

**KNOWLEDGE FARMS
MIXED USE DEVELOPMENT (MXD)
AMENDED REZONING APPLICATION
JUSTIFICATION STATEMENT**

Knowledge Farms Partners, LLC (“Applicant”) hereby submits this Amended Justification Statement in support of its request for rezoning the +/- 34.64 acres located at 3280 Urbana Pike, across from Campus Drive, in Urbana, Maryland (Tax ID # 07-201664) (the “Property”) from Office Research Industrial (ORI) to Mixed Use Development (MXD). The subject property is fronted by Urbana Pike on the eastern border and by The Woodlands of Urbana (500+ unit active adult community – hereinafter “Woodlands”) along the western border. The requested rezoning will facilitate an intended plan that incorporates the existing 36,000 square foot medical office building, with a mixture of age-restricted senior housing (including age 55+ active adult senior living and a continuing care retirement community which can include all or a combination of assisted living, independent living and memory care), and other complementary commercial uses and open space (the “Project”) on the Property.

Knowledge Farms Partners, LLC previously submitted a rezoning application which was addressed by the Planning Commission (March 2022) and County Council (June 2022). The Planning Commission approved the rezoning with a four to one vote, and thereafter the application proceeded to the County Council for its requisite hearing. After considering testimony from the County Council and the public, the Applicant withdrew its application in an effort to better address questions raised during the proceedings. This justification statement identifies material changes, from the original application, which mitigate certain issues raised during the Planning Commission and County Council hearings.

Below are the applicable criteria requiring written justification, quoted from the Frederick County Zoning Ordinance in bold typeface, with responses.

This justification statement is in support of all of the application materials submitted, including all plans, maps and exhibits, and specifically including the Concept Plan and attached Land Use Mix Table.

§ 1-19-10.500.2. SIZE AND LOCATION.

(B) The MXD District may only be established where the tract of land receiving the MXD District has a County Comprehensive Plan Land Use designation of Mixed Use Development, Office Research Industrial, or Limited Industrial except as provided in § 1-19-10.500.2(D) below.

RESPONSE: The Property has a County Comprehensive Plan Land Use designation of Office Research Industrial. The Livable Frederick Master Plan (“LFMP”) designates the Property in the Urbana County Growth Area/Secondary Growth Sector (LFMP at 40), along the Interstate Corridor (*Id.* at 45). The Interstate Corridor is:

a corridor for growth and development along Interstate 270 leading from central Frederick City, through Ballenger Creek Community Growth Area and continuing along I-270 through the Urbana Community Growth Area and terminating at the northern edge of Hyattstown. This corridor emphasizes transit-oriented, mixed-use development to be served by a practical and affordable transit line (e.g., Bus Rapid Transit, Transitway) . . . that parallels Interstate 270 and takes advantage of public and private infrastructure improvements extended to the Urbana Community Growth Area in recent decades. Additionally, the Interstate Corridor will continue to capitalize on significant access to regional employment centers by supporting policies that facilitate the development of this area as a prime employment corridor enhanced by livable, mixed-use neighborhoods between the City of Frederick and northern Montgomery County. (Emphasis added).

As discussed more fully herein, the proposed mixture of residential and commercial/employment land uses to be provided in the Project is consistent with the applicable designations in the LFMP.

(C) The Planned Development Districts may only be established where the tract of land receiving the Planned Development District has a category of Planned Service or higher as shown on the Frederick County Water and Sewerage Plan.

RESPONSE: The Property has a W-5 DEV category for water and an S-4 DEV category for sewer on the Frederick County Water and Sewerage Plan. Access to the existing public water and sewer line mains exists via reciprocal easements with adjacent property owners.

§ 1-19-10.500.3. APPROVAL CRITERIA.

The County Council may approve or disapprove a request for rezoning of property to a Planned Development District if persuaded that granting the request is appropriate and serves the public interest. The approval or disapproval of a request for the application will be determined through evaluation of several criteria to establish whether the proposed project meets the purpose and intent of the zoning district. In addition to the requirements in § 1-19-3.110.4, the Planning Commission and County

Council must find that the project adequately addresses the following criteria:

(A) The proposed development is compact, employing design principles that result in efficient consumption of land, efficient extension of public infrastructure, and efficient provision of public facilities;

RESPONSE: The Project will incorporate an efficient arrangement of the residential, commercial and open space uses, while abiding by all county design requirements. The attached Concept Plan exhibit shows the general progress from commercial to residential and institutional uses, though the number of buildings and sizes may vary. In particular, the Project layout takes advantage of seamless integration of the existing roadway and pedestrian infrastructure serving Urbana Pike, Campus Drive, Thornapple Drive, the existing Knowledge Farms and the adjoining Woodlands of Urbana. Additional sidewalk and road improvements will be added to integrate the Project with the surrounding existing improvements.

