



FREDERICK COUNTY PLANNING COMMISSION
March 9, 2016

TITLE: **Russell Property Lot 100: Home 2 Suites**

FILE NUMBER: **SP 04-11, AP #15988, APFO#15989, FRO #15990**

REQUEST: **Site Plan Approval**

The Applicant is requesting site plan approval for construction of a 68,511 square foot, 117 room hotel on a 2.54-acre site.

PROJECT INFORMATION:

ADDRESS/LOCATION: Located on the south west corner of MD 85 and Westview Drive (extended)

TAX MAP/PARCEL: Tax Map 86, Parcel 175
COMP. PLAN: General Commercial/Resource Conservation
ZONING: General Commercial/Limited Industrial
PLANNING REGION: Adamstown
WATER/SEWER: W-3/S-3

APPLICANT/REPRESENTATIVES:

APPLICANT: Russell Holdings, LLC.
OWNER: Russell Holdings, LLC.
ENGINEER: Harris, Smariga & Associates
ARCHITECT: N/A
ATTORNEY: N/a

STAFF: Tolson DeSa, Principal Planner II

RECOMMENDATION: Conditional Approval

ATTACHMENTS:

Exhibit 1-Russell Property Lot 100: Home 2 Suites Site Plan Rendering
Exhibit 2- Light Spillage Modification Request
Exhibit 3- Parking Space Modification Request
Exhibit 4- Compact Parking Space & Loading Modification Requests

