

Staff Report

Rezoning to a New PUD

July 1, 2008 Planning & Zoning Commission Meeting

Report date	June 27, 2008
Project type	Planned Unit Development (PUD) Application
Legal description	Lots 21, 65A and 65B; Tracts Q & R; And Parcel No. TK-3, Benchmark at Beaver Creek Subdivision
Current zoning	Town Center (TC)
Address	182 Benchmark Road, 68 and 82 Beaver Creek Boulevard (respectively)

Introduction

The applicant, Pedro Campos of the Vail Architecture Group, representing the owner of the property, EAH, LLC, is proposing a new Planned Unit Development (PUD) and a concurrent Preliminary Plan for Subdivision on a new development site comprised of the properties listed above, which are currently zoned Town Center (TC). The proposed PUD is envisioned to be a contemporary mixed-use development including retail space, office space, residential and lodging in three new buildings to be located on the site. More specifically, the PUD would consist of a maximum of 105,860 square feet of commercial, retail and guest-oriented space; 118 Lodging Units, 237 Residential Units, and twelve (12) "Professional Employee Housing Units" that would collectively comprise approximately 759,150 square feet. The parking proposed with this project consists of a combination of surface and structured, underground spaces totaling 628 parking spaces, the majority of which are to be below-grade structured spaces. While the tallest of the three new buildings (East Building) would be eight (8) levels above grade, the maximum height proposed is 110 feet due to ceiling-to-floor plate heights ranging from sixteen feet (16') to twenty feet (20') for the entire at-grade commercial / retail level.

During this third public hearing on the Avon 21 PUD and Preliminary Plan, the extent to which the proposed development conforms with the applicable Goals and Policies of the 2006 Town of Avon Comprehensive Plan, and with the Planning Principles listed in the East Town Center District Plan, will be scrutinized and discussed. The remainder of this Staff Report outlines the Goals, Policies, and Planning Principles contained in the two planning documents cited above, and provides insight regarding whether the subject application appears to conform or not to each one using the material provided by the applicant's representative.

Staff recommends the Commission **TABLE** the subject applications to the July 15, 2008 Commission meeting to allow the applicant time to adequately respond to the comments made thus far by the Staff, Commission, and members of the public.

PUD Design Criteria

According to the Town of Avon Zoning Code, Section 17.20.110, twelve (12) criteria shall be used as the principal criteria in evaluating a PUD. It shall be the burden of the applicant to demonstrate that submittal material and the proposed development plan comply with each design criteria, or demonstrate that one or more of them is not applicable, or that a particular development solution is consistent with the public interest. The focus of this staff report with regard to the 2006 Town of Avon Comprehensive Plan is on PUD Design Criterion 1, as follows:

- 1. Conformance with the Town of Avon Comprehensive Plan's Goals and Objectives.**
The proposed development site is designated as being within a High Priority District (District 2) in the Town of Avon Comprehensive Plan and is referred to as the East Town Center District. The specific language for District 2 is as follows:

District 2: East Town Center District:

The East Town Center District is a key revitalization prospect for the community. Significant redevelopment opportunities exist in the district, and must be considered comprehensively with concern for the needs and desires of the community. This district also abuts the Village at Avon and its associated future development. Strong pedestrian and street connections should be established so that these districts create a consistent and cohesive community core.

The size of the parcels provides an opportunity for a variety of redevelopment opportunities. The challenge will be to overcome the confusing street patterns, indirect pedestrian walkways, diminished sight corridors, and to entice people out of their car to experience the entire Town Center.

A mix of uses, including major retail establishments, smaller retail shops, personal services, offices, and supporting residential/lodging uses will be essential for the district.

Also relevant to the subject application are the Planning Principles listed on Page 74 of the Comprehensive Plan, which are listed verbatim and in their entirety as follows on the next page of this Staff Report:

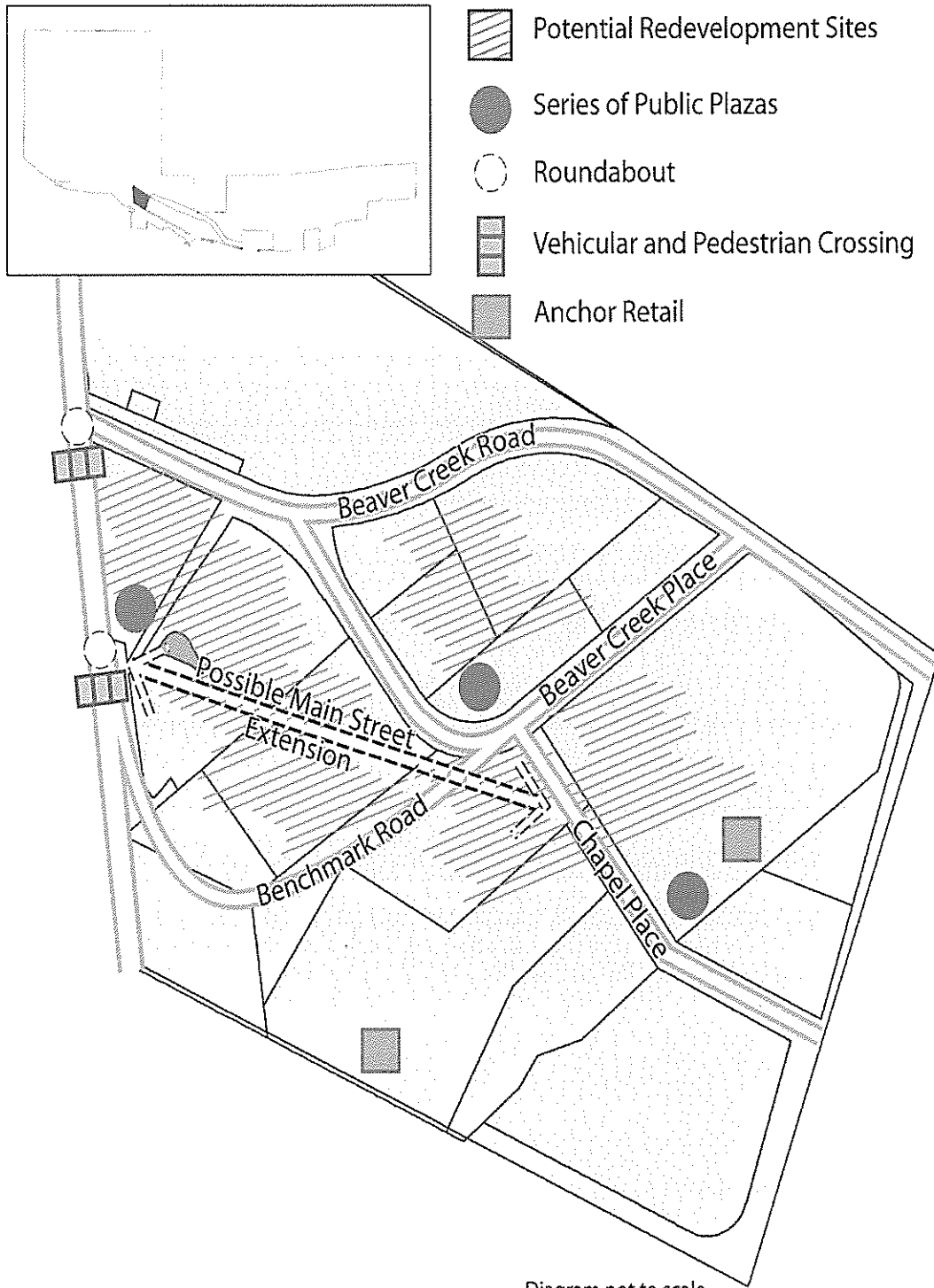
Planning Principles:

- Develop a mix of commercial uses with supporting residential/lodging development.
- Implement a street pattern that functionally extends “Main Street” across Avon Road.
- Plan for public plazas and other community gathering places.
- Develop structured parking facilities to make parking less obtrusive to the pedestrian.
- Accommodate anchor retailers without large expanses of parking to ensure these uses are integrated into a unifying framework.
- Create a cohesive physical framework and community image (compatible building orientation, scale, massing, siting, street alignments, streetscape furnishings, signage, lighting, etc.) between the Town Center Districts and the Village at Avon.
- Use architectural detailing on ground level/first floor to enhance the pedestrian environment that includes a human scale, display windows, appropriate lighting, and other pedestrian amenities.
- Site buildings of varying sizes along the street to maximize sun exposure, protect views, and break up building bulk.
- Ensure convenient pedestrian and auto access to the entire Town Center.