The Property fronts Urbana Pike, a Major Arterial Road, just south of, and integrated with, the confluence of the road network serving the overall Urbana Community Growth Area, as shown on the Transportation Map exhibit. The Project efficiently utilizes the existing road network. With Urbana High School on one side of the Property and the Woodlands of Urbana on the other, the Project will also optimize efficient use of existing water and sewer infrastructure, which has been extended to the Property limits. Additionally, fire/safety and law enforcement facilities already serve the Property and the surrounding area, allowing for the natural, efficient extension of these services to the Project.

(B) The proposed development design and building siting are in accordance with the County Comprehensive Plan, and any applicable community and corridor plans;

RESPONSE: The Project's development design and building siting are in accordance with the County Comprehensive Plan and applicable provisions of the LFMP. The Project's ORI designation "allows for the application of the Mixed Use Development (MXD) floating zone" (LFMP at p.201).

The LFMP Action Framework → Category: Housing Design → Goal: Communities → Initiative: Active Living, seeks to: "Promote community design that encourages physical activity by providing walkable, interconnected streets where multiple modes of transportation are available and where non-motorized modes of travel are emphasized." (Id. at 110).

The Project reflects a thirty-two foot (32') transit reservation, as shown on a plat recorded in the Plat Records for Frederick County, Maryland in Plat Book 77, page 20 (see Boundary and Property ID Plan exhibit), optimizing public transportation for the Project, but also for the overall Community Growth Area. The Project will orient its dwelling units, interior streets and sidewalks/walking trails in a way that optimizes pedestrian, bicycle and other non-motorized travel throughout the Project to its mix of uses and to the surrounding areas. Providing this network of sidewalks and trails in concert with the Project's development design and building siting will further assist in meeting the LFMP initiatives for the surrounding area. There is no current community or corridor plan applicable to the Property.

(C) The proposed development is compatible with existing or anticipated surrounding land uses with regard to size, building scale, intensity, setbacks, and landscaping, or the proposal provides for mitigation of differences in appearance or scale through such means as setbacks, screening, landscaping; or other design features in accordance with the County Comprehensive Plan, and any applicable community or corridor plans;

RESPONSE: The existing Knowledge Farms medical office use was developed in 2008. The Property is bordered by The Woodlands of Urbana (which achieved similar MXD rezoning in 2017) to the west and Urbana High School across Urbana Pike to the east (See Aerial, Vicinity and Land Use Plan exhibit). The proposed uses will integrate with the architecture and scale of existing Knowledge Farms, phases of the Woodlands at Urbana and Urbana High School. More specifically, components of the Project will include:

- Two story villas along a portion of the Woodlands boundary mirroring appearance and sizing of similar villas on the the Woodlands side of the boundary;
- A commercial building adjacent to the existing medical office building similar in scale to what is permissible under the current zoning (uses of which could include self-storage or a 2nd medical office building);
- Multifamily active adult buildings (similar in size and scale to those currently within the Woodlands) situated further away from the Woodlands boundary
- Components of or a full continuing care retirement community building fronting Urbana Pike; and
- A natural buffer along the Woodlands boundary that includes raised topography and tree lines.

The Project's layout and design is such that, once constructed, the Property will seamlessly integrate within the Urbana Community Growth Area.

(D) The proposed development provides a safe and efficient arrangement of land use, buildings, infrastructure, and transportation circulation systems. Factors to be evaluated include: connections between existing and proposed community development patterns, extension of the street network; pedestrian connections to, from, and between buildings, parking areas, recreation, and open space;

RESPONSE: As shown in the application materials, including on the Transportation Map exhibit, the request for the Property integrates with the existing and previously approved Knowledge Farms buildings, the surrounding Urbana High School and Woodlands, and the overall Urbana Community Growth Area. The proposed arrangement of land use, buildings, infrastructure and transportation circulation can integrate with the surrounding Woodlands neighborhood via connection of the newly developed sidewalk system and with all of the Project via a pedestrian path system, which will be incorporated within the final site design. The Project is a natural evolution and completion of the area's development patterns (i.e., the Project's primary access is a shared access for the Woodlands – provided to the Woodlands by the Applicant via a "right of way"). The access road through the Project will create a spine road and path system connecting all buildings. It is important to maintain certain flexibility in the final design and final layout of the Mixed Use area shown on the Concept Plan so that access and environmental issues can be adequately addressed at the time of the Phase II engineering design of the Property. For that reason, the building locations and footprints could vary at the time of Phase II engineering submittal and site plan review.

