: Support a model of development that focuses on people-first to provide accessible community facilities and services to meet the health, safety and quality of life needs of Lexington-Fayette County's residents and visitors.

Objectives:

- a. Ensure built and natural environments are safe and accessible thought activated and engaging site design.

Goal 3: Protect and enhance the natural and cultural landscapes that give Lexington-Fayette County its unique identity and image.

Objectives:

- a. Protect historic resources and archaeological sites.

Theme E - Maintaining a Balance between Planning for Urban Uses and Safeguarding Rural Land

Goal 1: Uphold the Urban Service Area concept.

Objectives:

- b. Continue to monitor the absorption of vacant and underutilized land within the Urban Service Area.
- c. Ensure all types of development are environmentally, economically, and socially sustainable to accommodate the future growth needs of all residents while safeguarding rural land.
- d. Emphasize redevelopment of underutilized corridors.
- e. Maximize development on vacant land within the Urban Service Area and promote redevelopment of underutilized land in a manner that enhances existing urban form and/or historic features.
- f. Pursue strategies to activate large undeveloped landholdings within the Urban Service Area.

THE PLACEBUILDER

The Property is located outside of New Circle Road and is adjacent to a residential and townhouses neighborhood. As such, the natural Place Type is Enhanced Neighborhood, and the Development Type is Medium Density for the multi-family component. We submit that this classification is appropriate due to the location of the Property well outside the downtown core and the surrounding 2nd Tier Urban Neighborhoods and the proposed use is adding additional units to an underutilized and challenging site. The R-4 zone is one of the suggested zoning categories for this Place Type.

Standards That Are Applicable to Our Proposal

SITE DESIGN, BUILDING FORM, & LOCATION

A-DS3-1: Multi-family residential developments should comply with the Multi-family Design Standards in Appendix 1. While we do not have specific architectural designs for the multi-family structures at this time, we will use our best efforts to comply with required design standards in the Subdivision Regulations and Zoning Ordinance.

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 Place builder priorities. The proposed development is located south side of Liberty Road, the grade change between Liberty Road and the site is approximately 10 feet in elevation an equivalent to 1 floor, given the topographic between the north side and south side of Liberty Road, the 3 story buildings will be of appreciate scale and height to the surrounding townhouses and duplex development.

A-DS5-3: Building orientation should maximize connections with the surrounding area and create a pedestrian-friendly atmosphere. The proposed development ensures its residents will be well connected into the existing site, the site and the surrounding area in a pedestrian friendly manner, while not overburdening the surrounding road system.

A-DS5-4: Development should provide a pedestrian-oriented and activated ground level. The development plan shows the necessary pedestrian connections with our structures having an activated ground level.

A-DS7-1: Parking should be oriented to the interior or rear of the property for nonresidential or multi-family developments. This is being done where feasible for the vast majority of the site.

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. There is appropriate landscape screening proposed on site in the locations of the multi-family parking areas.

A-DS10-1 Residential units should be within reason able walking distance to a focal point. The proposed units are within walking distance of the apartment amenity areas, proposed clubhouse, pool, and usable open space are located within the center of the property.

A-DN2-1: Infill residential should aim to increase density. The proposed development is adding 168 apartment units which will increase the density in the area without overburdening the transportation system or infrastructure.

B-PR9-1: Minimize disturbances to environmentally sensitive areas by utilizing the existing topography to the greatest extent possible. This has been done where feasible.

B-SU11-1: Green infrastructure should be implemented in new development. (E-GR3). We will be providing green infrastructure through our water quantity and quality components in the proposed stormwater management facility, tree canopy requirements, and routing runoff from parking and impervious area to exiting vegetative/grass area to enhance infiltration and filtration of runoff.

C-PS10-3 Over-parking of new developments should be avoided. (B-SU5). This development is not overparked. The proposed development adds 5 bike racks spreads along the development.

D-PL7-1: Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application. Letters have been sent out to the surrounding property owners prior to submitting this application. We've yet to be contacted by property owners to schedule a neighborhood meeting.

