

League of Women Voters of Lawrence-Douglas County
P.O. Box 1072, Lawrence, Kansas 66044

July 18, 2010

Mike Amyx, Mayor
Aron Cromwell, Vice-Mayor
Robert Chestnut, Commissioner
Lance Johnson, Commissioner
Michael Dever, Commissioner

RECEIVED

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CITY MANAGERS OFFICE
LAWRENCE, KS

RE: ITEM NO. 4, TA 12-27-07 (protection of environmentally sensitive land)

Dear Mayor Amyx and City Commissioners:

We have been following the proposed modifications to the Land Development Code Section 20-1101(d) and its related sections in Articles 7 (Planned Development and Cluster Development) and 17 (Terminology) on the preservation of environmentally sensitive land. Our most recent letter and attachments have been included in the supporting material for Item No. 4, TA 12-27-07. This text amendment is now before you for your approval.

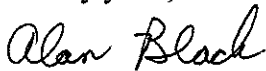
In the most recent text amendment on preservation of environmentally sensitive land released to you by the Planning Commission, we have found that although many of our concerns regarding clarity, consistency and effectiveness have been resolved, we have continued to find so many problems in interpreting and administering this version that we again reviewed and annotated the current draft text.

The following attachment is a list of suggestions that we are presenting for your consideration as changes to be made to the current TA-12-27-07 text based on our annotations on the text, which are also included as an attachment, in response to the Planning Commission revisions. Following that is the letter that we presented to the Planning Commission in June.

We hope you will give serious consideration and acceptance of our suggestions for changes.

Thank you.

Sincerely yours,



Alan Black, Chairman
Land Use Committee

ATTACHMENTS

Attachment One: Suggested list of revisions to the current version of TA-12-27-07.

Attachment Two: Text of current version of TA-12-27-07 annotated with our comments.

Attachment Three: Copy of our letter sent to June Planning Commission on our points of concern.

ATTACHMENT ONE

REQUESTED CHANGES TO TA-12-27-07

Please revamp the environmentally sensitive lands Priority List and make the following changes:

1. Require floodways to be preserved automatically intact without their contributing to a percentage allotment.
2. Do the same for regulated wetlands.
3. Do the same for native prairies.
4. Do the same for floodplains. As a member of the Jayhawk Audubon Society has pointed out, developing floodplains is unwise.
5. Do the same for streams. Adopt a stream preservation standard like that in Kansas City.
6. Do the same for historical and archeological sites, including those not yet registered.

Reason: All of the above are irreplaceable or functionally essential and should be preserved intact.

Percentage allotments:

7. The language should be changed to make clear that there is no upper limit on preserving sensitive land in Cluster Development and that this means preserving "as much as possible."

8. If you adopt a percentage allotment for an environmentally sensitive land feature, start the allotment after the above six types of environmentally sensitive land have been preserved. Start with trees, remembering that keeping vegetation on slopes should be a priority and steep slopes and vegetation cover should go together.

Prevention of prior land disturbance.

9. Require a grading and development permit to prevent slashing and burning prior to submission of development applications. And ENFORCE IT.

Better process:

10. Require the sensitive lands site plan to be submitted first, or at least along with the concept plan but before submission of a regular site plan or plat.

Needed clarification.

11. Define Open Space better. Exclude driveways and required space between buildings where multiple buildings on one lot are permitted.

12. Resolve the unclear definition of "Base Density." If it includes the density that would have been permitted in the preserved sensitive lands had they not been set aside, and that is added to the net density of the remaining land, then the resulting base density would be higher than the net density, and thereby would constitute a bonus. If the base density does not include the density that would have accrued from the sensitive land had it been developed, then the bonus makes sense. If the former is the case, then the allowed density already exceeds what can practically be built. The concept of the "base density" needs to be clarified. The problem comes with Section 20-1101(d)(4), which was left in after modifying the TA to add the concept of the Base Density and the Bonus section.

ATTACHMENT TWO

PLANNING COMMISSION REVISED VERSION CLEAN COPY OF TEXT
AMENDMENT 12-27-07 (preservation of environmentally sensitive land.)
Annotated with comments from the Land Use Committee, League of
Women Voters. July 17, 2010.

LIST OF ANNOTATIONS BY PAGE: 7-4; 7-6; 7-7; 11-2; 11-3; 11-4; and
Terminology page at end.

Please note: most of the pages not annotated with comments have been deleted.

