

**JUSTIFICATION STATEMENT OF ZONING APPLICATION'S  
COMPLIANCE WITH PLAN 2040**

**TERESA NGUYEN & JUSTIN V. DINH**

**6101, 6105 & 6107 SOUTHSIDE DRIVE  
101, 103, 105, 107, 109 & 111 STEEDLY DRIVE:  
PROPOSED ZONE CHANGE FROM: R-5, SINGLE-FAMILY RESIDENTIAL  
TO: CM, COMMERCIAL MANUFACTURING**

**THE PROPOSAL**

The applicant, Teresa Nguyen and Justin V. Dinh (mother and son) propose their application to rezone property Ms. Nguyen owns located at 6101, 6105 & 6107 Southside Drive and 101, 103, 105, 107, 109 and 11 Steedly Drive, Louisville, KY (cumulatively, approximately 7.14 acres; collectively, the properties are the "Property"), from its existing zoning of R-5 Single-Family Residential to CM, Commercial Manufacturing; the Property fronts both Southside Drive and Steedly Drive, and is within a well-established and active Suburban Workplace Form District, where a large employment center is home to a multitude of industrial, warehouse, office and commercial businesses operate and is anchored by the UPS Worldport, east of the Property and adjacent to the south of Louisville Muhammad Ali International Airport.

The applicant plans two (2) land use components for the Property. On the western portion of the Property, fronting Southside Drive, Steedly Drive and the Traditional Neighborhood Form established to the west/southwest of the Property, the applicant is requesting to build two commercial/retail buildings totaling twenty-two thousand five hundred (22,500 sq. ft.) square feet. This commercial component will serve the many residents living within the Traditional Neighborhood Form and the employees and customers of the various businesses operating within the Suburban Workplace Form encompassing the Property and surrounding area to the north, east and south of the Property. On the eastern portion of the Property, adjacent to more industrial land uses, the applicant is requesting to establish a moderately-sized office/warehouse use consisting of two structures that will provide space for storage or for small contractor's shops (plumbing, carpentry, auto repair, similar trades, etc.) and appurtenant offices. The two office/warehouse buildings combine for forty-five thousand (45,000 sq. ft.) square feet (each twenty-two thousand five hundred (22,500 sq. ft.)). The current use of the Property is one single-family dwelling, where the owner resides.

The applicant's request for CM zoning is a more fitting and appropriate zoning district for the Property within the Suburban Workplace Form than is the current single-family residential zoning district. The Property is on the western edge of the Suburban Workplace Form and just outside the eastern edge of the Traditional Neighborhood Form located to the west across Southside Drive and Steedly Drive from the Property. To the immediate north is

the old Naval Ordnance property, zoned EZ-1, Enterprise Zone and M-3, Industrial; the east is property zoned EZ-1 and is used to park heavier trucks and equipment; to the south is an LG&E facility that is primarily a graveled lot with electrical infrastructure situated toward its north property line; also to the south is a single-family residence fronting Steedly Drive; to the west of the property is the Traditional Neighborhood Form comprised of numerous single- and multi-family properties. Access to/from the Property is proposed from both Southside Drive and Steedly Drive.

Provided the Property's location is on the edge of this very active Suburban Workplace Form, where residential uses often conflict with the higher intensity, heavy-industrial uses, especially when the two different uses are located adjacent to one another, the applicant believes it is appropriate to establish a transition in uses from the Suburban Workplace to the east and the Traditional Neighborhood to the west of the Property. Given the increasing intensity of the uses within the Suburban Workplace Form to the east, the applicant looks to locate uses reflecting a lower industrial intensity on the east side of the Property and transition to neighborhood-serving commercial uses on the west side of the Property to serve the residents of the Traditional Neighborhood Form. In contrast, if the owner/applicant were to develop the Property under its currently-assigned R-5 zoning district, only a small fraction of the Property would be developable as individual single-family lots due to applicable Land Development Code provisions that require a significant setback for single-family houses constructed adjacent to EZ-1 and M-3 zoning districts. The applicant seeks CM zoning because it is appropriate for both the surrounding area and the proposed uses for the Property, and also because the Property's existing R-5, Single-Family zoning district designation is no longer appropriate.

Additional development review applications associated with the Proposal include review of the associated detailed district development plan (the "Plan") filed alongside the formal zoning application (cumulatively, land use components 1 and 2 as depicted on the Plan comprise the "Proposal").

