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

Zone Change Request for 2651 Sandersville Road

Dear Members of the Planning Commission:

We represent Artisan Apartments, LLC ("Artisan" or "Applicant") and on its behalf have filed a zone change request for the property know as 2651 Sandersville Road (the "Property"). The Property consists of 2.22 net (3.39 gross) acres currently zoned Wholesale and Warehouse Business (B-4) and is vacant. The Applicant's request is to rezone the Property to Planned Neighborhood Residential (R-3) zone to allow for two additional apartment buildings to be included in the adjacent apartment complex.

The Property is located on the northeastern corner of the Sandersville Road and Citation Boulevard intersection. The proposed development consists of 48 apartment units in two buildings. It is adjoined by the Artisan Apartment Complex, which is nearing completion of the development process. Once the proposed development is consolidated with the Artisan, there will be a total of 272 apartment units in 10 buildings. The surrounding area is made up of complementary single-family residential neighborhoods along Sandersville Road, a townhouse complex across Citation, and neighborhood business zoned property across Sandersville Road. The proposed development is consistent with the existing apartment buildings and will complete the residential area on the north side of Sandersville Road. This will ensure that a much needed residential development on underutilized land will be installed in a consistent manner that neighbors have come to expect.

This request is in agreement with the Comprehensive Plan for the multitude of reasons outlined below. Primarily, the Zone Map Amendment Request offers a chance to develop longtime vacant land inside the Urban Service Area for much needed residential use. This is an ideal property for the proposed multi-family residential structures as it will allow a more uniform feel along Sandersville Road by expanding the existing complex vs. trying to fit in a warehousing use on a relatively small tract of land. This well-designed project upholds the Urban Service Area preservation strategy, is appropriate infill in an area that is increasingly residential, provides varied housing choices with the adjacent single family which meet several community needs, encourages community interaction through pedestrian connectivity, all while respecting its neighbors with landscaping buffer and greenspace.

This project aligns with the aspects of a desirable community and the place making concepts the Comprehensive Plan stresses such as openness, social offerings, and aesthetics with its connections to the existing multi-family amenities and appropriate tie-ins to adjacent pedestrian facilities. The proposed development plan follows many of the specific recommendations of the Comprehensive Plan in its discussion on how to grow successful neighborhoods while protecting the environment as we are expanding the housing types in the area by providing additional multi-family units without impacting adjacent neighborhoods; supporting infill and redevelopment throughout the urban service area; providing a well-designed community that furthers the commitment to mixed-type housing with locations for safe and positive social interactions including easy access to the protected greenway system. Also, by increasing the residential land in the Citation/Sandersville area it potentially can lead to an expansion of mass transit to better serve this area north of Mercer Road. The development will not put undue strain on the surrounding infrastructure by minimizing the necessary access points to collectors, but also adding a secondary access point to the Property as desired by emergency services providers.

Artisan is quite confident in calling this project a well-designed project as it furthers many of the design policies laid out in the Comprehensive Plan. By providing ample pedestrian connections, we are utilizing a people-first/pedestrian friendly street pattern design with efficient roadways and separate pedestrian infrastructure that is making the proper road connections to enhance emergency services accessibility while creating inviting streetscapes. (Design Policy #1, #2, #5, #6, and #13). The parking areas for the additional multi-family buildings are either interior to the site to ensure they aren't a primary visual component to the neighborhood or any existing neighbors or we've proposed enhanced 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 our residents' use.

In summary, this well-designed project upholds the Urban Service Area preservation strategy, is appropriate development of a long vacant parcel, provides additional housing units with a mix of housing types, encourages community interaction through pedestrian connectivity, encourages a more comprehensive transportation system, all while respecting its neighbors and protecting the environment with landscaping buffers and greenspace. As such, it is quite clear that the proposed zone change is in compliance with the 2018 Comprehensive Plan. As outlined above, the proposed project 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...
- Plan for safe, affordable and accessible housing to meet the needs of older and/or disadvantaged residents.

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

b. Respect the context and design features of areas surrounding development projects and develop design standards and guidelines to ensure compatibility with existing urban form.

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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. Promote, maintain, and expand the urban forest throughout Lexington.