(E) The transportation system is or will be made adequate to serve the proposed development in addition to existing and pipeline uses in the area. Factors to be evaluated include: roadway capacity, level of service and safety, on-street parking impacts, access requirements, neighborhood and natural resource impacts, projected construction schedule of planned improvements, pedestrian and bicycle safety, and results of travel demand modeling assessing the change in future daily travel volumes, with and without the proposed development;

RESPONSE: As more fully discussed and described in the August 18, 2021 traffic study, updated with the subsequent study dated June 16, 2023, both prepared by Wells & Associates (the "Study"), the transportation network, with suggested improvements, will adequately accommodate the Project. The study accounts for existing traffic, regional growth, and pipeline development projects in the area. Similar to the traffic study conducted for the Woodlands, the Study references a possible new traffic signal at the Route 355 and Thornapple Drive intersection that provides access to the Property. This will be predicated on the phasing of the proposed Project and other new developments in the Urbana Community Growth Area. Additionally, the Applicant has explored a 2nd point of ingress and egress just south

of the Thornapple Drive intersection. This has been discussed with Frederick County and SHA, but only conceptually at this stage. The Applicant understands a future application for site development review will be subject to Adequate Public Facility Ordinance (“APFO”) requirements for traffic impact(s). Formal assessment of a 2nd point of ingress and egress and other related traffic impact mitigation measures shall be made at that time.

The most recent Wells study compared peak hour trips for the currently approved site plan (140,000 sq ft of Office) versus the existing 36,000 sq ft plus the proposed mixed-use concept (Active Adult - 22 villas and 125 multifamily units, 150 bed continuing care retirement community building, 100,000 sq ft self-storage building). The below summary table reflects 52 fewer AM Peak Hour trips and 23 fewer PM Peak Hour trips for the existing building and proposed uses.

Knowledge Farms

Trip Generation Analysis and Comparison

Development/Land Use	ITE Land Use			AM Peak Hour			PM Peak Hour		
	Code	Size	Units	In	Out	Total	In	Out	Total
<u>Existing/Approved Conditions</u>									
(The site is approved for up to 140,000 SF of Office uses, 36,000 SF of which is built)									
Research & Development Office ⁽¹⁾	ITE 760	140,000	SF	152	31	183	26	150	176
<u>Proposed Site Development Plan</u>									
Existing R&D/Office Building ⁽²⁾	ITE 760	36,000	SF	47	10	57	9	47	56
Proposed Townhouse Residential Use ⁽³⁾	ITE 251	22	DU	4	9	13	9	5	14
Proposed Residential Use ⁽⁴⁾	ITE 252	125	DU	9	16	25	18	14	32
Proposed Residential Use ⁽⁵⁾	ITE 254	150	Beds	16	11	27	14	22	36
Proposed Commercial Use ⁽⁶⁾	ITE 151	100,000	SF	5	4	9	7	8	15
<u>Subtotal Existing with Proposed</u>									
Trip Generation Comparison: Proposed vs. Approved									
Net Additional Trips: Proposed Uses									
(71) 19 (52) 31 (54) (23)									
34 40 74 48 49 97									

Notes:

(1) Based on rates and equations from ITE's Trip Generation, 6th Edition, from "Knowledge Farms Traffic Study, dated March 9, 2001.

(2) Based on rates and equations from ITE's Trip Generation, 11th Edition.

(3) ITE Land Use, Senior Adult Housing - Single-Family (251), was used to determine vehicle trips for residential use.

(4) ITE Land Use, Senior Adult Housing - Multifamily (252), was used to determine vehicle trips for residential use.

(5) ITE Land Use, Assisted Living (254), was used to determine vehicle trips for residential use.

(6) ITE Land Use, Mini-Warehouse (Self-Storage) (151), was used to determine vehicle trips for commercial use.

(F) The proposed development provides design and building placement that optimizes walking, biking, and use of public transit. Factors to be evaluated include: extension of the street network; existing and proposed community development patterns; and pedestrian connections to, from, and between buildings, parking areas, recreation, and open space;

RESPONSE: The Project will improve and complete the walking, biking and public transit network of the area, where desirable. The Project's proposed transit reservation adjacent to Urbana Pike will greatly enhance connectivity and mobility for the Urbana community and Frederick County as a whole. Additionally, a shared

use path is planned along the Route 355 frontage to enhance pedestrian and bicycle access in the area. The Transportation Map exhibit illustrates the County Comprehensive Plan alignment as currently proposed.