**THE PROPOSAL'S AGREEMENT WITH PLAN 2040  
LOUISVILLE METRO'S COMPREHENSIVE PLAN**

The application to rezone the Property from R-5, Single-Family Residential, to C-M, Commercial Manufacturing is in agreement with Plan 2040, A Comprehensive Plan for Louisville Metro ("Plan 2040"), as justified in detail below, and, therefore, CM, Commercial Manufacturing zoning is an appropriate designation for the Property and should be approved.

**Plan Element 1 - Community Form**

The Proposal conforms to Community Form Plan Element 1 and all applicable Goals, Objectives, and Policies adopted thereunder. The Community Form Plan Element guides the shape, scale and character of development in ways intended to promote a connected, healthy, authentic, sustainable and equitable built environment. Community Form encourages *redevelopment while promoting land use flexibility*. As described herein, the applicant's

Proposal advances these stated principles of the Community Form because the Proposal will provide redevelopment of infill property to establish uses more appropriate than the current single-family zoning use for the active Suburban Workplace Form District enveloping the Property and areas to the east, north and south of the Property. In place of the current zoning, the applicant proposes CM zoning, a hybrid commercial and industrial zoning designation, for the current and future uses of the Property, which will provide flexibility for commercial, industrial, or hybrid commercial-industrial users (certain light logistical users) to locate thereon and reinvest resources into the Property but without permitting the intense, noxious uses that are permitted within the higher level of intensity zoning designations of M-2 or M-3, Industrial or EZ-1, Enterprise Zone, which are present in this very Suburban Workplace Form and near the Property. The less intense CM zoning is appropriate for the Property because the commercial uses permitted within the CM district will serve both the Suburban Workplace and the Traditional Neighborhood forms and CM is an ideal zoning district for the Property, where commercial and lighter industrial uses can be a good transition between the heavier industrial uses located to the east and north of the Property to the residential uses to the west of the Property.

The Proposal complies with Community Form Goal 1, Policy 3.1.10 because the Property lies within the Suburban Workplace Form District, which is characterized by predominantly industrial and office uses where the buildings are set back from the street in a landscaped setting. Suburban Workplaces often contain a single large-scale use or a cluster of uses within a master planned development. In order to provide adequate transportation access in suburban workplaces connected roads, public transportation and pedestrian facilities should be encouraged. Walkways to workplace-serving uses are encouraged for workplace employees. Development within Suburban Workplace Form Districts may need significant buffering from abutting uses.

The Property currently contains a single-family residence on 7+ acres of property. Adequate roadway infrastructure is in place to serve this immediate area of the Suburban Workplace Form, as Southside Drive, a minor arterial roadway, connects to the north with E. Woodlawn Avenue, also a minor arterial roadway, which provides access to S. 3<sup>rd</sup> Street, which has an onramp to the Watterson Expressway, and to the south Southside Drive connects with National Turnpike, also a minor arterial roadway, which leads to the Outer Loop, a major arterial roadway, and also to the Gene Snyder Freeway. All of these well-used corridors maintain sufficient capacity to move goods and services from properties located within the Suburban Workplace Form with easy access to nearby expressway corridors as well as to the Muhammad Ali International Airport, located just east of the Property. TARC operates a local bus route along this stretch of Southside Drive, which same route also serves Steedly Drive. A pedestrian connection serves the western side of Southside Drive, as well as some eastern sections of Southside Drive. Similarly, a pedestrian connection serves the west side of Steedly Drive. The Plan shows pedestrian connections along the Property's frontages of both Southside Drive and Steedly Drive, expanding the area's network of pedestrian connections.