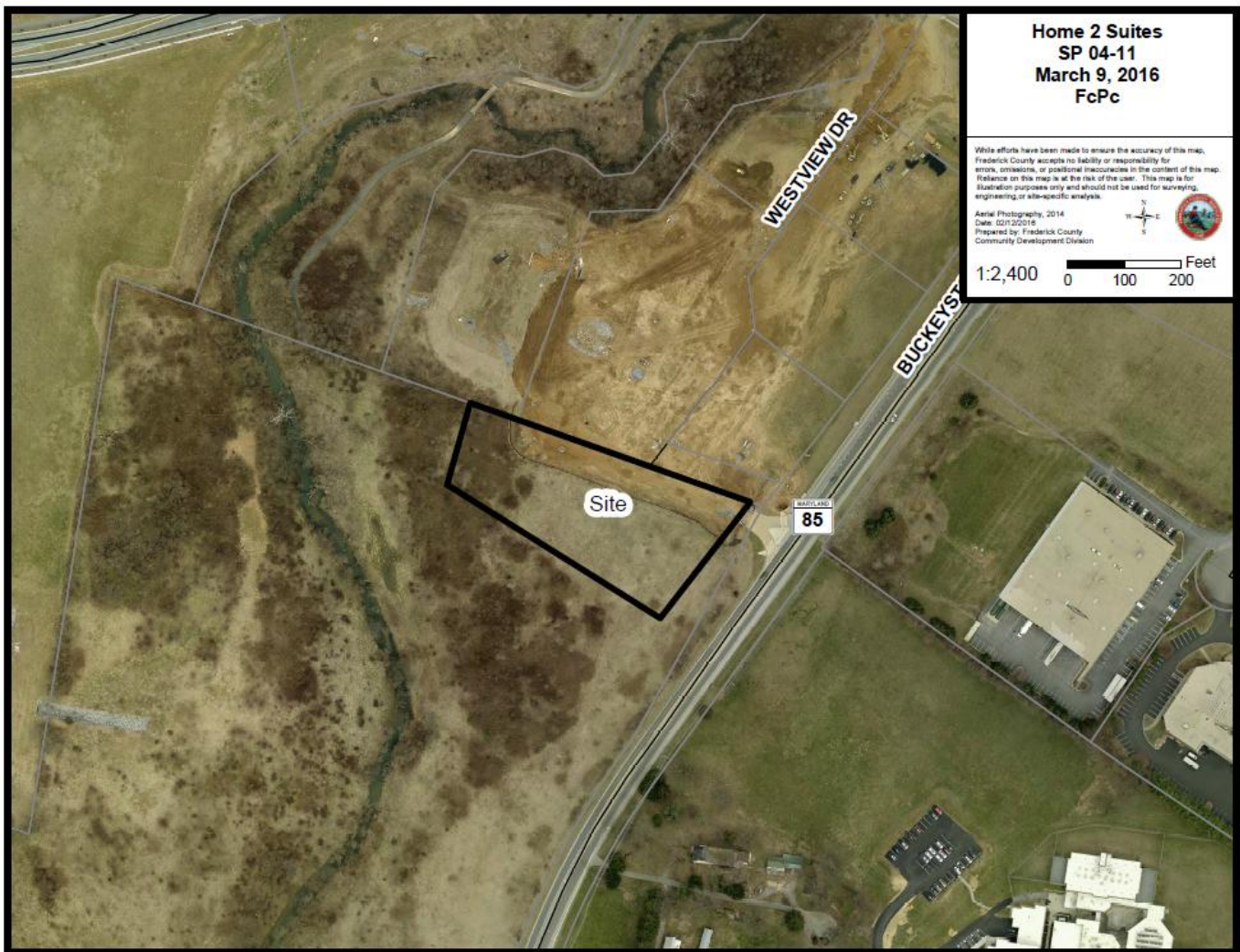
STAFF REPORT

ISSUE

Development Request

The Applicant is requesting site plan approval for construction of a 68,511 square foot, 117 room hotel on a 2.54-acre site. The proposed use is being reviewed as a "Hotel/Motel" land use under the heading of *Temporary Housing* per §1-19-5.310 Use Table in the Zoning Ordinance and is a principal permitted use in the General Commercial (GC) and Limited Industrial (LI) Zoning Districts subject to site development plan approval. A Combined Preliminary/Final Plat (AP 16118) to create the 2.541 acre lot for construction of the hotel is being processed concurrently with the site development plan. The site is located south of the Westview Lot 100 Series Mixed Use Development (MXD) and adjacent to the existing Homewood Suites Hotel that was approved on May 8, 2013 and recently constructed. See Graphic #1 below.

Graphic #1 Russell Property Lot 100: Home 2 Suites Aerial



BACKGROUND

Development History

Russell Site Plan History:

On August 16, 2006, the FCPC approved a Combined Preliminary Plat/Final Site Plan Application for 6 industrial lots containing 11 office/warehouse buildings for a total of 413,730 square feet on 104.45 acres. This process created the 35.11 acre "Remainder 1" from which the 2.54 acre site, known as Lot 100 will be further subdivided.

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- The original approval period for the Russell Site Plan (AP 4041) was two years, with an 8/16/2008 expiration date. The Site Plan approval was extended for 2 three-year periods to 8/16/2014, and expired on that date.

