



FREDERICK COUNTY PLANNING COMMISSION
December 10, 2014

TITLE: Costco Wholesale: Intercoastal Industrial Center Lot 9-A

FILE NUMBER: SP-02-21, AP 14792, APFO 14794, FRO 14795

REQUEST: Site Development Plan Approval

The Applicant is requesting Planned Industrial Site Development Plan approval for a 593,480 square foot warehouse and distribution (e-commerce) facility to be constructed in 2 Phases, on a 111.63-acre site

PROJECT INFORMATION:

ADDRESS/LOCATION: 5236 Intercoastal Dr, located along Intercoastal Drive, south of Baldwin Road.

TAX MAP/PARCEL: Tax Map 88, Parcel 6 (Lot 9-A)

COMP. PLAN: General Industrial

ZONING: General Industrial

PLANNING REGION: New Market

WATER/SEWER: W-3/S-3

APPLICANT/REPRESENTATIVES:

APPLICANT: Intercoastal Industrial Park, LP

OWNER: Intercoastal Industrial Park, LP

ENGINEER: Bohler Engineering

ARCHITECT: N/A

ATTORNEY: N/A

STAFF: Tolson DeSa, Principal Planner II

RECOMMENDATION:

Conditional Approval

ATTACHMENTS:

Exhibit 1-Site Plan Rendering

Exhibit 2-Parking, loading, lighting modification request

STAFF REPORT

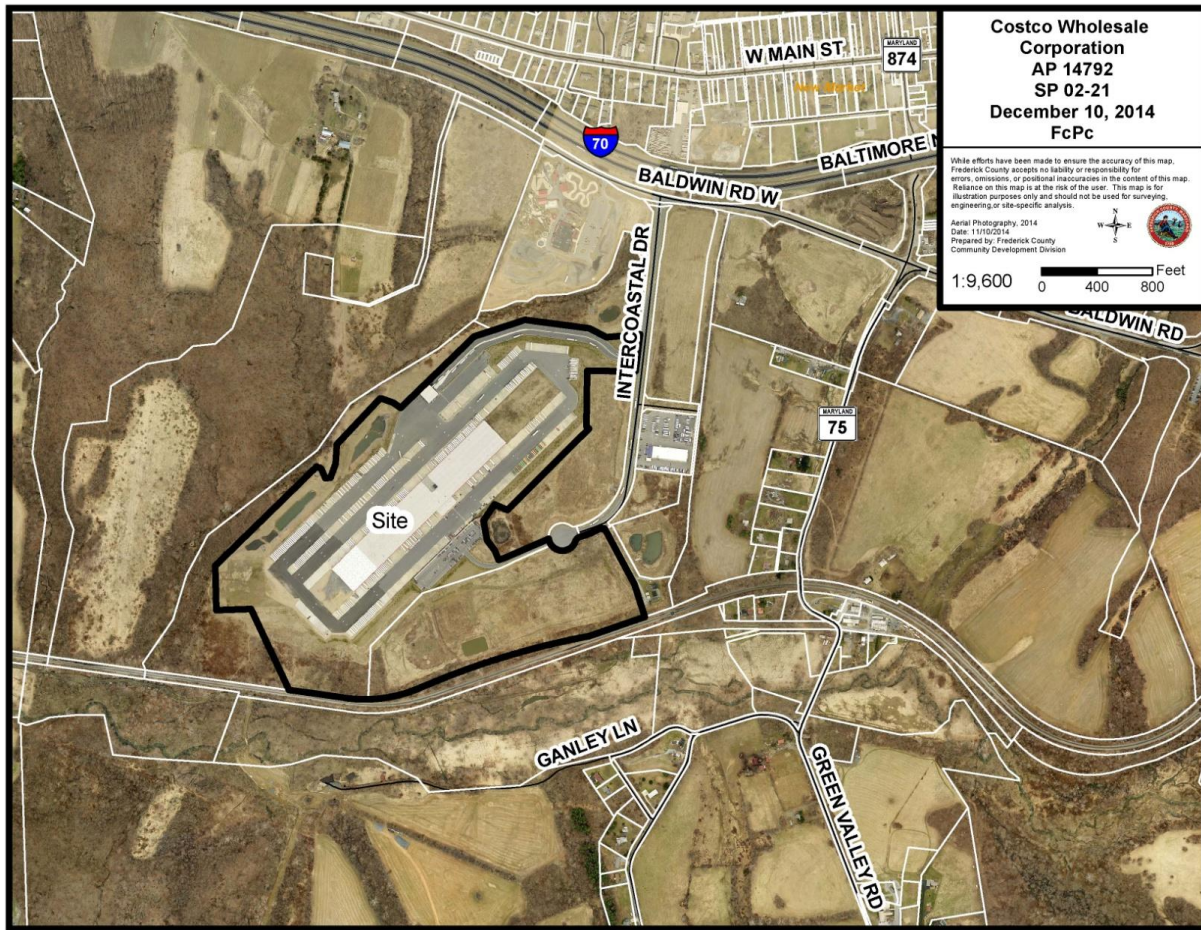
ISSUE

Development Request

The Applicant is requesting site plan approval for a 593,480 square foot warehouse distribution (e-commerce) facility with 100 associated parking spaces and 32 loading spaces, on a 111.63-acre site (the "Site"). The proposed use is being reviewed as a "Wholesaling and/or warehouse" land use under the heading of *Wholesaling and Processing* per §1-19-5.310 Use Table in the Zoning Ordinance and is a principal permitted use in the General Industrial (GI) Zoning District subject to site development plan approval. This project is also being reviewed and approved under the provisions of Zoning Ordinance Section 1-19-10.300 Planned Commercial/Industrial Development Standards.

The proposed 593,480 square foot Return to Vendor (RTV)/E-Commerce Facility will be located in the existing Intercoastal Industrial Center adjacent to the existing Costco facility. The Applicant has submitted a concurrent application for a Final & Addition Plat (AP#14908) to combine the existing Costco facility site with the site for the proposed new facility. The combined lots and overall development are being reviewed under the Planned Industrial Development process. The proposed expansion will be separated into two construction phases. Phase 1 will consist of 209,380 square foot structure with 18 loading spaces. Phase 2 includes a total of 387,100 square feet of building expansion broken down into three separate areas: a 105,560 square foot building expansion area with 14 additional loading spaces to the west of Phase 1, a 65,660 square foot building expansion to the south of Phase 1, and a 215,880 square foot building expansion to the east of Phase 1.

Graphic #1 Site Aerial



BACKGROUND

Development History

