



CITY OF DURHAM | DURHAM COUNTY
NORTH CAROLINA



ZONING MAP CHANGE REPORT

Meeting Date: November 19, 2012

Table A. Summary			
Application Summary			
Case Number	Z1100017	Jurisdiction	City
Applicant	Jeff Gelman, 751 LLC	Submittal Date	July 11, 2012
Reference Name	Southpoint Trails	Site Acreage	27.887
Location	8512 NC 751 Highway, west side of NC 751 Highway, north of Stagecoach Road and south of Massey Chapel Road		
PIN(s)	0717-01-28-3437, -29-1326, -2079, -18-8624, -9997		
Request			
Proposed Zoning	Planned Development Residential 6.040 (PDR 6.040)	Proposal	164 units
Site Characteristics			
Development Tier	Suburban Tier		
Land Use Designation	Low Density Residential (4 DU/Ac. or less)		
Existing Zoning	Residential Rural (RR)		
Existing Use	Vacant		
Overlay	F/J-B	Drainage Basin	Jordan Lake
River Basin	Cape Fear	Stream Basin	New Hope Creek
Determination/Recommendation/Comments			
Staff	Staff determines that this request is not consistent with the Future Land Use Map nor the applicable polices of the <i>Comprehensive Plan</i> . If the plan amendment were approved, the request would be consistent with the Future Land Use Map. The request is consistent with UDO requirements.		
Planning Commission	Approval, 8 – 5 on July 10, 2012. The Planning Commission finds that the ordinance request is not consistent with the adopted <i>Comprehensive Plan</i> . However, should the plan amendment be approved, the request would be consistent with the <i>Comprehensive Plan</i> . The Commission believes the request is reasonable and in the public interest and recommends approval based on comments received at the public hearing, the information in the staff report, and additional commitments proffered by the applicant.		
DOST	See Attachment 7, Durham Open Space and Trails Commission Memo		
BPAC	See Attachment 8, Durham Bicycle & Pedestrian Advisory Commission Memo		
Rails to Trails	See Attachment 9, Rails to Trails Conservancy Memo		

A. Summary

This is a request to change the zoning designation of 27.887 acre site from RR to PDR 6.040 for a residential development of 164 units. The site is comprised of five parcels located at 8512, 8506, 8420, 8416, and 8404 NC 751 Highway, on the west side of NC 751 Highway, north of Stagecoach Road and south of Massey Chapel Road (see Attachment 1, Context Map). This request is not consistent with the future land use designation of the *Comprehensive Plan* which designates this site as Low Density Residential (4 DU/Ac. or less). A plan amendment, case A1100005 has been requested to change the land use designation to Low-Medium Density Residential (4 – 8 DU/Ac.). Staff is recommending denial of the plan amendment.

Appendix A provides supporting information.

B. Site History

In 2003, a zoning map change application (case P03-71) for this site was submitted for the PDR 3.840 zoning district for 107 single-family units along with an annexation request and initial zoning (case P03-70). Both of these cases were withdrawn on November 25, 2003.

The site is currently within the County's jurisdiction; however a petition for annexation has been submitted to the City of Durham. As such there is a pending initial zoning, Case Z1100017A under consideration.

C. Review Requirements

Planning staff has performed a sufficiency review for this Zoning Map Change request (reference UDO Sec. 3.2.4, Application Requirements [general] and 3.5.5, Application Requirements [for a Zoning Map Change]). This staff report presents the staff findings per Sec. 3.5.8, Action by the Planning Director, on the request's consistency with the Unified Development Ordinance and applicable adopted plans.

This review is based primarily on compliance with all applicable laws, plans, or adopted policies of City Council. Any issues or concerns raised in this report are based on best professional planning practice unless they have a basis in adopted plans, policies, and/or laws.

D. Unified Development Ordinance (UDO) Compliance

This request is consistent with the requirements of the Unified Development Ordinance. The associated development plan (Attachment 4, Development Plan Reduction) provides the required elements for zoning map change requests in the PDR district (Sec. 3.5.6.D, Sec. 6.11.3). In addition, commitments in excess of UDO requirements have been made (see Appendix D for supporting information):

Text Commitments. Text commitments have been proffered to commit to requirements in excess of ordinance standards. A summary of these commitments

(see Table D5, Summary of Development Plan) include: dedication of right-of-way, north- and south-bound turn lanes, a median, and 4 feet of additional asphalt for a bicycle lane along the NC 751 Highway frontage, a greenway easement along with pedestrian access for Eagle Spur Trail, a masonry wall in the northwest corner of the site, and a wood fence along NC 751 Highway if approved by property owners.