Common Open Space, with the intent being to preserve all or as much environmentally sensitive lands as possible in their natural state.

(2) General Provisions

See Section 20-703 for General Provisions applicable to Open Space in a PD or Cluster Development.

(I) Additional Requirements and Standards

(1) Unified Control

No application for a PD will be accepted or approved unless all of the property included in the application is under unified Ownership or a single entity's control.

(2) Street Access

PDs that will generate 100 or more average daily trips (based on traffic generation estimates of the Institute of Transportation Engineers' Trip Generation Manual, 7th edition, or subsequent edition, or based on local estimates provided by the City) shall have Access to an Arterial Street using a Frontage or rear Access road or by taking direct Access to a Collector Street.

Individual residential Building Lot shall not take direct Access to an Arterial Street or a non-Residential Collector Street. Each individual residential Lot shall have Frontage on a public or Private Street that has been constructed to the Public Street standards of the City.

(3) Sidewalks

Sidewalks built to City specifications shall be built along both sides of all public and Private Streets. On Local Streets, sidewalks shall be at least 5 feet in width; on all other Streets sidewalks shall be at least 6 feet in width.

(4) Landscaping

The Landscaping and Screening standards of Article 10 apply to PDs. In addition, any part of the development area not used for Buildings, Structures, Parking, Streets, or Accessways shall be landscaped with a sufficient mixture of grass, vegetative Ground Cover, trees, and Shrubs, except those areas designated to be preserved with natural vegetation.

You need to make clear that there is no maximum sensitive lands area limit in both Cluster and Planned Developments.

(5) Preservation of Natural Features

Mature stands of trees or individually significant mature trees, vegetative cover, watercourses and other natural site features shall be preserved to the greatest extent possible. At a minimum the common open space provisions in this section and the standards of Article 10 apply.

(6) Zoning Map

Approved PDs shall be identified on the Official Zoning District Map.

(7) Additional Conditions

The Planning Commission may recommend, and the City Commission may impose, other reasonable conditions and standards, as deemed necessary to ensure consistency with the purposes of this section and those of this Development Code. Such conditions may include limitations on the types of uses, Structures or Building Types to be allowed in the PD. When such

- (1) In RS Districts and the CN1 District, Cluster Housing Projects shall not include more than 35 Dwelling Units. Larger projects in said Districts are subject to the Planned Development regulations of Section 20-701 and shall be reviewed and approved in accordance with the procedures of Section 20-1304.
- (2) Cluster Housing Projects allowed by-right will be evaluated for compliance with applicable regulations and reviewed and approved in accordance with the subdivision procedures of Article 8 review process.

(d) Lot Area and Lot Width Requirements

There are no minimum Lot Area or Lot Width requirements for Cluster Housing Projects. Lots shall be adequate to meet all applicable standards of this Development Code.

(e) Housing Types

Detached Dwelling Units on individual Lots are the only type of housing allowed in a Cluster Housing Project. The proposed Building Envelope for all houses shall be shown on the subdivision plat with enough detail so that compliance with required Density and Dimensional Standards can be determined.

(f) Setbacks

- (1) A Setback equal to the minimum Front Setback of the Base District shall be provided along the entire perimeter of the Cluster Housing Project that is adjacent to any Street or right-of-way.
- (2) A Setback equal to the minimum Rear Setback of the Base District shall be provided along the entire perimeter of the Cluster Housing Project that is not adjacent to any Street or right-of-way.
- (3) Within the project, the distance between houses shall be at least 10 feet (to be measured in accordance with the Setback measurement provisions of Section 20-602(e)).

(g) Building Coverage

The Building coverage standards of the Base District do not apply to each individual Lot, but the total Building coverage of all Lots (in aggregate) may not exceed the maximum Building coverage standard of the Base District.

(h) Outdoor Area

The required minimum outdoor area standard per Dwelling Units of 240 Sq. Ft. shall be on each Lot.

(i) Common Open Space

(1) Amount Required

The Cluster Housing Project shall include at least 10% of the total site area as Common Open Space.

Environmentally sensitive lands, if present, shall be protected and included within the Common Open Space. 30% of the Common Open Space shall be developed as Recreational Open Space, unless environmentally sensitive lands

The wording on this hasn't been changed so that there is still a minimum of 10% common Open Space required, and since the sensitive land is included in the common open space there still is the minimum requirement to preserve only 10% of the total tract when more sensitive land is present. 5% of that must be recreational.

