



College Heights Estates Association  
Fall 2020  
President's Letter and CHEA Newsletter  
WWW.CHEAMD.ORG

July 30, 2021

Via email

Honorable Elizabeth Hewlett, Chairman  
Prince George's County Planning Board  
14741 Governor Oden Bowie Drive  
Upper Marlboro, MD 20772

Re: Comments and Requests of College Heights Estates Association

Dear Chairman Hewlett:

The College Heights Estates Association (CHEA) hereby submits its comments to the Prince George's County Planning Board (Board) for its consideration, and the consideration of the Maryland-National Capital Park and Planning Commission (M-NCPPC) staff, in preparing the Draft Adelphi Road-UMGC/UMD Purple Line Station Area Sector Plan (APL Sector Plan). The comments in this letter were approved by the CHEA Board on July 26, 2021.

**ONE ISSUE must be mentioned immediately – M-NCPPC staff is improperly incorporating an outdated project for the southern portion of the APL Sector Plan.** Based on its presentations on June 3 and June 29, 2021, M-NCPPC staff is using a private developer's outdated project that has not been filed, subjected to public scrutiny, or approved. The project provides no new mitigation for its planned destruction of 10 acres of tree canopy and wetlands, fails to meet the intent of the county's Woodland ordinance, and ignores reasonable setback – by including only our resident's backyards and decade-old mitigation from another project as its only surviving "greenspace." Further, as best CHEA has been able to determine, this project used by staff in its presentations failed to follow the "P3" rules it purports to use to avoid public scrutiny.

Introduction. CHEA is a non-profit, civic organization, representing 220 single-family homes in the southern part of the APL Sector Plan. CHEA represents approximately 700-800 residents of Prince George's County. Our residents live adjacent to the University of Maryland (UMD or University) and are part of an unincorporated area of Hyattsville, Maryland. Our community, as well as surrounding communities, have a broad array of interests in the preparation of the APL

Sector Plan, especially the retention of woodlands and tree cover to mitigate hard surface developments and to moderate local climate change.

CHEA is disturbed by the current direction of M-NCPPC staff in preparing to issue the draft APL Sector Plan. But CHEA does not generally object to the development around the Adelphi-Purple Line (APL) station. Higher density living in these areas can have positive environmental impacts, if it encourages walking, biking, and public transit, and if these benefits are not negated by destroying tree cover, exacerbating local climate damage, increasing traffic congestion, or worsening groundwater issues. Of course, the benefits of walking, biking and public transit use will be proportional to the greenspace and temperatures in which to walk and bike. Thus, higher density areas and the protection of woodlands and tree canopy are consistent and necessary. Indeed, you may have notice in the July National Geographic Magazine cover story, the recent New York Times article ([here](#)), and the recent Washington Post article ([here](#)), showing the present heat dome over UMD (Exhibit A).

Simply put, we are watching the negative impacts of urban heat caused by climate change, and, if the vast majority of climate scientist are correct, the heat at UMD and the surrounding APL Sector will grow worse. Indeed, if the woodlands in the APL Sector Plan are lost, the sector will become a staging area for environmental injustice and increasing climate crisis. This will create a corresponding lack of interest in people living, walking, and biking in this area.

The articles cited are just the most recent information verifying that climate change is a local issue. It should be clear by now that the Board and M-NCPPC staff need to focus specifically, and expressly, on the amount of tree canopy and step back in preparing the Draft APL Sector Plan and apply the laws and policies that are available in a way that protects all of us that live here and that will live here in the future. They should not be adopting an outdated developer's plan.

Background. On June 3, 2021, several CHEA residents attended an Adelphi Road Scenario Planning Workshop put on by M-NCPPC staff. We were unanimously shocked by what staff presented. It wasn't just that none of the scenarios presented were palatable, but the fact that staff appeared to have adopted an unapproved project for the southern portion of the sector in every detail; a long abandoned and outdated plan. Until the June 3<sup>rd</sup> meeting, CHEA and the residents of CHE had been led to believe that this project had yet to be submitted to the Board or filed in any public way. We were told to wait until it was filed, and then we would be able to comment. The project adopted by M-NCPPC is known as the Western Gateway Project. The Gilbane Development Company (Gilbane) is the developer and the driving force pushing this outdated project and presenting it as a private/public partnership project with the University of Maryland, which is unsupported by public records.