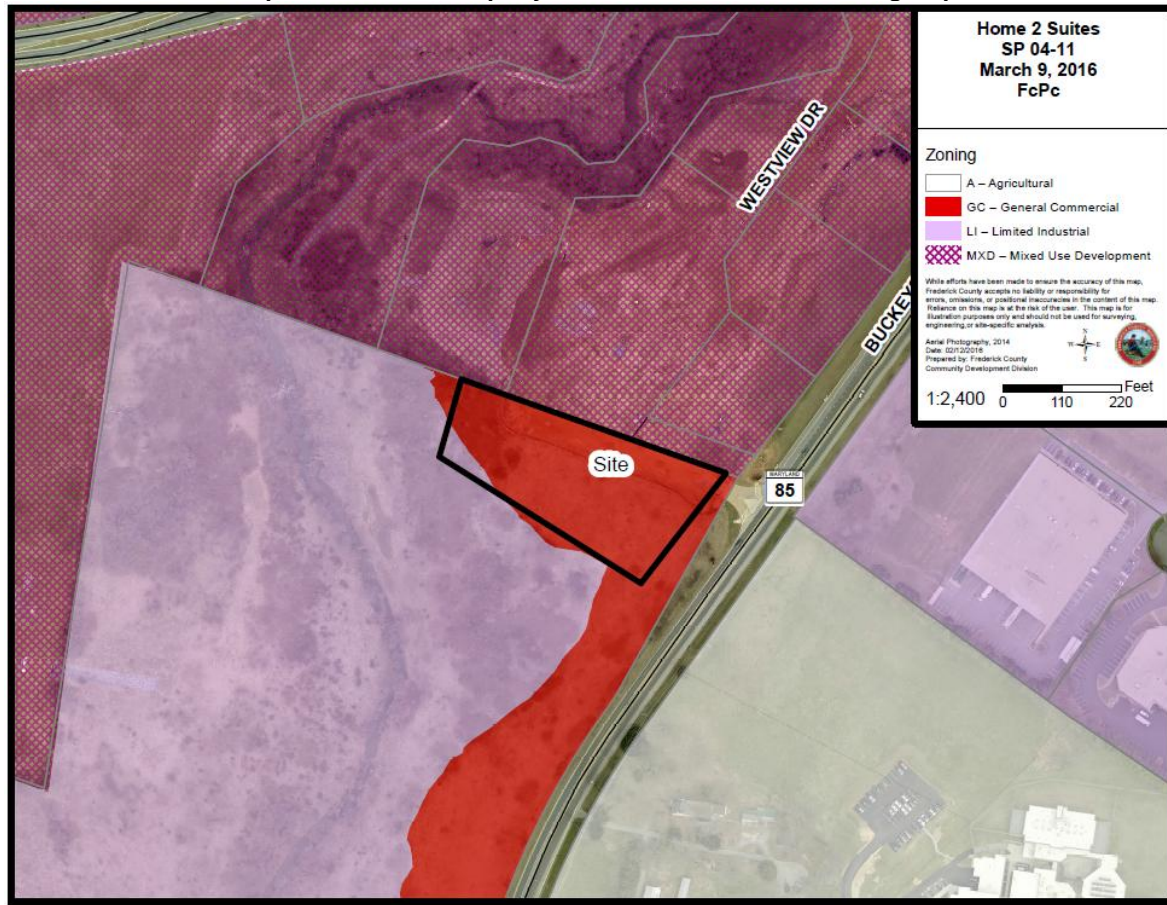
On October 15, 2014, the FCPC reviewed and approved site plans for Lots 1, 2, & 6. Staff worked with the Applicant to bring the previously approved site plans further into compliance with the existing Code within the confines of the recorded plats, while avoiding a complete redesign of the project.

The current Combined Preliminary/Final Plat is being processed concurrently with a Site Development Plan (AP# 15988) for Home 2 Suites to be developed on the newly created Lot 100.

Existing Site Characteristics

The site is currently zoned General Commercial (GC) with a small portion of the site to the west zoned Limited Industrial (LI). See Graphic #2 below. The LI portion of the site to the west is encumbered with a FRO conservation easement and FEMA floodplain and will remain within the Waterbody/Floodplain buffer. The site is currently undeveloped.

Graphic #2 Russell Property Lot 100: Home 2 Suites Zoning Map



ANALYSIS

Summary of Development Standards Findings and Conclusions

The principle issues associated with this site plan were preserving the environmental features and creating an overall design for the development that relates to nearby projects within the Westview Lot 100 Series MXD as well as MD 85. The buildings to be developed on lots 106, 107, 108, 109, and 111 were developed with an orientation to the private street; therefore, on-site parking is intended to be

placed to the side and rear of those buildings to maximize the “town center” focus. In addition, the building restriction lines and grading for the Home 2 Lot 100 site were also adjusted in order to keep all building areas outside of the 100 year Floodplain/Waterbody buffer and minimize disturbance.

Detailed Analysis of Findings and Conclusions

Site Development Plan Approval shall be granted based upon the criteria found in §1-19-3.300.4 Site Plan Review Approval Criteria of the Frederick County zoning ordinance.

Site Development §1-19-3.300.4 (A): Existing and anticipated surrounding land uses have been adequately considered in the design of the development and negative impacts have been minimized through such means as building placement or scale, landscaping, or screening, and an evaluation of lighting. Anticipated surrounding uses shall be determined based upon existing zoning and land use designations.

Findings/Conclusions

1. Dimensional Requirements/Bulk Standards §1-19-6.100:

The proposed setbacks for the Lot 100 Hotel, Home 2 Suites are the following:

	<u>Required</u>	<u>Proposed</u>
Minimum Lot Area	20,000	2.54 acres
Minimum Lot Width	100'	288'
Front Yard	25'	105'
Rear Yard	40'	148'
Side Yard	15'	28'
Max Building Height	60'	60'

The proposed Site Development Plan adheres to the design requirements of the GC Zoning District.

