

TOWN *Of* **PARADISE VALLEY**



STAFF REPORT

TO: Chair and Planning Commission Members

FROM: Lisa Collins, Community Development Director
Paul Michaud, Planning Manager

DATE: May 16, 2023

DEPARTMENT: Community Development Department – Planning Division
Paul Michaud, 480-348-3574

AGENDA TITLE: Discussion Smoke Tree Resort Major Special Use Permit
7101 E Lincoln Drive

SUMMARY STATEMENT:

Request

The applicant requests a Major Special Use Permit (SUP) amendment (SUP-23-01) of the Smoke Tree Resort. The proposed redevelopment of the existing 5.0 net acre site includes 82 total resort guest units ranging in size from approximately 533 square feet to 1,486 square feet (includes 5 single-story casitas with small plunge pools and a presidential suite on the 3rd floor), a detached fine dining restaurant/bar with cellar and patio dining, all-day market bistro with outdoor patios, meeting function building with outdoor event lawn, resort pool, guest fitness and spa facility, and underground parking. The resort is located at 7101 E Lincoln Drive (Maricopa County Assessor Number 174-64-003A) submitted by Withey Morris, PLC, on behalf of ST HOLDCO, LLC, a Delaware limited partnership (being the land asset management and global real estate company called Walton Global Holdings).

Location

The Smoke Tree resort is located at the southeast corner of Lincoln Drive and Quail Run Road/Palmeria Boulevard. It lies approximately 200 feet west of the Town limits and the City of Scottsdale. It borders two public roads. These are Lincoln Drive, a major arterial, and Quail Run Road, a local road. To the north of the resort is the Five Star Development (specifically the proposed attached residences). To the east is a medical plaza. To the south is the Andaz resort. To the west across the street on Quail Run Road are single-family R-43-zoned lots.

History/Background

Use of the property as a resort began prior to its annexation into the Town in 1961. Refer to the SUP History of the property for more information (Attachment C).

Purpose

The primary purpose of the May 16th work session is for the applicant to provide the Planning Commission with a presentation on the project. Staff will review the scope of the request focusing on areas of the proposal not meeting Special Use Permit (SUP) Guidelines and will

cover the Statement of Direction (SOD) from the Town Council. The Planning Commission will have an opportunity to discuss and comment.

Additional Items

To move the SOD forward, the applicant as in other recent Intermediate/Major SUP requests provided applicable submittal items as outlined in Section 1102.3.C of the Zoning Ordinance. However, these submittals required additional detail at the time of SOD. The applicant plans to resubmit following the May 16th Planning Commission work session.

Project Data

Text in **purple** indicates existing conditions not within the SUP Guidelines. Text in **red** indicates proposed conditions not within the SUP Guidelines. The applicant's submittal uses net acres that excludes only the existing Lincoln Drive right-of-way at 33 feet in width in lieu of the typical 65 feet half width. The net numbers with the asterisk (*) excludes the above Lincoln Drive right-of-way and the typical 25-foot half-width Quail Run Road post dedication right-of-way as the SOD directs to calculate lot coverage and floor area ratio based on both gross and net area.

	SUP Guidelines	Existing	Proposed
Lot Size	Minimum 20 acres	233,630 gross square feet (sf) 218,096 net sf 5.4 gross acres/ 5.0 net acres	233,630 sf 207,250 sf 5.4 gross acres/ 4.8 net* acres
Guest Units Density	58 units (gross) or 55 (net) 1 unit per 4,000 sf 10.7 units per gross acre 11.0 units per net acre	30 units 1 unit per 7,788 sf (gross) 5.6 units per gross acre 1 unit per 7,720 sf (net) 6.0 units per net acre	82 units 1 unit per 2,849 sf (gross) 15.2 units per gross acre 1 unit per 2,660 sf (net) 16.4 units per net acre 1 unit per 2,527 sf (net) * 17.1 units per net * acre
Total Area Impervious	60% all impervious area 953,616 sf	29.8% gross, 32.0% net (Estimated 69,700 sf)	58.8% gross, 63% net and 66.3% net * (137,360 sf)
Open Space	Minimum 40%	65.0% gross, 70.0% net (Estimated 152,000 sf)	41.2% gross, 44.1% net and 46.5% net * (96,271 sf)
Lot Coverage	Maximum 25%	10.3% (24,100 sf – gross) 11.1% (24,100 sf – net)	27.5% (64,350 sf – gross) 29.5% (64,350 sf – net) 31.0% (64,350 sf – net) *
Floor Area Ratio	None	10.3% (24,100 sf – gross) 11.1% (24,100 sf – net)	50.0% (116,570 sf – gross) 53.4% (116,570 sf – net) 56.2% (116,570 sf – net) *