This still doesn't indicate that there is a requirement to preserve more sensitive land than a total of 10% less 5% of that. Please see suggested wording opposite.

are present, in which case the amount of Recreational Open Space may be reduced to no less than 5% and no more than 10% of the Common Open Space, with the intent being to preserve all or as much environmentally sensitive

? " land as possible. Where more sensitive land is present, up to 20 % of the total tract shall be required to be preserved, and beyond that there is no upper maximum limit to the amount of sensitive land that may be preserved."

(2) General Provisions

See Section 20-703 for General Provisions applicable to Open Space in a Planned Development or Cluster Housing Project.

20-703 OPEN SPACE STANDARDS IN CLUSTER AND PLANNED DEVELOPMENTS

(a) Preservation Required

The Open Space land shall be preserved and maintained solely for the purposes specified in this Section and in such a manner as may be acceptable to the City Commission. The method for accomplishing such preservation and maintenance of Open Space land shall be limited to one of the following:

- (1) establishment of a mandatory-membership homeowner's association to own and maintain the land in common for the Open Space purposes intended; or
- (2) transfer of the land to a conservation trust or an institution, person, organization or other conservation-oriented entity together with the requisite requirements for maintenance of the land for the Open Space purposes intended; or
- (3) dedication of the land to the City with executed deed restrictions that the City is party to, which ensure the land shall remain as dedicated open space, subject to City Commission acceptance of such dedication.

(b) Execution of Instruments

The City Commission shall require the Developer or Owner of the Open Space land to execute, acknowledge and file at the Register of Deeds office such maps and documents as, in the opinion of the Director of Legal Services, will effectively create a trust, Easement or covenant running with the land, for the benefit of the property owners in the development and of the City, which:

- (1) will be binding on all future Owners of the Open Space land;
- (2) will not be affected by any subsequent changes in zoning;
- (3) may be enforced by property owners in the development or the City by appropriate action in court for damage or equitable relief;
- (4) will be perpetual;
- (5) will assure appropriate maintenance of the Open Space land to the satisfaction of the City Commission;
- (6) shall provide that if maintenance, preservation and/or use of the Open Space land no longer complies with the provisions of the trust, Easement

Annotated
comments are
in red.

(6' minimum height). This provision shall apply only to those exterior sides of a Planned Development that are adjacent to RS zoning or to detached Dwelling Units.

(d) Standards for Environmentally Sensitive Lands

(1) Applicability

The provisions of this Article regarding environmental protection for sensitive lands shall apply to all construction and development in all RS and RM Districts, with the exception of individually platted lots for single or duplex dwellings which were platted prior to (the effective date of this Text Amendment).

(2) Environmentally Sensitive Lands

(i) Protected Areas.

If 500 sq ft or more of a proposed development consists of lands falling in the following categories, any proposed development may proceed only in accordance with the processes allowed by this section. The lands affected by this section are listed below in a priority order for protection:

- a. Regulatory Floodway, designated on the FEMA Flood Insurance Rate Map for Douglas County and identified on the City GIS Baseline Environmentally Sensitive Areas Map;
- b. Regulatory Floodway Fringe, designated on the FEMA Flood Insurance Rate Map for Douglas County based on 100 year storm and identified on the City GIS Baseline Environmentally Sensitive Areas Map,
- c. Jurisdictional Wetlands, as determined by the Army Corps of Engineers.
- d. Stream Corridors as defined in this Code and identified on the City GIS Baseline Environmentally Sensitive Areas Map
- e. Stands of Mature Trees as defined in this Code and identified on the City GIS Baseline Environmentally Sensitive Areas Map; and
- f. Archaeological and Historic Sites listed on local, state, or federal registers.

You still need to protect potential
archeological and historic sites that
have not yet been registered.

(ii) Determination of Development Land Area

In determining whether a portion of a proposed development consists of sensitive lands, all contiguous lands under the same Ownership or control shall be considered. Lands owned or controlled by a partnership, trust or corporation under the same effective control shall be considered, along with lands owned directly by the applicant and lands under option to the applicant or a partnership, trust or corporation under the effective control of the applicant.