The portion of the Site that is the subject of the current application was previously developed with a stormwater management basin. The overall Site is being redeveloped and the existing stormwater management basin is being reconstructed to mitigate the stormwater impact from the proposed development.

Existing Site Characteristics

The proposed warehouse distribution (e-commerce) facility would be located on a site that is currently zoned General Industrial (GI), and is immediately adjacent to the developed 344,355 square foot existing Costco warehouse facility. The property to the north of the existing Costco site is developed with Adventure Park. The properties to the east are vacant lots, with the exception of Lot 21, which is developed with Office and Warehouse for Colonial Equipment. The property to the west beyond the existing Costco site is currently zoned Agricultural and is vacant. Immediately to the south of the subject property is the CSX rail line.

Previous Site Plan Approvals: The Site Plan for Phase 1 development of Lot #1 (“Adventure Park USA”) was approved by the FcPc in January 2003. Improvements have only recently been made to Baldwin Road and Rt. 75. Phase 1 has been constructed and is operational.

The FcPc approved the site plan for Colonial Equipment in November 2006. Part of that approval dealt with the construction timing of the road connection to the property to the east of this development. At the November 14, 2007 FcPc meeting the FcPc also approved the Costco Warehouse site plan, which covers the adjacent 84 acres.

With the exception of the existing Costco Lot 9 and Lot 21 “Colonial Equipment”, no other lots have been platted or recorded. The Applicant recently submitted plats for the remaining lots. As a condition of approval the Applicant will have to record an addition plat, which will create the 111.63 acre parcel for this proposed Costco expansion.

Continuing Community Impacts

Since the initial opening of the Costco Warehouse, the neighborhood has been continuously impacted by Costco vender trucks illegally parking and causing closures to MD 75 when trucks either get stuck under or back up from the CSX bridge. This has caused a burden to the welfare of the motoring public who travel along MD 75 when trucks frequently cause a shutdown of the road. It also impacts the Sheriff’s Department staff and state troopers who are called to cite and help remedy the situation. The problem of trucks arriving early and waiting overnight in the vicinity has largely been remedied by Costco’s proactive decision to waive early arriving trucks onto its sight. The same is true, to some extent, for trucks leaving the Costco site. However, trucks generally park along Intercoastal Drive legally when exiting the Site if the drivers are beyond the requisite federally mandated driving hours.