The Staff, Commission and Council are to utilize these Planning Principles while reviewing the subject PUD and Preliminary Plan applications, and staff has provided an objective response to each one in the next section of this Staff Report.

Additionally, as can be easily discerned from the graphic depicted below and extracted directly from the Comprehensive Plan (Page 73), the applicant's proposal demonstrates cohesion with the layout and general intent for the proposed development site shown in context with the remainder of the surrounding properties located within District 2.

The recently adopted East Town Center District Plan contains nineteen Planning Principles which are distinctly pertinent and applicable to the subject development proposal. These Planning Principles are refinements of those listed in the 2006 Town of Avon Comprehensive Plan and are to be addressed in the same manner.



Adherence to Planning Principles of the High Priority East Town Center District

- **Develop a mix of commercial uses with supporting residential / lodging development**

As proposed, Avon 21 is a comparatively high-density mixed-use redevelopment project comprised of a variety of use types, including commercial retail and restaurant/bar/cafe uses on the ground level; and office, residential, and lodging units on the upper levels. The additional density proposed beyond the maximum allowable under existing Town Center (TC) zoning designation could work toward establishing a critical mass necessary to create a vibrant core in this town center district.

- **Implement a street pattern that functionally extends “Main Street” across Avon Road.**

The proposed Avon 21 PUD has been designed and configured to effectively create an extension of the West Town Center’s “Main Street” across Avon Road into the East Town Center District. A key aspect of this application is the consolidated ownership of the primary lots of the proposed development site which seems a logical prerequisite in order to pursue a properly aligned and straightened Main Street. The applicant has stated an intention to establish a clear vehicular and pedestrian circulation pattern that may improve circulation for vehicles and pedestrians, and possibly increase the overall quality and character of the built environment in this subarea.

- **Plan for public plazas and other community gathering places**

The submitted plans depict an area described as being designed to function as a multi-events plaza, in addition to other delineated areas intended for outdoor seating and similar gathering spaces. The creation of inviting portals and gateways for pedestrians has been identified as a goal in order to link together these spaces. It appears the placement of such spaces has been with some consideration of which areas are likely to receive the most sunlight along the new Main Street on the east side of Avon Road. Outdoor seating areas have been proposed as Special Review Uses to correspond with the Avon Municipal Code (AMC). The applicant’s proposal also appears to have been designed and oriented in anticipation of the future “Town Square” park on the adjacent property to the east as contemplated in the East Town Center District Plan.

- **Develop structured parking facilities to make parking less obtrusive to the pedestrian**

The Avon 21 PUD application plans depict the majority of required parking to be located in a series of underground structured parking facilities. In each of the three proposed buildings, two levels of sub-grade parking are shown on the plans. In this regard, the stated goals of the applicant are to make parking convenient and give the project a highly pedestrian-oriented focus on the street level. A limited number of surface parking spaces have been proposed along Main Street for convenient, short-term errand access, and on streets around the perimeter of the proposed project site.

- **Accommodate anchor retailers without large expanses of (surface) parking to ensure these uses are integrated into a unifying framework.**

The preponderance of floor space located on the street grade has been proposed to accommodate commercial land uses typical of the existing zoning and in adherence to the pertinent comprehensive documents. The individual commercial tenant spaces have been programmed in a variety of sizes and a number of these spaces are designed and configured to house anchor retailers while maintaining a pedestrian scale.

- **Create a cohesive physical framework and community image (compatible building orientation, scale, massing, site, street alignment, streetscape furnishings, signage, lighting, etc.) between the Town Center Districts and the Village at Avon).**

The Avon 21 PUD proposal cites the cohesive physical framework established by the realigned Main Street design, associated roads and the enhanced pedestrian network depicted in the submitted plans. The alignment of the road that is proposed to become the westernmost expanse of the east side of Main Street apparently dictates the orientation and massing of the proposed buildings. The proposed road alignment also has the potential to increase the connectivity of the East Town Center District with Town Center West, the Riverfront Village, and the Village at Avon. The proposed roadway framework is likely to improve automobile and pedestrian circulation and may increase the aesthetic quality of the built environment.

