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November 25, 2019

LFUCG Planning Commission 200 E. Main Street Lexington, KY 40507

Re: Zone Change Application at 1918-1922 Nicholasville Road

Dear Planning Commission:

My firm represents Ms. Julie Butcher (the "Applicant") in her application for a zone change at 1918-1922 Nicholasville Road, Lexington, Kentucky (the "Property") from its current R-1C (Single Family Residential) zone to a P-1 (Professional Office) zone. The site is comprised of two parcels totaling approximately 0.88 acres at the northeast corner of the intersection of Nicholasville Road and Edgemoor Drive. The Property is bounded by existing commercial and residential uses. The Property is located within the Infill and Redevelopment Zone.

### **GOALS AND OBJECTIVES**

The Applicant believes that our proposed development is in agreement with the 2018 Comprehensive Plan. Specifically, the Applicant believes the proposed development meets the following Goals and Objectives:

- Theme A
  - o Goal 2: Support infill and redevelopment throughout the Urban Service Area as a strategic component of growth.
    - Objective a: Identify areas of opportunity for infill, redevelopment, adaptive reuse, and mixed-use development.
      - *Implementation:* The Property is located within the infill and redevelopment zone.
    - Objective 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.
      - *Implementation:* As described more fully below, the development is being designed and planned to be compatible with both the commercial and residential uses nearby the Property.

- o Goal 3: Provide well-designed neighborhoods and communities.
  - Objective 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.
    - <u>Implementation:</u> The development is designed to provide for new services accessible by the residents and business along the Nicholasville Road corridor without significantly disrupting the existing nearby residential neighborhood.
  - Objective 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.
    - *Implementation:* The development is designed to be pedestrian and bicycle friendly.
- Theme D
  - o Goal 1: Work to achieve an effective and comprehensive transportation system.
    - Objective a: Support the Complete Streets concept, prioritizing a pedestrian-first design that also accommodates the needs of bicycle, transit and other vehicles.
      - <u>Implementation:</u> The development is designed to encourage the use of bicycles (via bicycle racks) and public transportation (via the nearby bus stops), as well as rideshare and carpooling opportunities.

### **ENGAGEMENT**

The Property is located at the furthest southwest boundary of the Southern Heights Neighborhood Association ("SHNA"). We contacted the SHNA Board of Directors October 2, 2019 via phone and email to set up a meeting to discuss the engagement process for the neighborhood. We held a meeting with the SHNA Board of Directors on October 10, 2019 to discuss the engagement process, and some initial concerns by the neighborhood regarding traffic, neighborhood preservation, and development.

We held a public stakeholder meeting for SHNA members, local residents, owners, and business owners, and other stakeholders on November 4, 2019 at Hunter Presbyterian Church. In advance of the meeting, we mailed notice letters to approximately eighty (80) owners and tenants within the 500-foot notification area, we asked the SHNA Board to help notify its members and local residents, we posted five (5) signs at major neighborhood intersections, and we set up a

public Google Drive folder with information about the meeting and the development. That public folder can be accessed at: https://tinyurl.com/1918-1922Nicholasville.

Approximately forty (40) stakeholders—comprised of residential owners, tenants, and business owners/operators—attended the meeting. Notes taken at the meeting can be accessed at the link above. Generally, the neighbors expressed a resistance to development of any kind, citing traffic congestion, public safety, and neighborhood characteristic concerns. At the time of the meeting, Ms. Butcher had not determined the place-type, development type, or zoning she would seek in this application, so we asked the attendees what they would—and would not—prefer to see on the Property. Based on stakeholder feedback, the predominant answer is that none of the Comprehensive Plan's place-types were appropriate for the Property; however, the nearest fit would be a Corridor or Enhanced Neighborhood. The attending stakeholders repeatedly suggested that although the Property is in the infill and redevelopment zone, no development would be appropriate for this site except possibly an expansion of the existing structure or continued use as a rental property.