The Applicant has agreed to work with the State Highway Administration (SHA) and the County to provide additional and very visible overhead signs in an attempt to persuade trucks that will not fit under the CSX Bridge over MD 75, not to make the attempt before they turn onto Green Valley Road. As many of the truck drivers just do not read the sign, the expectation among professionals is that the disruptions would only be lessened. The best solution to preventing trucks from being stuck under the CSX Bridge, or having to back up to avoid being stuck, is to provide two truck turnaround areas on both sides of the bridge. This solution has been studied by SHA and the Applicant has been asked to consider partnering with SHA to help accomplish this much needed improvement, but to date the Applicant has not agreed to help with this improvement.

ANALYSIS

Summary of Development Standards Findings and Conclusions

The key issues associated with this development proposal are the overall design and circulation of the proposed facility combined with the existing Costco warehouse distribution center. Overall on-site and off-site transportation concerns were also identified during the development review process.

Detailed Analysis of Findings and Conclusions

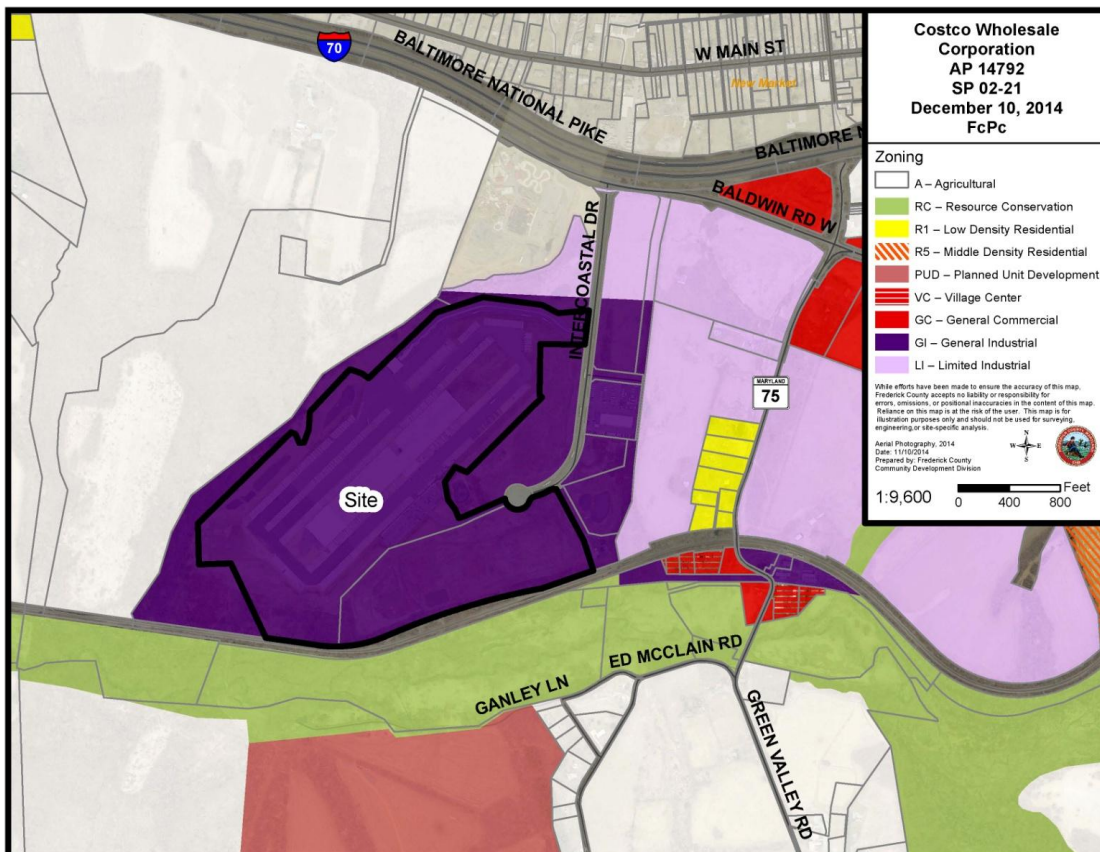
Site Development Plan Approval shall be granted based upon the criteria found in §1-19-3.300.4 Site Plan Review Approval Criteria of the Frederick County Zoning Ordinance.

