TITLE: Arcadia Business Park – Lot 3  
(Formerly the Russell Property)

FILE NUMBER: SP04-11, AP 18859, APFO AP 18860, 
FRO AP 18861

REQUEST: Site Plan Approval
The Applicant is requesting Site Plan approval as a 
Planned Industrial Development to construct a one-story 
123,760 sf building on a 15.90 acre site.

PROJECT INFORMATION:
LOCATION: Buckeystown Pike (MD 85), north of English Muffin Way.  
ZONE: Limited Industrial (LI)
REGION: Adamstown
WATER/SEWER: W-1, W-3 / S-3
COMP. PLAN/LAND USE: Limited Industrial (LI)

APPLICANT/REPRESENTATIVES:
APPLICANT: Russell Holdings, LLC c/o St. John’s Properties
OWNER: Russell Holdings, LLC c/o St. John’s Properties
ENGINEER: Harris Smariga and Associates, Inc.
ARCHITECT: N/A
ATTORNEY: N/A

STAFF: Graham T. Hubbard, Principal Planner I

RECOMMENDATION: Conditional Approval

ATTACHMENTS:
Exhibit 1 – Site Plan Rendering
Exhibit 2 – Modification Requests
ISSUE
Development Request

The Applicant is requesting Site Plan approval as a Planned Industrial Development to construct a one-story 123,760 sf building on a 15.90 acre site. Due to the speculative nature of their business model, the Applicant has provided a list of proposed uses all of which are principal permitted in the Limited Industrial (LI) Zoning District subject to Site 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 purpose of the Planned Commercial/Industrial Development provisions, in part, is to allow for more than one (1) principal use or building on a single lot in the GC, ORI, LI and GI zoning districts.

Figure #1: Arcadia Business Park Lot 3: Site Aerial
BACKGROUND

Development History

The original property (approximately 140 acres) from which this subject property was developed, has the following re-zoning history:

- The original property was zoned Agriculture on the 1959 Frederick County Zoning Map.
- A 1970 rezoning changed the zoning to Residential Mobile Home District.
- The entire original site was comprehensively rezoned to Planned Unit Development (PUD) in 1972.
- The 1977 Zoning Maps were updated in 1989, and showed a 1988 rezoning of the property into several zones, but primarily Office/Research/Industrial (ORI) for about 95% of the Russell Property.
- The 2000/2001 Adamstown Comprehensive Rezoning process changed the ORI zoning to limited industrial (LI).
- 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.
- In 2006, the Preliminary Plan (AP 4164), received a three year approval with an 8/16/2009 expiration date. Under Ord. #09-23-527 the expiration date was extended three years to 8/16/2012. In 2011, under a second ordinance, the project’s expiration date was further extended to 8/16/2015. The Applicant recorded all of the plats for the 6 lots shown on the Russell Preliminary Plan prior to 8/16/15, and therefore, has vested the Preliminary Plan.
- APFO (AP 4042) approval was originally granted for three years or until 8/16/2009. Similar to the Preliminary Plan, the APFO was also extended twice, resulting in an expiration date of 8/16/2015. The Applicant recorded all of the plats for the 6 lots shown on the Russell Preliminary Plan prior to 8/16/15 and has satisfied all requirements of the Letter of Understanding (LOU), and therefore has vested the APFO portion of the Preliminary Plan.
- 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 also extended twice to 8/16/2014, and expired on that date.
- Staff worked with the Applicant toward plat recordation and vesting prior to expiration. As part of that process, the project was resubmitted for site plan review. Staff worked with the Applicant to bring the previously approved site plan further into compliance with the existing Code within the confines of the recorded plats and avoiding complete redesign of the project.
- On October 14, 2015 the FCPC approved site plans for Russell Lots 1, 2 and 6.
- In January 2017, a Preliminary Plan was approved for Lots 1-6 (AP 16796).
- Also in January 2017, Site Plans were approved for Lots 5 and 6 (AP 16799 and AP 16802).
- In May 2017, an Addition Plat was recorded to add 0.71 acres of land to Lot 6 from the adjacent Country Side development to provide fee simple legal access (PB.98 PG.143, AP 17098).
- In December 2017, an Addition Plat was recorded to combine Lots 1-6, dissolve three outlot parcels, and vacate the public right-of-way for Arcadia Drive (PB.99 PG.128, AP 17536).
- In December 2018, a Final Plat was recorded for Lots 5 and 6 (PB.101 PG.116-117, AP 17770).