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. Apartment located along Liberty Road had been located further from the right of line anticipating the dedication of the right of way for the widening of Liberty Road.

E-GR9-4: Development should intensify underutilized properties and develop vacant and underutilized gaps within neighborhoods (E-GR6). The Property is underutilized and surrounded by developments that were constructed a long time ago. This Property has many challenges which include topographic, geotechnical, and stormwater challenges.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

A-DS1-1: Mass transit infrastructure such as seating and shelters should be provided/enhanced long transit routes. (A-EQ7). The proposed development is located approximately 400 feet from a cover shelter, a proposed sidewalk will be constructed to connect to the sidewalk along Fortune Drive.

A-DS1-2: Direct pedestrian linkages to transit should be provided. sidewalks will be constructed from the proposed development to the bus shelter located at Fortune Drive.

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-LI7, E-AC5). Sidewalks will be constructed as part of the development to create appropriate connectivity to surrounding pedestrian infrastructure. In addition, with the widening of Liberty Road with bikes and sidewalk added, this will improve the connectivity to larger scale in the area.

A-DS5-1: Adequate multi-modal infrastructure should be provided to ensure vehicular separation from other modes of transport. The development is appropriately connected to surrounding pedestrian infrastructure, amenity area, and bus stop.

A-DS5-2: Roadways should provide a vertical edge, such as trees and buildings. This has been achieved where feasible.

A-DS10-2 New focal points should be designed with multi-modal connections to the neighborhood. The development is appropriately connected to surrounding pedestrian infrastructure, amenity areas, and cover bus stops.

A-EQ3-2 Development on corridors should be transit-oriented (dense & intense, internally walkable, connected to adjacent neighborhoods, providing transit infrastructure and facilities). The development is dense, with an internal sidewalk, and appropriately connected to surrounding pedestrian infrastructure, amenity areas, and cover bus stop.

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). Part of the development is to construct a club house, pool, and useable open space area.

D-CO1-1: Rights-of-way and multimodal facilities should be designed to reflect and promote the desired place-type. This has been done where feasible.

D-CO2-1: Safe facilities for all users and modes of transportation should be provided. The development is appropriately connected to surrounding pedestrian infrastructure, amenity area, and cover bus stop.

D-CO2-2: Development should create and/or expand a safe, connected multimodal transportation network that satisfies all users' needs, including those with disabilities. The development is appropriately connected to surrounding pedestrian infrastructure, amenity areas, and bus stops.

GREENSPACE & ENVIRONMENTAL HEALTH

A-DS4-3 Development should work with the existing landscape to the greatest extent possible, preserving key natural features. This has been done where feasible.

A-EQ7-3: Community open spaces should be easily accessible and clearly delineated from private open spaces. This has been done where feasible.

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

B-PR7-2 Trees should be incorporated into development plans, prioritize grouping of trees to increase survivability. This has been done where feasible.

B-PR7-3 Developments should improve the tree canopy. This development intends to increase the total tree canopy on the site.

B-RE1-1 Developments should incorporate street trees to create a walkable streetscape. This has been done where feasible.

B-RE2-1 Green infrastructure should be used to connect the greenspace network. Roof drains and impervious areas to be routed to grass and vegetative buffer to increase infiltration and treatment of runoff.

E-GR3-2 New focal points should emphasize geographic features unique to the site. This has been done where feasible.

Standards That Are Not Applicable to Our Proposal

SITE DESIGN, BUILDING FORM, & LOCATION

A-DS7-3: Parking structures should activate the ground level. There are no proposed parking structures.

A-DS11-1: Common public uses that serve as neighborhood focal points, such as parks and schools, should be on single loaded streets. There are no neighborhood focal points as part of this development. We are proposing appropriate amenity areas for the residents in the existing adjacent complex that will be consolidated.

A-DS12-1: Medium Density development should be located nearest to the neighborhood-serving commercial area. There is no commercial development that is adjacent to the proposed development.