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:** Although the Planned Commercial/Industrial provisions state that setbacks and height shall be established by the Planning Commission based upon the underlying zoning district and other factors, the Applicant has chosen to adhere to the dimensional standards in the GI zoning district. The GI zoning district requires a front yard setback of 25', a 15' side yard setback, a 40' rear yard setback, and a maximum height of 60'. As provided in Zoning Note 8 on sheet 2, the proposed site plan meets all of the dimensional requirements and bulk standards within the GI Zoning District.

Graphic #2: Site Zoning Map



Costco Wholesale: Intercoastal Industrial Center Lot 9-A

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2. **Signage §1-19-6.300:** No additional signage is being proposed as part of this development expansion.
3. **Landscaping §1-19-6.400:** The Applicant has submitted a landscape plan in accordance with the requirements of §1-19-6.400.

The Applicant is proposing to retain a significant amount of landscaping around the periphery of the Site in order to satisfy the screening requirements. In addition to the on-site preservation the Applicant is also proposing to augment the Site with 26 deciduous trees that will provide visual interest to the Site as well as increase the canopy cover and screening. The Applicant has satisfied all of the requirements of 1-19-6.400.

4. **Screening §1-19-6.400:** In addition to the proposed landscaping plan, there is a large area of permanently preserved forested areas along the western boundary of the Intercoastal Industrial Park. This area provides additional screening to the west of the Site. The southern boundary of the Site is also screened by proposed landscaping as well as existing preserved forested areas, adjacent to the railroad tracks.
5. **Lighting §1-19-6.500:** The Applicant has prepared a lighting plan in accordance with Zoning Ordinance Section 1-19-6.500, see sheet 13 of 13 of the site plan. The Applicant has submitted a lighting modification request for lighting pole height above the required 24' foot tall maximum height for the industrial zoning districts (See Exhibit #2). The requested modification is a result of Costco utilizing LED lights throughout the proposed facility. The Applicant has stated that the LED lights will be installed on taller poles, in order to reduce the amount of poles throughout the Site. The Applicant is proposing 20 light poles at a height of 39' from the finished grade.

The Applicant is also proposing 2 pole lights at a height of 20' as well as 43 wall pack lights to be mounted at various heights from 20' to 25'.

There are several areas where there is slight light spillage over 0.5 foot candles; the Applicant will work with staff in order to reduce those light levels in order to adhere to the requirements of Z.O. Section 1-19-6.500. The Applicant is proposing to dim the entire Site to security levels during all non-business hours, approximately between 8:00PM and 2:00 AM. Staff has no objection to the requested lighting pole height modification request.

Conditions

Lighting Modification: In accordance with Z.O. Section 1-19-6.500.G: To provide 39' high poles in lieu of the maximum 24' poles.

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 existing truck access and egress off of Intercoastal Drive will be utilized for the proposed expansion. The Applicant has separated truck and employee vehicle access points and internal circulation patterns. There is no mixing of the truck and employee vehicle traffic. There is, however, an emergency connection designed that will allow use of one

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internal circulation pattern if the other one becomes blocked. The truck access is roughly 1,150' from the Baldwin Road entrance. The trucks are required to pass through another 1,725' internal lane that leads to a weighing and guard station. From there, all truck-parking spaces have "through-movement" or loop road access.

The Return to Value (RTV) trucks will use the existing access point, proceed through the existing checkpoints and drive southwest around the existing facility down the hill to the proposed warehouse facility, off-load/pick-up, then travel back up the hill using the same truck route and out of the Site via the existing access and check-out stations. This route is intended for truck traffic only; trucks will not be permitted to travel east and through the employee parking area or around the proposed structure.