Gilbane claims that it is working within a private/public partnership with UMD to build the Western Gateway Project. Gilbane is [proposing](#) to build a 300-unit, five-story building for graduate housing and 81 townhouses crammed into a small area. This project offers no additional mitigation for the development and hard surfacing of wetlands and other land. Even more, the result will be the loss of about 25% of UMD's tree canopy.

In the June 3<sup>rd</sup> meeting, it was clear that M-NCPPC staff's slides (Exhibits B) used Gilbane's outdated and unreviewed plan, which provided no new "greenspace." The project's greenspace is made up of the backyards of our residents (Exhibit D) and the mitigation area that was required of the developer to build those houses in this wetland area around 2009. On June 3<sup>rd</sup>, M-NCPPC staff presented the Western Gateway Project as the best-case scenario, despite its obvious deficiencies. At this point, CHEA began to seek more information about the APL Sector Plan and the Western Gateway Project and asked to provide additional input into it.

On June 29, 2021, the Vice President of CHEA, Earl Adams, Jr., and I met virtually with M-NCPPC staff. It was clear from the start that staff continued to adopt the Western Gateway Project in its presentation. See Exhibit C. When confronted about its bare adoption of Gilbane's representation of the project, staff's response was, "the owner can do what it wants with the land." This was a surprise to me, as the lack of mitigation and the loss of woodlands was patently outdated. Further, the same staff member rudely denied that the narrow greenspace included our residents' backyards. I was interrupted three times with the outburst, "that's not true!" Yet, our residents' backyards are clearly a significant portion of the "greenspace" in staff's presentation (unchanged from its June 3<sup>rd</sup> presentation). See Exhibits B and C, Staff's map slides, and Exhibit D, GIS map of our residents' back yards.

Most importantly, however, at the end of the June 29<sup>th</sup> meeting, staff expressed to us that additional setback and greenspace were likely necessary. Staff said that this change was something that they were already contemplating. That is yet to be seen, and we encourage the Board and M-NCPPC staff to carefully consider the input in this letter and input they have received from UP, Calvert Hills, and local individuals with whom staff has recently met.

One other issue came up the June 29<sup>th</sup> meeting that should be mentioned. Staff also briefly tried to justify its slides adopting the Western Gateway Project by referencing permits for the "zombie" project referred to as Mosaic at Turtle Creek. This project was permitted some 15 years ago, but its design quickly became economically implausible and was abandoned (except that its permits continue to get renewed). It remains a shell despite the increased value of real estate in this area. It should be made clear that the Turtle Creek project would not pass muster today and that the Western Gateway is no better.

CHE has identified the following issues within the APL Sector Plan and would ask that you have M-NCPPC staff address them in writing before completing the Draft APL Sector Plan:

**(1) The APL Sector Plan should not use the Western Gateway Project**

At the June 29<sup>th</sup> meeting, M-NCPPC staff admitted it used Gilbane's website for its Sector Plan slides, offering no other reason except staff's statement that the owner could do what it wanted with the property. Of course, if that were true, then there would be no need for the Board or M-NCPPC. Moreover, the Western Gateway Project has far too many problems to take it wholesale or even at face value. In other words, the APL Sector Plan should not adopt an unfiled project that is so clearly outdated and harmful to the local climate and land. It would be more understandable to incorporate the permitted Mosaic at Turtle Creek project, despite the fact that its zoning has changed, it is 15 years later, and the climate has changed since then. Indeed,

Gilbane hopes to build a project that is just as out-of-date. Gilbane plans to destroy a large portion of UMD tree canopy without providing any additional mitigation or setback or protection from climate change. The bottom line is that; what was acceptable 15 years ago should not be acceptable today.

Here are just some of the problems with the adoption of the unfiled Western Gateway Project (which is free from public scrutiny) in the Draft APL Sector Plan:

- a. The Western Gateway Project has not been subject to the county public review process, as should be required BEFORE being accepted in the Draft APL Sector Plan.

Gilbane has proceeded in a manner to make sure that its Western Gateway Project is adopted in the APL Sector Plan BEFORE it files its detailed site plan or has received any meaningful public scrutiny. If this happen, then it will deprive M-NCPPC staff and the public of important information and public comment before an unknown project is “baked” into the county sector plan process. This is the definition of “bootstrapping” of a project.