*Net includes Quail Run Road post dedication

Scope of the Request

The request is a Major SUP amendment as the proposal is to demolish all the existing structures and rebuild the entire site. Below is a summary of the proposed site improvements further outlined in the Guideline Comparison (Attachment L).

- **Arrival Building.** The arrival building is the largest building in area proposed at the resort. It is a principal building since it includes guest units. It houses the 3-meal service market, lobby, event space, spa, fitness, and 77 of the 82 guest units. The proposal is for three stories with a maximum height of 36 feet 3 inches (with the SUP Guideline at 36 feet tall and no guideline on the number of stories), with the tallest

height visible at the southeast elevation as viewed from the rear of the adjoining medical plaza and within the pool courtyard. The second and third floors only have guest units and mechanical/housekeeping storage rooms. The other parts of the building range in height from 14 feet, 18 feet, and 22 feet. The building is setback 95 feet to Lincoln Drive (175 feet for the second and third stories), 55 feet to the post dedication of Quail Run Road (175 feet for the second and third stories), 50 feet to the east property line adjoining the medical plaza (all three stories), and 44 feet to the south property line with the Andaz Resort (75 feet for the third story). The SUP Guideline for height is 36 feet and 100 feet for setbacks on a principal building.

- *Casitas.* There are five casitas attached as one principal building. The building is one-story and at a height of 14 feet. The casitas complete the courtyard layout with the arrival building. The casitas are setback 365 feet to Lincoln Drive, 60 feet to the post dedication of Quail Run Road, 230 feet to the east property line adjoining the medical plaza, and 50 feet to the south property line with the Andaz Resort. The SUP Guideline for height is 36 feet and 100 feet for setbacks on a principal building.
 - *French Cowboy Restaurant Building.* The detached restaurant building is an accessory building and pays homage to The Other Place restaurant that existed on the property for decades with a location near Lincoln Drive. The narrative identifies this restaurant as a dinner venue with cellar and patio dining options. It is one-story with a maximum height of 18 feet (although the Conceptual Site Sections in Attachment E identify this building at a height of 25 feet 5 ¼ inches). The SUP Guideline for height on an accessory structure is 24 feet. The restaurant is setback 25 feet to Lincoln Drive, 39 feet to the post dedication of Quail Run Road, 305 feet to the east property line adjoining the medical plaza, and 360 feet to the south property line with the Andaz Resort. The SUP Guideline for height on an accessory structure is 24 feet and 40 feet for setbacks.
 - *Event Lawn Gazebo.* The event lawn gazebo is a small one-story accessory structure (expected to be less than 16 feet tall and 20 feet in width and length or approximately 400 square feet) located within the arrival building/casitas courtyard. The gazebo is setback 320 feet to Lincoln Drive, 160 feet to the post dedication of Quail Run Road, 270 feet to the east property line adjoining the medical plaza, and 135 feet to the south property line with the Andaz Resort. The SUP Guideline for height on an accessory structure is 24 feet and 40 feet for setbacks. There is additional detail needed, but this structure should only be visible within the courtyard and not visible offsite.
 - *Pool Bar/Restrooms.* The pool bar/restroom structure is a small one-story accessory structure at 11 feet tall and 30 feet in width and 35 feet in length or approximately 1,050 square feet under roof) located within the arrival building/casitas courtyard at the resort pool. The majority of the square footage is covered patio with the bar enclosure at approximately 200 square feet and the restrooms at approximately 125 square feet. The bar only serves the resort pool area when it is open. This structure is setback 315 feet to Lincoln Drive, 200 feet to the post dedication of Quail Run Road, 220 feet to the east property line adjoining the medical plaza, and 125 feet to the south property line with the Andaz Resort. The SUP Guideline for height on an accessory structure is 24 feet and 40 feet for setbacks. There is additional detail needed, but this structure should only be visible within the courtyard and not visible offsite.
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- *Cabanas.* The cabanas are small one-story accessory structures (expected to be less than 16 feet tall and cover an area 10 feet in width and 70 feet in length or approximately 700 square feet) located within the arrival building/casitas courtyard at the resort pool. The cabanas are setback 285 feet to Lincoln Drive, 225 feet to the post dedication of Quail Run Road, 165 feet to the east property line adjoining the medical plaza, and 165 feet to the south property line with the Andaz Resort. The SUP Guideline for height on an accessory structure is 24 feet and 40 feet for setbacks. There is additional detail needed, but these cabanas should only be visible within the courtyard and not visible offsite.
- *Pools.* The main resort pool available to all guests is within the arrival building/casitas courtyard. This pool is approximately 2,000 square feet in water area with a size similar to other resort pools (e.g., same water area as the main resort pool at the Andaz Resort). The resort pool is setback 315 feet to Lincoln Drive, 240 feet to the post dedication of Quail Run Road, 170 feet to the east property line adjoining the medical plaza, and 95 feet to the south property line with the Andaz Resort. The SUP Guideline for setbacks on pools that are generally available to all guests is 65 feet. This pool should only be visible within the courtyard and not visible offsite. There are also seven plunge pools that are not available to all guests and therefore there is no SUP Guideline on setback. These pools are located on the south side of the site (one at each casita and two at the spa behind a six-foot tall walled area). These pools are setback 350 feet to Lincoln Drive, 65 feet to the post dedication of Quail Run Road, 125 feet to the east property line adjoining the medical plaza, and 35 feet (casitas) and 30 feet (spa) to the south property line with the Andaz Resort. The size of these plunge pools are approximately 10 feet in width and 15 feet in length (150 square feet, four of the pools are at this size), 10 feet in width and 25 feet in length (250 square feet, one of the pools is at this size), and 7 feet in width and 10 feet in length (70 square feet, two of the pools are at this size).
- *Context Appropriate Design.* The policies from the General Plan broadly cover architecture and address context appropriate development (e.g., scale, massing, façade articulation) and a high-quality built environment that contribute to the Town's identity. The proposed elevations and renderings illustrate the building architecture and visual impact off-site. The site design mitigates the view of the three stories of the arrival building from Lincoln Drive by the placement of the approximate 18-foot tall market, ten-foot ceiling heights of the first and second floors compared to the 12-foot ceiling height of the third floor, and an approximate two-foot grade difference underneath the principal building. More review on the design will follow with additional renderings (e.g., more views from the street, view north from Andaz, more views inside the event lawn/resort pool area, view of the plunge pools at a casita).