**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**: Reduce Lexington-Fayette County's carbon footprint. 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. Develop a viable 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. Encourage public safety and social sustainability by supporting Secured-by-Design concepts and other policies and programs for the built and natural environments of neighborhoods to help reduce opportunities for crimes.

**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.
- b. Incentivize the renovation, restoration, development and maintenance of historic residential and commercial structures.
- c. Develop incentives to retain, restore, preserve and continue use of historic site and structures, rural settlements and urban and rural neighborhoods.

# <u>Theme E - Maintaining a Balance between Planning for Urban</u> Uses and

## Safeguarding Rural Land

Goal 1: Uphold the Urban Service Area concept.

## Objectives:

- b. Ensure all types of development are environmentally, economically, and socially sustainable to accommodate the future growth needs of all residents while safeguarding rural land.
- c. Emphasize redevelopment of underutilized corridors.
- d. 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.
- e. Pursue strategies to activate large undeveloped landholdings within the Urban Service Area.

**Goal 3**: Maintain the current boundaries of the Urban Service Area and Rural Activity Centers; and create no new Rural Activity Centers. To ensure Lexington is responsive to its future land use needs, this Goal shall be superseded and no longer in effect upon completion of Theme E, Goal 4, Objective D.

#### Placebuilder

The Property is located outside New Circle Road and is adjacent to a residential neighborhood and multi-family site that are under development. 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 2<sup>nd</sup> tier urban neighborhoods and the proposed use is adding additional units to a development currently under construction that maintains recent development trends in the area. The R-3 zone is one of the suggested zoning categories for this Place Type.

Also submitted with the Zone Map Amendment Request is the color-coded reflection of

how the proposed project addresses the design criteria for the selected Development Types. Items highlighted in green are represented graphically on the submitted preliminary development plan; items in yellow are addressed in this letter, and items highlighted in orange are not applicable to this proposal.

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

## 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 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 Placebuilder priorities. As noted above, the proposed development is a similar housing type and density to the adjacent multifamily complex.

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 are 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.

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 screenage proposed on site in the locations of the multi-family structures and 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.

A-DN2-1 Infill residential should aim to increase density. The proposed development is adding 48 apartment units to the approved complex which will increase the density in the area without overburdening the transportation system.

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 quality components in the existing stormwater management facility and tree canopy requirements.

- C-LI7-1 Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment. This development is adding residential units with safe access to community facilities and greenspace.
- C-PS10-3 Over-parking of new developments should be avoided. (B-SU<sub>5</sub>). This development is not overparked.
- 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 as most of the area is still under construction.
- 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. This development has adequate right-of-way for the proposed transportation infrastructure.
- E-GR9-4 Development should intensify underutilized properties and develop vacant and underutilized gaps within neighborhoods. This is what is being proposed on the Property.

#### TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- 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). The development is appropriately connected to surrounding pedestrian infrastructure, amenity areas, and greenspaces.
- 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 areas, and greenspaces.
- A-DS5-2 Roadways should provide a vertical edge, such as trees and buildings. This has been achieved were 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 greenspaces.
- 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 areas, and greenspaces.
- D-CO2-2 Development should create and/or expand a safe, connected multimodal transportation net-work that satisfies all users' needs, including those with disabilities. The development is appropriately connected to surrounding pedestrian infrastructure, amenity areas, and greenspaces.

#### 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-PR7-1 Connections to greenways, tree stands, and stream corridors should be provided. 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 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. The created wetlands within the stormwater management facility function as greenspace.
- E-GR3-1 Physical and visual connections should be provided to existing greenway networks. This has been done where feasible.
- E-GR3-2 New focal points should emphasize geographic features unique to the site. This has been done where feasible.