More plainly, if Western Gateway is adopted wholesale, it will make it difficult to deny or even condition its site plan. This would appear to be exactly what Gilbane is attempting. The Board and M-NCPPC staff should have no part of allowing a private developer to game the county process in this manner. The Board and M-NCPPC staff must require -- at the very least -- Gilbane to file its detailed site application, receive public comment, and justify its obvious deficiencies before its plans are adopted wholesale into the Draft APL Sector Plan.

It should be noted that there may also be pressure to complete the draft APL Sector Plan before the old permits expire at the end of this year. Again, this is another part of gaming the system and should not be allowed. The sector plan has been outdated for a long time, there is no reason to rush it now. Even the appearance of such gamesmanship should not be allowed. It is bad government and rightfully brings distrust to local agencies and government.

- b. The destruction of tree canopy and woodlands using the Western Gateway Project is insufficient and improper under present law and policy.

If M-NCPPC adopts the Western Gateway Project for the southern portion of the Draft APL Sector Plan, it will fail to provide sufficient tree canopy and woodland protections under the county’s woodland ordinance. It would also be adopting this unpermitted project with no new woodland protection. Gilbane offers, as the only “greenspace” between the project and CHE, (1) the woodlands that were part of existing mitigation measures (applied as part of the permits to develop residential housing along Windsor Lane in CHE) and (2) the wooded backyards of CHE residents. Thus, in adopting Gilbane’s Western Gateway Project, the Draft APL Sector Plan would provide no new Woodland protection and cannot meet the county’s Woodland ordinance. The proposed “greenspace” in the staff’s APL Sector Plan slides is already required or is private property. Surely the Woodland ordinance and reasonable mitigation for wetland development by Gilbane, and its destruction of urban forest, requires additional protection of more woodlands; much more.

In addition to applicable laws and policies, UMD has its own tree policy and designations. These are important obligations for the University, its students and faculty, and surrounding communities. UMD was identified as a heat dome area in an article by the Washington Post ([here](#)). The University should not be a part of creating additional hot areas and heat domes with the destruction of an estimated 25% of the trees around the UMD campus by proceeding with the Western Gateway Project. Indeed, we have yet to hear from the University's leadership about the project's impact on its overall tree canopy and ultimately on UMD's local climate.

- c. Additional mitigation should be incorporated into the southern portion of the APL Sector Plan.

Staff's rendition of the southern portion of the APL Sector Plan uses the proposed Western Gateway Project wholesale but fails to update the mitigation that will be required for the development. It is a fact that the project proposes no additional mitigation, despite its destruction of wetlands and tree canopy. It purports to rely only on mitigation already required of the past development of the contiguous wetland area along Windsor Lane, which was approved over a decade ago. The project's mitigation does not appear to even include any mitigation for the long-permitted, and never-to-be-built, Mosaic at Turtle Creek project. But, even if it does, it is based on lax standards from 15 years ago.

- d. Additional setback and buffer zones should be incorporated into the southern portion of the APL Sector Plan.

The slides used by M-NCPPC staff, as with the lack of woodlands and mitigation, show an improper setback and buffer zone for the transition from residential to commercial properties, but also for storm water purposes. Is there any doubt that more frequent and severe storms will continue to occur and worsen? The woodlands in the southern portion of the APL Sector Plan are there to provide a buffer zone. Gilbane is pushing to provide no additional space. None! In adopting Gilbane's project (as admitted), M-NCPPC staff provides for only the narrowest of woodlands before you reach the backyards of CHE residents. There is no doubt that, even if the law allowed the destruction of so much woodlands, and even if NO mitigation was required to build on a wetland, then a much larger buffer zone and setback would still require a larger wooded area along the entire southern boundary of the Draft APL Sector Plan where the proposed Western Gateway Project abuts the existing mitigation areas and CHE private properties.

- e. The use of the Western Gateway Project in the APL Sector Plan is flawed.

CHEA is currently seeking records from the University to determine whether the private/public partnership between Gilbane and UMD is legitimate under the "P3" rules. No public records show that Gilbane or UMD have followed the rules for a legitimate private/public partnership. We have not seen any competitive bids, as required for each kind of P3 partnership. Further, it is unclear whether UMD fully realized the fair market value of the public properties in contributing

public land for this partnership. (The two appraisals are inconsistent with other properties in the area.) Unless the records are located and made public, M-NCPPC should consider that, if improperly done, this project is not a proper use of public lands. This should concern staff and the Board as much as us.