Proposed community development patterns will provide convenience and access to all properties and recreational areas throughout the Project. Specific to recreational activities, Frederick County APFO requirements for “housing for older persons” must address amenities and activities for older persons. These APFO requirements require a program of amenities that include some combination of trail systems/walking paths, a multi-purpose building, recreational area for activities like tennis, pickleball, horseshoes, bocce court, or similar and passive recreational space. The Applicant intends to incorporate natural walking trails, pickleball courts, gazebos, firepits, grilling areas and other social meeting areas (indoor and outdoor), among others. Details will be further defined during the site plan review process. Noteworthy, the Applicant has discussed amenity requirements with potential end users of the Project, and the referenced amenities meet or exceed their expectations.

(G) Existing fire and emergency medical service facilities are or will be made adequate to serve the increased demand from the proposed development in addition to existing uses in the area. Factors to be evaluated include: response time, projected schedule of providing planned improvements, bridges, roads, and nature and type of available response apparatus;

RESPONSE: The fire and emergency services available to Knowledge Farms and the Urbana Community Growth Area (Urbana Volunteer Fire Company, Green Valley Substation of New Market Volunteer Fire Company) will be adequate for the Project’s additional units and uses.

(H) Natural features of the site have been adequately considered and protected in the design of the proposed development. Factors to be evaluated include: the relationship of existing natural features to man-made features both on-site and in the immediate vicinity, natural features connectivity, energy efficient site design, use of environmental site design or low impact development techniques in accordance with Chapter 1-15.2 of the Frederick County Code;

RESPONSE: As shown on the Natural Features Map, Overview Plan and Concept Plan exhibits, the Project will meet the referenced criteria in its design and planning. The proposed improvements will be oriented in a manner that facilitates storm flows from the existing on-site improvements towards internal micro-bioretention island and environmental site design (ESD) features that will be located along the perimeter roadway. The Project integrates the proposed development along

the western side of the Property and protects the potentially sensitive natural stream valley and steep slopes along the eastern side of the Property. The Project's planned trails and walking paths will highlight the surrounding natural features, while aiming to minimize disturbance of natural features. In addition, planned stormwater management conveyance systems (*i.e.*, drainage ditches and piping) will be designed to maximize the potential ESD benefits, while integrating their construction within the natural site features.

(I) The proposed mixture of land uses is consistent with the purpose and intent of the underlying County Comprehensive Plan land use designation(s), and any applicable community or corridor plans;

RESPONSE: The ORI designation "allows for the application of the Mixed Use Development (MXD) floating zone." (*Id.*). Please see 1-19-3.110.4.(A).(1) for additional commentary.

(J) Planned developments shall be served adequately by public facilities and services. Additionally, increased demand for public facilities, services, and utilities created by the proposed development (including without limitation water, sewer, transportation, parks and recreation, schools, fire and emergency services, libraries, and law enforcement) shall be evaluated as adequate or to be made adequate within established county standards;

RESPONSE: The existing Property is approved for 140,000 square feet of office, research or industrial development. The Applicant submits this rezoning application in view of the various public facility and utility improvements made and planned in the area (*i.e.*, extension of public water and sewer to the Property,), especially in conjunction with the overall Urbana Community Growth Area. Because the proposed Project stands to have lesser impact on many public facilities than what would be permitted within the current ORI, the Applicant anticipates that existing public facilities will be adequate. All of the residential uses will be age-restricted senior living, which tend to have a lower impact on public facilities and services, and no negative impact on school capacity. The Applicant will apply for Adequate Public Facilities Ordinance approval at the appropriate development stage.

(K) Sensitive environmental resources are protected to the maximum extent practicable; and

RESPONSE: Supplemented by 1-19-10.500.3(H), and as shown in the application materials, to the extent sensitive environmental resources are located within the area of influence from the Project, the proposed development accounts for such resources. However, the Applicant notes that existing forest, specimen trees, wetlands, streams, and hydrologically sensitive areas do exist along the eastern

portion of the Property, but all of these potentially sensitive areas can and will be protected by an existing forest conservation easement that includes these areas, which will remain in place and undisturbed throughout the development of the Project.

(L) All efforts have been made to promote the protection, preservation, and integration of historic resources into the planned development through reuse, adaptive use and rehabilitation.

RESPONSE: Not applicable.

§ 1-19-3.110.4. APPROVAL CRITERIA.

