

HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING
Division of Land Development

DATE: May 31, 2018

DPZ File No. WP-18-130

Department of Planning and Zoning

- 1 Research
- 1 Resource Conservation (Historic/Ag Pres)
- Public Service and Zoning Administration
- Address Coordinator

- 1 Comprehensive & Community Planning
- 2 Development Engineering Division
- Other
- 1 File

See:

Agencies

- 1 Soil Conservation District
- 1 Department of Inspections, Licenses & Permits
- 1 Department of Fire and Rescue Services
- 5 State Highway Administration
- 1 Health Department
- 1 Public School System
- 1 Recreation and Parks
- 1 Office of Transportation
- MD Aviation Administration
- WSSC (Non-Residential Only)

- Tax Assessment
- Verizon
- BGE
- Cable TV
- Police
- MTA
- Finance
- 1 DPW, Real Estate Services
- DPW, Construction and Inspection
- DPW, Bureau of Utilities

RE: Howard County Fairgrounds

ENCLOSED FOR YOUR Signature Approval Review & Comments Files

THE ENCLOSED Original Pre-Packaged Plan Set

<u>Plans</u>	<u># of Plans</u>	<u>Supplemental Documents</u>
<input type="checkbox"/> Sketch Plan	_____	<input type="checkbox"/> Wetlands Report
<input type="checkbox"/> Prel Equiv Sketch Plan	_____	<input type="checkbox"/> Soils/Topo Map/Drain Area Map
<input type="checkbox"/> Preliminary Plan	_____	<input type="checkbox"/> FSD/FCP/Worksheet and Application
<input type="checkbox"/> Final Plat/Plat of Easement/RE Plat	_____	<input type="checkbox"/> Declaration of Intent (Forest Cons)
<input type="checkbox"/> Final Constr Plans (RDS)	_____	<input type="checkbox"/> Drainage and/or Computation/Pond Safety Comps
<input type="checkbox"/> Final Development Plan	_____	<input type="checkbox"/> Preliminary Road Profiles
<input type="checkbox"/> Site Development Plan	_____	<input type="checkbox"/> APFO Roads Test/Mitigation Plan/Traffic Study
<input type="checkbox"/> Landscape Plan/Supplemental Plan	_____	<input type="checkbox"/> Noise Study
<input type="checkbox"/> Grading Plan	_____	<input type="checkbox"/> Sight Distance Analysis/Speed Flow Study
<input type="checkbox"/> House Type Revision/Walk-Thru Red-Line	_____	<input type="checkbox"/> Floodplain Study
<input type="checkbox"/> Water and Sewer Plan	_____	<input type="checkbox"/> Stormwater Management Comps/Geo-Tech Report
<u>Applications</u>		<input type="checkbox"/> Industrial Waste Survey (DPW)
<input checked="" type="checkbox"/> Alternative Compliance Application	<u>1</u>	<input type="checkbox"/> Road Poster Form Letter
<input type="checkbox"/> Planning Board Application	_____	<input checked="" type="checkbox"/> Justification Letter
<input type="checkbox"/> ASDP/CSDP Application	_____	<input type="checkbox"/> Perc Plat
<input type="checkbox"/> DED Application/Checklist	_____	<input type="checkbox"/> Scenic Road Exhibits
<input type="checkbox"/> DED Fee Receipt/Deeds/Cost Estimate	_____	<input type="checkbox"/> Deeds
<input type="checkbox"/> Overall Scaled Composite	_____	<input type="checkbox"/> Photographs
<input type="checkbox"/> Water & Sewer Plans	_____	<input type="checkbox"/> Retaining Wall Comps/Details
<input type="checkbox"/> List of Street Names	_____	<input type="checkbox"/> Poster/Community or HDC Meeting Information
		<input type="checkbox"/> Route 1 Details/Summary

WAS: Received Tentatively Approved Recorded

Received and Revised Approved On May 31, 2018

COMMENTS: See memo Due- 17 Working Days: 6/25/18

Check, initial and return to the Department of Planning and Zoning if plan is approved with no comments.