The Proposal aims to strengthen the surrounding Suburban Workplace Form and to serve the neighboring Traditional Neighborhood Form with commercial retail and

restaurant uses along the Southside/Steedly corridors and, behind the commercial component, space to establish businesses and provide jobs via two (2) appropriately-sized office/warehouse buildings. This is not a zoning application that will insert and/or expand non-residential uses into existing residential areas, for the Property is within the Suburban Workplace Form comprised mainly of industrial uses and the applicant's Proposal will add to the employment center. The proposed CM zoning and redevelopment of the Property, as show on the Plan, will establish compatibility between properties in the immediate area, now and in the future, because it creates a suitable transition of uses on the Property from industrial to neighborhood-serving commercial and because the Property is located in the Suburban Workplace Form, which is served by the adequate infrastructure and transportation facilities already in place. A fifty-foot (50') landscape buffer area is provided on the southern property line, where trees and landscaping will screen the neighboring R-5, Single-Family property immediately to the south. No buildings or delivery or loading/unloading or parking areas will be up against the Property's southern property line shared with this residential property. Behind this residential property fronting Steedly is a Louisville Gas & Electric facility which appears as a tree-less, graveled lot with electrical infrastructure. The Proposal will ensure compatibility in scale and design with these nearby existing land uses and with the prevailing pattern of development in the Suburban Workplace Form.

The proposed retail/restaurant commercial uses proposed for the street-facing portion of the Property is consistent with the commercial retail/restaurant uses that serve Traditional Neighborhood Forms as well as supplement existing Suburban Workplace uses; the office/warehouse component will be setback and screened from Southside Drive and Steedly Drive and from any property line shared with a residential use. Moreover, all delivery areas and dumpster areas on the site will be internal to the site and shielded from residential uses west and south of the Property. No hazardous materials will be stored or handled onsite and should the Property be approved for CM zoning, no junkyards, landfills or quarries would be permitted to operate on the Property within the CM district. The office/warehouse buildings will be constructed of materials typically found in office/warehouse style construction; tilt-up wall and/or metal siding construction is likely for the proposed buildings. Ninety-eight parking spaces will serve the office/warehouse buildings, while eighty-one parking spaces will serve the retail/restaurant component of the Proposal.

Goal 2 of the Community Form encourages sustainable growth and density around mixed-use centers and corridors. The surrounding Suburban Workplace Form is well-developed and active primarily with industrial uses of various sizes and intensities as well as some commercial uses and a handful of residential properties; the industrial activity and employment center here is well-rooted. Though many large operations are positioned within this Suburban Workplace Form, mainly given their convenient access to the airport and support from rail, the primary user of this particular Suburban Workplace Form is UPS Worldport, where thousands of employees commute daily to and from the large employment center. The Proposal supports the established Suburban Workplace and neighboring Traditional Neighborhood Form because it consists of two land use components, of which will provide convenient food options, goods and services for the numerous employees working within the Suburban Workplace as well the residents of the neighboring Traditional

Neighborhood Form; the new warehouse/office space will support existing or emerging uses within the Suburban Workplace and new employment options within walking distances to the residents of the Traditional Neighborhood Form. Moreover, the Proposal is designed in a way that supports the Suburban Workplace while respecting the Traditional Neighborhood Form to the west. The relatively compact site layout will offer a mix of compatible neighborhood-serving retail/restaurant uses located in commercial buildings that will shield the office/warehouse buildings in the rear of the site from Southside Drive and Steedly Drive. The Proposal will add new investment and resources to the Suburban Workplace and new employment options to the activity center, which is easily accessible via pedestrian connections, bicycle, transit and by vehicular travel from surrounding nearby residential neighborhoods, thereby encouraging use of multi-modal transportation.

The Suburban Workplace Form encompassing the Property is served by adequate roadway corridors and TARC service. The Proposal will be served by curb cuts directly onto both Southside Drive and Steedly Drive. A third curb cut stubs north into the Naval Ordnance property, providing means of cross-access between the properties for when that portion of the Naval Ordnance property is redeveloped; currently the portion of the neighboring property located directly adjacent to the Property is not being used. This proposed curb cut would allow for vehicular movements between properties without the need to access Southside Drive. No change to the existing grid pattern of streets is proposed and the parking being requested is sufficient to serve the proposed uses. Compatible utilities shall be placed in a common trench unless otherwise required by appropriate agencies.

The Property contains no historic or archaeological resources that contribute to Louisville Metro's authenticity, nor does the site contain watersheds, viewsheds, or natural resources that would be unprotected. Additionally, no environmentally sensitive flood prone areas or wet or highly permeable soils, or sever, steep or unstable slopes exist on the Property to avoid. The Property is not located within the Ohio River Corridor. No natural features warranting protection exist on the Property and the site does not sit upon karst terrain; no substantial changes to the topography of the land is anticipated. Required tree canopy areas will be provided onsite. The existing house on the Property is not recognized as a historical structure and does not possess architectural value that would trigger preservation of the same; similarly, no distinctive cultural features are evident onsite. Consequently, the Proposal complies with the applicable objectives and policies of Plan 2040 Community Form's Goals 1, 2, 3 and 4. Plan 2040's Goal 5 is inapplicable to this Property and specific Proposal.