2. **Signage §1-19-6.300:** The Applicant is permitted to have 99 square feet of signage based on the length of the side of the building facing the public street. The signage calculation is listed in Site Plan Note #11 on Sheet 1 of the site plan. At this time the Applicant is proposing 82 square feet of building mounted signage only. The proposed signage amount meets the requirements of the zoning ordinance.
3. **Landscaping §1-19-6.400:** The Applicant has provided a landscaping plan on Sheet 2 of the site plan. The landscaping plan proposes a mixture of evergreen and deciduous tree species in order to be compliant with the zoning ordinance as well as increase the aesthetic of the site and overall development. The site contains 290' of frontage along MD 85, which requires 9 street trees, the Applicant proposed 9 street trees. The parking lot area is 40,477 square feet, which requires 11 trees in order to meet the 20% minimum parking lot canopy coverage; the Applicant has provided 7 parking lot canopy trees. The proposed landscaping meets the requirements listed in §1-19-6.400 of the Zoning Ordinance.
4. **Screening §1-19-6.400:** The majority of the parking areas are located on the side of the proposed hotel. The parking areas are screened from the private road through the use of a mix of evergreen shrubs and deciduous trees.
5. **Lighting §1-19-6.500:** The Applicant has proposed a lighting plan, which is shown on Sheet 3 of the site plan. The Applicant is proposing 17 pole mounted and 16 wall mounted lights. The Zoning Ordinance states in section 1-19-6.500(B) that maximum height for pole and building mounted lights for commercial uses is 18'. Note 9 of the site plan states that the pole lights will not exceed this height. This note shall be updated to include both pole and building mounted lighting. The lighting plan adheres to the requirements of §1-19-6.500 with the exception of light

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spillage over 0.5 foot candles at the right of way line adjacent to MD 85 and at the northwest corner of the site near the proposed dumpster. Both amounts of spillage are very slight, although over the minimums. Therefore, the Applicant is seeking a lighting spillage modification in accordance with Z.O. §1-19-6.500.G (see Exhibit #2). The remaining light levels on site adhere to the requirement listed within Z.O. §1-19-6.500. Staff has no objection to granting this light spillage modification request.

Modifications:

1. **Lighting Modification (§1-19-6.500.(D)):** The Applicant is requesting a modification from the requirement to limit light spillage to 0.5 foot candles at the property line along MD 85 and in the northwest corner of the building.

Transportation and Parking §1-19-3.300.4 (B): *The transportation system and parking areas are adequate to serve the proposed use in addition to existing uses by providing safe and efficient circulation, and design consideration that maximizes connections with surrounding land uses and accommodates public transit facilities. Evaluation factors include: on-street parking impacts, off-street parking and loading design, access location and design, vehicular, bicycle, and pedestrian circulation and safety, and existing or planned transit facilities.*

Findings/Conclusions

1. **Access/Circulation:** The Applicant proposes to access Lot 100 via the existing right-in, right-out driveway entrance off of MD 85. The entrance meets SHA and County standards for a commercial entrance.
2. **Connectivity §1-19-6.220 (F):** The proposed development of the site includes a connection to Westview Drive (extended) near the main hotel entrance as well as at the westernmost portion of the parking lot. The westernmost connection is intended to provide ease of access between sites and Westview Drive (extended). The site is well connected to Executive Way to the north via the shared drive, and the south via the existing right-in/right-out access onto MD 85.
3. **Public Transit :** This site is served indirectly by transit, the Rt. 85 Shuttle, with a stop about ¼ mile from the site at Executive Drive and the Omega Center, with one am and one pm run (M-F).
4. **Vehicle Parking and Loading §1-19-6.200-through 1-19-6.220:** In accordance with the parking requirements for hotels 1 space is required for every sleeping room, plus 1 space for every 2 employees.

Therefore, the target is 117 spaces plus 6 for the total of 12 employees per shift, for a total of 123, including 5 ADA accessible spaces. The Applicant has provided 117 spaces, including the 5 ADA spaces.