The attending stakeholders voiced concerns about traffic congestion across Nicholasville Road, and suggested that any Nicholasville Road access should be one-way only. They were also concerned about light pollution from a proposed development. In response to the attendees' feedback, we developed a proposed plan which addresses the concerns raised in the meeting to result in a traffic-sensitive, neighborhood appropriate development that minimizes the impact on existing residences.

As of the date of this letter, we have scheduled a private meeting with the closest neighbors so that they—being the most directly impacted by this development—can speak freely about their concerns. In addition, we agreed to hold to another public meeting prior to the technical review committee (TRC) meeting for this application, and have reached out to the stakeholders suggesting dates for that meeting.

### SITE DESCRIPTION

The Property is located on a major commercial corridor—Nicholasville Road—in an area that includes single-family residential and commercial uses in the immediate vicinity. Just across Edgemoor Drive is a U.S. Bank retail location and administrative office (P-1). Directly across Nicholasville Road from the Property is El Toro Mexican Restaurant, as well as a T-Mobile retail store (B-1). Immediately south of El Toro is a Denny's restaurant and a Shell gas station, and behind each is a four-story Hampton Inn hotel (B-3). There are numerous two- and three-story buildings—both residential and commercial—in the general vicinity, and some that are even taller. At the nearby intersection of Nicholasville Road and Southland Drive, construction is currently underway for a LaRosa's Pizzeria that appears to be at least two, and possibly three, stories tall. The structure currently located on the Property is two-and-a-half stories tall. There are no known schools or places of worship in the general vicinity.

While some of the residential houses in the vicinity were constructed in the 1930s and 1940s, several others were constructed—with different, modernized designs and architecture—in the last thirty years. The El Toro and T-Mobile stores are located on property which, from the 1930s to the 1980s, was used as a boarding house or hotel (the current structure was built in 1998). Likewise, the U.S. Bank retail building was constructed in 1965 as a savings and loan branch, the Denny's building was constructed in 1953, and the Hampton Inn was constructed in 2015. The area surrounding the Property is therefore mixed-use, and was developed at different times for difference purposes. Accordingly, the proposed professional office use is appropriate as the nearby U.S. Bank is already zoned P-1, and P-1 is recognized as an appropriate buffer from residential zones to commercial/business zones. The requested zone map amendment is therefore an extension of the existing zoning scheme, and does not present any drastic change to the character, design, or use within the existing neighborhood.

### PLACE-TYPE, DEVELOPMENT TYPE, & REQUESTED ZONE

Due to its location on a major transportation and commercial road, the most appropriate place-type is a **Corridor**, which the Comprehensive Plan defines as:

Lexington's major roadways focused on commerce and transportation. The overriding emphasis of Imagine Lexington is significantly overhauling the intensity of the major corridors. The future of Lexington's corridors lies in accommodating the shifting retail economic model by incorporating high density residential and offering substantial flexibility to available land uses.

2018 Comprehensive Plan p. 265. The only other potentially appropriate place-type is Enhanced Neighborhood. However, this Property—being located directly on Nicholasville Road—is clearly more defined by that feature than it is by any neighborhood designation.

The Corridor place-type encourages medium, medium-high, and high-density residential uses, as well as medium and high density nonresidential/mixed uses. Due to the proximity of existing commercial uses and its orientation to a major roadway, the Applicant believes this Property is appropriate for a **medium density nonresidential/mixed use development**. The existing neighborhood will be well served with additional professional offices in this location, as professional uses are active during the day—when most people are at work or otherwise out of the house—but are quiet during the evening and night, when most people are at home. This should strike an appropriate balance by introducing additional amenities and options to the neighborhood and corridor travelers without imposing a significant burden on the neighborhood during hours when most people are home.

The Comprehensive Plan recommends several zones for this development type, but P-1 (Professional Office) is not among them. However, B-6P, MU-2, and MU-3 are recommended zones and each of them allow principal and (some) accessory uses which are the same as P-1,

therefore P-1 zoning would be appropriate for the Property. The P-1 zone strikes a balance between the high density/intensity development and zones recommended for Corridor placestypes and the lower density/intensity residential zone of the adjacent neighborhood.