(A) Approval or disapproval of a request for an individual zoning map amendment or floating zone reclassification shall be determined through review of several criteria. The Planning Commission and County Council review will include, but not be limited to:

(1) Consistency with the comprehensive plan;

RESPONSE: The ORI designation “allows for the application of the Mixed Use Development (MXD) floating zone”. (LFMP at 201). Consistent with this, the Applicant is seeking approval of an MXD floating zone to allow for the redevelopment of the Property with a combination of non-residential uses (including the existing 36,000 square foot medical office building), age-restricted residential dwelling units and some or all components of a continuing care retirement community, among other possibilities to be developed on-site. Additionally, the Project will be consistent with the other applicable recommendations of the LFMP, as follows:

- The LFMP encourages directing development to “Growth Areas,” including the “Urbana County Growth Area” (LFMP at 40 & 46) in which the Property is located:
 - *Support policies that direct growth to Growth Areas and that correspond to the growth strategies described in the Thematic Plan. Id. at. 95.*
 - *Ensure that residential development occurs in county designated growth areas with minimal harm to the environment and adequate water, sewer, transportation choices, schools, and other county infrastructure needed to support a high quality of life. Id. at 162.*

The Project will utilize existing road (subject to potential future improvements as discussed in the Study), school, sewer and water infrastructure. It will complement and build upon existing development in the Urbana Community Growth Area, including the adjacent Woodlands.

- The LFMP promotes land use patterns that will support multi-modal mobility:

- *Promote land use patterns that support accessibility and diversified mobility through the geographic concentration of multi-functional uses, activities and destinations. Id. at 95.*
- *Ensure commercial and residential development constructs shared-use paths and on-street bikeways designated in county nonmotorized transportation plans that pass through or are adjacent to their proposed development site. Id. at 101.*
- *Promote community design that encourages physical activity by providing walkable, interconnected streets here multiple modes of transportation are available and where non-motorized modes of travel are emphasized. Id. at 110.*
- *Provide more transit service throughout the county with regular stops at senior centers, apartment complexes, shopping centers, medical services, and employment centers. Id. at 195.*

The Project supports accessibility and diversified mobility through the geographic concentration of multi-functional uses, activities and destinations. Specifically, the Project will incorporate interior streets and sidewalks/walking trails in a way that optimizes pedestrian, bicycle and other non-motorized travel from the Project to the adjoining properties, as permitted. The proposed transit dedication will optimize the already available proximate public transportation right-of-way, bringing the total MD Route 355 right-of-way to one hundred and thirty feet (130') wide.

- The LFMP promotes diverse housing types:
 - *Require the provision of a mixture of residential dwellings in the Euclidean and floating Mixed Use zoning districts, with emphasis on providing **multi-family housing** and with exceptions for small sites, infill, and redevelopment. Id. at 112.*

The Project will include multifamily (“for sale” and/or “for rent) age-restricted senior housing in the MXD zone.

- The LFMP promotes mixed-use development:
 - *Support the development of communities that are mixed use and higher density, where the distance between origins and destinations is compressed, thus allowing access by means other than automobiles. Id. at 140.*
 - *Create places that are compact, mixed use, and walkable that afford social interaction and support safety and human comfort. Id. at 149.*
 - *Support mixed-use commercial facilities that offer affordable options to small business owners. Id. at 168.*

The Project’s complementary mix of employment, age-restricted senior residential and other commercial uses will be developed with a pedestrian friendly and synergistic flow in mind. The proposed density provides an

efficient use of the land while incorporating county required design and development elements.

- The LFMP encourages the incorporation of open and green space in development project:
 - *Provide and maximize native species natural landscaping and planting within street rights-of-way at commercial and residential development and within public and private open space as a part of community specific and corridor specific planning in the county. Id. at 141.*
 - *Protect critical open spaces within the built environment. Id. at 189.*

The Project will incorporate approximately 8.67 acres of open and green space. The applicant will also consult with landscape architects to ensure best practices throughout its landscape design.

- The LFMP broadly promotes development that will be in harmony with sensitive environmental resources:
 - *Critically examine the land use designations and zoning applied to Green Infrastructure and other sensitive environmental resources within Community Growth Areas. Id. at 187.*
 - *Preserve natural resources during the development process. Id. at 189.*
 - *During the development review and approval process, ensure that the functional viability and stability of wetlands will be maintained. Id. at 191.*

The Applicant notes that existing forest, specimen trees, wetlands, streams, and hydrologically sensitive areas do exist along the eastern portion of the Property, and these potentially sensitive areas can and will be protected as part of the Project's development.