Statement of Direction (SOD)

The Town Council approved the SOD to the Planning Commission at its April 27th meeting. Below is the SOD direction by topic and the analysis to date.

1. Use. The primary areas for the Planning Commission to study include, and are not limited to, the design/layout, impact of said uses to the surrounding area outside the site (specifically noise and light), as well as the specific operational factors (hours of operation, outdoor seating, etc.) and resort quality standards. For-sale product is not proposed nor desired at this location.
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Analysis: The type of resort uses are compliant with Section 1102.2 of the Zoning Ordinance. The site is and has been since incorporation in 1961 used as a resort, with the resort not in operation for the last couple of years. The uses at the proposed resort will include additional resort amenities from the past resort. Besides additional guest units, the proposal offers two different food and beverage options instead of one restaurant facility, an indoor/outdoor meeting function space, and fitness/spa facilities. Improvements to the grounds include a large resort pool, enhanced landscaping, new signage, and underground parking.

2. Noise Mitigation/Impact to Adjacent Uses. The Planning Commission shall consider impacts including noise, light, traffic, and any other adverse impacts, particularly for those existing residential properties west of the site along Quail Run Road. In particular, outdoor employee areas and service uses such as maintenance, maid service/laundry, trash collection/storage, mechanical equipment (roof/ground), outdoor areas (e.g., restaurant dining, patios/balconies), and all other noise generating elements shall be studied. The review shall address site design, location, and orientation; along with the reasonable separation between incompatible uses and effective buffering of unwanted noise, light, traffic, views of the buildings offsite, and other adverse impacts. The Planning Commission take into account mitigation measures based upon design (e.g., courtyards, walls), technology (e.g., installation of a distributed audio system), and operational means through stipulations.