The Applicant is seeking a variance to reduce the required parking pursuant to Article 7-6(b) of the Zoning Ordinance. The Property is within the Infill & Redevelopment Area. In light of the proximity to public transit, the provision of bicycle racks, and the walkability from the existing neighborhood, the Applicant is requesting a parking reduction from the required eighty-three (83) spaces by thirty-four percent (34%) to the fifty-five (55) spaces as shown on the preliminary development plan.

The Applicant's proposal is in agreement with the Comprehensive Plan's Goals and Objectives, and the community vision for place-types and development types in the Placebuilder.

### **DEVELOPMENT CRITERIA**

The Applicant's landscape architect prepared an annotated graphic of the proposed development plan. The design standards being met are denoted on the annotated graphic are as follows:

Site Design, Building Form & Location	Transportation & Pedestrian Connectivity	Greenspace & Environmental Health
A-DS4-2	A-DS1-2	B-PR7-2
A-DS5-3	A-DS4-1	B-RE1-1
A-DS5-4	A-DS5-1	
A-DS7-1	A-EQ3-2	
A-DS7-2	D-CO1-1	
	D-CO2-1	
	D-CO2-2	

Other development criteria require further explanation to demonstrate this application's compliance with the Comprehensive Plan, and that the current R-1C zoning is inappropriate for a Corridor place-type but the proposed P-1 zone would be appropriate.

Site Design	Site Design, Building Form, & Location	
A-DS4-2	The building is designed to be no taller than many existing nearby structures so as	
	to be appropriate in its location.	
A-DS5-3	The building will be oriented so as to allow for sufficient pedestrian	
	interconnectivity. In order to honor the Corridor designation and design criteria, no	
	Nicholasville Road access is proposed. Currently, the only access the 1918	
	Nicholasville Road parcel has is onto Nicholasville Road. The Applicant proposes	
	giving up that existing access as part of this rezoning effort. That will reduce the	
	number of traffic access pinch points on Nicholasville Road, which complements	

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	the Corridor place-type.
A-DS5-4	The plan is designed to be accessible by pedestrians.
A-DS7-1	Parking is oriented to the side and rear to the extent practicable.
A-DS7-2	The Applicant is agreeable to reasonable screening as may be required or appropriate.
A-DN2-2	The Property is not located within a designated historic area. However, the building is designed to be of appropriate height and scale for the neighborhood and nearby structures. The proposed zoning (P-1) will act as an appropriate intensity transition to the existing neighborhood.
A-DN3-1	The development will add useful professional office space within walking distance for the existing neighborhood, which will benefit local residents.
A-EQ3-1	The development and proposed use provides for more intense use (compared to the current use) along the corridor while preserving an appropriate transition to nearby existing residential lots.
B-PR9-1	There are no known environmentally sensitive areas on the Property; however, the existing topography will remain largely unchanged.
B-SU11-1	The Applicant is open to exploring, prior to a final development plan, green infrastructure techniques as may be appropriate for the Property.
C-DI1-1	The requested P-1 zoning allows for a variety of uses which may attract new businesses and jobs to the urban service area. The location may encourage the "work where you live" planning concept.
C-LI6-1	The development proposes commercial/professional uses along a major corridor, Nicholasville Road, which will be walkable from the surrounding neighborhoods and public transit.
C-LI7-1	The development proposes commercial/professional and employment uses along a major corridor, Nicholasville Road, which will be walkable from the surrounding neighborhoods and public transit.
C-PS10-2	The Applicant is open to exploring shared or flexible parking arrangements if appropriate.
C-PS10-3	The Applicant does not request to "over-park" on the Property. Applicant will be requesting a reduction in the required parking, which is permissible because the Property is in the infill and redevelopment area. Applicant is also evaluating pick up/drop off spots dedicated to rideshare and carpooling.
D-PL7-1	The Applicant has engaged extensively with area stakeholders prior to preparing its application, including multiple meetings, multiple mailings, and public information sharing. See "Engagement" above.
D-SP3-1	Applicant's plan includes standard easement and right-of-way areas.
E-GR9-4	The Property—which consists of two parcels along a critical designated corridor—is currently underutilized as a residential rental property. The proposed zoning and development will be a more appropriate use for the corridor.
E-GR10-2	The development proposes useful professional services within walking distance of the surrounding neighborhood.