Graphic Commitments. General location of tree coverage areas, location of greenway, location of roadway improvements, and the location of masonry wall and a wood fence are committed as shown on the development plan (see Attachment 4, Development Plan Reduction, sheet DP-2.0).

Determination. The requested PDR 6.040 zoning district and associated development plan meets or exceeds the applicable requirements of the UDO. If this zoning map change request is approved, the attached development plan (Attachment 4) establishes the level of development allowed on the property.

E. Adopted Plans

A zoning map change request must be consistent with the *Comprehensive Plan*. As such, other adopted plans have been included by reference in this document. Table E, Adopted Plans, in Appendix E identifies the applicable policies of the *Comprehensive Plan* and other adopted plans included by reference.

Determination. The requested zoning district and associated development plan is not consistent with the Future Land Use Map of the *Comprehensive Plan*. Staff is recommending denial of the companion plan amendment request (case A1100005) to designate the subject parcel as Low-Medium Density Residential (4 – 8 DU/Ac.). Further, the subject request is not supported by policy 2.3.1.b, Contiguous Development, to “support orderly development patterns that take advantage of existing urban services. Policy 8.1.2j and k provide further guidance on transportation impacts, which will be discussed in Section G, Infrastructure, below.

Conditions in other adopted plans have been identified (see Appendix E, Table E):

Long Range Bicycle Plan Map 4.6 and Durham Trails and Greenways Master Plan. A greenway is proposed along the existing railroad bed, known as Eagle Spur Trail. The applicant has committed to dedicating a greenway easement through the site for this purpose, as shown on the attached development plan (see Attachment 4, Development Plan Reduction, sheet DP-2.0). However, there is no commitment to construct the trail.

Durham County Inventory of Important Natural Areas, Plants, and Wildlife. This site is within the vicinity of the New Hope Creek Corridor according to the Inventory. More recent analysis provided by the state indicates that this site falls outside the current State Natural Heritage Area Boundary. Therefore, there is no ordinance or policy guidance applied to this site in regards to the Inventory.

F. Site Conditions and Context

Site Conditions. The 27.887-acre site is located at 8512, 8506, 8420, 8416, and 8404 NC 751 Highway. Portions of the site are cleared with a maintained lawn associated with four single-family homes on the site. There is a gentle slope on the site moving away from the center. There are significant stands of trees; to the west of an old rail road bed (known as Eagle Spur Trail) that runs north-south through the site, approximately two acres surrounding the southern-most house, and approximately two acres in the rear yard of the north-most home which surrounds a small 0.086-acre pond (see Attachment 3, Aerial Photography). There are no other environmental features identified on the site.

Area Characteristics. The site is at the edge of the Suburban Tier on the west side of NC 751 Highway. The Army Corps of Engineers owns property to the west which is associated with the floodway and floodway fringe of New Hope Creek.

This area, south of Interstate 40 between NC 751 and Fayetteville Road has experienced development pressure over the last 15 years including large commercial and residential projects such as The Streets at Southpoint, Renaissance Village, Renaissance Center, Southpoint Terrace, Westpoint at 751, Eagle View, Chancellor's Ridge, Chelsea Meadows, and the Hills at Southpoint. Despite these developments, overall density in the vicinity is low and lower on average than the proposed development.

The site is completely surrounded by the RR zoning district; uses include place of worship, single-family residential, forestry, and vacant land.

Appendix F provides a summary of the uses and zoning in the more immediate vicinity of the subject site.

Determination. The proposed PDR 6.040 district meets the UDO requirements in relation to potential development on the subject site. Contextually, the character of the area is beginning to change as noted with the following observations:

Durham County and the Concentric Ring Growth Intensities. This site is within the Suburban Tier at its boundary with the Rural Tier. The overall land use plan for Durham County is generally a series of concentric rings decreasing in residential intensity from the centrally located downtown area to the Rural Tier, with areas of more intense growth identified in the Compact Tiers and Suburban Transit Areas. This project has a Future Land Use Map designation of Low Density Residential (4 DU/Ac. or less) and this project exceeds that density.