**(2) The recent changes in law and policy must be reflected in the APL Sector Plan**

As the Chairman knows, trees are now an issue of environmental justice and public health, and the abundance of trees (or lack thereof) will define the Adelphi/Purple Line area for a long time. The current elimination of trees in the southern portion of the proposed sector plan shows the adoption of a project that is based on minimum trees and greenspace from over 14 years ago. This is simply untenable. It is improper under national, state, local and university policies and fails to meet county ordinances (i.e., woodland requirements). The elimination of a majority of the tree canopy in this area must be completely reconsidered by the Board and M-NCPPC staff, as there are new laws and policies and new awareness to be considered.

a. National policy supporting the retention of trees.

Almost immediately after taking office, President Biden issued Executive Order 14008 (January 27, 2021) (see 86 Federal Register 21 (Feb. 1, 2021) or [here](#)). This is a huge change from the previous administration, and the Board and M-NCPPC staff should take into consideration the policies embodied in the President’s order when preparing its draft APL Sector Plan. It is not enough to say that certain staff members have done 32 sector plans. When national health and nation interests have so clearly come to recognize the need to protect its people from impending climate disasters, staff must change its thinking overall and understand that the President’s order and other state, local, and UMD policies require something more.

The Board and M-NCPPC staff should use tools and scientific information available to assess and determine whether it is creating an environmental injustice and health crisis with its draft plans, as [here](#). American Forestry calls it “Tree Equity.” ([here](#).) Further, this summer has brought more awareness to the connection between a lack of trees in a community and the severity of climate impact, creating both colder and hotter periods. We must think differently now.

b. State policies supporting retention of trees.

While local private projects are reviewed at the local planning and zoning office, the State of Maryland has policies in place that support maintaining urban forests. Both UMD and the City of College Park are involved in maintaining urban tree canopy. It is also relevant that research at UMD is used by the state to track tree canopy, as indicated on the Maryland Department of Natural Resource website ([here](#)).

- c. County ordinances requiring protection of woodlands and policies supporting retention of trees.

It might be assumed that M-NCPPC staff is expert in the application of the new ordinances to protect woodlands and setback. But that is not what staff's actions have shown in their presentations. A treatise on the application of the county's code is unnecessary. It may well be that staff has significant analysis on the application of the Woodland and Wildlife Habitat Conservation Ordinance ([here](#)). It simply is not shown in the wholesale adoption of the outdated Western Gateway Project for most of the southern portion of the APL Sector Plan. Nor was it a subject that staff addressed in the June 3<sup>rd</sup> or June 29<sup>th</sup> meetings, despite concerns about the woodlands there. As requested below, this letter requests that you request M-NCPPC's staff address this most pertinent ordinance in full. It was created to add to existing rules – it should have real and practical effect.

Ironically, despite this woodland ordinance, CHEA has seen Gilbane's presentation where their "experts" make out the woods in the southern portion of the APL Sector Plan to be a snake-pit of a woods. Their experts argue that the trees there are invasive and non-native. As with their other games, this is only partially true, and so what. According to them, they are doing us all a favor to come and cut it down and put up townhomes. Once again, we see a gaming of the system. Before any public comment, Gilbane is presenting a false narrative that appears to have worked its way into staff's presentations on the APL Sector Plan. Surely, there is a reason to demonstrate that this seeming gamesmanship does not defeat important laws and policies or create an appearance of impropriety.

- d. UMD environmental policies require it to reconsider and lessen the loss of trees in its use of public lands.

As the state's public institution of higher learning, UMD has a special responsibility to protect its faculty, staff, students, and surrounding communities from climate disasters. It even has an environmental department upon which it should rely to help with the draft APL Sector Plan, but I am unaware that they have provided any expertise or comment on it or that staff has talked to UMD leadership. Thus, what has come through is a false narrative, and it may be anticipated that UMD leadership will reevaluate its partnership with Gilbane on the Western Gateway Project. Certainly, the University must reevaluate its mitigation of the heat dome evidenced over its campus, as documented by the Washington Post (Exhibit B and [here](#)). Moreover, as discussed above, the Board and M-NCPPC must also make this evaluation.