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Transporta	Transportation & Pedestrian Connectivity	
A-DS1-1	The Applicant is open to discussion of seating and/or shelter for public	
	transportation.	
A-DS1-2	The development is designed to allow access to pedestrians, including those using	
	nearby public transit.	
A-DS4-1	The plan restricts access to the major corridor to encourage flow of traffic. Bicycle	
	racks, pickup/drop off spaces, and public transit access are incorporated into the	
	plan.	
A-DS5-1	Individual vehicles will be routed and parked separately from bicycles and other	
	modes of transportation to the extent practicable.	
A-EQ3-2	This corridor development is designed with public transit and pedestrian access in	
	mind. To prevent further traffic congestion caused by left turns and deceleration,	
G PG10 1	there will be no direct access to the Property from Nicholasville Road.	
C-PS10-1	The Applicant is open to flexible and shared parking arrangements if warranted.	
D-CO1-1	The rights-of-way and access shown on the plan are intended to complement the	
	existing corridor by omitting features that may slow or stop traffic at/near the	
D-CO2-1	Property.  As it exists today, the 1918 Nicholasville Road parcel is <i>only</i> accessible via	
D-CO2-1	Nicholasville Road. The proposal results in elimination of that Nicholasville Road	
	access. Further, channeling ingress/egress through a side street (Edgemoor Drive)	
	will reduce the likelihood of collisions, including pedestrians.	
D-CO2-2	The plan is designed to be compliant with all disability accommodations, including	
	transportation service, by providing accessible, clearly marked parking and	
	pickup/drop off areas.	
E-ST3-1	The plan includes ridesharing/carpooling pickup/drop off opportunities.	
Greenspace	e & Environmental Health	
A-DS4-3	The plan essentially maintains the current topography and grade.	
B-PR7-2	Existing trees will be preserved where practicable, and the tree canopy	
	requirements will be satisfied.	
B-PR7-3	Any development will meet or exceed the tree canopy requirement.	
B-RE1-1	There are already significant, mature street trees and shrubs on the Property. The	
	Applicant will endeavor to preserve those trees and shrubs to the extent practicable.	

There are a number of Placebuilder development criteria which are not applicable to the Applicant's proposed zone change. The inapplicable criteria are listed below, with a brief explanation of why they are inapplicable to this application.

Site Design, Building Form & Location	
A-DS3-1	The plan does not propose multi-family residential development.
A-DS7-3	No parking structures are proposed.
A-DS8-1	No new public streets or single-family detached housing are involved.
A-DS10-1	No residential units are proposed.
A-DS11-1	No neighborhood focal points like parks or schools are proposed.

No residential development is proposed.
No residential units are proposed.
No school site is proposed.
The Property is not in an opportunity zone.
The Property is within the urban service area and is not governed by the Rural Land
Management Plan.
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Management Plan.
The Property is within the urban service area and is not governed by the Rural Land
Management Plan.
There is no current office space on the Property.
There are no historically significant structures on the Property.
No public art easements are proposed.
No cellular towers are proposed.
No housing or dwelling units are proposed.
There are no viable existing structures which could be feasibly used as a
professional office in the manner contemplated by the Comprehensive Plan for
corridor development. Use of the existing structure would be inefficient result in
chronic underutilization within the infill and redevelopment area.
No structure on the Property has demonstrated historic significance.
No live/work or residential units are proposed.
No retail-focused operation is contemplated by the proposed development.
tion & Pedestrian Connectivity
No new public roadways are proposed.
No new public roadways or focal points are proposed.
There are no existing stub streets which can connect to the Property.
The development does not propose healthcare or social services facilities.
There are no nearby greenspaces or community centers to which the Property may
be connected.
No new public roadways are proposed.
No new public roadways are proposed.
No school site is proposed.
& Environmental Health
No community open spaces are proposed.
There are no known environmentally sensitive areas on the Property.
There are no floodplains on the Property.
There are no floodplains on the Property.
There are no greenways, tree stands, or stream corridors in the vicinity of the
Property, therefore no connections are feasible.
There are no greenways in the vicinity of the Property, therefore no connections are
feasible.
No school site is proposed.