### **Plan Element - 2 Mobility**

The applicant's Proposal complies with the intent of Plan 2040's Mobility Plan Element and its applicable Goals, Objectives and Policies. Goal 1 of Plan 2040's Mobility Plan Element is to implement an accessible system of alternative transportation models. Goal 2 of the Mobility Plan Element is to plan, build and maintain a safe, accessible and efficient transportation system, while Goal 3 encourages land use and transportation patterns that connect Louisville Metro and support future growth. The applicant's Proposal complies with Plan 2040's Mobility Plan Element because it redevelops and reuses the Property in a manner more appropriate and more in keeping with the surrounding Suburban Workplace

Form District, including the Proposal's support of multi-modal transportation options. The change in zoning designation to the Property allows for reinvestment in the Property and new sources of jobs within the active employment center surrounding the Property. The Property is served by connections to existing public roadways, where, within the Suburban Workplace and neighboring Traditional Neighborhood Form, industrial, commercial, residential and general pass-thru traffic utilize the roadway network. Access to the Property is from both Southside Drive, a minor arterial roadway, and Steedly Drive, a local level roadway. A stub connection from the property to the north is being proposed on the Plan. The site has convenient proximity and adequate access via the public roadway network to I-65, I-265 and I-264 highways, which convenient access promotes the efficient movement of people and goods.

As it relates to safety of access to the Property, there are no site-distance, corner-clearance or site-line issues affiliated with the curb cuts proposed for serving the Property, thereby facilitating safe vehicular and pedestrian access to and from the proposed development and adjacent land uses, and the applicant will work with Louisville Metro Public Works to ensure the same. The Proposal affords proper functioning of internal circulation and appropriate access to existing roadway network. The applicant will install pedestrian connections along the Property's frontages of Southside Drive and Steedly Drive, thereby strengthening the network of sidewalks within the immediate area. Internal pedestrian connections will be provided intra-site, as depicted on the Plan filed alongside the zoning application. The Proposal will add a moderate amount of vehicular trips to the existing traffic in the immediate area, for the retail/restaurant uses will mostly feed off of customers already in the surrounding area and the warehouse/office use, provided its moderate amount of space and low intensity use, will cause no adverse effects to adjacent areas. Secure, convenient, and user-friendly bicycle parking facilities will be furnished onsite. Residents from the Traditional Neighborhood Form can walk, bike and use transit to access the neighborhood-serving uses that locate on the site.

TARC operates a local route within this area, serving both Southside Drive and Steedly Drive, providing multi-modal options for employees and customers to reach the property without the need for reliance on an automobile. As mentioned, pedestrian connections exist in the area and the applicant will be installing sidewalks along the Property's frontages with Steedly Drive and Southside Drive, allowing for adequate means of multi-modal transportation to the Property and surrounding goods and services in the area. The Plan includes bicycle parking on the Property, supporting those employees and customers who prefer or require bicycle transportation as a means of travel. Adequate parking for the Proposal is established on the Property for the mix of uses (68 is the minimum required; 179 is the maximum required; the applicant proposes 143 parking spaces), including sufficient ADA parking spaces. In summary, the applicant's Proposal will provide a mix of compatible land uses for the immediate area that are served by and, therefore, encourages the use of multi-modal transportation, including transit. Street trees will be planted along the Property's frontage along Southside Drive and Steedly Drive and will be planted in a manner that does not affect public safety or hamper sight distances. For the foregoing reasons, the Proposal complies with the Mobility Plan Element of Plan 2040, including its Goals 1, 2 and 3 and their applicable Policies.