Regional Growth Area. The subject site is within an area of historic high growth and market desirability with close proximity to the Research Triangle Park, Raleigh-Durham International Airport, Jordan Lake (which holds significant amenity value in addition to being a drinking water source), Chapel Hill, and high growth in western Cary and other locations in western Wake County.

G. Infrastructure

The impact of the requested change has been evaluated to suggest its potential impact on the transportation system, water and sewer systems, and schools. In each case, the impact of the change is evaluated based upon a change from the most intense development using the existing land use and zoning to the most intense use allowed under the request.

See Appendix G for additional information.

Determination. The proposed PDR 6.040 district is not consistent with *Comprehensive Plan* policies regarding infrastructure impacts.

Comprehensive Plan Policy Compliance. Per Policy 8.1.2k, the cumulative road impacts are to be tracked to maintain the adopted level of service standard. There are three approved developments with Traffic Impact Analysis' (TIA's) (Jordan at Southpoint, Westpoint at 751, and 751 Assemblage) near this rezoning. The cumulative impact on this segment of NC 751 Highway from the full-build-out of these three approved developments is an additional 10,925 trips per day. With the additional traffic from these three approved developments, the segment of NC 751 Highway adjacent to this rezoning will have an estimated traffic volume of 22,925 vehicles per day. This would result in this section of NC 751 Highway operating at 138.9% of capacity. To mitigate the impacts of this estimated traffic volume, the applicant was requested to widen NC 751 Highway from Renaissance Parkway to Stagecoach Road to provide a four-lane divided cross-section with bicycle lanes. The applicant has declined to commit to this mitigation measure and to not indicate this improvement as a text commitment, prior to the first certificate of occupancy, and as a graphic commitment. This is an unresolved Transportation concern.

The proposed rezoning is estimated to generate an additional 1,117 vehicles per day. Using a simple trip distribution of 60% (north) and 40% (south), the proposed zoning would result in a net impact of an additional 670 trips per day being added to this segment of NC 751 Highway. With the additional site trips and the previously approved development trips, the adjacent segment of NC 751 Highway will have an estimated traffic volume of 23,595 vehicles per day. This would result in this section of NC 751 Highway operating at 143.0% of capacity.

Durham *Comprehensive Plan* Policy 8.1.2j prohibits the Planning Department from recommending approval of any zoning map change which would result in the average daily trips exceeding 120% of the adopted level of service standard.

H. Staff Analysis

This request is not consistent with the *Comprehensive Plan*, but is consistent with ordinance requirements and other adopted plans and polices. If this request of PDR 6.040 zoning designation were approved, the development plan would further establish the development potential of the proposed residential development.

This project is within an area that requires infrastructure improvements, some of which are related to nearby development that was recently approved.

Fiscal Impact. The estimated annual General Fund revenues generated from this one annexation area under requested zoning at build out in FY2016-17 would be \$331,701. The estimated annual expenditures associated with providing City services at build out in FY2016-17 would be \$80,835. The estimated annual net gain to the City at build out in FY2016-17 would be \$250,866. The cumulative estimated net gain to the City at build out in FY2016-17 would be \$550,323.

I. Contacts

Table I. Contacts		
Staff Contact		
Amy Wolff, Senior Planner	Ph: 919-560-4137, ext. 28235	Amy.Wolff@DurhamNC.gov
Applicant Contact		
Agent: Robert Shunk, HadenStanziale	Ph: 919-286-7440	rshunk@hadenstanziale.com

J. Notification

Staff certifies that newspaper advertisements, letters to property owners within 600 feet of the site and the posting of a zoning sign on the property has been carried out in accordance with Section 3.2.5 of the UDO. In addition, the following neighborhood organizations were mailed notices:

- Inter-Neighborhood Council
- Fayetteville Street Planning Group
- Friends of Durham
- Unity in the Community for Progress
- Jordan lake Resource Management
- Downing Creek

K. Summary of Planning Commission Meeting July 10, 2012 (Case Z1100017)

Zoning Map Change Request: RR to PDR 6.06

Staff Report: Ms. Wolff presented the staff report.

Public Hearing: Vice Chair Monds opened the public hearing. Four individuals spoke in favor and one spoke against. Vice Chair Monds closed the public hearing.