DPZ STAFF INITIALS: KTB

Howard County Department of Planning and Zoning
 Division of Land Development
ALTERNATIVE COMPLIANCE APPLICATION
[Alternative Compliance from Subdivision and Land Development Regulations]

Date Submitted/Accepted 5/31/18 DPZ File Number WP-18-130

I. Site Description

Subdivision Name/Property Identification: Howard County Fairgrounds
 Location of property: 2210 Fairgrounds Road, West Friendship, Maryland 21794
 (Street Address and/or Road Name)

Commercial
 (Existing Use)

Commercial
 (Proposed Use)

15
 (Tax Map No.)

3 & 4
 (Grid/Block No.)

10, 28, & 98
 (Parcel No.)

Third
 (Election District)

B-2
 (Zoning District)

88.69 acres
 (Total Site Area)

Provide a brief site history including reference to all previously submitted or currently active plans on file with the County (subdivision plans, Board of Appeals petitions, alternative compliance petitions, etc.)

PS 034

II. Alternative Compliance Request

In accordance with Section 16.104 of the Howard County Subdivision and Land Development Regulations, the Department of Planning and Zoning, in conjunction with the Subdivision Review Committee **may grant alternative compliances or modifications to the minimum requirements stipulated within the Regulations if it is determined that extraordinary hardships or practical difficulties may result from strict compliance with the regulations, or if it is determined that the regulations may be served to a greater extent by an alternative proposal.**

In the area below, the petitioner shall enumerate the specific numerical section(s) from the Subdivision and Land Development Regulations for which an alternative compliance is being requested and provide a brief summary of the regulation. Attach a separate sheet if additional information is appropriate.

<u>Section Reference No.</u>	<u>Summary of Regulation</u>
1. <u>16.155(a)(1)</u>	<u>Site Development Plan is required for Non-Residential Development</u>
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

III. *Justification*

All alternative compliance requests must be fully justified by the petitioner. Incomplete or inadequate justification may result in rejection of the application at the time of submission. Justification must be specific to the subject property. The justification provided by the petitioner should include all factors which rationalize or substantiate the request in accordance with the following criteria:

- a. Summarize any extraordinary hardships or practical difficulties which may result from strict compliance with the Regulations.
- b. Verify that the intent of the Regulations will be served to a greater extent through the implementation of the alternative proposal.
- c. Substantiate that approval of the alternative compliance will not be detrimental to the public interests.
- d. Confirm that approval of the alternative compliance will not nullify the intent of the Regulations.

PLEASE ATTACH A SEPARATE LETTER OF JUSTIFICATION TO SUPPORT THE ALTERNATIVE COMPLIANCE REQUESTS.

IV. *Pre-Submission Meeting Requirements*

- a. **Community Meeting Requirement** - If no previous subdivision plans and/or zoning or conditional use petitions were processed, a pre-submission community meeting is required for the initial plan submittal of all new residential development and for new non-residential development located within 200 feet of a residential zoning district or an existing non-residential development which is located within 200 feet of a residential zoning district and proposed for a floor area expansion of more than 25% in accordance with Sections 16.156(a) and 16.128 of the Subdivision and Land Development Regulations for alternative compliance of the site development plan requirement. [See DPZ policy memo dated 3/22/04 for existing lots/parcels]. The property owner/developer must provide 3 weeks advance notice regarding the community meeting's date, time and location to all adjoining property owners identified in the records of the State Department of Assessments and Taxation and any community association that represents the geographic area of the subject property by first class mail; and sent electronically to any community association registered with the County for projects in a certain geographic area; the Howard County Council; and DPZ, which will place the meeting notice on the DPZ's website. The developer shall send a copy of the minutes and written responses to the meeting attendees and DPZ, either electronically or by first class mail. **A certification that meeting notices were mailed, contact information for the attendees and a copy of the minutes and a written response with a dated return mail receipt or dated email attached to all of the major comments recorded at the meeting must be submitted to DPZ along with the initial plan application. The meeting minutes, including a written response to all questions, shall be sent to all meeting attendees within 60 days of the meeting either electronically or by first class mail [Council Bill 6-2011].**
- b. **HPC Meeting Requirement** - A pre-submission advisory meeting with the Historic Preservation Commission is required for new development located within a Historic District or if the site contains a historic structure (50 years or older) in accordance with Section 16.603A of the Howard County Code. Verify this requirement by checking the Historic Sites Inventory list and maps available at the DPZ public service desk or checking with the Resource Conservation Division. The property owner/developer must contact the DPZ, Resource Conservation Division for the HPC scheduling process and procedures. **The property owner/developer must submit a copy of the minutes from the HPC Advisory Meeting to DPZ along with the initial subdivision or site development plan application.**
- c. **MAA Meeting Requirement** - For all proposed subdivisions or developments located within the BWI Airport Noise Zone or the Airport Zoning District (4 mile radius from the center of the airport), the review and approval by the Maryland Aviation Administration is required prior to signature approval of final plan road and SWM construction drawings, and/or site development plans, or alternative compliance approval of SDP. Please contact the MAA at P.O. Box 8766, BWI Airport, Maryland, 21240-0766, or (410) 859-7100. A copy of the MAA approval letter must accompany the submission of the final road/SWM construction plan original drawings, and/or site development plan original, or alternative compliance application.