The proposed building bulk, mass and scale, particularly with respect to the maximum height of the East Building (110'), exceed the maximum allowable development standards of the existing Town Center (TC) zone district. However, it is important to note the maximum of eight (8) stories does relate back to the *Town of Avon's Comprehensive Plan Built Form Diagram*. All three proposed buildings are shown as stepping back at approximately the fourth level in an effort to break up monolithic appearing masses, create articulation, visual interest, and enhanced solar exposure to the street level. Streetscape furnishings, signage, and lighting have been proposed in an attempt to provide an orchestrated aesthetic experience. These surface elements are proposed cohesively with the guidelines and standards adopted in the West and East Town Center Design Guidelines and have the potential to create a unique sense of place.

- **Use architectural detailing on ground level/first floor to enhance the pedestrian environment that includes a human scale, display windows, appropriate lighting, and other pedestrian amenities.**

The fourteen foot (14') minimum floor-to-ceiling plate height for all at grade square footage is intended to optimize display space, provide ample light penetration, and enhance the sense of proportion and scale along the street level. Architectural elements such as awnings, light fixtures, and signs with substantial detailing and distinct characteristics should be considered during the design stages of the project to increase the aesthetic appeal.

- **Site buildings of varying sizes along the street to maximize sun exposure, protect views, and break up building bulk.**

As stated previously in this report, a total of three separate buildings varying in size and shape are proposed in this project, with each one presenting some extent of articulation and with stepping back at certain levels in an attempt to break up an imposing visual presence of bulk and mass. The proposed buildings are oriented on the plans with a focus on Main Street and have been sized in order for the majority of the project to conform to the existing Town Center maximum height of eighty-feet (80'), with a smaller portion of building height reaching 110 feet. Gaps between buildings along the main street façade are proposed in an effort to facilitate efficient automobile and pedestrian access throughout the vicinity of the proposed project while still maintaining a continuous retail experience. An apparent emphasis has been placed on maximizing the commercial space on the perimeter of the North Building and all south-facing facades to take advantage of solar exposure. The proposed plaza is designed to expose the ground floor spaces in the North building to sunlight at different times of the day throughout the year.

- **Ensure convenient pedestrian and auto access to the entire Town Center.**

The proposed, linear Main Street running through the East Town Center District could potentially improve pedestrian and automobile access on the east side of town. Since the proposed project, if approved, would effectively extend Main Street from the West Town Center to the East, the development application has the potential to vastly improve pedestrian and automobile circulation throughout the center of town. In order to encourage pedestrians to cross Avon Road, the applicant has offered to enhance the cross walks with additional signage, lighting, and other such improvements. The proposed roads and sidewalks appear to have been designed to facilitate access for both pedestrian and automobiles through and around the development site to create a fluid circulation network. Given the close proximity of the proposed development site to other core area attractions, the application focuses on pedestrian movement instead of automobile traffic. As mentioned earlier, the structured parking will help achieve the intent of this criterion as well.

Comprehensive Plan Goal B.1: Promote a compact community form.

The proposal appears to adhere to the following applicable policies listed for this goal:

Policy B.1.1: *"Require that development throughout the community fit the overall Built Form according to the Built Form Diagrams in this plan."*

Staff Response: The Avon 21 PUD, as depicted, appears to generally conform to the Built Form Diagram on Page 33 of the Town of Avon Comprehensive Plan, in the sense that the proposed buildings step down in height from east to west.

Policy B.1.3: *"Ensure development protects the enjoyment of outdoor spaces by maximizing sun exposure and protecting views."*

Staff Response: The applicant intends to demonstrate the maximization of solar exposure and has designed a plaza space.

Policy B.1.4: *“Require that development throughout the community meet the density guidelines as indicated on the Future Land Use Map.”*

Staff Response: Avon 21 meets the density guidelines as indicated on the Future Land Use Map (*Mixed Use*).

Policy B.1.6: *“Require that development within the Town Center Districts includes vertically mixed uses.”*

Staff Response: As proposed, the Avon 21 PUD will be a vertically integrated, mixed-use development.

Policy B.1.7: *“Require that development within the Town Center Districts maintain a strong street edge, however all floors above the third shall be setback and articulated.”*

Staff Response: The Avon 21 PUD proposal appears to maintain a strong street edge throughout the applied for development and each building steps back after the third floor-plate above grade and is further articulated elsewhere.