In accordance with §1-19-6.220.A.1, the Applicant has submitted a parking modification for a 6 space reduction from the target number of parking spaces. The Applicant cites institutional knowledge of the parking requirements associated with the hotel, a combined employee workforce between the existing Lot 110 hotel and the proposed Home 2 Suites, as well as shared parking throughout the adjacent Westview Lot 100 Series MXD development, as reasons to justify the 6 parking space reduction(see Exhibit #3). Staff has no objection to granting this modification for the reduction of 6 spaces from the target parking number.

The Applicant has submitted a loading space modification request in accordance with Zoning Ordinance §1-19-6.210.D (see Exhibit #4). In accordance with §1-19-6.210.A, the proposed hotel would be required to provide 4 large loading spaces. The hotel does not have the need for any large tractor trailer loading, because deliveries typically occur at the entrance; this design reduces impervious coverage and is a proven design throughout the Applicant's other hotel locations.

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Staff has no objection to granting this modification for the elimination of the loading space requirement.

The Applicant has submitted a parking stall modification request in accordance with Z.O. §1-19-6.220.B.2 for an increase in stall width for 10 compact spaces from the required 8'x16' to 9'x16' for increase pedestrian circulation(see Exhibit #4). Staff has no objection to granting this parking stall width modification for the 10 compact parking spaces.

5. **Bicycle Parking §1-19-6.220 (H):** The Applicant is required to provide 6 bike racks; the Applicant has provided 6 bike racks at the side of the hotel.
6. **Pedestrian Circulation and Safety §1-19-6.220 (G):** The proposed Site Development Plan benefits from the existing sidewalks along the north side of the Westview Drive (extended). The Applicant has proposed crosswalks across Westview Drive (extended). The Applicant is also proposing an ADA compliant asphalt trail connection from the internal sidewalks on the north side of the hotel to the Ballenger Creek Trail. This trail connection will provide a more accessible trail route for patrons of the existing and proposed hotels.

Modifications:

1. In accordance with §1-19-6.220.A.1, the Applicant has submitted a parking modification for a 6 space reduction from the target number of parking spaces.
2. In accordance with §1-19-6.210.D, the Applicant has submitted a loading space modification to eliminate the need for on-site loading spaces.
3. In accordance with §1-19-6.220.B.2, the Applicant has submitted a parking stall modification for an increase in stall width for 10 compact spaces from the required 8'x16' to 9'x16' to improve pedestrian circulation.

Public Utilities §1-19-3.300.4 (C): *Where the proposed development will be served by publicly owned community water and sewer, the facilities shall be adequate to serve the proposed development. Where proposed development will be served by facilities other than publicly owned community water and sewer, the facilities shall meet the requirements of and receive approval from the Maryland Department of the Environment and the Frederick County Health Department.*

Findings/Conclusions

1. **Public Water and Sewer:** The site is to be served by public water and sewer and is classified W-3, S-3. The entire site is in pressure Zone #1 with water coming from the New Design Road Water Treatment Facility and Sewer flowing into the Ballenger McKinney Wastewater Treatment Facility. The Division of Utilities and Solid Waste Management have reviewed and approved the proposed Home 2 Suites site development plan.

Natural features §1-19-3.300.4 (D): *Natural features of the site have been evaluated and to the greatest extent practical maintained in a natural state and incorporated into the design of the development. Evaluation factors include topography, vegetation, sensitive resources, and natural hazards.*

Findings/Conclusions

1. **Topography:** The site is relatively flat with a slight rise in elevation from MD 85 to the center of the site.
2. **Vegetation:** The site is mostly free of vegetation with the exception of the 100/yr Floodplain areas to the north. There are large trees throughout the floodplain as well as in the 25' buffer.

3. **Sensitive Resources:** The Ballenger Creek stream runs along the southern border of Lot 100. There are 100 year FEMA Floodplain areas along the southern boundary of Lot 100. A waterbody buffer was established on the site as part of the subdivision process and includes a 25' floodplain buffer that extends into the site. No building, structures, or impervious surfaces, and no activities requiring clearing or grading over 5,000 sq ft, will be permitted in the waterbody buffer except as permitted under 1-19-9.400 of the Z.O. No fill or work is proposed within the 100 year floodplain.
4. **Natural Hazards:** Although there are 100 year Floodplain and flooding soils within the adjacent Russell remainder and along the southern boundary of Lot 100 lot setbacks and site design have been adjusted to keep the building envelopes outside of the floodplain and the 25' buffer.