A Site Plan for Arcadia Business Park Lot 1 is also on the Planning Commission agenda for this February 13, 2019 meeting.
Existing Site Characteristics

The site is currently zoned Limited Industrial (LI), and the vacant property has been mass graded. The site is bordered by Westview South to the north (across the Lot 5 panhandle) and Wedgewood Business Park to the south and west.

Figure #2: Arcadia Business Park Lot 3: Zoning
ANALYSIS

Summary of Development Standards Findings and Conclusions

The site presents several issues that added challenges to the development of this project.

1. **Adjacent Residential Development**:
   a. The Arcadia Business Park development surrounds the Countryside PUD (approximately 35 acres) on the south, west and northern sides. Originally, the entire area of the Russell development site was part of a residential PUD. Only a 30-acre portion was actually developed with attached single family units, an additional 5-acre buffer behind the units was added, creating a total of 35 acres within Countryside PUD.
   b. To address the limited site-access problems, the Applicant acquired land from the adjoining Countryside PUD development. The Applicant worked with the Home Owners Association (HOA) to acquire the additional land needed for a safe entry.
   c. The Arcadia Business Park development plan adds landscape improvements designed to mitigate the effects of an existing residential development that is surrounded by a planned industrial development.

2. **Historic Arcadia Mansion Farm**:
   a. The Arcadia Mansion Farm is located in between MD 85 and Lots 5 and 6 of the Arcadia Business Park development project. Arcadia is listed in the National Register (NR) but is zoned LI and currently under the ownership of Calvary Independent Baptist Church of Mount Airy Inc. The main farm-house is a two and one-half-story structure built about 1790, with post-Civil War additions. There is a bank barn, carriage house and wagon shed/corn crib on the site and these are structures of historical importance as part of the Arcadia farm complex.

3. **Site Access**:
   a. A short dead-end road "Conestoga Trail" serves the Countryside townhouse development. An extension (Arcadia Drive) of Conestoga trail is proposed and reflected on this revised Preliminary Plan (AP 16796). This entrance is designed as a monumented access onto MD 85 and will eventually provide a safer access into the Countryside development due to a planned traffic light to be constructed at MD 85 and the existing Conestoga Trail.
   b. Arcadia Drive is also proposed to connect to Wedgewood Boulevard to the west, via a private drive, which would provide for two full movement access points for Arcadia Business Park.
   c. SHA design for a bridge reconstruction across Ballenger Creek and Ballenger Creek floodplain and impacts to the Arcadia Mansion prevented the Applicant from developing a site entry on MD 85 north of the Arcadia Mansion Farm.

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:** This section of the Zoning Ordinance stipulates the setback requirements for the LI zone and the minimum lot area for the proposed use. The setback requirements are 25-foot front and 20-foot rear, and side yards equal to the height of the structure. The proposed building location meets the minimum setback requirements and the proposed building height is 38 feet. The proposed plan meets the required Bulk/Dimensional requirements.

2. **Signage §1-19-6.300:** In accordance with this section, the signage allotment permitted for Lot 3 is 780 sf. The Applicant is proposing 780 sf of building mounted signage for this lot, leaving 0 sf of signage available for entrance signs to the business park. The Applicant has provided an overall signage breakdown for the entire Arcadia Business Park on Sheet 4 of the Site Plan.