Policy B.1.8: *“Locate uses that generate traffic to areas near transit facilities or shared parking facilities to minimize automobile travel and ‘re-parking’ within the same area.”*

Staff Response: The proposed Avon 21 PUD will generate traffic near transit facilities and proposed shared parking facilities with the stated intention of minimizing automobile traffic and ‘re-parking’ within the immediate vicinity. A Memorandum from the Director of the Department of Public Works and Transportation to the Planning Manager is attached to this report for reference.

Policy B.1.9: *“Encourage redevelopment and revitalization of currently outdated, rundown, or otherwise neglected areas.”*

Staff Response: The Avon 21 PUD will entirely redevelop and revitalize currently outdated, rundown, or otherwise neglected areas and the structures located thereon.

Goal C.1: Provide a balance of land uses that offers a range of housing options, diverse commercial and employment opportunities, inviting guest accommodations, and high quality civic and recreational facilities, working in concert to strengthen Avon’s identity as both a year-round residential community and as a commercial, tourism and economic center.

Review Comments:

The following policies listed for this Goal C.1 are relevant to the subject PUD proposal:

Policy C.1.1: *“Ensure that proposed development and redevelopment projects conform to the Future Land Use Plan’s designations and are a scale and intensity appropriate for the planning district in which they are located.”*

Staff Response: The Avon 21 PUD application conforms to the Future Land Use Plan’s designations and appears to exhibit a scale and intensity appropriate for the planning district. The proposal contemplates less than the maximum gross floor area currently permitted when applying the development standards of the current Town Center (TC) zoning designation.

Policy C.1.3: *"Focus lodging and guest accommodation in the Town Center Districts to take advantage of the proximity to retail, commercial and other community services."*

Staff Response: The proposed PUD does focus lodging and guest accommodations in a High Priority Town Center District within close proximity to the amenities listed above.

Comprehensive Plan Goal C.3: Use mixed-use development to create a more balanced, sustainable system of land uses.

Review Comments:

The following policies of this goal are applicable to this application:

Policy C.3.1: *"Require vertical and/or horizontal mixed-use development to occur in those areas identified in the Future Land Use Plan for mixed-use to enhance the Town's ability to respond to changing market conditions."*

Staff Response: The Avon 21 PUD is proposed to be a vertical mixed-use development that appears to respond to ever-changing market conditions.

Policy C.3.2: *"Provide opportunities for short-term office and service uses in ground floor retail space when market demand is low, but retain permanent designation as retail."*

Staff Response: As proposed, the Avon 21 PUD could provide opportunities for short-term office and service uses in ground floor retail spaces when the market demand for retail space is low, but the permanent designation for such space is retail.

Comprehensive Plan Goal C.4: Encourage a sustainable commercial development that enhances Avon's overall economic health, contributes to the community's image and character, and provides residents and visitors with increased choices and services.

Review Comments:

The following policies of this goal are applicable to this application:

Policy C.4.1: *"Develop a detailed District Master Plan for the East Town Center District identifying parcel configurations and new automobile and pedestrian circulation alignments to increase the district's viability."*

Staff Response: The Avon 21 PUD application depicts a reconfiguration of land in a manner that conforms to the Draft East Town Center District Plan and increases the District's viability with potential clarification and increased efficiency of automobile and pedestrian circulation alignments.

Policy C.4.2: *"Require future commercial businesses, when appropriate, to cluster buildings and to provide publicly accessible amenities."*

Staff Response: The proposed commercial businesses included in the project are clustered and oriented with publicly accessible amenities (sidewalks, outdoor seating areas, and multi-use event plaza).

Policy C.4.4: *"Encourage commercial developments to utilize innovative and environmentally friendly planning and construction techniques."*

Staff Response: The Avon 21 PUD proposes to utilize innovative and environmentally friendly planning and construction techniques. The proposed development can be

designed to a minimum LEEDS certification standard and endeavors to achieve one or more forms of USGBC LEEDS certification.

Comprehensive Plan Goal D.1: Ensure that development and redevelopment is compatible with existing and planned adjacent development and contributes to Avon's community image and character.

Review Comments:

The following policies of this goal are applicable to this application:

Policy D.1.1: *"Encourage creative, forward-thinking development consistent with adopted plans."*

Staff Response: The Avon 21 PUD seems to be a "forward-thinking development" compatible with adopted plans, and that could constitute a positive contribution to the image of the Town of Avon.