A-DN2-2: Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods. The proposed development is not adjacent to a historic area or neighborhood.

A-DN3-2: Development should incorporate residential units in commercial centers with context sensitive design. This isn't a commercial center.

A-DN4-1: Medium Density development should be located nearest to neighborhood focal point. This is the only undeveloped property in the area.

A-EQ3-1: Development should create context sensitive transitions between intense corridor development and existing neighborhood. This is the only undeveloped and underutilized site in the area, all other areas surrounding the site are developed.

A-EQ7-1: School sites should be appropriately sized. There is no school site proposed.

C-LI6-1: Developments should incorporate multi-family housing and walkable commercial uses into development along arterials/corridors. The proposed development is located along arterial street but there is no commercial development within the vicinity of the development.

C-LI6-2: ADUs and/or affordable housing options should be incorporated into existing and new single-family residential development. (A-DN5). ADU's are still not permitted in the selected zone.

C-PS10-2: Development should explore options for share and flexible parking arrangement for currently underutilized parking lots. The proposed development is self-contained with parking and there are no parking lots surrounding the area.

C-LI7-1: Development should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping and entertainment. The site is surrounded by single-family, townhouse, and duplex development, there is no business, shopping, or entertainment facilities within the proximity of the site.

D-PL9-1: Historically, significant structures should be preserved. There are no historically significant structures on this site.

D-PL10-1: Activate the streetscape by designating public art easements in prominent locations. There are no public art easements proposed on this site as it is a private apartment complex.

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. There are no proposed cellular tower antennae that are proposed as part of this development.

E-GR4-1: Development Should incorporate reuse of viable existing structure. All the on-site structures have no significant value, they are in bad shape.

E-GR5-1: Structures with demonstrated historic significance should be preserved or adapted. There are no historic structures on the site.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

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. There are no streets as part of this development.

D-CO5-1: Streets should be designed with shorter block lengths, narrower widths, and traffic calming features. There are no streets as part of this development.

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. There are no school sites in close proximity, the property east of the site is owned by Fayette County Board of Education, but it is a regional bus stop.

E-ST3-1: Development along major corridors should provide for ride sharing pick up and drop off locations along with considerations for any needed or proposed park and ride functions of the area (E-GR10, E-GR7). There is no existing infrastructure along the corridor.

GREENSPACE & ENVIRONMENTAL HEALTH

B-PR2-2: Dividing floodplains into privately owned parcels with flood insurance should be avoided. This development does not have an effective floodplain as per FEMA Map.

B-PR2-3: Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them. This development does not have an effective floodplain as per FEMA Map.

B-PR7-1: Connections to greenways, tree stands, and stream corridors should be provided. There are no greenways or stream corridor within the area of the development.

D-SP2-1: Visible, usable greenspace and other natural components should be incorporated into school sites. There are no proposed school sites.

D-SP2-2: Active and passive recreation opportunities should be provided on school sites. There are no proposed school sites.

E-GR3-1: Physical and visual connections should be provided to the existing greenway network. There is no greenway within the vicinity of the project area.