- d. **Design Advisory Panel (DAP)** – A pre-submission advisory meeting with the Design Advisory Panel is required for sketch and preliminary equivalent sketch plans that are submitted on or after November 3, 2008 for new development or redevelopment projects on parcels located in the U.S. Route 1 corridor that are zoned 'CE', 'CAC' or 'TOD' or that adjoin the Route 1 right-of-way and that are subject to the Route 1 Design Manual; on parcels located within the U.S. Route 40 corridor that are zoned 'TNC' or that are subject to the Route 40 Design Manual; on parcels which age-restricted adult housing is to be constructed pursuant to a conditional use; on redevelopment parcels located in the New Town Village Centers with boundaries proposed by a property owner or established by the Zoning Board or County Council; and for revitalization and redevelopment of Downtown Columbia in accordance with Sections 16.1501 and 16.1504 of the Howard County Code. The property owner/developer must contact the DPZ, Division of Comprehensive and Community Planning to verify this requirement and for information concerning the DAP meeting scheduling process and procedures. **The property owner/developer must submit a copy of the DAP project design recommendations to DPZ along with the initial subdivision plan application.**

V. **Plan Exhibit**

A. **Number of Copies Required**

The alternative compliance application must be accompanied by copies of a detailed plot plan, subdivision plat or site development plan (**15 sets of the completed alternative compliance application and plan exhibit if the subject property adjoins a County road; 19 sets for properties adjoining a State road**).

In instances where the alternative compliance request concerns an approval extension or if an associated plan is in active processing, only 2 sets of plans are required along with 15 or 19 copies of the application form. **Plans must be folded to a size no larger than 7-1/2" x 12". The pre-packaging of plans and supplemental reports by SRC agency will be permitted by DPZ provided that each package contains a cover letter which itemizes all plans, reports and documents included in the package.**

Please be advised that all plan application submissions are ACCEPTED BY APPOINTMENT ONLY. All plan submission appointments must be scheduled with the Division of Land Development at (410) 313-2350.

Plan applications are available on the DPZ website at <https://howardcountymd.gov/Departments/Planning-and-Zoning/Land-Development>.

B. **Plan Requirement Checklist**

The detailed alternative compliance exhibit, plot plan, subdivision plan or site development plan must indicate the following required information relevant to the alternative compliance request to ensure acceptance of the alternative compliance application for processing.