Commission Discussion: Discussion centered on committed elements, buffers, and fencing.

Motion: To Approve Z1100017. (Mr. Whitley, Mr. Smudski 2nd)

Action: Motion carried 8-5. (Beechwood, Board, Harris, Monds and Winders voting against).

Findings: The Planning Commission finds that the ordinance request is not consistent with the adopted *Comprehensive Plan*. However, should the plan amendment be approved, the request would be consistent with the *Comprehensive Plan*. The Commission believes the request is reasonable and in the public interest and recommends approval based on comments received at the public hearing, the information in the staff report, and additional commitments proffered by the applicant.

L. Supporting Information

Table K. Supporting Information		
Applicability of Supporting Information		
Appendix A	Application	Attachments: 1. Context Map 2. Future Land Use Map 3. Aerial Photography 4. Development Plan Reduction 5. Application 6. Owner’s Acknowledgement 7. Durham Bicycle & Pedestrian Advisory Commission Memo 8. Durham Open Space and Trails Commission Memo 9. Rails to Trails Conservancy Memo 10. Submittal and Review History
Appendix B	Site History	n/a
Appendix C	Review Requirements	n/a
Appendix D	Unified Development Ordinance	Table D1: Designation Intent Table D2: District Requirements Table D3: Environmental Protection Table D4: Project Boundary Buffers Table D5: Summary of Development Plan
Appendix E	Adopted Plans	Table E: Adopted Plans
Appendix F	Site Conditions and Context	Table F: Site Context
Appendix G	Infrastructure	Table G1: Road Impacts Table G2: Transit Impacts Table G3: Utility Impacts Table G4: Drainage/Stormwater Impacts Table G5: School Impacts Table G6: Water Impacts
Appendix H	Staff Analysis	n/a
Appendix I	Contacts	n/a
Appendix J	Notification	n/a

Table K. Supporting Information		
Appendix K	Summary of Planning Commission Meeting	Attachments 11. Planning Commissioner’s Written Comments 12. Ordinance Form

Appendix A: Application Supporting Information

Attachments:

1. Context Map
2. Future Land Use Map
3. Aerial Photography
4. Development Plan Reduction
5. Application
6. Owner’s Acknowledgement
7. Durham Bicycle & Pedestrian Advisory Commission Memo
8. Durham Open Space and Trails Commission Memo
9. Rails to Trails Conservancy Memo
10. Submittal and Review History

Appendix D: Unified Development Plan Supporting Information

Table D1. UDO Designation Intent	
PDR	Planned Development Residential - the PDR district is established to allow for design flexibility in residential development. A development plan is required with a request for this district, which shows a conceptual representation of the proposed site that indicates how the ordinance standards could be met. Any significant change to the development plan would require a new zoning petition. While PDR is primarily a residential district, other uses may be allowed under limited provisions of the ordinance.
F/J-B	Falls/Jordan District B (F/J-B) Watershed Protection Overlay – The purpose of this overlay district is to preserve the quality of the region's drinking water supplies through application of the development standards intended to protect the environment. In general, water supply protection will be accomplished by establishing and maintaining low intensity land use and development on land near the region's water supply rivers and reservoirs. Where high density development is desired, water supply protection will be accomplished through the use of engineered stormwater controls. The overall objective is to: <ul style="list-style-type: none"> • Reduce the risk of pollution from stormwater running off of paved and other impervious surfaces; and • Reduce the risk of discharges of hazardous and toxic materials into the natural drainage system tributary to drinking water supplies.

Table D2. District Requirements – PDR			
	Code Provision	Required	Committed
Minimum Site Area (square feet)	6.11.3.B.1	4	27.887
Residential Density (maximum)	6.11.3.C	Specified on plan	6.04 (DU/Ac.)
Maximum Height (feet)	6.11.3.C.3	35	35
Minimum Street Yard (feet)	6.11.3.E.1	8	8
Minimum Open Space (%)	6.11.3.F	17 (4.74 ac.)	17 (4.74 ac.)