Multi-family Design Standards

Site Planning

- **SP-1** – This Enhanced Neighborhood project is still in the early design phase. However, this is being done where feasible. We will continue to work with Staff regarding the design of the street access and open space during the final development plan process.
- **SP-2** - This is being done where feasible. However, the Applicant provides apartment buildings with access to individual units through a center corridor for the safety of our tenants and building occupants.
- **SP-3** - This is being done where feasible.
- **SP-4** – Setback from Liberty Road is consistent as well as the setback from adjacent properties.
- **SP-5** – This is being done where feasible with pedestrian systems that run throughout the multi-family development connecting it to the surrounding area.
- **SP-6** – This is being done where feasible
- **SP-7** - This Enhanced Neighborhood project is still in the early design phase. However, this is being done where feasible. The apartment site will be screened with landscaping and appropriately parked and we will continue to work with Staff throughout the final development plan process on this type of design issue.
- **SP-8** – The parking occurs interior to the proposed residential development and is spread out throughout the apartment site with ample open space. We will continue to work with Staff throughout the final development plan process on this type of design issue.
- **SP-9** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of design issue.
- **SP-10** – The site is well connected for vehicular and pedestrian access to the surrounding area, amenities, and open space. In addition to sidewalks there will be bike lanes from Liberty Road to the apartment complex with bike racks spread within the apartment complex area.
- **SP-11** - This is being done where feasible.
- **SP-12** – The Applicant is proposing an internal open space and pedestrian system to ensure the development is walkable and pedestrian friendly. We will continue to work with Staff throughout the final development plan process on this type of design issue.
- **SP-13** – The site is well connected for vehicular and pedestrian access to the surrounding area, amenities, and open space.
- **SP-14** – This is being done where feasible. The multi-family areas contain ample pedestrian facilities and open space. Additional landscaping is proposed as well as ensuring existing landscaping will be retained where feasible.

- **SP-15** – All parking and walking areas will be well lit as per LFUCG zoning ordinance.
- **SP-16** – This project will be built to ADA and Kentucky Building code requirements.
- **SP-17** – This Enhanced Neighborhood project is still in the early design phase. However, this is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of design issue.

Open Space & Landscaping

- **OS-1** - This is being done where feasible with the open space areas being easily accessible throughout the entire multi-family site. We will continue to work with Staff throughout the final development plan process on this type of design issue.
- **OS-2** – This is being done where feasible with multiple open space areas throughout the site, centralized open space, and easily accessed amenities.
- **OS-3** – This is being done where feasible as private balcony, porch, or yard amenities are included with this project. We will continue to work with Staff throughout the Final development plan process on this type of design issue.
- **OS-4** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of landscaping and design issue.
- **OS-5** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of landscaping and design issue.
- **OS-6** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of landscaping and design issue.
- **OS-7** – This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of landscaping and design issue.
- **OS-8** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on any stormwater detention plans.
- **OS-9** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on the design of the various paths in the multi-family section.
- **OS-10** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of design issue.
- **OS-11** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of landscaping and design issue.
- **OS-12** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of lighting and design issue.

- **OS-13** - This is being done where feasible and we will continue to work with Staff throughout the final development plan process on this type of lighting and design issue.

Architectural Design

- **AD-1** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding building mass, form, and roof shapes.
- **AD-2** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding height, size, and character.
- **AD-3** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding building mass, roof shapes, exterior wall setback, materials, colors, building height, and landscaping.
- **AD-4** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding windows.
- **AD-5** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding wall faces.
- **AD-6** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding porches, stairs, railings, walls, and roofs.
- **AD-7** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding materials and colors for facades and roofing.
- **AD-8** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding side and rear facades.
- **AD-9** – This Enhanced Neighborhood project is still in the early phases of design. There have been no architectural plans made at this time. This project complies with all zoning and building code requirements regarding building spacing, landscaping, setbacks, building mass, building height, and building design.

In addition to compliance with the Comprehensive Plan, the request is justified because the existing zoning is inappropriate. The current zone is R-1B and R-3 has been proved not to be desired and practical. The site had been vacant for a long time whereas the surrounding area had been

developed. The small track of R-1B of 3.2 acres which is not practical to be constructed as a single-family residential area due to the associated high challenge in topography and geotechnical aspects.

On the other side, the proposed R-4 zone is clearly appropriate, the R-4 zoning for the entire site will make more homogenous development with higher density. The area north of the site is R-4 and R-3 zoning. The proposed development ensures continuity in neighborhood character. Finally, this site is the only remaining undeveloped site, the property clearly fits the character of the medium-density residential R-4 zone, which is a more appropriate zone than the R-1B zone.

Thanks so much for considering the proposed zone change request, should you have any questions or need additional information, please do not hesitate to call, we will be at the October hearing in order to make a complete presentation and request your favorable consideration.

Sincerely,

Jihad Hallany

Jihad A. Hallany, P.E.