As another obligation, College Park, MD, is designated as a "Tree City USA" by the Arbor Day Foundation, including UMD. UMD is proud of this designation and has touted it in publications. This designation comes with implicit obligations to strengthen its position, and this obligation falls on UMD as well, as indicated [here](#). It should not include destroying an estimated 25% of UMD tree canopy.

- e. Environmental and governmental ethics apply to require reconsideration.

Neither the Board nor M-NCPPC staff can pretend that protections that would have “checked the boxes” for developers 15, 10 or even 5 years ago can be any guide for the draft APL Sector Plan today. The policies protecting us from climate breakdown have changed, and our collective awareness and understanding of local climate has changed. To stick with old ways is unethical, knowing that local climate issues will be made worse.

As noted, we can't afford gamesmanship anymore. Yes, we need public transportation and higher-density living where it can have positive environmental and health impacts, but it is unethical to ignore the negative impacts. Those negative impacts may be addressed in the draft APL Sector Plan now. It should not be issued until these issues are made a priority by the Board and implemented in way that protects all of our futures, especially those they expect will live in the APL Sector.

### **(3) Stormwater Management.**

CHEA believes this is also a critical issue. Storms are more frequent and more severe. Science tells us that this will only get worse. While we adopt the comment of the City of University Park, we want to emphasize how important this issue is to the surrounding communities. Despite what Gilbane's consultants may say on their behalf, this is an issue that also must be more highly scrutinized than in the past.

CHEA supports UP's comments that “Stormwater management along Guilford Run, and the preservation of some of the woodland between College Heights Estates (Windsor Drive [sic], in particular) was a major concern of CHE and University Park residents in the meeting. University Park has been working with our County Councilmember and the Clean Water Project to mitigate flooding at the Pineway end of Guilford Run as it crosses from University Park into College Park, and we should continue to work toward a meaningful solution to flooding in this part of University Park. Stormwater drainage is critical in the Guilford Run watershed, as downstream areas, including portions of University Park, now experience flooding from that watershed. Extensive development, including significant additional impervious surfaces (roofs, streets, sidewalks, etc.) will certainly increase this problem. How does the sector plan provide for improvements to stormwater management in this area?”

This is a very good question. We would like to know the answer too, but it should not be evaluated until the laws protecting woodlands are applied. There is no doubt that the woodlands and setback have a place in storm water management. Thus, as expected, the tree canopy and land must be protected, then the stormwater analysis may well be different. But, as discussed below, the draft APL Sector Plan is too small, as it does not appear to include adjacent impermeable spaces, like paved parking lots. If expanded, then the draft APL Sector Plan will have more options to increase density and protect tree canopy and stave off an environmental crisis.

### **(4) Intersection of Adelphi Road and University Boulevard**

This multi-road intersection is a traffic mess without the Purple Line or a much heavier population flowing through it. This seems like a box that the developer can easily check, even though it is one of life and death. Each accident that could have been avoided starts with the draft APL Sector Plan. With that said, CHEA adopts the statement by UP that “[i]t does not appear that there was any significant restructuring to the intersection of University Blvd and Adelphi Road. At present this is a very difficult intersection, often blocked up or gridlocked due to the signal timing at the intersection with Campus Drive immediately to the south. This is, in part by virtue of its size and current configuration, an extremely dangerous and difficult intersection for pedestrians and bikes. The bike lanes on Adelphi Road northbound terminate south of Campus Drive, and there are few crosswalks or signals to support the time required for pedestrians to cross safely. Addition of the rail line through the middle of this intersection will exacerbate the problem. Could you provide comments on how the Sector Plan will improve these conditions?”

**(5) The APL Sector Plan is too small and fails to incorporate existing impermeable areas as an alternative to woodland destruction.**

CHEA agrees with UP that the area of this plan is too small to be meaningful. Further, it conveniently excludes areas that would be far better suited for the relatively high-density living near the purple line, such as what has been referred to as Lot 1, a paved parking lot that would be ideal for graduate housing and more of it without additional impact to local climate change. This issue is important and once again may show business-as-usual that is unethical. Why was the APL Sector Plan made so small? Why did it exclude Lot 1? And how did that decision come about – was it before our collective awareness was raised by the obvious heat domes being created over UMD that will be expanded to surrounding areas. This one decision may be the root of environmental injustice and crisis, where none need exist.