2. **Connectivity §1-19-6.220 (F):** The Costco warehouse distribution "campus" is designed as a secure facility that requires check-in and check-out of every truck and vehicle entering the access drive. The Site will contain separate access points for the trucks and employee traffic. The Site has a security fence which will be extended around the entire 111.63 acre Site, which discourages connectivity. However if in an emergency either access point gets blocked there is an alternative route for both employees and trucks in order to gain access onto Intercoastal Drive.
3. **Public Transit:** This Site is not served by Transit
4. **Vehicle Parking §1-19-6.220:** Although the proposed use is a warehouse, the proposed parking calculations are based on the category of 'All Industrial Use' rather than 'Warehouse' due to the proposed activities on-site, the number of proposed employees, and to maintain consistency with the existing Costco facility. Required parking for the category of 'All industrial uses' is calculated at 1 space for every 2 employees (on the largest shift for which the building is designed) plus 1 for each motor vehicle used in the business. Therefore, 180 employees, require 90 parking spaces. The Applicant is not proposing to have any business vehicles on site. The Applicant has proposed 100, including four (4) ADA accessible spaces. In accordance with Z.O. Section 1-19-6.220.A.1, the Applicant is seeking a parking space modification for approval of ten (10) spaces over the target number of 90 (see Exhibit#2). Costco is anticipating adding additional employees at a later date, which would bring the need for the number of parking spaces closer to the proposed 100 spaces. Staff has no objection to the modification request. The Applicant was asked to provide parking on-site to minimize impacts of trucks parking upon exit on Intercoastal Drive when the drivers have exceeded the federally required maximum hours. To mitigate this, the Applicant is conditioned to re-stripe Intercoastal Drive by moving the center strip over 8' toward the side where it is not legal to park, thus making it less likely trucks would park illegally.
5. **Loading §1-19-6.210.B:** For industrial uses over 5,000 square feet, the Zoning Ordinance requires 1 large + 1 additional large loading space is required for each additional 10,000 sq. ft. of total building net floor area or part thereof over 5,000 sq. ft. Proposed building square footage totals 593,480 square feet. Therefore, this Site requires 60 - 12'x50' loading spaces. The Applicant has provided 32 large loading spaces, and therefore is seeking a modification from the requirements of Zoning Ordinance Section 1-19-6.210.B, for a reduction of 28 loading spaces (see Exhibit#2). Costco is confident that their Return to Vendor and E-Commerce warehouse and shipping model will be successful and efficient with the 32 loading spaces proposed. Staff has no objection to this modification request based on the Applicant's knowledge of activities and operations proposed on-site.
6. **Bicycle Parking §1-19-6.220 (H):** In accordance with Z.O. Section 1-19-6.220, the Applicant is required to provide 1 bike rack per 40,000 SF of GFA, minimum 1, maximum 10. The Applicant has proposed 10 bike racks to be located on the south side of the cul-de-sac bulb located within the employee parking lot for the proposed structure.

- 7. Pedestrian Circulation and Safety §1-19-6.220 (G):** The proposed building has sidewalk along the full length of the northern building exposure and a majority of the eastern building facade. The sidewalk corresponds with the proposed employee parking areas. There are no sidewalks along Intercoastal Drive.

Conditions

Parking Modification: Z.O. Section 1-19-6.220.A.1, the Applicant is seeking a parking space modification for approval of ten (10) spaces over the target number of 90.

Loading Space Modification: Zoning Ordinance Section 1-19-6.210.B, the Applicant is seeking a modification for approval of a reduction of 28 loading spaces.

Vehicle Parking: The Applicant shall work with County Staff to re-stripe Intercoastal Drive by moving the center strip over 8' toward the side where it is not legal to park. This requirement shall be noted on the site plan, and completed prior to issuance of the final building permit.

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/the Frederick County Health Department.*

Findings/Conclusions

- 1. Public Water and Sewer §[1-19-enter]:** 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 New Design WTP and Sewer flowing into the Interim Monrovia Sewer Plant and ultimately being treated at the Bush Creek Interceptor.

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:** Topography of the Site is relatively flat, with slopes less than 5%. The grades change significantly as the Site transitions from the north to the south.
- 2. Vegetation:** The majority of the Site area is comprised of tall grasses, with the periphery of the Site remaining in forested areas. The majority of the remaining existing forested areas are protected with a FRO easement area that was required during the existing Costco facility review process. This remaining protected forested areas help to provide a full screen, adjacent to the agricultural land along the entire western boundary of the Intercoastal Industrial Park.
- 3. Sensitive Resources:** There are two areas of HdA and RoB wet and flooding soils located within the southeast corner of the site. The Applicant shall address the standards for developing and mitigating wet and flooding soils in accordance with Z.O. Section 1-19-9.110.7 prior to final site plan approval.
- 4. Natural Hazards:** There are no natural hazards located on site.