Common Areas §1-19-3.300.4 (E): *If the plan of development includes common areas and/or facilities, the Planning Commission as a condition of approval may review the ownership, use, and maintenance of such lands or property to ensure the preservation of such areas, property, and facilities for their intended purposes.*

Findings/Conclusions

1. **Proposed Common Area:** There are no common areas proposed as part of this development.

Other Applicable Regulations

Stormwater Management – Chapter 1-15.2: Stormwater management (SWM) shall be in accordance with the Maryland Storm water Design Manual, including all revisions and all supplements. A SWM concept plan (AP #16110) is approved for this project.

APFO – Chapter 1-20: This project received APFO (AP# 15989) approval as part of the Combined Preliminary/Final Subdivision Plat for Lot 100.

1. **Schools.** Schools are not impacted because the proposed development is a non-residential use.
2. **Water/Sewer.** Water and Sewer APFO review and approval was processed in conjunction with the Combined Preliminary/Final Subdivision Plat (AP# 16118) for Lot 100.
3. **Roads.** Roads APFO was processed in conjunction with the Combined Preliminary/Final Subdivision Plat for Lot 100.

Forest Resource – Chapter 1-21: FRO requirements for this site were met in 2007 as part of the overall Russell Property development (FRO Plan S-1104, AP 6866). Mitigation was provided via a combination of forest conservation easements and payment of fee-in-lieu. However, the Home 2 Suites Site Plan proposes to impact 13,877 square feet (0.318 acres) of recorded FRO easement. The Applicant has submitted a revised Final Forest Conservation Plan (AP 15990) proposing to release this impacted area from the FRO easement, which if approved will generate a 0.64 acre replacement mitigation requirement. The Applicant proposes to provide this mitigation via purchase of forest banking credits. Although this explanation is provided to the Planning Commission for informational purposes, the County Executive has final approval authority of FRO easement releases. Approval of the revised Final Forest Conservation Plan, Site Development Plan, and Combined Preliminary/Final Plat for this development project does not guarantee final approval of the partial release deed by the County Executive. The revised Final Forest Conservation Plan must be approved, the FRO easement partial release deed recorded, and replacement mitigation provided prior to final Site Development Plan approval and prior to the recordation of the Combined Preliminary/Final Plat.

Historic Preservation – Chapter 1-23: There are no historic resources located on this lot.

Summary of Agency Comments

Other Agency or Ordinance Requirements	Comment
Development Review Engineering (DRE):	Conditional Approval
Development Review Planning:	Hold: Address all agency comments as the plan proceeds through to completion.
State Highway Administration (SHA):	Approved
Div. of Utilities and Solid Waste Mngt. (DUSWM):	Approved
Health Dept.	N/A
Office of Life Safety	Conditional Approval
DPDR Traffic Engineering	Approved
Historic Preservation	N/A

RECOMMENDATION

Staff has no objection to conditional approval of the Site Development Plan for a 68,511 square foot, 117 room hotel, on a 2.54-acre site. If the Planning Commission conditionally approves the site plan, the site plan is valid for a period of three (3) years from the date of Planning Commission approval, to March 9, 2019.

Based upon the findings and conclusions as presented in the staff report, the application meets or will meet all applicable zoning, APFO, and FRO requirements once the following conditions are met:

1. Address all agency comments as the plan proceeds through to completion.
2. Prior to final signature approval of the Home 2 Suites Site Development Plan, Lot 100 of the Russell Property Combined/Preliminary Final Plat (AP16118) shall be recorded and the Liber Folio for the newly created Lot 100 shall be listed on the Home 2 Suites Site Development Plan (SP-04-11, AP 15988).
3. Approval of the revised Final Forest Conservation Plan, Site Development Plan, and Combined Preliminary/Final Plat for this development project does not guarantee final approval of the FRO partial release deed by the County Executive. The revised Final Forest Conservation Plan must be approved, the FRO easement partial release deed recorded, and replacement mitigation provided prior to final Site Development Plan approval and prior to the recordation of the Russell Property Lot 100 Combined Preliminary/Final Plat (AP16118).
4. Complete the requirements of the APFO LOU for the Russell Property Lot 100.
5. Construction/Maintenance/Access Easement between Lot 100 and the southern GC Russell Property remainder portion must be recorded and the Liber/Folio numbers shown on the plat, and reflected on the Home 2 Suites Site Development Plan AP 15988.
6. Prior to final signature approval of the Home 2 Suites Site Development Plan the Applicant shall update Note 9 to state that "...Building and pole mounted lights shall not exceed 18'..."
7. Planning Commission approval of the requested light spillage modification in accordance with §1-19-6.500(G), to allow light spillage to 0.5 foot candles at the property line along MD 85 and slightly above .5 foot candles at the northwest corner of the site near the dumpsters as depicted on the Home 2 Suites Site Development Plan.

9. Planning Commission approval of the requested parking space modification in accordance with §1-19-6.220.A.1 to provide 117 parking spaces which is a 6 space reduction from the required 123 number of parking spaces.
10. Planning Commission approval of the requested loading space modification in accordance with §1-19-6.210.D to allow the Applicant to eliminate the requirement to provide on-site loading spaces.
11. Planning Commission approval of the requested parking stall modification in accordance with §1-19-6.220.B.2 to allow an increase in stall width for 10 compact spaces from the required 8'x16' to 9'x16'.

PLANNING COMMISSION ACTION
MOTION TO APPROVE

I move that the Planning Commission **APPROVE** Site Plan-04-11, AP 15988 **with conditions** and modifications as listed in the staff report for the proposed 68,511 square foot hotel, on a 2.54-acre site, based on the findings and conclusions of the staff report and the testimony, exhibits, and documentary evidence produced at the public meeting.

Exhibit 1- Home 2 Suites Site Plan Rendering



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Exhibit 2- Home 2 Suites Light Spillage Modification Request



January 7, 2015

Tolson DeSa
Frederick County Development Review
30 N. Market Street
Frederick, MD 21701

Re: Lighting Modification – Home2 Suites
Project Number 15988
HSA Job No. 7525-HOME2

Dear Tolson:

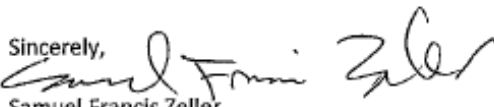
Planning Commission approval of the following lighting modification is requested for the Home2 Suites Site Plan. The modification to Section 1-19-6.500.(D) is outlined below:

As shown on the lighting plan photometrics there are two areas on the plan where lighting levels exceed 0.50 footcandles at the property line. These areas are adjacent to the proposed right of way line of Route 85 and in the northwest corner of the site near the proposed dumpster.

These increased lighting levels will not adversely impact the adjacent properties given the surrounding land uses. Adjacent land uses include MD 85/Buckeystown Pike a major arterial/state highway and in the northwest an existing adjacent storm water management pond and the adjacent Homewood Suites Hotel. The proposed lighting levels quickly drop to zero shortly outside the property boundary. The lighting levels at the edge of Buckeystown Pike reach zero prior to reaching the existing pavement edge which is approximately 80' away and will not negatively impact visibility for drivers on Buckeystown Pike. Lighting in the northwest corner will provide illumination for the proposed drive aisle and parking spaces for the new hotel. This lighting will provide for a safe parking area for those guests that arrive after dark.

Given these reasons it is requested that the Planning Commission approve the proposed lighting modification.

Sincerely,


Samuel Francis Zeller
Vice President

CC: Justin Shelton

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Exhibit 3- Home 2 Suites Parking Space Modification Request



February 19, 2016

Tolson DeSa
Frederick County Development Review
30 N. Market Street
Frederick, MD 21701

Re: Parking Modification – Home2 Suites
Project Number 15988
HSA Job No. 7525-HOME2

Dear Tolson:

In accordance with our discussions, Planning Commission approval of the following parking modification is requested for the Home2 Suites Site Plan. The modification is as follows:

1. Parking Modification – Section 1-19-6.220.(A)(1)
The zoning ordinance uses a table to determine the amount of parking spaces required for a site. Parking shall be limited to the number of spaces required based on an evaluation of each use, hours of operation, etc. An increase or reduction in spaces may be granted by the Planning Commission.