(3) Protection Standards

(i) Platted Lots-Amount Required

The minimum amount of environmentally sensitive lands which are required to be protected in Planned Developments and Cluster Housing Projects are noted in Sections 20-701 and 20-702 respectively. For other types of developments, required protection of environmentally sensitive lands shall be limited to a

This still doesn't change
the minimum amount of
required open space
(sensitive land) of 10% in
Cluster Development.
Please see page 7-1 for
suggested rewording.

maximum protection area of 20% of the total land area. The protected environmentally sensitive lands shall be set aside as private Common Open Space or dedicated to the City as parkland or open space. Incentives for protection of environmentally sensitive lands in amounts above 20% of the total land area are included in Section 20-1101(f).

(ii) Development Process

Development on land which contains more than 500 square feet of environmentally sensitive lands shall require submission of a Sensitive Areas Site Plan [see Section 20-1101(f)], and may proceed through one of the following processes:

This still hasn't changed the approval timing of the sensitive lands site plan. As it reads here, the sens. Inds. site plan can be approved too late to be worthwhile in planning the development. THE SENSITIVE LAND SHOULD BE SET ASIDE FIRST IN THE PLAN SO THAT THE DEVELOPMENT CAN BE PLANNED AROUND IT.

- a. **Site Planning.** Development on properties containing more than 500 square feet of environmentally sensitive lands shall require submission of a Sensitive Areas Site Plan [see Section 20-1101(f)], which may be consolidated with any other required site plan submitted, but will be, in any event, required prior to approval of a development proposal. The plan shall clearly delineate the environmentally sensitive lands to be protected and shall include information regarding protection measures and maintenance.
- b. **Platting.** Environmentally sensitive lands to be protected shall be located within tracts and/or easements. Information regarding ownership and maintenance responsibility of the tract or easement, as well as protection measures, shall be included on the preliminary and final plat.
- c. **Planned Development.** Development standards in Section 20-701 apply. Environmentally sensitive lands to be protected shall be included within the Common Open Space.
- d. **Cluster Housing Project.** Development standards in Section 20-702 apply. Environmentally sensitive lands to be protected shall be included within the Common Open Space.

(4). Effect of Protection Standards on Development Density

Where the types of lands listed in Section 20-1101(d)(2)(i) are included in a proposed development, that land may be included in determining the allowable Density or intensity of development and the allowable density, calculated on the total land area, may be transferred to other developable portions of the property.

(e) Density Bonus Incentives for Protection of Additional Lands

Density bonuses are available to encourage the protection of environmentally sensitive lands in a greater amount than required.

(1). Applicability

A development shall qualify for a density bonus if environmentally sensitive lands noted in this Section are committed for preservation either through designation as a tract, through a conservation or landscape easement, or dedication to the City in addition to the area required in Section 20-1101(d)(3)(a) with the following exceptions or additions:

- (i) The density bonus incentives do not apply to the protection of regulatory floodway above the amount required in this Section.

The original definition of base density was density allowed on all of the developable land after all of the requirements were met. The 20% sensitive land was subtracted from the overall tract along with its density allotment.. Allowing the density of the 20% to be added to that allowed on the remaining tract increases the density beyond what would otherwise be permitted. This already is a bonus.

- (ii) Slopes of 25% or greater may be included in the environmentally sensitive lands for the density bonus incentives, provided the required area being protected with features listed in Section 20-1101(d)(2)(i) equals or exceeds 20% of the total developable area.

Why not simply require each native prairie to be preserved in its entirety regardless, rather than making it's preservation voluntary.

Native prairies are irreplaceable.

- (iii) Native prairie remnants may be included in the environmentally sensitive lands for the purpose of these incentives. The protection of any amount of native prairie remnant qualifies for the density bonus incentives, regardless of what amounts of other environmentally sensitive lands have been protected. If native prairie remnants are protected, the density bonus is calculated per Table 1 and 2 in Section 20-1101(e) as if the 20% of developable area has been protected.

(1) Approval Criteria

- (i) In addition to these regulations, development on properties with certain environmentally sensitive lands, such as jurisdictional wetlands, may be restricted by state or federal regulations.

- (ii) In order for a density bonus to be approved, City planning staff must determine that utilities and infrastructure are available to serve the additional density proposed and the design of the development does not negatively impact adjacent properties.

- (iii) Land offered for dedication shall be subject to approval by the Governing Body.

(2) Density Bonus -- Increase in Number of Dwelling Units.

- (i) Determination of Base Density.

The Base Density, the number of dwelling units which can be developed on a property, will be determined from a 'concept plat' or sketch plan provided by the applicant which shows the basic street layout and rights-of-way, the areas necessary for stormwater detention (based on an approved conceptual drainage study), the 20% of the site which is being protected with environmentally sensitive lands, and proposed lot layout in conformance with density and dimensional standards in Section 20-601.