# **Standards Not Applicable**

## SITE DESIGN, BUILDING FORM, & LOCATION

- A-DS7-3 Parking structures should activate the ground level. There are no proposed parking structures.
- A-DS8-1 At the individual street level, medium density housing types should be interspersed with single-family detached units and should be context sensitive. This is a MF complex without individual streets. There are substantial amounts of SF houses in close proximity.
- 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-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-DN6-1 Allow and encourage new compact single-family housing types. This is a multifamily development.
  - 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 proposes development is not along an arterial or corridor. But, the development is located at the corner of Citation and Sandersville with a walkable site and connections to surrounding pedestrian system.
- 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 Developments should explore options for shared and flexible parking arrangements for currently underutilized parking lots. This does not have an underutilized parking lot.
- 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 no proposed cellular tower antennae that are proposed as part of this development.
- D-SP9-1 Encourage co-housing, shared housing environments, planned communities and accessory dwelling units for flexibility and affordability for senior adults and people with disabilities. This is a multi-family development. All ages are welcome.
- E-GR4-1 Developments should incorporate reuse of viable existing structures. There are no viable existing structures on the site.
- E-GR5-1 Structures with demonstrated historic significance should be preserved or adapted. There are no historic structures on the site.
- E-GR9-1 Live/work units should be incorporated into residential developments. This is a residential development that does not anticipate any dedicated flex space.

E-GR9-3 Less intense multi-family residence types should be incorporated into primarily single-family areas. The proposed development is only adding a small amount of acreage onto an approved multi-family development.

#### TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. (A-EQ7). Mass transit is not available to the Property at his time. However, increasing the residential users in this area could increase the demand for LexTran to serve the area in the future.
- A-DS1-2 Direct pedestrian linkages to transit should be provided. Mass transit is not available to the Property at his time. However, increasing the residential users in this area could increase the demand for LexTran to serve the area in the future.
- A-DS13-1 Stub streets should be connected. (D-CO4). There are no stub streets on the Property.
- 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). The development is appropriately connected to surrounding pedestrian infrastructure, amenity areas, and greenspaces that are within walking distance.
- D-CO4-1 Dead-end streets and Cul-de-sacs should be discouraged except where connections are not topographically or environmentally feasible. There are no dead-end streets or cul-de-sacs on this project.
- 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-CO4-3 Street pattern and design should consider site topography and minimize grading where possible. There are no streets as part of this development.
- D-CO<sub>5</sub>-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.
- D-SP6-1 Social services and community facilities should be accessible via mass transit, bicycle and pedestrian transportation modes. (A-EQ7). There are no social services or community in close proximity.

## GREENSPACE & ENVIRONMENTAL HEALTH

B-PR2-2 Dividing floodplains into privately owned parcels with flood insurance should be avoided. This development does not have single-family lots.

B-PR2-3 Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them. This has been done where feasible in the development, but not on the Property.

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.

# <u>Multi-family Design Standards</u> <u>Site Planning</u>

- 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 This is a new multi-family complex without existing setback patterns.
- 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.
- 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 This is being done where feasible.
- SP-16 This project will be built to 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 and improper, and the proposed zoning is appropriate. The current zoning is B-4 and any type of warehousing use on the Property has not proven to be desired or realistic. This small tract is not appealing to a majority of the permitted uses in the B-4 zone, especially due to the restrictions associated with warehousing structures adjacent to residential zoned property. The Special Provisions in the B-4 Zoning Ordinance prohibit structures from being within 100 feet from any residential zone, unless the portion within that distance has no opening except stationary windows and doors that are designed and intended solely for pedestrian access. While this is technically achievable, it adds a tremendous design hurdle for any Wholesale and Warehousing tenant. The selection of the larger B-4 parcel for a storage facility across Sandersville Road and the recent zone change from B-4 to B-1 for the adjacent corner parcel only emphasizes the lack of desirability of this particular parcel for potential B-4 users.

On the other hand, the proposed R-3 zoning is clearly appropriate. R-3 zoning is by far the predominant residential zoning category in the area. The residential land that is north of Sandersville Road to the interstate, to the east of Citation Boulevard until Masterson Station is almost exclusively zone R-3 and contains a mix of single-family, townhouses, and apartments. The proposed development ensures the continuity in neighborhood character preservation to respect the existing atmosphere of the area. Finally, the proposed development plan locates the structures along each of the adjacent roadways to reinforce street frontages and ensure ideal density transition from the busier Citation Boulevard to buffer the single-family development. As such, it is without question that the proposed zone is appropriate for the Property.

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

Sincerely,

Stoll Keenon Ogden PLLC

Nick Nicholson

NN:NN

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