(2) Availability of current and planned public facilities;

RESPONSE: Per the responses to Sections 1-19-10.500.2(C) and 1-19-10.500.3(A),(E),(F),(G) and (J) above, current and planned public facilities are accounted for within the Project.

(3) Adequacy of existing and planned future transportation systems;

RESPONSE: Per the responses to Sections 1-19-10.500.3(D),(E) & (F) above, and in the Study, the combination of existing and planned future transportation systems are adequate for this Project.

(4) Compatibility with existing and proposed development;

RESPONSE: Per the responses to Section 1-19-10.500.2(B), 1-19-10.500.3(C) & (I) above, of most significance, the Project will be compatible (including architecturally) with the proximate Woodlands at Urbana, the existing Knowledge Farms and the overall Urbana Community Growth Area. The Applicant believes the proposed uses are far more compatible with the surrounding uses than the currently approved Knowledge Farms office park.

(5) Population change, including availability and location of land zoned to meet the ten-year need for residential development;

RESPONSE: The LFMP states that by 2025 “the total number of adults age 65+ is projected to exceed the total number of school-age children (ages 5-19) in the county.” (LFMP at 134). According to studies conducted by the Maryland Department of Aging, the 60+ population for Maryland, Frederick and neighboring counties will increase as follows:

60+ Population Growth							
Jurisdiction	2020	2025	2030	2035	2040	2045	% Change (2020-2045)
MD	1,374,091	1,554,717	1,677,497	1,747,399	1,790,573	1,842,011	34.1%
Frederick	59,973	73,161	81,784	87,032	89,333	91,293	52.2%
Carroll	46,424	55,469	61,500	63,901	63,883	64,488	38.9%
Howard	70,580	83,260	91,811	97,204	101,154	104,768	48.4%
Montgomery	232,373	258,801	280,575	299,732	314,740	331,806	42.8%

65+ Population Growth							
Jurisdiction	2020	2025	2030	2035	2040	2045	% Change (2020-2045)
MD	974,979	1,139,636	1,296,675	1,395,231	1,438,939	1,456,674	49.4%
Frederick	42,191	53,173	63,633	70,981	74,602	75,408	78.7%
Carroll	33,433	40,991	48,934	54,373	56,216	55,621	66.4%
Howard	49,697	60,463	77,803	77,803	81,746	83,598	68.2%
Montgomery	166,327	191,478	216,570	235,846	249,180	259,851	56.2%

Data Source

Alfred Sundara

MD Dept of Planning

According to CoStar/Apartments.com (tracks apartment units locally and throughout the country), Frederick County currently has an inventory of senior only apartments totaling 1,180. Of those, only 370 units have been built in the last 20 years (171 market rate units and 199 affordable units). The current cost of construction makes “affordable” units cost prohibitive without alternative financing sources such as low income housing tax credit incentives.

Inventory of “for-sale” active adult is summarized in the following chart.

Age-Restricted For Sale Communities - Frederick County				
Name of Community	City	Estimated Units	Unit Type	Year Commenced
Woodlands of Urbana	Urbana	565	Attached, Single Family & Condos	2019
Boxwood Villas	Urbana	92	Attached	2019
Signature Club at Greenview	New Market	233	Attached & Single Family	2003
JerMae Estates	Thurmont	108	Attached & Single Family	2003
Albert Courts	Thurmont	100	Attached & Condos	1991
Crestwood Village	Frederick	550	Attached, Single Family & Condos	1979
Ballenger Run	Frederick	36	Attached	2019
Village at Foxfield	Middletown	81	Single Family	2003
Bloomfields	Frederick	1,300	Attached & Single Family	Present
Cromwell	New Market	600	Attached, Single Family & Condos	TBD
Total		3,665		

Source: 55places.com

Other than new inventory under development, few of the reflected properties become available for sale in any given year. Unfortunately, the senior population is growing at a pace that far exceeds available and planned active adult housing inventory. The Applicant is attempting to address growing demand through a combination of senior housing options that could include for sale and/or for rent options.