Table D3. Environmental Protection			
Resource Feature	UDO Provision	Required	Committed
Tree Coverage	8.3.1C	20% (5.58 acres)	20% (5.58)

Table D4. Project Boundary Buffers			
Cardinal Direction	Adjacent Zone	Required Opacity	Proposed Opacity
North	RR	0.2/0.2	0.2(10 feet)
East	RR	0.2/0.2	0.2 (10 feet)
South	RR	0.2/0.2	0.2 (10 feet)
West	RR	0.2/0.2	0.2 (10 feet)

Table D5. Summary of Development Plan		
Components	Description	Development Plan Sheet
Required Information	Intensity/Density. 164 units	DP-2.0
	Building/Parking Envelope is appropriately identified.	DP-2.0
	Project Boundary Buffers are appropriately shown.	DP-2.0
	Stream Crossing. No streams identified on site.	n/a
	Access Points. Two (2) vehicular access points have been identified. Two (2) greenway access points have been identified.	DP-2.0
	Dedications and Reservations. Greenway easement as shown.	DP-2.0
	Impervious Area. 70% = 19.5 acres	DP-2.0
	Environmental Features. 380 square feet of floodway fringe shown on site.	DP-2.0

Table D5. Summary of Development Plan		
	Areas for Preservation. Floodway fringe areas as shown.	DP-2.0
	Tree Coverage. 20% (5.58 acres) as shown.	DP-2.0
Graphic Commitments	Location of greenway and location of tree coverage areas.	DP-2.0
Text Commitments	<p>1. Prior to the issuance of any building permit: dedicate right-of-way for the NC 751 site frontage as illustrated on sheet DP-2.0.</p> <p>2. Prior to the issuance of a certificate of occupancy:</p> <p><u>NC 751 and Site Entrance #1</u></p> <p>a. Construct a northbound left-turn lane with adequate storage and appropriate tapers on NC 751.</p> <p>b. Construct a southbound right-turn lane with adequate storage and appropriate tapers on NC 751.</p> <p><u>NC 751 and Site Entrance #2</u></p> <p>c. Construct a median (per NCDOT standards) along NC 751 to limit site entrance #2 to right-in/right-out access only.</p> <p>d. Construct a southbound right-turn lane with adequate storage and appropriate tapers on NC 751 at site entrance #2.</p> <p>3. A minimum of 4 feet of additional asphalt (in addition to the proposed through and turn-lane widening) will be provided for the full frontage of the site along the west side of NC 751. The additional asphalt widening will be provided to allow for a future bicycle lane.</p> <p>4. Dedicate a 50-foot greenway easement along the Eagle Spur Trail prior to the first certificate of occupancy.</p> <p>5. Provide a 10-foot pedestrian access to the Eagle Spur Trail prior to the certificate of occupancy for the 90th unit.</p> <p>6. Construct a 6-foot tall masonry wall with stucco finish along the tree coverage boundary in the northwest corner of the site indicated on sheet DP-2.0. Construct prior to the 1st Certificate of Occupancy.</p> <p>7. Subject to the approval of each individual property owner of parcels identified as: 0718-03-20-5074, 0717-01-29-5792, and 0717-01-29-5589, the developer shall install a 6-foot tall wood fence along their property line adjacent NC 751 Highway. Along the frontage of 0717-01-29-7228, a f-foot tall fence shall be installed. The fences shall be setback from the right-of-way a minimum of 1 foot. Construct prior to the first Certificate of Occupancy. Evidence of property owner disapproval shall be submitted to the Planning Director in writing.</p>	Cover

Table D5. Summary of Development Plan		
	8. Impervious surface shall not exceed 48%.	
SIA Commitments	None provided	n/a
Design Commitments	There will be no architectural style presented. The rooflines will be pitched with asphalt shingles. The primary exterior siding can be masonry, vinyl, or cement-fiber plank. Features such as gables and dormers can be incorporated.	Cover

Appendix E: Adopted Plans Supporting Information

Table E. Adopted Plans	
<i>Comprehensive Plan</i>	
Policy	Requirement
Future Land Use Map	Low Density Residential (4 DU/Ac. or less)
2.2.2a	Suburban Tier Development Focus
2.2.2b	Suburban Tier Uses
2.3.1b	Contiguous Development
7.1.6b	Development Review and the Inventory
8.1.2j	Transportation Level of Service
8.1.2k	Tracking Cumulative Road Impacts
8.1.4b	Development Review and the Adopted Trails and Greenway Plan
8.1.4d	Development Review and the Adopted Bicycle Plans
11.1.1a	School Level of Service
11.1.1b	Adequate Schools Facilities
<i>Durham Trails and Greenways Master Plan</i>	
Durham Trails and Greenways Master Plan shows a trail running along railroad corridor through the site; known as Eagle Spur Trail.	
<i>Long Range Bicycle Plan</i>	
Map 4.6 shows a proposed bicycle lane along NC 751 Highway and a greenway along the railroad corridor running through the site; known as Eagle Spur Trail.	
<i>Durham County Inventory of Important Natural Areas, Plants, and Wildlife</i>	
This site is within the New Hope Creek Corridor; however is outside the State Natural Heritage Area Boundary.	