Legend:	<input checked="" type="checkbox"/> Information Provided	<input checked="" type="checkbox"/> Information Not Provided, Justification Attached
	<input type="checkbox"/> NA Not Applicable	

- 1. Vicinity map scale 1" = 2,000' indicating and identifying the total boundary of the property, exact site location, vicinity roads and north arrow.
- 2. Bearings and distances of property boundary lines for the entire tract and size of tract area.
- 3. North arrow and scale of plan.
- 4. Location, extent, boundary lines and area of any proposed lots.
- 5. Any existing or proposed building(s), structures, points of access, driveways, topography, natural features and other objects and/or uses on the subject and adjacent properties which may be relevant to the petition; i.e. historic structures, cemeteries or environmentally sensitive areas.
- 6. Delineation of building setback lines. *INTERIOR TO SITE*
- 7. Delineation of all existing public road and/or proposed street systems. *PRIVATE*
- 8. Identification and location of all easements.
- 9. Approximate delineation of floodplain, streams, wetland and forested areas, if applicable, and/or

- N/A provide a professional certification that environmental features do not exist on the property.
- N/A 10. Road profile to evaluate sight distance, if the application includes a request for direct access to a major collector or more restrictive roadway classification.
- N/A 11. Any additional information to allow proper evaluation (e.g. for alternative compliance to wetland buffers an alternative analysis and mitigation proposal are needed; for alternative compliance to SDP requirements where there is no subdivision of land, an APFO Roads Test evaluation may be needed, for alternative compliance of final plat or SDP, a copy of property deeds to confirm legal creation or status of property is needed).
- N/A 12. Photographs, perspective sketches or cross-sections as necessary to adequately portray the alternative compliance request.
- N/A 13. The exhibit plans should be highlighted to accurately illustrate the requested alternative compliance(s) to allow proper evaluation (i.e. proposed grading, tree clearing or other disturbances within environmentally sensitive areas or buffers).
14. Submit 2 sets of photographs for all existing on-site structures.
15. Identify the location of any existing wells and/or private septic systems.

N/A 16. **Route 1 Manual**
 Compliance with the Route 1 Manual is required for new development and some alterations or enlargements located in the CE, TOD and CAC zoning districts and for other zoning districts located within the Route 1 corridor. All plan submissions, beginning with the initial subdivision or site development plan, shall show all applicable streetscape, site and building designs responding to the Route 1 Manual's requirements and recommendations. All plan submissions shall provide a written summary of how the proposed design achieves the objectives of the Route 1 Manual. Also, building design and schematic architectural elevation details must be included with the initial subdivision or site development plan submission.

N/A 17. **Route 40 Design Manual**
 Compliance with the Route 40 Design Manual is required for new development and redevelopment projects located in the Traditional Neighborhood Center (TNC) zoning districts and on parcels located within the Route 40 Corridor as defined in the Route 40 Design Manual. All plan submissions within the Route 40 corridor, beginning with the initial subdivision or site development plan, shall show all applicable streetscape, site and building designs responding to the Route 40 Design Manual's requirements and recommendations. All plan submissions within the Route 40 corridor shall provide a written summary of how the proposed design achieves the objectives of the Route 40 Design Manual. Also, building design and schematic architectural elevation details must be included with the initial subdivision or site development plan submission.

18. **Property Deeds** – Information to confirm the legal creation or status of the property to be improved. (Copy of deeds from Howard County Land Records Office or record plat name and recording reference number). **A complete chronological deed history is required for all deeded residential properties. Provide 2 copies of the recorded deeds for the subject property tracing its history back to 1960.**

19. Please complete the following:

A pre-submission meeting was held with DPZ on August 11, 2017 with _____ [date] _____, if applicable.
 DED Chief (Chad Edmondson) & Stephanie Tuite
 [DPZ, Director, DLD Division Chief or other SRC representatives]

VI. **Fees**

The Alternative Compliance application fee shall be in accordance with the adopted fee schedule. All checks shall be made payable to the *Director of Finance*. **The petition will not be accepted for processing until the fee has been paid. Incomplete, incorrect or missing information may result in the rejection of the application** and could cause additional time to be required to revise the application for resubmittal and re-review. For more information or questions, contact DPZ at (410) 313-2350.