### **Plan Element 3 – Community Facilities**

Plan 2040's Community Facilities Plan Element provides guidance and recommendations for the proper integration of necessary community resources across Louisville Metro to plan and maintain accessible facilities that will improve the quality of life for existing and future residents and visitors of Louisville Metro. The Proposal complies with Plan 2040's Community Facilities Plan Element, and all applicable Goals, Objectives and Policies thereunder, because the Property is served by existing infrastructure and all necessary utilities, including water, sewer, electricity, and telephone. Upon redevelopment, and to the extent possible, utilities will be located within common easements and trenches, as required by each utility. The development also has an adequate supply of potable water and water for fire-fighting purposes and is served by the Louisville Fire Battalion Chief 3, Engine 10, Truck 8, located at 501 W Ashland Ave, Louisville, KY 40214, which is located approximately 1.9 miles from the Property. Moreover, the rezoning of the Property from residential to commercial manufacturing is appropriate because it will bring future investment in the Property and hopefully lure a new source of jobs to the immediate area and/or a land uses that lend supportive services to the larger Suburban Workplace Form encompassing it.

### **Plan Element 4 – Economic Development**

The intent of Plan Element 4 of Plan 2040 is to provide a positive, healthy economic climate for citizens of Louisville Metro in a way that cultivates a vibrant city to attract and retain a highly-skilled workforce. Sound economic development planning allows for equitable, sustainable and innovative growth that strengthens our community's ability to attract and retain a strong and diverse workforce. The Proposal advances the intent of Plan 2040's Economic Development Plan Element, and its applicable Policies, Goals and Objectives because the Property is currently underused as a single-family residence on the edge of large and very active Suburban Workplace Form District and the proposed change in use from the one single-family home to a mixed-use development of commercial and office/warehouse will create job opportunities for the neighborhood while also serving its residents with goods and services. The surrounding Suburban Workplace Form is already well outfitted with infrastructure serving industrial and commercial uses compatible with the CM zoning proposed for the Property. Additionally, the Proposal promotes the Goals and Objectives of Plan 2040's Economic Development Plan Element because it is geographically positioned near one of the Louisville Metro's major job centers – UPS Worldport – where thousands of employees work daily and various nearby supportive services and businesses reliant on UPS coexist and take advantage of common infrastructure and utilities within the Suburban Workplace Form.

The Property fronts Southside Drive, a minor arterial, and Steedly Drive, a local road, not far from where Steedly intersects with Strawberry Lane, a primary collector level roadway. As mentioned, TARC does serve the Suburban Workplace Form with a local transit route that includes the Property – local TARC routes run on both Southside and Steedly – which addresses access to multi-modal for the workers who have jobs in this employment

center, including future employees of commercial ventures that locate on the Property. The Property also has convenient connections to major highways, such as I-65 and I-264, further supporting the flow of goods and services via adequate access to the Suburban Workplace Form and to the Property. In short, rezoning the Property to CM provides an opportunity for useful, appropriate infill redevelopment of the property of which the current single-family residential use is certainly not the highest and best use, nor the appropriate use for the Property as it will not contribute to the economic growth and sustainability of the community and, at its currently developed density of one dwelling per 7.14 acres, will provide far under the amount necessary housing density to serve the job centers in the surrounding Suburban Workplace. Therefore, the Proposal is in agreement with the Economic Development Plan Element of Plan 2040.

### **Plan Element 5 – Livability**

The Livability Plan Element of Plan 2040 provides guidance and direction for the provision and maintenance of resources necessary for the health and well-being of citizens, including a focus on designing and developing places while prioritizing the protection and enhancement of the natural environment and the integration of it with the built environment as development occurs. Applicant's Proposal is consistent with the applicable Goals, Objectives and Policies of Plan 2040's Livability Plan Element, primarily those set forth under Goal 1 of the Plan Element, because the proposed development is located on a site that will enable proper stormwater handling and release management that will not adversely affect adjacent and downstream properties. Stormwater will be collected and piped underground to one of the two (2) detention basins proposed on the Plan. One basin is located along the north property line, while the other is located on the south property line, near the southwestern corner of the Property, between the southern property line and an access point to Steedly Drive. The site discharges into the combined sanitary sewer system and shall limit the 100-year post-developed discharge to the pre-developed discharge for 10-year storm, per 10.3.1.2 of the MSD design manual. The final stormwater design is required to receive approval from MSD prior to construction of the proposed development and must meet all of MSD's MS4 water quality regulations. In addition, an Erosion Prevention and Sediment Control Plan utilizing best management practices as recommended by MSD will be implemented prior to commencing construction of the development.