Appendix F: Site Conditions and Context Supporting Information

Table F. Site Context			
	Existing Uses	Zoning Districts	Overlays
North	Place of Worship	RR	F/J-B
East	Single-family residential, forestry, vacant	RR	F/J-B
South	Vacant	RR	F/J-B
West	Vacant	RR	F/J-B

Appendix G: Infrastructure Supporting Information

Table G1. Road Impacts		
NC 751 Highway and Stagecoach Road are the major roads impacted by the proposed zoning change. There are no scheduled City of Durham or NCDOT roadway improvement projects in the area.		
Affected Segments	NC 751 Highway	Stagecoach Road
Current Roadway Capacity (LOS D) (ADT)	16,500	11,900
Latest Traffic Volume (AADT)	12,000	7,500
Traffic Generated by Present Designation (average 24 hour)*	364	
Traffic Generated by Proposed Designation (average 24 hour)**	1,117	
Impact of Proposed Designation	+753	

Source of LOS Capacity: FDOT Generalized Level of Service Volume Table 4-1 (2009)

NC 751: 2-lane class I arterial with left-turn lanes.

Stagecoach Road: 2-lane major city/county roadway without left-turn lanes.

Source of Latest Traffic Volume: 2011 NCDOT Traffic Count Map

*Assumption- (Max Use of Existing Zoning) –RR: 32 single-family homes.

** Assumption- (Max Use of Proposed Zoning) – PDR 6.04: 164 apartments.

Table G2. Transit Impacts
Transit service is not currently provided within one-quarter mile of this site.

Table G3. Utility Impacts
This site will be served by public water and sewer.

Table G4. Drainage/Stormwater Impacts
The impacts of any change will be assessed at the time of site plan review. The subject site is of sufficient size and shape to accommodate appropriate stormwater facilities that may be required at this time.

Table G5. School Impacts			
The proposed zoning is estimated to generate 22 students. This represents an increase of 10 students over the existing zoning if developed to maximum residential potential. Durham Public Schools serving the site are Creekside Elementary School, Githens Middle School, and Jordan High School.			
Students	Elementary School	Middle School	High School
Current Building Capacity	15,864	8,647	9,916
Maximum Building Capacity (110% of Building Capacity)	17,450	9,512	10,908
20th Day Attendance (2011-12 School Year)	15,827	7,008	9,686
Committed to Date (July 2009 – June 2012)	384	124	81
Available Capacity	1,239	2,380	1,141
Potential Students Generated – Current Zoning*	5	3	4
Potential Students Generated – Proposed Zoning**	20	7	7
Impact of Proposed Zoning	+15	+4	+3

*Assumption (Max Use of Existing Zone) – RR: 32 single-family units

**Assumption (Max Use of Proposed Zoning) – PDR 6.04: 164 apartments

Table G6. Water Supply Impacts	
This site is estimated to generate a total of 16,860 GPD if developed to its maximum potential with the proposed zoning district. This represents an increase of 13,900 GPD over the existing zoning district.	
Current Water Supply Capacity	37.00 MGD
Present Usage	28.06 MGD
Approved Zoning Map Changes (July 2009 – June 2012)	0.70 MGD
Available Capacity	8.24 MGD
Estimated Water Demand Under Present Zoning*	4,960 GPD
Potential Water Demand Under Proposed Zoning**	18,860 GPD
Potential Impact of Zoning Map Change	+13,900

Notes: MGD = Million gallons per day

*Assumption- (Max Use of Existing Zoning) – RR: 32 single-family units

** Assumption- (Max Use of Proposed Zoning) – PDR 6.04: 164 apartments

Appendix K: Summary of Planning Commission Meeting

Attachments

- 11. Planning Commissioner’s Written Comments
- 12. Cost/Benefit Analysis
- 13. Ordinance Form