3. **Landscaping and Screening §1-19-6.400:** The Applicant has proposed a Landscape Plan that includes street trees, parking lot landscaping, and screening along exterior property lines.
   
   a. **Street Trees:** The Applicant is required to provide 1 tree for every 35 linear feet of public road frontage. Lot 3 has 358’ of frontage along the proposed Arcadia Drive, which requires 11 Street Trees. The Applicant has provided 11 Street Trees.
   
   b. **Parking Lot Landscaping:** The Applicant is required to provide 20% parking lot canopy coverage for each parking lot. The Applicant is exceeding this requirement.
   
   c. **Screening along exterior property lines:** The Applicant has provided a mixed evergreen and deciduous screen buffer to the south, north, and west of the proposed buildings.

4. **Lighting §1-19-6.500:** The Zoning Ordinance provides that pole and building mounted lighting shall not exceed a maximum height of 24 feet for industrial uses. The Applicant has submitted a lighting plan that proposes 24 foot tall pole lights as well as 17 foot tall building mounted lights throughout the Site, which complies with Zoning Ordinance requirements. The Zoning Ordinance also states that lighting shall not exceed 0.5 foot-candles as measured from the property line. The Applicant is requesting a lighting modification under §1-19-6.500 to allow light spillage in excess of 0.5 foot-candles, up to a maximum of 7.8 foot-candles, over lot lines interior to the overall Arcadia Business Park Development, including areas of Arcadia Drive (See Exhibit #2).

   Staff has no objection to the light spillage proposed due to the integrated industrial park design as well as providing improved levels of lighting and safety for the users of all lots, Arcadia Drive and the overall Arcadia Business Park. The lighting has been designed and will be installed to be fully shielded and directed downward to prevent glare and light trespass onto adjacent (exterior) properties, roadways, and the nighttime sky.

Modifications/Conditions:

The Applicant is seeking a modification under §1-19-6.500 to allow light spillage exceeding 0.5 foot-candles over lot lines interior to the overall Arcadia Business Park Development including areas of Arcadia Drive (See Exhibit #2).

**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 previously approved Preliminary Plan proposed Arcadia Drive as a public road (cul-de-sac) with a 60’ wide right-of-way and a length of 1,621 feet. The Applicant is now proposing to extend this Arcadia Drive by approximately 453 linear feet to a length of 2,074 feet, to better serve the business park. In keeping with the previously approved Preliminary Plan, the Applicant is also proposing to construct a 20’ wide private road to the south of proposed Lot 3 in order to serve as a future full movement connection to Wedgewood Boulevard. This connection would eventually provide all of the proposed lots with access to both MD 85 and Wedgewood Boulevard.

2. Connectivity §1-19-6.220 (F): The Applicant has worked with Staff to provide a 60’ wide right-of-way for the construction of Arcadia Drive and a 20’ wide private road to the south of proposed Lot 3 in order to serve as a future full movement connection to Wedgewood Boulevard. This connection would eventually provide all of the proposed lots with access to both MD 85 and Wedgewood Boulevard.

3. Public Transit: This Site is served by the MD 85 Commuter Shuttle, which runs Monday through Friday and drops off/picks up at Wedgewood Boulevard and English Muffin Way in the adjoining Wedgewood development. Although not yet funded, Transit is planning to expand this route to full Connector status, thus increasing the days of service and improving headways.

4. Vehicle Parking and Loading §1-19-6.200-through 1-19-6.220: In accordance with Z.O. §1-19-6.220.A.1: For the purpose of this chapter, the parking space requirements in the following table will apply. Parking shall be limited to the number of spaces required based on an evaluation of each proposed use, hours of operation, and joint or shared parking agreements. An increase or reduction in the number of required parking spaces may be granted by the Planning Commission where the applicant or Planning Commission authorized representative can demonstrate need based on characteristics of the proposed use, hourly parking demand studies published by the Institute of Transportation Engineers (ITE), or other documentation as approved by the Planning Commission.