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D-SP2-2	No school site is proposed.
E-GR3-1	There are no greenways in the vicinity of the Property, therefore no connections are feasible.
E-GR3-2	There are no unique geographic features on the Property.

A color-coded copy of the development criteria is enclosed herewith for your convenience and review.

### **CONCLUSION**

Ms. Butcher respectfully requests that the Commission recommend approval of the proposed zone change, as it will satisfy the Goals and Objectives of the Comprehensive Plan, and fits well within the Placebuilder criteria for a corridor development. I thank you for your time and consideration.

Sincerely,

ZACHARY G. CATO

ENCL.

# MEDIUM DENSITY NON-RESIDENTIAL / MIXED-USE

## SITE DESIGN, BUILDING FORM, & LOCATION

- A-DS3-1 Multi-family residential developments should comply with the Multi-family Design Standards in Appendix 1.
- A-DS4-2 New construction should be at an appropriate scale to respect the context of neighboring structures; however, along major corridors, it should set the future context in accordance with other Imagine Lexington corridor policies and Placebuilder priorities.
- A-DS5-3 Building orientation should maximize connections with the surrounding area and create a pedestrian-friendly atmosphere.
- A-DS5-4 Development should provide a pedestrian-oriented and activated ground level.
  - A-DS7-1 Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments.
- A-DS7-2 Any non-residential or multi-family parking not buffered by a building should be screened from the streetscape view and adjacent properties.
  - A-DS8-1 Parking structures should activate the ground level.
    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.

  A-DS10-1\* Residential units should be within reasonable walking distance to a focal point.

CORRIDOR

- A-DS11-1 Common public uses that serve as neighborhood focal points, such as parks and schools, should be on single loaded streets.
- A-DN2-1 Infill residential should aim to increase density.
- A-DN2-2 Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods. (D-PL9, E-GR6)
- A-DN3-1 Pedestrian-oriented commercial opportunities should be incorporated within residential neighborhoods.
- A-DN3-2 Development should incorporate residential units in commercial centers with context sensitive design.
- A-EQ3-1 Development should create context sensitive transitions between intense corridor development and existing neighborhoods.
  - A-EQ7-1 School sites should be appropriately sized.
- B-PR9-1 Minimize disturbances to environmentally sensitive areas by utilizing the existing topography to the greatest extent possible.
- B-SU11-1 Green infrastructure should be implemented in new development. (E-GR3)

C-D11-1 Consider flexible zoning options that will allow for a wide range of jobs.

- C-DIS-1 In Opportunity Zones with a clearly defined local context, consider adaptive reuse to enhance the existing context.
- 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.
- 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-LI6-1 Developments should incorporate multi-family housing and walkable commercial uses into development along arterials/corridors.
- C-LI7-1 Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment.
- C-PS9-2 Modify current office space to include complementary uses.
- C-PS10-2 Developments should explore options for shared and flexible parking arrangements for currently underutilized parking lots.
- C-PS10-3 Over-parking of new developments should be avoided. (B-SU5)
- D-PL7-1 Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application.
- D-PL9-1 Historically significant structures should be preserved.
- D-PL10-1 Activate the streetscape by designating public art easements in prominent locations
- 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 should be used to improve the visual impact from the roadway and residential areas.
  - used to improve the visual impact from the roadway and residential areas.