- (ii) Determination of Density Bonus.

If the density bonus meets the criteria noted in Section 20-1101(e)(1), the density bonus to be applied to the base density shall be calculated using the proportions in Table 1.

- a. The density may exceed the Density Cap in multi-dwelling districts.
- b. The density may equal but may not exceed the Density Cap for single-family and duplex districts.
- c. Density Caps set by the Comprehensive Plan are noted in Table 2.

be completed by an engineer, architect or other qualified professional. In addition to the contents noted in Section 20-1305(f), the site plan shall:

- (i) Clearly delineate the property boundaries.
- (ii) Clearly delineate the boundaries of the environmentally sensitive lands listed in Section 20-1101(d)(2)(i).
- (iii) Designate protected lands per the priority order in Section 20-1101(d)(2)(i).
- (iv) Provide information on the ownership and maintenance responsibility for the protected lands.
- (v) Provide information on the methods to be used to protect environmentally sensitive lands, both during construction and after.

[Followed by remainder of Article 11.]

ARTICLE 17

Proposed revisions to definitions in Section 20-1701:

Base Density: The number of dwelling units that can be developed on a subject property, rather than the number of dwelling units that are permitted for the zoning district. Base density is the number of dwelling units that can be developed given the size of the parcel, the area required for street rights-of-way or infrastructure, the density and dimensional standards of Section 20-601(a), the environmental protection standards, as well as topographical or other features unique to the property.

Common Open Space: Land, water body, water course, or drainageway within a development that is designed and intended for the use or enjoyment of all the residents and Landowners of the Development. Common Open Space, except for Common Open Space designated as Environmentally Sensitive Lands, may contain such supplementary Structures and improvements as are necessary and appropriate for the benefit and enjoyment of all the residents and Landowners of the Development. Common open space shall not include space devoted to streets, alleys, or parking areas. While required setbacks may function as common open space, they may not be used to meet the minimum requirements.

Density Bonus: An incentive-based tool that permits property owners to increase the maximum allowable development on a property in exchange for helping the community achieve public policy goals, such as protection of environmentally sensitive areas.

Density Cap: Maximum density levels set by the Comprehensive Plan. Low-density (6 dwelling units per acre); medium density (15 dwelling units per acre) and high density (24 dwelling units per acre).

Jurisdictional Wetland: Wetlands which are regulated by Section 404 of the Clean Water Act and are under the regulatory jurisdiction of the Army Corps of Engineers (Corps) and the Environmental Protection Agency (EPA).

Mature Trees, Stand of: An area of ½ acre (21,780 sq ft) or more located on the 'development land area', per Section 20-1101(d)(2)(ii) or on other contiguous residentially zoned properties containing trees that are 25 feet or more in height, or are greater than 8" caliper, in an amount adequate to form a continuous or nearly continuous canopy. (Canopy may be determined from resources such as, but not limited to, NAIP, National Agricultural Imaging Program; City/County GIS aerials; and field surveys.)

Native Prairie Remnants: Prairie areas that have remained relatively untouched on undeveloped, untilled portions of properties are 'native prairies'. Native prairie remnants will be confirmed by the Kansas Biological Survey, or a consulting firm with local expertise in these habitats, as areas that have remained primarily a mixture of native grasses interspersed with native flowering plants. (These areas have not been planted, but are original prairies). A list of approved consulting firms for prairie determination is available in the Planning Office.

Stream Corridor: A strip of land 100 feet wide, of which the centerline shall be the centerline of a stream that is not an ephemeral stream: a stream where flow occurs for only a short time after extreme storms and does not have a well-defined channel, similar to a drainage way.

This definition is not clear because we can't tell whether it includes the density accrued from the sensitive land or not. See 20-1101(d)(4).

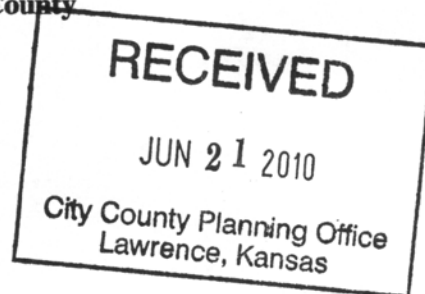
You still need to exclude from Common Open Space: driveways, private streets in PUDs, and the 10 ft requirement as space between buildings in Cluster Developments and PUDs.