The Applicant has submitted a “St. John’s Properties parking and loading standard” that is customized to provide parking and loading requirements based on St. John’s Properties “Flex” building standards that are used throughout the Mid-Atlantic region. The buildings throughout the Arcadia Business Park will be occupied with uses that are consistent with Frederick County’s LI zoning district and each individual tenant suite will be able to be configured to accommodate that tenant’s specific needs. As a result the tenant may need a smaller amount of parking spaces for their respective business needs, and may be replaced by a tenant that requires more parking than the previous tenant after a couple of years.

As an example, Section 1-19-6.220, calculates parking for warehouse space at a rate of 1 space for each 1,000 sf of floor area and office at a rate of 1 space per 300 sf of floor area. The total building area of 123,760 sf will be developed as 20% office (24,760 sf) and 80% warehouse (99,000 sf), which would require 182 parking spaces. Other uses permitted in the LI zone have different parking calculations based on number of employees or different per square-foot ratios.

Parking in accordance with the St. John’s Properties Standard will be 181 parking spaces,
including 6 ADA accessible spaces.

In addition to the defined parking bays, overflow parking blocks have been identified in the truck courts should there be higher parking demands and lower loading demands based on fluctuating tenant demands. Staff has no objection to granting this parking space modification.

In accordance with Z.O. Section 1-19-6.210.B, the Applicant is required to provide 13 large loading spaces. The Applicant is providing 13 large loading spaces.

The Applicant is seeking a parking space modification in order to permit the St. John’s Properties Standard as described (see Exhibit #2) in order to provide for flexibility.

5. Bicycle Parking §1-19-6.220 (H): The Zoning Ordinance requires 1 bicycle rack for every 40,000 square feet of Gross Floor Area (GFA), which requires 3 racks for this Site. The Applicant is proposing 3 racks along the front of the building. The Applicant has provided a note that bicycle parking will comply with the Frederick County Bicycle Design Guidelines.

6. Pedestrian Circulation and Safety §1-19-6.220 (G): The Applicant is proposing 5’ wide sidewalks throughout the site. Sidewalk stubs along the southern property line will lead pedestrians to future Lot 2 which will provide pedestrian access and circulation throughout the business park.

**Modifications/Conditions:**
- The Applicant is seeking a parking space modification in order to permit the St. John’s Properties Parking Standard as described (see Exhibit #2) in order to provide for flexibility.

**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:** The site is to be served by public water and sewer and is classified W-1, W-3, and S-3. The entire site will be served by water coming from New Design WTP and Sewer flowing into the Ballenger-McKinney WWTP.

**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 property is relatively flat with the exception of a few soil mounds. The proposed plan will not significantly alter the existing topography on site.

2. **Vegetation:** The site was graded and cleared of vegetation in 2010 subsequent to the approvals gained at that time.
3. **Sensitive Resources**: Existing mapping of the site reflects LsA type flooding and wet soils, located on-site. However, after the previous Preliminary/Final Site Plan approval the site was mass graded consistent with approvals in place at that time. The recent site plan note #6 indicates that no wetlands or 100-year floodplain are impacted by the proposed development. The site has been designed to treat all SWM for quality and quantity in accordance with the 2007 MD SWM Guidelines.

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.

**Findings/Conclusions**
No common areas are required or proposed.

**A. OTHER APPLICABLE REGULATIONS**

**Stormwater Management – Chapter 1-15.2**: Stormwater Management has been addressed per previously approved and still valid Improvement Plans, AP 14165 and AP 17236.

**APFO – Chapter 1-20:**

1. **Schools.** Schools are not required to be tested due to the commercial uses proposed.

2. **Water/Sewer.** The site is classified W-1 and W-3/S-3 and while the public sewer and water facilities are currently adequate to serve the Project, the Applicant is aware that capacity is not guaranteed until purchased.

3. **Roads.** As previously discussed, this development has fully satisfied the road improvements required by the APFO at preliminary subdivision plan, outlined in the project’s vested 2006 Letter of Understanding (LOU) (AP 4166).