    D-SP9-1\*

    Encourage co-housing, shared housing environments, planned communities and accessory dwelling units for flexibility and affordability for senior adults and people with disabilities.
- E-GR4-1 Developments should incorporate reuse of viable existing structures.
- E-GR5-1 Structures with demonstrated historic significance should be preserved or adapted.
- E-GR9-1 Live/work units should be incorporated into residential developments.

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

MAGINE LEXINGTON

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

Theme Letter - Pillar Abbreviation & Policy Number - Criteria Number





# MEDIUM DENSITY NON-RESIDENTIAL / MIXED-USE

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

E-GR9-4 Development should intensify underutilized properties and develop vacant and underutilized gaps within neighborhoods. (E-GR6)

E-GR10-2 Developments should provide walkable service and amenity-oriented commercial spaces.

E-GR10-3 Shared common space in commercial developments should be provided to encourage experiential retail programming.

## TRANSPORTATION & PEDESTRIAN CONNECTIVITY

A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. (A-EQ7).

A-DS1-2 Direct pedestrian linkages to transit should be provided.

A-DS4-1 A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided. (A-DS2, A-DN1, B-SU1, B-SU2, C-LI7, E-AC5)

A-DS5-1" Adequate multi-modal infrastructure should be provided to ensure vehicular separation from other modes of transport.

A-DS5-2 Roadways should provide a vertical edge, such as trees and buildings.

A-DS10-2 New focal points should be designed with multi-modal connections to the neighborhood.

A-DS13-1 Stub streets should be connected. (D-CO4)

A-EQ3-2 Development on corridors should be transit-oriented (dense & intense, internally walkable, connected to adjacent neighborhoods, providing transit infrastructure & facilities). (B-SU3)

A-EQ7-2 Multi-modal transportation options for healthcare and social services facilities should be provided. (E-ST3)

-B-SU4-1 Where greenspace/community centers are not located within walking distance of a new development, applicants should attempt to incorporate those amenities. (A-DS9)

C-PS10-1 Flexible parking and shared parking arrangements should be utilized.

D-CO1-1) Rights-of-way and multimodal facilities should be designed to reflect and promote the desired place-type.

D-CO2-1 Safe facilities for all users and modes of transportation should be provided.

D-CO2-2 Development should create and/or expand a safe, connected multimodal transportation network that satisfies all users' needs, including those with disabilities.

D-CO4-2 Roadway capacity should be increased by providing multiple parallel streets, which alleviate traffic and provide multiple route options, in lieu of additional lanes.

D-CO5-1 Streets should be designed with shorter block lengths, narrower widths, and traffic calming features.

D-SP1-3 Developments should provide multi-modal transportation infrastructure to school sites, including sidewalks, shared-use paths, and roadways that can accommodate the bus and vehicle traffic associated with the site.

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)

## GREENSPACE & ENVIRONMENTAL HEALTH

A-DS4-3 Development should work with the existing landscape to the greatest extent possible, preserving key natural features.

A-EQ7-3 Community open spaces should be easily accessible and clearly delineated from private open spaces.

B-PR2-1 Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site.

B-PR2-2 Dividing floodplains into privately owned parcels with flood insurance should be avoided.

B-PR2-3 Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them.

B-PR7-1 Connections to greenways, tree stands, and stream corridors should be provided.

**B-PR7-2** Trees should be incorporated into development plans, prioritize grouping of trees to increase survivability.

B-PR7-3 Developments should improve the tree canopy.

**B-RE1-1** Developments should incorporate street trees to create a walkable streetscape.

B-RE2-11 Green infrastructure should be used to connect the greenspace network.

D-SP2-1 Visible, usable greenspace and other natural components should be incorporated into school sites.

D-SP2-2 Active and passive recreation opportunities should be provided on school sites. E-GR3-1 Physical and visual connections should be provided to existing greenway

E-GR3-2 New focal points should emphasize geographic features unique to the site.

networks.

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

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