Analysis: The submittal includes a noise study. This study demonstrates that noise will comply with the daytime 56 decibel limits and require the consideration of stipulations such as the installation of noise mitigation equipment and/or design modifications to meet nighttime and holiday 45 decibel limits. Some items requested of the applicant for clarification includes the impact of the plunge pools/patios and some referenced decibel levels. Compliance with noise mitigation is under review and will be revisited.

3. Density. The Planning Commission shall evaluate how the proposed density impacts safety and quality of life. The site adjoins non-residential zoning on three sides, and the proposed site plan has reduced density on the west and south sides of the site.

Analysis: The site area is and has been five acres, which is a quarter of the SUP Guideline for resorts at a minimum of 20 acres. Smoke Tree is the smallest resort by size within the Town. The proposed density at 15.2 units per acre (gross) and 17.1 units per acre (net) falls within the density range for existing Town resorts of 3.9 units per acre (Camelback Inn located at 5201 E Lincoln Drive due to it being the largest resort by size at 117 total acres) and 20.1 units per acre (Doubletree Paradise Valley located at 5401 N Scottsdale Road). Based on the five acres, the maximum number of guest units in accordance with the SUP Guideline is 58 units (gross) or 52 and 55 (net) and the applicant proposes 82 units. The SOD directs the Planning Commission to evaluate how the proposed density impacts safety and quality of life.

4. Lot Coverage/Floor Area Ratio. The Planning Commission shall consider lot coverage and floor area ratio while taking into consideration the unique characteristics of the site located on five acres, its proximity to the City of Scottsdale, and that non-residential zoning adjoins three sides of the site with the fourth side adjoining Quail Run Road adjacent to residential R-43 zoning. The Planning Commission shall also evaluate the lot coverage and floor area ratio within the context of the immediately adjacent properties. The lot coverage and floor area ratio shall be calculated based on both net and gross area.

Analysis: The proposed lot coverage at 27.5% (gross) and 31.0% (net) compared to SUP Guideline of 25% falls near the lot coverage range for existing Town resorts of 7.8% (Camelback Inn located at 5201 E Lincoln Drive due to it being the largest resort by size at 117 total acres) and 28.7% (Omni Montelucia resort located at 4949 E Lincoln Drive). There are two Town resorts that allow for different lot coverage requirements. The Montelucia resort allows for the maximum building footprint (excluding roof overhangs or other projections) not greater than 25% of the gross area and the maximum lot coverage including building footprints, overhangs, projections, canopies, shade structures, trellis, pool cabanas and miscellaneous structures not greater than 31% of the gross area. The Camelback Inn allows for fully enclosed buildings at a maximum of 20% of the gross area, all other structures at a maximum of 10% of gross area, and public areas a maximum of 30% of the gross area. The applicant should provide more detail on lot coverage by footprint, overhang, and other accessory structures should there be consideration in allowing total lot coverage above the 25% SUP Guideline. The proposed floor area ratio of 50.0% (gross) and 56.2% (net) would result in the highest floor area ratio percentage compared to existing Town resorts. The highest being the 35.1% (Montelucia) and 34.6% (Sanctuary on Camelback Mountain located at 5700 E McDonald Drive). As the SOD directs the Planning Commission to evaluate lot coverage and floor area ratio within the context of the immediately adjacent properties the applicant may want to provide lot coverage and floor area data on nearby resorts within the City of Scottsdale. Also, the SOD allows for consideration of lot coverage and floor area ratio based on the unique characteristics of the site (e.g. five acre size, proximity to the City of Scottsdale, and the site adjoining non-residential uses on three sides).

5. Heights/Viewsheds. The Planning Commission shall evaluate the proposed height and viewsheds based on its visibility of proposed buildings as seen from off-site which may require additional visuals (e.g. sight line representation, rendering, etc.). Lower height is encouraged on the west side of the site nearest to existing residential properties. Heights shall comply with the SUP Guidelines with mechanical screening and architectural elements included in the maximum height. This site is one quarter the suggested 20-acres per the SUP Guidelines and the location adjoins other non-residential uses. 36 feet or three-story resort development is the exception in the Town, and will only be considered where contextually appropriate and mitigated by design. The Planning Commission focus shall be that the overall mass of the structures are of an appropriate scale, with

special consideration given to the views from the south side bordering the Andaz resort and the west side bordering Quail Run Road.