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.*

1. **Proposed Common Area:** The Site is an industrial place of business used for warehouse and distribution without any retail component. There are no common areas proposed or required.

Other Applicable Regulations

Moderately Priced Dwelling Units – Chapter §1-6A: The proposed use is non-residential; therefore, MPDU's are not required.

Stormwater Management – Chapter §1-15.2: All Site stormwater management (SWM) shall be in accordance with the “2007 Maryland Stormwater Design Manual”. SWM quality management will be provided by 13 microbioretention facilities. A Stormwater Concept Plan has been submitted and approved.

Subdivision Regulations – Chapter §1-16: In order to permit the existing and proposed Costco facilities to be located on one 111-acre parcel a final & addition plat had to be filed in order to create Lot 9A a legal lot of record. The plats have been submitted and reviewed; the recordation of these plats will be listed as a condition of approval of this site plan.

Planned Commercial/Industrial Development Standards-§1-19-10.300: This development proposal adheres to all of the standards listed in Z.O. Section 1-19-10.300.

§1-19-10.300. (A) *Purpose and intent.* In summary, the Planned Commercial/Industrial Development process is intended to encourage a concentration of uses and limit strip development, to provide for controlled access/convenience/efficiency for users, and to allow more than 1 principal use or building on a single lot in the GC, ORI, LI and GI zoning districts where flexibility in planning can be permitted without disturbing the neighborhood. Within the General Industrial the Planned Commercial/Industrial development process allows the use and development of a site for multiple users that may rotate over time without the necessity of subdividing the property. It allows for efficient and full use of an existing site that is larger in size than what is needed by an individual user. Staff has worked with the Applicant to achieve the purpose and intent of the development process as it would apply to the General Industrial zoning district. The proposed development meets the requirements of this section.

The layout and location of the existing and proposed E-commerce distribution center use helps to reduce sprawl through efficient use of the existing warehouse distribution industrial site.

§1-19-10.300. (C) *Design standards.* The proposed development meets the design standards of this section. The layout has been designed to provide safe and efficient arrangement of land uses facilitating vehicular access into and throughout the site.

The proposed uses comply with applicable supplementary Industrial district regulations as well as the Industrial District Performance Standards provided in §1-19-7.600 and §1-19-7.610.

APFO – Chapter 1-20:

1. **Schools.** This Site is a non-residential use and therefore is exempt from school testing.
2. **Water/Sewer.** While the public sewer and water facilities are currently adequate to serve the project, the Applicant recognizes that capacity is not guaranteed until purchased. APFO approval for sewer and water does not guarantee that plats will be recorded or that building permits will be issued. Plat recordation and building permit issuance are subject to compliance with the Annotated Code of Maryland, Environment Article Section 9-512, et. seq and all applicable County regulations, including but not limited to Sec. 1-16-106 of the Frederick County Subdivision Regulations.
3. **Roads.** This Site does not exceed the roads trip cap and is exempt from further review.

Forest Resource – Chapter 1-21: A forest conservation plan was approved for the Intercoastal Industrial Center in 2008, which resulted in the recordation of onsite FRO easements (14.11 acres of forest retention and 18.17 acres of newly planted forest). The Applicant has submitted a revised FRO plan that proposes to revise one of the previously recorded FRO easements. Approximately 0.45 acres of planted easement area is proposed to be released, 0.18 acres of existing forest under easement is proposed to be cleared and replanted, and an area of existing easement that was to be planted per the 2008 FRO plan will be graded and replanted. In addition, the Applicant is proposing to clear 0.66 acres of forest that is not within the existing FRO easement. To mitigate for the impacts to the existing FRO easement and the proposed new forest clearing, the Applicant is replanting a portion of the established FRO easement area, planting 0.82 acres of new forest easement area, and providing a new easement over 1.31 acres of existing forest that was not previously protected. The revised FRO plan must be approved prior to final approval of the site plan. Since the authority to release the existing FRO easement lays with the County Executive, the proposed FRO easement release must be executed and new easements (replacement mitigation for the released area) must be recorded prior to final site plan approval.