Policy D.1.2: *"Ensure that development and redevelopment responds appropriately to adjacent development."*

Staff Response: The relationship between the applications for the Avon 21 PUD responds and adjacent development is difficult to gauge because no other properties in the vicinity are contemplating redevelopment at this time.

Policy D.1.3: *"Restrict large surface parking areas that directly abut local streets. If a large surface parking area is located next to a local street, use berms, plant materials of varying height, or other materials to buffer and screen these parking areas."*

Staff Response: The plans for Avon 21 appear to eliminate existing large surface parking areas and propose to locate the majority of required parking structures below grade.

Policy D.1.4: *"Create a unified and cohesive physical framework and community image by ensuring compatible building orientation, scale, massing, siting, street alignments, streetscape furnishings, signage, lighting, etc."*

Staff Response: The configuration, scale, massing, building sites, street alignments, and streetscape furnishings depicted in the proposed project appear to establish a cohesive and unified physical framework promoting the community's image.

Comprehensive Plan Goal D.2: Create community gateways and streetscapes that reflect and strengthen Avon's unique community character and image.

Review Comments:

The following policies of this goal are applicable to this application:

Policy D.2.1: *"Beautify the town with street trees, sidewalks, landscaping and public art."*

Staff Response: As depicted, the project clearly attempts to beautify the town and establish a new benchmark for the built environment and public space in the Town of Avon. Landscaping, street furnishing, and public art are all proposed for incorporation into the project.

Policy D.2.2: *“Design and maintain the Town’s streets and walkways as safe, inviting, and pedestrian/bicycle friendly public spaces.”*

Staff Response: The proposal demonstrates an effort toward redesigning the streets and walkways in a positive manner.

Comprehensive Plan Goal D.3: Develop new and continue to enhance existing cultural and heritage facilities, events, and programs that strengthen Avon’s community character and image.

Review Comments:

The following policies of this goal are applicable to this application:

Policy D.3.3: *“Encourage development of civic and recreational amenities that benefit existing neighborhoods.”*

Staff Response: The project proposes to create a public plaza that can be used as a venue for select community events at appropriate times.

Comprehensive Plan Goal E.3 Increase the number of visitors to Avon by enhancing our attractiveness as a destination resort community.

Review Comments:

The following policies of this goal are applicable to this application:

Policy E.3.3: *“Institute minimum density requirements in the Town Center Districts to achieve the needed critical mass of retail, residential, and accommodation units.”*

Staff Response: The development standards proposed for the Avon 21 PUD exceed the minimum density standards in the Town Center District and increase the critical mass of retail, residential, and accommodation units correspondingly with the East Town Center District Plan.

Policy E.3.8: *“Ensure that the tourism and recreational attractions, shopping and dining areas, parks, transit stops, trails, and bicycle routes are coordinated within an integrated wayfinding signage program oriented towards both pedestrian and vehicular traffic.”*

Staff Response: The application includes a statement regarding cohesion with the sign programming for the Town Center Districts as detailed in the West Town Center Design Guidelines.

Policy E3.10: *“Encourage and facilitate the creation of new tourist attractions relating to interesting, niche retail and/or manufacturing operations.”*

Staff Response: The application refers to creating a high quality, pedestrian-oriented ‘niche’ retail shopping experience that can garner new interest in Avon as a tourist destination.

Comprehensive Plan Goal F.1: Achieve a diverse range of quality housing options to serve diverse segments of the population.

Staff Response: As stated above, this is an opportunity to make progress toward the Town of Avon’s goal of achieving a diverse range of attainable housing within the core area of Avon. The applicant has proposed to provide twelve (12) “professional” housing units on the proposed development site. Given the recent revisions to the 2006 Town of Avon

Comprehensive Plan and the detail provided therein related to Employee Generation Rates, the amount of new commercial and residential space are to be applied to quantify the impact this rezoning application will have on attainable housing needs. The Planning and Zoning Commission and Town Council will then consider the all of the public benefits inherent in the subject rezoning application to determine the appropriate mitigation rate using the current commercial and residential employee generation calculations listed under this recently updated Topic Area of the Comprehensive Plan.

Comprehensive Plan Goal F.2: Provide a workforce housing program that incorporates both rental and ownership opportunities for residents that are attractive, safe, and integrated with the community.