We also agree with UP that, while the areas around transit stations should be developed at higher densities than areas further away from them, this proposal crowds too much in a small area without consideration of the effects this will have on adjacent communities such as CHEA and UP.

Conclusion. Our residents, and the surrounding localities and communities, are already facing a UMD’s heat dome. The APL Sector Plan slides presented by M-NCPPC staff will create its own heat dome. It is no longer enough to “check the boxes” or allow developers to game a system designed to protect the public. Rather, the Draft APL Sector Plan must clearly meet the new laws and policies designed to make UMD, the APL Sector, and the surrounding communities a good place to live in 5, 10 and 20 years. They must show that these law mean something.

Request for Responses. CHEA requests that the Board request that M-NCPPC staff address all of the issues above BEFORE they issue the Draft APL Sector Plan. I noticed that Mayor Carey also had a few questions in UP’s comments, and those should be answered too. We feel that it will help CHEA and those that support our efforts here to feel like our concerns are being addressed. We are happy to meet with M-NCPPC staff, but we ask for written responses to each of our comments.

I hope that this letter will help create a better Draft APL Sector Plan. Our effort here is in earnest and in good faith. We are loath to interrupt a developer's business, but they must be held to a higher standard than 15 years ago, especially as it relates to tree canopy and climate change. The Draft APL Sector Plan is not about building for building sake. It is about building smart and protecting the Sector's residents – current and future – from a developer making money, while disregarding the most important issue of the future. Please feel free to contact me if you have any questions or if your staff would like to discuss our concerns.