For the 117 room Home2 project we are providing less target spaces than required by the parking table. Per the table a hotel is required to have 1 parking space for each sleeping room plus one space for each 2 employees. We have provided 1 parking space for each of the 117 rooms but are seeking a modification for the required parking spaces for the employees. A maximum of 12 employees during the daytime shift or 6 employee parking spaces are required.

The proposed Home2 will be operated by the same company, Springwood Hospitality as the adjacent 117 room Homewood Suites to the north. Springwood Hospitality operates a number of hotels in both Maryland and Pennsylvania and they have an institutional knowledge of the parking requirements associated with the hotels. Based on their operating experience they have provided at least 1 parking space for each guest room, and for the combined 234 rooms they have provided 237 spaces. The Hilton chain which operates nationally, only requires 1 space per room in their standards. While the goal for hotels is to be 100% occupied that does not always happen. The recently opened Homewood Suites has been running approximately 60% occupancy with several sold out nights.

Furthermore, during the day when the majority of the hotel employees are onsite the majority of guests have left for business or vacation activities. With the guests gone adequate parking is available for the employees. At peak times there may be 27 employees combined at both hotels. During the night there are typically only 1 to 2 employees at each hotel.

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With the Homewood Suites hotel, Springwood Hospitality has found that some of their employees and guests utilize public transit services. They expect a similar situation for the new Home2. Springwood Hospitality has even asked Transit to consider changing the bus service to add more convenient service for the hotel guests and employees. Transit is considering expanding the route of the #10 bus which runs all day long to better serve this area. This would be in addition to the Md. 85 shuttle which only runs once in the AM and PM.

Lastly, there are additional parking opportunities along existing private Westview Drive. Surplus parallel spaces are proposed along Westview Drive that can provide parking should there be an unusual overlap of employee and guest parking demand. Furthermore, the recently approved Westview South Shopping Center that is being constructed adjacent to the Homewood Suites was approved with an over target surplus of 24 spaces that may be available for use by adjacent businesses. Both hotels, the shopping center and future uses have been designed in such a way as to create an interconnected network of roads and sidewalk connections that will provide easy access between these uses and parking areas.

Given these reasons it is requested that the Planning Commission approve the new proposed Home2 with 117 spaces instead of the 123 target spaces.

Sincerely,

Samuel Francis Zeller
Vice President

CC: Justin Shelton

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Exhibit 4- Home 2 Suites Compact Parking Space & Loading Modification Requests



February 22, 2016

Tolson DeSa
Frederick County Development Review
30 N. Market Street
Frederick, MD 21701

Re: Compact Space Dimension and Loading Space Modification – Home2 Suites
Project Number 15988
HSA Job No. 7525-HOME2

Dear Tolson:

In accordance with our discussions, Planning Commission approval of the following parking modification is requested for the Home2 Suites Site Plan. The modification is as follows:

Per Section 1-19-6.220.(B)(2) an increase in stall and aisle width dimensions may be granted when recommended by the Community Development Division Traffic Engineer and approved by the Planning Commission or their authorized representative, for the following:

- (a) Safety or site circulation needs which shall be based on an evaluation of land use turnover rates (ITE Traffic Engineering Handbook, 6th Edition as amended), circulation efficiency, and parking availability.

On the basis of circulation efficiency, we are requesting to increase in the width of the compact stall size from the standard 8' to 9'. Patrons of the hotel will be bringing luggage with them to the hotel and the extra foot would aid in circulation and decrease the risk of damage to patron's cars. Given these reasons it is requested that the Planning Commission approve the new proposed Home2 with a 9' x 16' compact space as opposed to the standard 8' x 16' compact space.

In regards to loading space requirements and just like the adjacent Homewood Suites the New Home2 does not need a designated loading space for tractor trailers. Deliveries typically occur at the entrance and can be accommodated in the design that you see on the plan. The lack of a loading space reduces impervious surface and increases the efficiency of the operation. Interference with guests and staff is not an issue at their other locations where this occurs.

Sincerely,

Samuel Francis Zeller
Vice President

cc: Justin Shelton

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