Analysis: The proposed structures are within the SUP Guidelines on height except for two buildings (French Cowboy building on height over 24 feet and penetrating the OSC and the arrival building on height over 36 feet and portions of the third floor penetrating the OSC). The SOD identifies that heights comply with the guidelines with mechanical screening and architectural elements included in the maximum height, adding that 36 feet/three story is the exception and only considered where contextually appropriate and mitigated by design. The applicant could redesign the French Cowboy building to comply with the SUP Guidelines as the amount and roof location of the encroachment on this building is minimal. There may be options for the applicant to evaluate the design of the third story of the arrival building.

6. Setbacks. The Planning Commission shall explore appropriate setbacks for structures and outdoor spaces, with particular attention to the setback along Quail Run Road for the residents west of the site, visitors to the medical plaza to the east of the site, and the Andaz resort guests south of the site related to privacy and noise levels. The Commission shall also identify any mitigating circumstances that may buffer the development (e.g. the use of vegetation, modified setbacks or heights, reorientation of the structures, etc.).

Analysis: Both the existing and proposed setbacks for the principal buildings are not within the SUP Guideline of 100 feet. Refer to the Guideline Comparison for more detail (Attachment L). The setback for the two story and three story elements of the arrival building exceed a setback of 100 feet from Lincoln Drive and Quail Run Road. The placement of the arrival building skewed eastwards results in a larger setback away from the single-family lots along the west side of Quail Run Road. Also, it places the guest unit balconies further away from the homes to the west and the Andaz Resort to the south due to the 'L' shape design with the open part of the 'L' facing south. The roof planters on the third floor are setback 15 feet to 25 feet from the roof edge that will limit the visibility of persons on the roof patio for the two southernmost third floor guest units. The greatest impact of the third story is to the east with the medical plaza and the balconies of the resort on this side. The casitas building at one-story, 14-foot tall may have a setback less than 100 feet to the property lines of Quail Run Road and Andaz Resort, but these are 60 feet and 50 feet respectfully that would be no more impactful than an accessory structure with a lessor 40-foot setback and 24-foot height. This building also completes the courtyard that helps in mitigating noise/light from the event lawn. The setbacks of the French Cowboy restaurant building (footprint/roof-patio overhang) at the northwest corner of the site are less than the SUP Guideline for an accessory structure of 40 feet from a public street. Town staff suggests that the setback from the post Quail Run Road dedication property line not be less than 40 feet. Also, the applicant consider a larger setback to the existing Lincoln Drive property line (33-foot half width right-of-way line) to account for any future right-of-way needs.

7. Landscaping/Buffers. The Planning Commission focus on landscaping/buffers shall be along the perimeter of the site. This includes, and is not limited to, appropriate screening or relocation of the utility cabinets along Lincoln Drive, locations and screening of loading zones and dumpsters, suggested guidelines along Lincoln Drive from the Town's Visually Significant Corridors Master Plan (e.g., Resort Living Character Zone), buffers along the rights-of-way adjoining the proposed restaurant (particularly the two outdoor patios) at the Lincoln Drive and Quail Run Road intersection, harmony of the proposed landscaping with the adjacent landscaping (e.g., Lincoln Drive medians), appropriate type of plant material for the location (e.g., drought tolerance, scale, seasonal color), review of plant impact (e.g., fire/fall hazard, pollen irritants), and appropriate stipulations (such as maintenance, early phasing of street frontage/perimeter landscaping, and replacing dead plant material).

Analysis: Neither the existing nor the proposed perimeter landscape and parking buffers meet the SUP Guidelines. Refer to the Guideline Comparison for more detail (Attachment L). The proposed plant quantities, hedge materials along the south and east property lines, and proposed screen/patio walls along the rights-of-way will buffer the resort as viewed from off the property with additional changes. These changes may include a greater setback of the French Cowboy as noted under Setbacks, a wider landscape buffer south of the access driveway along Quail Run Road, and plant material changes along Lincoln Drive and along the south and east property lines. Stipulations will be included regarding maintenance/replacement of plant material along with other applicable stipulations. Additional analysis is necessary as the applicant provides more information.