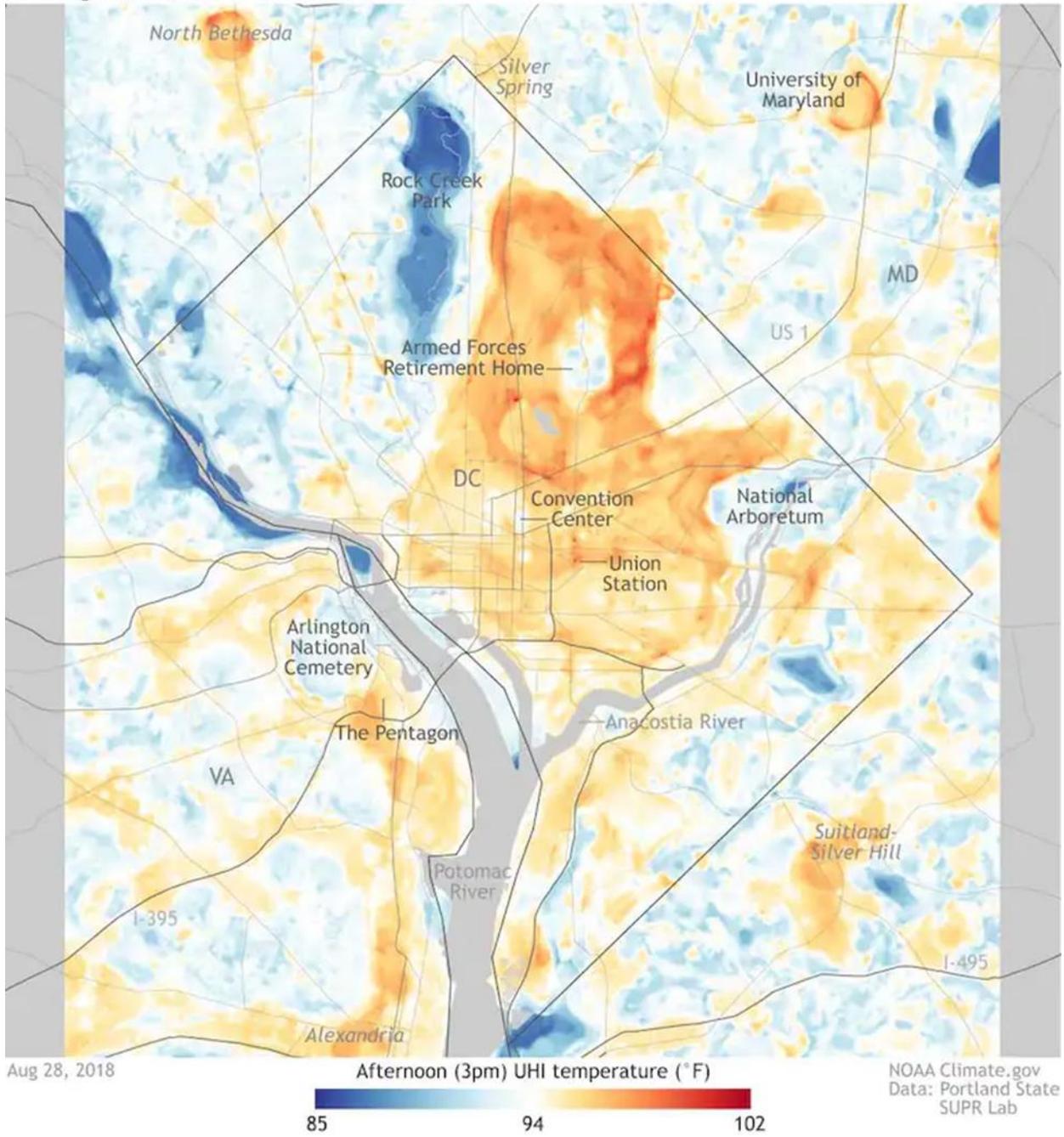
Sincerely,

*Chris Oehrle*

Chris Oehrle  
President  
CHEA

Exhibit A

Washington, DC, urban heat island effect



[\(Cite\)](#)

Exhibit B

The screenshot shows a Microsoft Teams meeting interface. The main content area displays a presentation slide titled "Adelphi Road Scenario Planning workshop" with the subtitle "SCENARIO – Shared Elements – Open Space" and "ESCENARIO - Elementos Compartidos - Espacio Abierto". The slide features a map of the Adelphi Road area with a legend for "Plaza (Plaza)", "Park (Parque)", and "Passive Open Space (Espacio Abierto Pasivo)". The map includes labels for "UNIVERSITY HILLS DUCK FOND PARK", "UMGC Headquarters", "UMGC UMO Station", and "UMD CAMPUS". To the right of the map are two photographs: one of a modern playground with blue structures and another of an outdoor seating area with orange chairs. The right sidebar shows a "Live event Q&A" section with a question from "Chris Oehrle -- Pres. CHEA (You)" asking about protecting residential communities. The Windows taskbar at the bottom shows the time as 7:27 PM on 6/3/2021.

Exhibit C

Stakeholder Meeting with College Heights Estates Association (CHEA) representatives

41:27 Request control

The screenshot displays a Zoom meeting interface. The main window shows a site plan with a legend and a list of parking requirements. The legend indicates: On-Street Parking for Apartments: 90 (blue outline) and On-Street Parking for Townhomes: 95 (red outline). The list of requirements includes: Apartments Upper level Garage: 96 spaces, Apartments Lower level Garage: 127 Spaces, Total Apartment Garage Spaces: 223 spaces, On-Street Parking for Apts: 90 sp, Total Required Parking for Apartments: 300 sp, Total Provided Parking for Apartments: 313 sp, Townhomes Integral Garage Spaces: 100 spaces, On-Street Parking for Townhomes: 95 spaces, Townhome Parking Required: 166 sp, and Townhome Parking Provided: 195 sp. The meeting title is 'Stakeholder Meeting with College Heights Estates Association (CHEA) representatives'. The time is 41:27. The Zoom interface includes a 'Request control' button, a 'Leave' button, and a grid of participant video feeds. The system tray at the bottom shows the time as 4:40 PM on 6/29/2021 and the temperature as 95°F.

- Apartments Upper level Garage: 96 spaces
- Apartments Lower level Garage: 127 Spaces
- Total Apartment Garage Spaces: 223 spaces
- On-Street Parking for Apts: 90 sp
- Total Required Parking for Apartments: 300 sp
- Total Provided Parking for Apartments: 313 sp
- Townhomes Integral Garage Spaces: 100 spaces
- On-Street Parking for Townhomes: 95 spaces
- Townhome Parking Required: 166 sp
- Townhome Parking Provided: 195 sp

On-Street Parking for Apartments: 90

On-Street Parking for Townhomes: 95

AR

Ruiz, Ar...

4:40 PM 6/29/2021 95°F

Exhibit D