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

Summary of Agency Comments

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

RECOMMENDATION

Staff has no objection to conditional approval of the Site Development Plan. 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.

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:

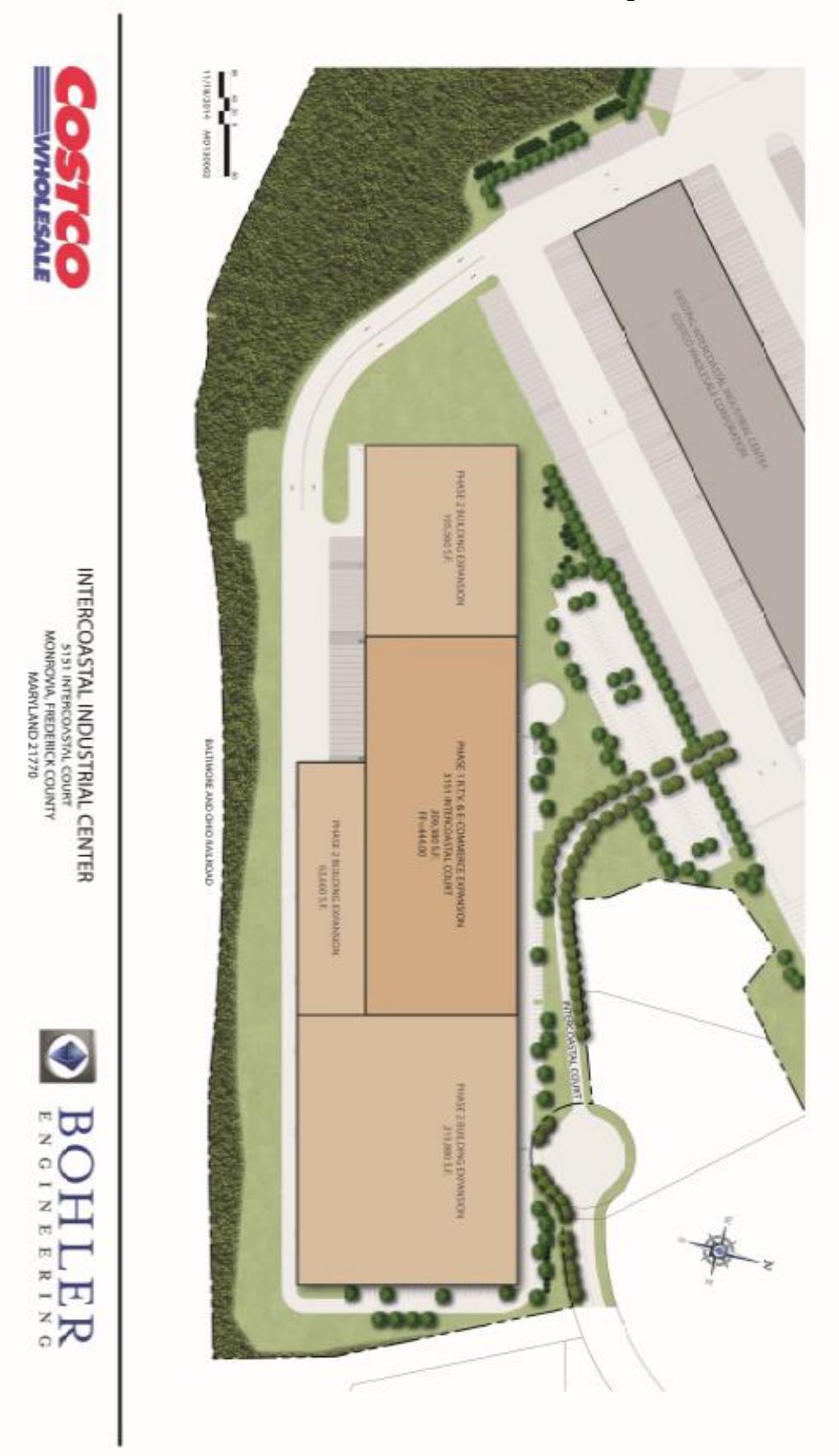
1. Address all agency comments as the plan proceeds through to completion.
2. The revised FRO plan must be approved, the proposed FRO easement release must be executed, and the new FRO easements (replacement mitigation for the released area) must be recorded prior to final site development plan approval. The Applicant shall update FRO note #2 on sheet 2 to state the following "Revisions to the existing FRO easement boundaries must be executed prior to final site development plan approval".
3. Final Plat AP 14908 shall be recorded and the respective liber folio numbers listed on the site plan.
4. Planning Commission approval of the requested parking space modification of the ten (10) spaces over the target number of 90.
5. Planning Commission approval of the loading space modification request for a reduction of 28 loading spaces.
6. Planning Commission approval of the lighting modification to allow 39' high light poles in lieu of the maximum of 24' poles for industrial uses. The Applicant will work with staff in order to address any site lights that allow light spillage over 0.5 foot candles at the property line.
7. The proposed uses shall comply with applicable Supplementary Industrial District Regulations as well as the Industrial District Performance Standards provided in §1-19-7.600, §1-19-7.610.
8. The Applicant shall address the standards for developing and mitigating wet and flooding soils in accordance with Z.O. Section 1-19-9.110.7 prior to final site plan approval.
9. The Applicant shall work with County Staff to re-stripe Intercoastal Drive by moving the center strip over 8' toward the side where it is not legal to park. This requirement shall be noted on the site plan, and completed prior to issuance of the final building permit.
10. The Applicant shall work with the SHA and County Staff to make signing and striping improvements to the external road system in order to minimize truck impacts within the community. The scope of improvements shall be finalized as site plan conditions prior to final Site Development Plan approval.