Per FIRM Map No. 21111 C 0074 E, dated December 5, 2006, no portion of the site is located within the 100-year flood plain. In addition, no kart terrain or hydric soils are present on the Property and the site does not contain any known archaeological features on it; and no severe, steep or unstable slopes exist on site. The Proposal does not require any open space and given its compact nature, it would be difficult to locate any open space onsite that would be usable for the area. Tree canopy requirements will be met via planting, including street tree plantings.

The proposal conforms to the requirements of APCD, represents an efficient land use that contributes to and enhances the existing pattern of development for the surrounding Suburban Workplace Form, and utilizes current traffic patterns on roadways with sufficient capacity and safe access thereto. Although the Property is located within an industrial center,



it is positioned in an area supported by transit services and pedestrian connections, whereby accessing the site is not limited to only vehicle access. The proposed rezoning of the property to a more appropriate CM zoning will invest new resources into the Property and compatibly add to an existing activity/employment center without negatively effecting adjacent land uses.

### **Plan Element 6 - Housing**

The Housing Plan Element strives to enhance housing opportunities for all citizens of Louisville Metro by promoting equitable housing means, ensuring diverse, quality, physically accessible affordable housing choices with access to opportunities, services and amenities. The following three Goals are set forth within the Housing Plan Element: 1) Expand and ensure a diverse range of housing choices; 2) Facilitate the development of connected mixed-use neighborhoods; and 3) Ensure long-term affordability and livable options in all neighborhoods. The Proposal advances the Housing Plan Element because it seeks to remove the single-family house from an underdeveloped parcel of land located in a Suburban Workplace Form, which has only increased in intensity over the years and is poised to continue on a similar trajectory with additional industrial and commercial uses or expansions of existing operations occurring therein, and in its place establish commercial and light industrial uses more appropriate for the applicable Suburban Workplace and more fitting for the Property. The Proposal will locate supportive goods and services and new sources of jobs within walkable distances to the houses in the Traditional Neighborhood Form.

As previously described, the Property is on the edge of the Suburban Workplace, and the applicant's Proposal responds accordingly with neighborhood serving commercial uses fronting the Traditional Neighborhood across Steedly Drive and Southside Drive from the Property and light industrial office/warehouse uses behind the commercial uses and nearer the adjacent industrially-used properties to the east. Though Plan 2040 encourages developments to not displace residential uses from property, the change in zoning of the Property to CM, Commercial Manufacturing is much more in keeping with the applicable Suburban Workplace Form and, here, the owner and resident of the Property is freely choosing to develop the Property; the current incompatible relationship between the single-family house currently on the Property, the zoning district being sought, the form district applicable to the Property and the surrounding industrial land uses, which have only intensified over the past thirty (30) years, warrant removal of the single-family use from the Property.

Although the applicant is (appropriately) not pursuing a housing development for the Property, the Proposal will provide for the eventual redevelopment and reinvestment of capital into the Property, which will add to the employment opportunities within the already active Suburban Workplace Form, which neighbors a long-established Traditional Neighborhood Form to the west, consisting of single- and multi-family residential developments that will benefit from the location of new retail, restaurant, and space to locate trade businesses, which also provides opportunities for entrepreneurs to establish their own business. As such, additional employment positions in the area will assist residents of inter-

generational, mixed-income and mixed-use development possibly find employment in an area within reasonable commuting (and walking for some) distances from where they reside. Pedestrian connections already exist within the Suburban Workplace Form as well as easy accessibility to TARC. The rezoning of the Property to CM removes an isolated single-family house from the Suburban Workplace Form and the prospect of the Property's redevelopment into a higher, better use as an appropriate industrial/commercial use to further strengthen the existing Suburban Workplace Form will support existing and future residential uses in the surrounding neighborhoods.

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For all the foregoing reasons, including the information shown on the submitted Plan to be discussed at the Planning Commission's Land Development & Transportation Committee, and for all other reasons presented at the LD&T review and the Planning Commission's public hearing, this Proposal to change the zoning designation of the Property to CM, Commercial Manufacturing is appropriate for the Property and for the surrounding Suburban Workplace Form District because it complies with all other applicable Goals, Objectives and Policies of Plan 2040, Louisville Metro's adopted Comprehensive Plan. Equally as true, the current R-5, Single-Family zoning designation is no longer appropriate for the Property and retention of the existing zoning would not be consistent with the applicable Suburban Workplace Form or the Guidelines, Policies and Objectives of Plan 2040.

Respectfully submitted,

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