   The summed peak hour trips from each site in the subdivision cannot exceed the overall 482 AM and 529 PM peak hour trips originally used for APFO testing for the entire site. This site will generate 21 am and 24 pm weekday peak hour trips as determined by the 10th edition of the ITE Trip Generation Manual for warehouse uses.

**Forest Resource Ordinance – Chapter 1-21**: FRO mitigation for this development (recording of on-site forest conservation easements and payment of fee-in-lieu) was provided in 2008 under AP 6866. No further FRO mitigation is required.
Summary of Agency Comments

<table>
<thead>
<tr>
<th>Other Agency or Ordinance Requirements</th>
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<tr>
<td>Development Review Engineering (DRE):</td>
<td>Conditional Approval</td>
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<tr>
<td>Development Review Planning:</td>
<td>Conditional Approval</td>
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<td>State Highway Administration (SHA):</td>
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<td>Div. of Utilities and Solid Waste Mngt. (DUSWM):</td>
<td>Conditional Approval</td>
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<tr>
<td>Health Dept.</td>
<td>Approved. Adequate water and sewer taps must be available</td>
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<tr>
<td>Office of Life Safety</td>
<td>Conditional Approval. Premises identification must comply with Section 05-01-362, fire lanes shall be marked and have signage, access boxes shall be provided at approved locations.</td>
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<tr>
<td>DPDR Traffic Engineering</td>
<td>Approved</td>
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<tr>
<td>Historic Preservation</td>
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**RECOMMENDATION**

Staff has no objection to conditional approval of this Site Plan for a Planned Commercial/Industrial Development for a one-story 123,760 sf building on a 15.90 acre site. If the Planning Commission conditionally approves the Site Plan, it is valid for a period of three (3) years from the date of Planning Commission approval (February 13, 2022).

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. Should the Planning Commission grant approval of this application (SP04-11, AP 18859), Staff recommends that the following items be added as conditions to the approval:

**Planning Commission approval of the following modification request from the Applicant:**

1. A parking modification under §1-19-6.200 to permit the St. John’s Properties Parking Standard as described (see Exhibit #2) in order to provide for flexibility.

2. A lighting modification under §1-19-6.500 to allow light spillage exceeding 0.5 foot-candles, up to a maximum of 7.8 foot-candles, over lot lines interior to the overall Arcadia Business Park Development including areas of Arcadia Drive.

**Staff-proposed conditions of approval:**

1. The Applicant shall comply with all Staff and agency comments through the completion of the plan.

2. The Preliminary Plan must be stamped and signed and the lot must be recorded prior to final approval of this Site Plan.
PLANNING COMMISSION ACTION

MOTION TO APPROVE

I move that the Planning Commission APPROVE the Arcadia Business Park – Lot 3 Site Plan SP04-11 (AP 18859) with conditions and modifications as listed in the staff report for the proposed one-story 123,760 sf building on a 15.90 acre site, based on the findings and conclusions of the staff report and the testimony, exhibits, and documentary evidence produced at the public meeting.
January 10, 2019

Frederick County Planning Commission
30 North Market Street
Frederick, MD 21701

Re: Arcadia Business Park Lot 3 Zoning Modification Requests
Site Plan A/P #18859 & Preliminary Plan 18863

Dear Planning Commission:

St. John Properties, Inc. ("SJP") is the one of the largest developer and owners in the Mid-Atlantic region with a portfolio of over 19,000,000 square feet in eight states. To accommodate a variety of tenants, we have developed a parking and loading standard for all our projects. This standard has been developed through our 47-year history of developing, owning, leasing, and managing similar business parks throughout the country. Because of the "value-oriented" market for our space, SJP places an intense focus on minimizing construction costs to keep its rents competitive in the marketplace. Critical to achieving competitive rents is limiting the amount of parking and loading areas we deliver in each park. However, the tenants make it abundantly clear they will only lease suites when there is sufficient parking/loading. It is also noted that tenants are constantly reconfiguring and turning over (vacating, growing, and shrinking), so it's critical that the parking/loading areas be flexible to accommodate the changing demands on those areas. In SJP's experience, tenants require a wide range in the amount of parking vs. loading spaces. Tenants that require more loading spaces (such as warehouse tenants) use less parking spaces and tenants that require more parking spaces (such as office tenants) use less loading spaces. It is this balance between parking and loading spaces that helps to avoid constructing excess impervious parking/loading areas. For example, loading areas can be modified/augmented as overflow parking areas to avoid the need to construct supplemental parking areas in open spaces if a warehouse tenant vacates and an office user moves in.

Consistent with the prior approval of Arcadia Drive Lots 5 & 6 by the Frederick County Planning Commission, St. John Properties continues to develop the Arcadia Business Park (formerly known as the Russell Property) as a planned commercial industrial park with multiple tenants in multiple buildings. This project will be delivered on a speculative basis (meaning no specific user group identified and no pre-leasing) with; 1.) "Flex" buildings having small bay sizes (2,520 to 3,000 square feet) and 16'-18' clear ceiling heights; and 2.) "Bulk" buildings having larger bay sizes (20,000 to 40,000 square feet) and taller ceiling height (32' clear). The buildings of Arcadia Business Park will be occupied with tenants whose uses are consistent with Frederick County's Limited Industrial ("LI") zoning and each individual tenant suite will be able to be configured/reconfigured to accommodate that tenant's specific needs. As a result, a tenant may need a smaller amount of parking spaces for their business only to be replaced by a tenant that requires more parking than the previous tenant after a couple of years. Upon completion, Arcadia Business
Park will be similar to other projects SJP has developed in Frederick such as Westview Business Park and Riverside Technology Park.

SJP respectfully requests modifications from the provisions of the Frederick County Zoning Ordinance for:

**Frederick County Code Section 1-19-6.220 (A) Parking**

As demonstrated and agreed upon in the previous approval for Arcadia Business Park Lots 5 & 6, SJP will provide adequate parking for the needs of the property. The current Zoning Ordinance does not have a parking calculation for “flex” or “bulk” uses. Typically in LI zoning districts the requirement would be “Industrial”; however that requires a known number of employees and business vehicles, which number could not be accurately represented for a speculative development such as this. As such, parking demand for this type of use should rely on SJP’s extensive experience with operating this produce type successfully. The majority of the SJP’s portfolio is “flex industrial/business-park” buildings consistent with those planned for the property. Based on all its observed experience, the SJP finds that demand for paved, striped, and unreserved vehicle parking in front and to the sides of its buildings averages out to a ratio range of approximately two (2) to three (3) spaces per 1,000 sf of buildings (not including the truck courts to the rear of the buildings).

Additionally, the SJP’s parking is self-regulating at all of its flex industrial/business park projects. As an example, if a building was 75% leased, but 100% of the available parking consumed, prospective tenants would not lease the remaining 25% of the building (they won’t lease if they can’t park). For these reasons, most other jurisdictions have determined that the parking demand/requirement for all flex industrial/business uses is two (2) to three (3) spaces for 1,000 sf of building area.

Consistent with the above, the Arcadia Business Park will have adequate parking to provide for the needs of the users.

**Frederick County Code Section 1-19-6.500 (D) Lighting**

SJP is requesting a modification from the 0.5 foot-candle illumination spillage requirement beyond its property lines (including Arcadia Drive). Arcadia Business Park will be comprised of multiple lots creating a campus style environment that will require cross lighting between the parking areas and green space that separates each lot. This allows for appropriate lighting between the buildings and parking areas for safety and security. SJP will comply with all requirements for 0.5 foot-candles at all exterior property lines.

Thank you,

ST. JOHN PROPERTIES, INC.

Daniel J. Severn
Director of Development