According to data from the Maryland Department of Planning (“MDP”), the 80+ age group in Maryland, Frederick and the surrounding counties is expected to grow at a more accelerated rate than the 60 and 65+ age group. The MDP’s findings are as follows:

80+ Population Growth							
Jurisdiction	2020	2025	2030	2035	2040	2045	% Change (2020-2045)
MD	227,724	272,118	342,521	414,545	492,327	557,142	144.7%
Frederick	10,707	13,698	17,804	22,236	27,656	32,811	206.4%
Carroll	8,375	10,801	14,414	18,382	23,457	28,889	244.9%
Howard	10,340	13,833	18,649	23,296	28,121	32,392	213.3%
Montgomery	41,104	48,905	60,718	72,758	84,036	94,065	128.8%

Data Source

Alfred Sundara

MD Dept of Planning

According to Costar/Apartments.com, the MD Dept of Aging and SeniorGuidance.org, Frederick County is home to only ten Continuing Care Retirement Communities (“CCRC”) and/or assisted living facilities with more than twenty-five units. Of the ten, only two facilities were built in the last twenty years. (Note: The Applicant considers assisted living as a component of a CCRC, which typically includes a broader scope of living options such as independent living and memory care.)

CCRC/Assisted Living Projects - Frederick County					
<u>Name of Community</u>	<u>Address</u>	<u>City</u>	<u>Units</u>	<u>Year Built</u>	<u>Distance From KF's</u>
Buckingham's Choice	3200 Baker Circle	Adamstown	304	1999	5.6 miles
Record Street Home	115 Record St	Frederick	29	1892	8.4 miles
Orchard Terrace	5905 Edenton Dr	Frederick	38	2012	9.2 miles
Tranquillity at Fredericktowne	6441 Jefferson Pike	Frederick	90	2000	9.3 miles
Sunrise of Frederick	990 Waterford Dr	Frederick	88	1991	10.1 miles
Montevue Assisted Living	1910 Rosemont Ave	Frederick	75	2012	11.1 miles
Somerford House	2100 Whittier Dr	Frederick	46	1999	12.8 miles
Somerford Place	2100 Whittier Dr	Frederick	52	1999	12.8 miles
Heartfields at Frederick	1820 Latham Dr	Frederick	52	1998	13.5 miles
Homewood at Frederick	7407 Willow Rd	Frederick	595	2000	15.8 miles
			Total:	774	

Sources: MD Dept of Aging/CoStar/Senior Guidance

Actuarial Consulting firm Milliman reports that the average age of a CCRC resident is between 85-87 years old. With Frederick's 80+ population projected to triple by 2045, the surrounding area is poised for massive demand that is significantly underserved in Frederick and surrounding counties. The closest CCRC product to Urbana is over five miles away.

(6) The timing of development, planned future transportation systems and planned public facilities;

RESPONSE: Per the responses to 1-19-3.110.4(A)(2) & (3) above, planned transportation and public facility improvements are phased in, if/when required and will be adequate to serve the Project.

(7) Sensitive environmental resources have been identified and impacts to these resources are avoided or minimized to the maximum extent practicable; and

RESPONSE: Per the responses to Sections 1-19-10.500.3(H) & (K) above, the Applicant will minimize impact to environmental resources.

(8) Historic resources have been identified and impacts to these resources are avoided or minimized to the maximum extent practicable.

RESPONSE: Not applicable.