ATTCHMENT THREE

League of Women Voters of Lawrence-Douglas County
P.O. Box 1072, Lawrence, Kansas 66044

June 20, 2010

Mr. Greg Moore, Chairman
Members
Lawrence-Douglas County Planning Commission
City Hall
Lawrence, Kansas 66044



RE: ITEM NO. 5, TEXT AMENDMENT; ENVIRONMENTALLY SENSITIVE AREAS

Dear Chairman Moore and Planning Commissioners:

You have received many letters from us on this subject and we appreciate the changes that you have made to the proposed text amendment in response. However, we continue to have serious concerns about the current proposed revisions. Below is a summary of these concerns.

1. Environmentally sensitive areas in the city and county should be protected prior to development. There should be a means of protecting sensitive land before it is disturbed such as requiring a development permit similar to that in the Floodplain Management Regulations.
2. The Environmentally Sensitive Areas Site Plan should be submitted first. Before a development is planned, as the first stage the Environmentally Sensitive Areas Site Plan should be submitted. The maximum amount of sensitive land should be set aside and the remaining developable land then designed for development. It is too late in the design, planning and development process to submit a Sensitive Areas Site Plan immediately prior to approval.
3. Some lands are protected by other laws. The lands that by law cannot be developed—Regulatory Floodways and Jurisdictional Wetlands—should not be included in the percentage of sensitive areas that must be protected.
4. We believe that the sensitive land itself should dictate how much and, in fact, whether each tract of land can be developed. We have always questioned the policy that there should be a set minimum or maximum amount of sensitive land that should be preserved. All environmentally sensitive areas should be preserved.
5. Serious deficiencies. However you plan to revise these regulations, as written now, they have some serious deficiencies that will make them difficult to administer. These are discussed below along with suggestions for corrections.
 - a. Definition of Open Space needs correcting. Although the definition of Open Space has been corrected to exclude setbacks, it still is not clear that the Open Space does not include required space between buildings such as the 10 feet required in PDs. Open Space also should not include private streets (in PDs) or driveways (in all developments).
 - b. Regulations on Cluster Development need revision. The amount of sensitive land as Common Open Space required in Cluster Developments at only 10% is totally deficient. Cluster Development is one of the most efficient and equitable methods of providing protection for sensitive lands. When the density is calculated based on the original tract, i.e., the original number of lots permitted, which was the intention with Cluster Development, the density

does not require a bonus incentive because there is no need for a density bonus adjustment due to loss of developable land. The reason is because with protection of sensitive land there is no loss in potential number of dwellings that can be built. The same number of lots are simply made smaller.

- c. Expanding the use of the Cluster Development concept. Making the lots smaller is an adjustment that is allowed for traditional development in these revised regulations. When sensitive land is present, if the density were to be calculated in the same way as that for Cluster Development, there would be no need for density bonus incentives.
- d. Problems with RM Districts. The problems that appear with density bonus incentives in multiple family developments are due largely to the staff interpretation of allowing multiple buildings on one large lot. This is an anomaly that occurs because in the Land Development Code there is no required space—such as 10 feet—between buildings in RM Districts. The exterior yards at the edge of each large multiple family lot can provide the permeable space of 25% required in the Land Development Code Section 20-601 and therefore would not add to the amount of required open space. What this does is to create the opportunity for each large lot to have such a large net density that it can be built almost to its gross density. This is where there is a “loss” of density in conventional multiple family districts by adding the 20% open space requirement for sensitive land because it allows fewer dwelling units. Please see our letter sent in April, 2010 on this issue.
- e. The deficiency of not listing other sensitive lands in the priority list. Prairies and steep slopes should be added to the priority list rather than treating them as a bonus. In addition, potential archeological and historic sites and significant but intermittent streams should also be added to the list. Actually, the priority list is an anomaly because all of these sensitive types should be preserved. Those required to be preserved by law—Regulatory Floodways and Jurisdictional Wetlands—should not be included to add to the total Open Space allotment; rather, they should be preserved over and above the allotment.

We sincerely hope that you will respond positively to our points and suggestions and make what we consider necessary changes before giving your approval. Attached is the Clear Copy of the staff proposed revisions that is annotated with our comments.

Thank you.

Sincerely yours,

Milton Scott
Vice President

Alan Black

Alan Black, Chairman
Land Use Committee

Attachment