8. Exterior Lighting. The Planning Commission focus on exterior lighting shall be how it meets SUP Guidelines and that the fixtures are of a quality expected for a Town resort. In particular, some focus areas include lighting along the perimeter of the site, how illumination might wash building elevations, limits on the visual impact of string lights and palm tree lights, and impact of lighting at the second and third floor elevations.

Analysis: The proposed lighting appears to be within the Special Use Permit Guidelines with more information required on the hooding/shielding of fixtures CP1, M1, and N1. Also, the material needs to include the proposed light fixtures for the second and third floors.

9. Grading/Drainage & Utilities. The Planning Commission has this information as a resource to understand the scope of the project and if applicable provide general input should the drainage, grading, and utilities affect the design or impact to nearby properties.

Analysis: The site currently provides no onsite retention. The proposed improvements will utilize parking and drive corridors to drain stormwater east and north to match current drainage patterns through a series of catch basins and underground retention basins. Utility improvements are onsite with basic water

and sewer connections in Lincoln Drive at the shared access with the medical plaza.

10. Traffic, Parking, Access, and Circulation. The proposed density and location within a heavily traveled and mixed-use density area near the City of Scottsdale creates a heightened need for ensuring the proposed redevelopment has a positive impact on traffic safety, parking, and circulation which is reviewed by the Town's professional staff to ensure compliance to safety and other standards which may require additional analysis. This analysis shall include, and is not limited to, necessary queuing areas (e.g., deceleration lanes) and driveway access functioning (e.g., allowed movements into and out from the driveway, favorable geometry, sight distance, Quail Run Road primary access considerations, and visibility). The Planning Commission has this information as a resource to understand the scope of the project and if applicable provide general input should these items affect the design or impact nearby residents.

Analysis: The professional staff reviewed the parking analysis and traffic analysis and staff awaits a response from the applicant. There were aspects of the traffic and parking analysis requiring clarification such as the categorization of certain uses related to internal capture rate, time of day reductions, modeling assumptions related to back of house/employees, any valet mode options, queue storage, and additional information on warrants for deceleration lane(s).

11. Signage. Planning Commission review shall focus on the impact of sign location, dimensions, and illumination on the streetscape and compliance with SUP Guidelines.

Analysis: Based on the conceptual plans the proposed signs should comply with SUP Guidelines. The applicant will provide a table summarizing the proposed exterior signs that includes maximum sign area, height from grade to the top of the sign, quantity, and the type of illumination. Also, the applicant will provide a typical detail with material identified and dimensions.

12. Walls. Planning Commission review shall evaluate the setback, height, and design of the proposed perimeter walls to ensure these walls are consistent with the quality and design of a Town resort. No walls shall be within the post-dedication rights-of-way.

Analysis: Many of the proposed walls do not meet the SUP Guidelines. Refer to the Guideline Comparison for more detail (Attachment L). The four proposed feature walls and the two French Cowboy patio walls are not within the guidelines on height for the setback proposed. Also, the proposed six-foot tall wall south of the Quail Run Road driveway is within the post-dedication right-of-way which may require a larger setback and redesign (e.g., material, meander, etc.). Additional information on the screening and/or relocation of the APS utility cabinet north of the proposed French Cowboy restaurant building is needed. Allowance for some taller walls at a setback closer than the guideline may or

may not be warranted due to the resort site being a quarter of the recommended 20 acres and that walls help mitigate unwanted noise and other nuisances.

Process

The process for the SUP request is a pre-application review (completed), approval of the SOD (completed), Planning Commission review of the SUP (in process), a Citizen Review Session (neighborhood meeting) held by the applicant prior to the Planning Commission recommendation, a Planning Commission public hearing on the SUP for recommendation to Council, and Council study session(s) and Council public hearing for action on the SUP.

Public Comment

There is no required noticing or outreach with the SOD. However, Town staff received some comments on the proposed project (Attachment N).

Next Steps

The next scheduled Planning Commission discussion is tentatively set for June 20th.

ATTACHMENT(S):

- A. Staff Report
 - B. Vicinity & Related Maps
 - C. SUP History
 - D. Application
 - E. Narrative & Plans Packet
 - F. Sign Plan
 - G. Noise & Lighting Studies
 - H. Grading, Drainage, & Utilities
 - I. Parking Statement
 - J. Traffic Impact Analysis
 - K. General Plan Policies
 - L. Guideline Comparison
 - M. Statement of Direction
 - N. Public Comments
 - O. Presentation
-