PLANNING COMMISSION ACTION

MOTION TO APPROVE

I move that the Planning Commission **APPROVE** Site Plan SP-02-21 (AP #14792) **with modifications and conditions** as listed in the staff report for the proposed 593,480 square foot warehouse distribution facility based on the findings and conclusions of the staff report and the testimony, exhibits, and documentary evidence produced at the public meeting.

Exhibit #1: Costco RTV Site Plan Rendering



Costco Wholesale: Intercoastal Industrial Center Lot 9-A

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Exhibit #2: Costco RTV Site Plan Modification Requests

October 9, 2014
Via Federal Express

Anne Arundel County
Permit Application Center
2664 Riva Road
Annapolis, MD 21401

Re: Modification Request
Proposed Costco E-Commerce
and RTV Depot
Intercoastal Industrial Center
Frederick County, MD
BECF #MD130002

To Whom It May Concern:

Bohler Engineering on behalf of its Client, Costco Wholesale, Inc., is seeking a modification to the regulation pursuant to Section 1-19-6.220 which states that: "All industrial use and solid waste operations [require] 1 [parking space] for every 2 employees (on the largest shift for which the building is designed) plus 1 for each motor vehicle used in the business. Costco proposes to provide 100 spaces in lieu of the required 90 spaces. The request for relief arises from the need for Costco to provide the maximum number of parking stalls. The E-Commerce part of Costco's business may require more personnel in the future than is currently anticipated, and Costco is accounting for an increase in personnel in the future to 200 employees. Therefore, 100 spaces would be required by Code.

Costco Wholesale, Inc. is additionally seeking a modification to the regulation pursuant to Section 1-19-6.210(B) which states that: "Single-user retail, all industrial and all wholesale over 5,000 square feet [require] 1 large + 1 additional large for each additional 10,000 square feet or part thereof over 5,000 square feet." Costco proposes 32 spaces in lieu of the required 60 spaces. The request for relief arises from the nature of E-Commerce and Return to Vendor business model that Costco anticipates. Costco believes at this time that the depot can be serviced with the loading spaces proposed.

Costco Wholesale, Inc. is additionally seeking a modification to the regulation pursuant to Section 1-19-6.500(B) (3) which states that: "Pole and building mounted lighting shall not exceed a maximum height of...24 feet for industrial uses." Costco proposes to provide 39' high light poles in lieu of the maximum 24' poles. The request for relief arises from site lighting for Costco now being LED lights to improve energy and longevity of the fixtures. The taller pole height reduces the number of lights required thus reducing energy usage. Property line maximum light levels will be maintained.

In light of the aforesaid, it is our contention that the above modifications should be granted. We would request your confirmation of the same.

If you should have any questions or require additional information, please do not hesitate to contact our office at (410) 821-7900.

Sincerely,
BOHLER ENGINEERING

Andrew Stine, P.E.
Assistant Project Manager