Review Comments:

The following policies of this goal are applicable to this application:

Policy F.2.2: *“Calculate the impact generated by varying types of land use and development, specifically, commercial and residential linkage calculations. The most recent data available, as periodically updated by Eagle County and the State will be used in this regard. Alternative methods of providing attainable housing, including but not limited to: payment-in-lieu; land dedications; and public-private partnerships, may also be considered.”*

Staff Response: Please see Exhibit D for the spreadsheet showing the commercial linkage employee generation rate calculations accounting for 100% of the employees generated by the proposed mix of commercial uses.

Policy F.2.3: *“Ensure that attainable housing mitigation is applied at the most appropriate rate and is derived with full consideration of all other public benefits, as contemplated by the public benefits criteria referenced in Section 17.28.085 (AMC), provided by any proposal found to be subject to the rezoning and PUD criteria.”*

Staff Response: The proposed 'local professional' housing program (12 units) amounts to approximately 5% of the total residential units proposed and does not seem adequate or commensurate with the sheer size of this application. The limited amount of 'local professional' housing proposed must be scrutinized and compared with the other public benefits being proposed as part of this new PUD.

Comprehensive Plan Goal G.5 Encourage a “park once/shop many” environment

Review Comments:

The following policies of this goal are applicable to this application:

Policy G.5.4: *“Require that all development or redevelopment in the Town Center Districts incorporate structured parking or contribute to a pay-in lieu program to develop joint private/public parking structures. Separate underground parking structures should share access and connect to adjacent underground parking structures.”*

The application proposes to incorporate the majority of required parking in structured parking facilities with the stated flexibility to share access and connect to future, adjacent underground parking structures.

The recently adopted East Town Center District Plan contains seventeen (17) Planning Principles which are distinctly pertinent and applicable to the subject development proposal. These Planning Principles are refinements of Goals and Policies listed in the 2006 Town of Avon Comprehensive Plan; they are to be addressed in the same manner as the Goals and Policies of the Comprehensive Plan; and have been adopted as follows:

1. *Utilize green building practices.*
2. *Create environmentally superior development.*
3. *Provide a mix of uses, including commercial, residential and lodging.*
4. *Ensure that pedestrians have safe and convenient access throughout The East Town Center District.*
5. *Maintain two access points off Avon Road.*
6. *Maintain a dispersed circulation pattern through The District.*
7. *Create quiet, residential scale development.*
8. *Provide on-street parking.*
9. *Minimize the impacts of off-street parking lots.*
10. *Provide de-centralized parking garages.*
11. *Ensure the architectural character of The East Town Center District complements the character emerging in The West Town Center District.*
12. *Ensure that buildings with mid-size retail uses fit the character of the area and support a pedestrian-friendly experience.*
13. *Encourage a high level of site planning and design to maximize public and semi-public pedestrian spaces.*
14. *Maximize solar exposure.*
15. *Define the plaza and other key pedestrian areas by framing these spaces with buildings.*
16. *Maintain key views to and from The East Town Center District to provide visibility, orient people to their surroundings, and define the character of the spaces.*
17. *Focus municipal involvement on actions that produce the most public benefit.*

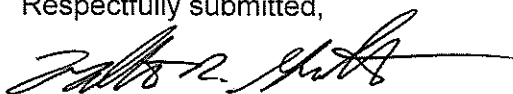
All of the Planning Principles listed above are followed by descriptive language in the Plan which is meant to further guide redevelopment and interpret what each Principle is intended to achieve. The applicant will go through each of these Planning Principles during their presentation on July 1, 2008 in an effort to demonstrate how the subject proposal adheres to each one.

Staff Recommendation:

Staff recommends the Commission **TABLE** the subject applications to the July 15, 2008 Commission meeting to allow the applicant time to adequately respond to the comments made thus far in the process related to the subject proposal.

If you have any questions regarding this project or any planning matter, please call me at 748-4002, or stop by the Community Development Department.

Respectfully submitted,



Matthew R. Gennett, AICP
Planning Manager

Exhibits:

Exhibit A: Vicinity Map

Exhibit B: Employee Generation Rate Calculations (Commercial Only)

Exhibit C: Correspondence to Date

Exhibit D: Copy of PowerPoint Slideshow Presentation

Exhibit E: Revised Narrative from the Applicant

Exhibit F: Reduced Plan Sets