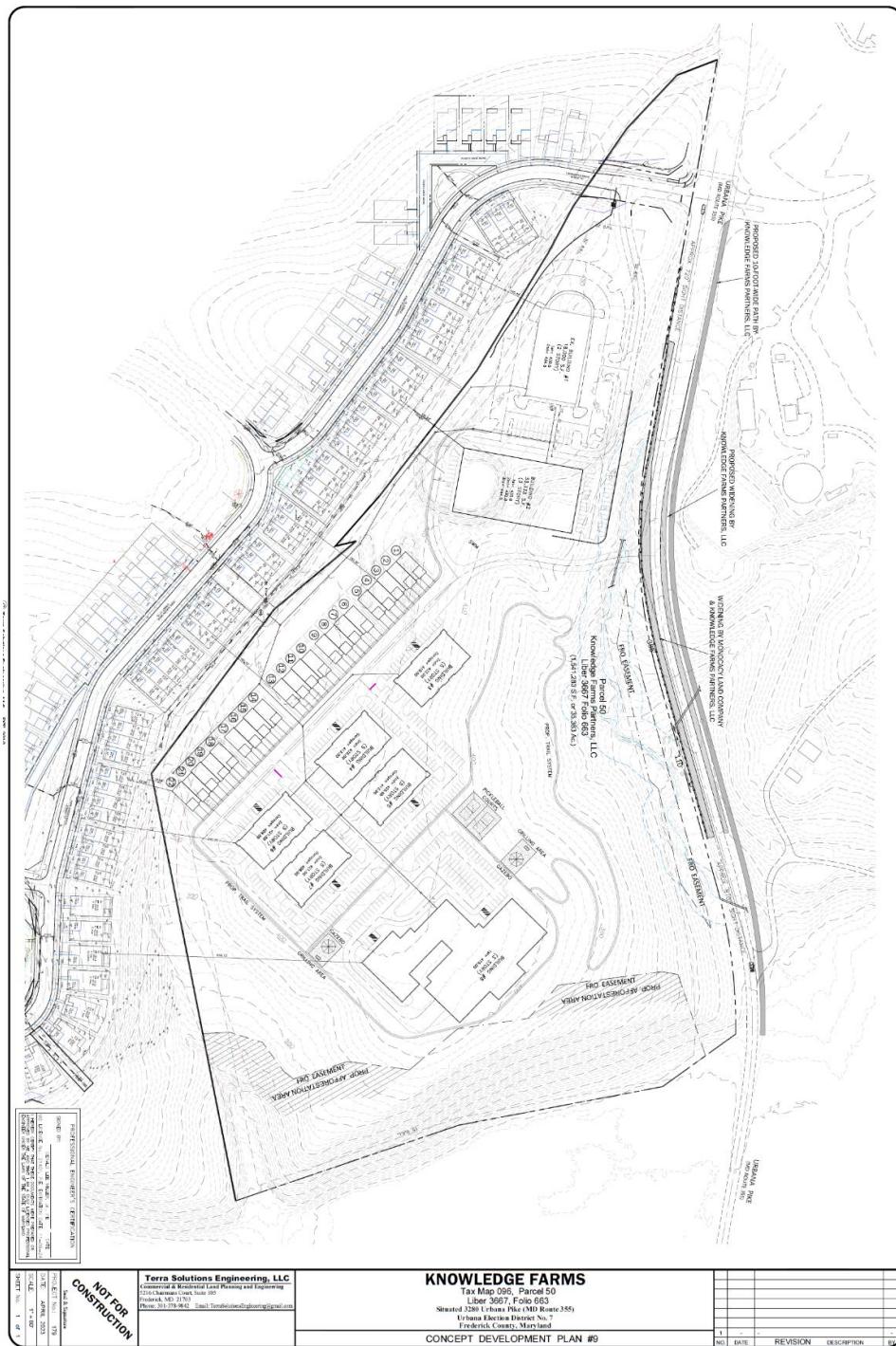
CLOSING

To further supplement the foregoing responses, and as indicated in the application's prelude, the Applicant is proposing plan criteria not previously reviewed by the Planning Commission and County Council. The attached Concept Plan illustrates the following revisions which take into account collective public and county officials' feedback:

- Maximum active-adult ("for rent" and/or "for sale") density limited to 150 units;
- Residential development along the shared boundary between Knowledge Farms and The Woodlands limited to 2 levels;
- Consideration of a second ingress/egress along Urbana Pike; and
- A continuing care retirement community building limited to no more than 3 levels.

**Note that the 2nd ingress/egress has been discussed with both the state highway administration and Frederick County planning staff. Both agree it's a possibility, but would be subject to formal, technically complete plan review which would not occur until subdivision plans are completed, all of which are subject to approval of this rezoning.*

CONCEPT PLAN



(This concept plan is being provided to illustrate approximate building locations, densities and product types. Everything is subject to planning commission and county council feedback, as well as future county APFO requirements)

Knowledge Farms Land Use Mix Table – Proposed and Permitted

Proposed Land Use Mix

Proposed Land Use	Prop. (Acres)	Percentage (Total Site)	Limits (Acres)	Maximum Permitted or Minimum Required
Residential / Multi -Family (non-institutional):	6.71 ±	19.18%		* 25% Gross project Area
Commercial:	6.71 ±	19.18%		* 25% Gross Project Area
Combined Commercial / Residential:	13.42 ±	38.35%	13.99 (Max.) 13.42 (Max.)	40% Gross Project Area (0.4 x 34.99 Ac.) * 50% Max. Project less Natural Area (0.5 x 26.84 Ac.)
Employment, Civic / Institutional & Cultural:	11.39 ±	32.55%	No Limit	
Open Space / Green Area:	8.67 ±	24.78%	1.34 ± (Min.) 2.01 ± (Min.)	20% Commercial Area 30% Residential Area
Road Right-of-way / Other (Transit Dedication):	1.51 ±	4.32%		
Gross Project Area:	34.99 Ac. (Platted)			Net Usable Area: 26.84 Ac.

*Exclusive of floodplain, stream buffer, steep-slopes (>25%), and forest conservation easement areas.