- N/A 10. provide a professional certification that environmental features do not exist on the property.
- N/A 10. Road profile to evaluate sight distance, if the application includes a request for direct access to a major collector or more restrictive roadway classification.
- N/A 11. Any additional information to allow proper evaluation (e.g. for alternative compliance to wetland buffers an alternative analysis and mitigation proposal are needed; for alternative compliance to SDP requirements where there is no subdivision of land, an APFO Roads Test evaluation may be needed, for alternative compliance of final plat or SDP, a copy of property deeds to confirm legal creation or status of property is needed).
- N/A 12. Photographs, perspective sketches or cross-sections as necessary to adequately portray the alternative compliance request.
- N/A 13. The exhibit plans should be highlighted to accurately illustrate the requested alternative compliance(s) to allow proper evaluation (i.e. proposed grading, tree clearing or other disturbances within environmentally sensitive areas or buffers).
- ✓ 14. Submit 2 sets of photographs for all existing on-site structures.
- ✓ 15. Identify the location of any existing wells and/or private septic systems.

N/A 16. **Route 1 Manual**
 Compliance with the Route 1 Manual is required for new development and some alterations or enlargements located in the CE, TOD and CAC zoning districts and for other zoning districts located within the Route 1 corridor. All plan submissions, beginning with the initial subdivision or site development plan, shall show all applicable streetscape, site and building designs responding to the Route 1 Manual's requirements and recommendations. All plan submissions shall provide a written summary of how the proposed design achieves the objectives of the Route 1 Manual. Also, building design and schematic architectural elevation details must be included with the initial subdivision or site development plan submission.

N/A 17. **Route 40 Design Manual**
 Compliance with the Route 40 Design Manual is required for new development and redevelopment projects located in the Traditional Neighborhood Center (TNC) zoning districts and on parcels located within the Route 40 Corridor as defined in the Route 40 Design Manual. All plan submissions within the Route 40 corridor, beginning with the initial subdivision or site development plan, shall show all applicable streetscape, site and building designs responding to the Route 40 Design Manual's requirements and recommendations. All plan submissions within the Route 40 corridor shall provide a written summary of how the proposed design achieves the objectives of the Route 40 Design Manual. Also, building design and schematic architectural elevation details must be included with the initial subdivision or site development plan submission.

✓ 18. **Property Deeds** – Information to confirm the legal creation or status of the property to be improved. (Copy of deeds from Howard County Land Records Office or record plat name and recording reference number). **A complete chronological deed history is required for all deeded residential properties. Provide 2 copies of the recorded deeds for the subject property tracing its history back to 1960.**

✓ 19. Please complete the following:

A pre-submission meeting was held with DPZ on August 11, 2017 with _____ [date] _____, if applicable.
 DED Chief (Chad Edmondson) & Stephanie Tuite
 [DPZ, Director, DLD Division Chief or other SRC representatives]

VI. **Fees**

The Alternative Compliance application fee shall be in accordance with the adopted fee schedule. All checks shall be made payable to the *Director of Finance*. **The petition will not be accepted for processing until the fee has been paid. Incomplete, incorrect or missing information may result in the rejection of the application** and could cause additional time to be required to revise the application for resubmittal and re-review. For more information or questions, contact DPZ at (410) 313-2350.

VII. **Owner's/Petitioner's Certification**

I/WE the undersigned fee simple owner(s) hereby make application to the Howard County Department of Planning and Zoning to provide an alternative compliance request of the minimum requirements of the Howard County Subdivision and Land Development Regulations. The undersigned hereby certifies the information supplied herewith is correct and complete, confirms that the regulations and policies as referred to in the attached are understood, and authorizes periodic on-site inspections by the Howard County Subdivision Review Committee agencies. ***If the applicant is the owner's agent, written documentation from owner granting that authority is required at the time of the submission.**

Owner's authorization attached *

Mickey Day, President 2/11/18
(Signature of Property Owner) (Date)
(Fee Simple Owner Only)

Stephanie Tuite 2/11/18
(Signature of Petition Preparer) * (Date)

Howard County Fair Association

(Name of Property Owner)

2210 Fairgrounds Road

(Address)

West Friendship, Maryland 21794

(City, State, Zip Code)

E-Mail mickey.day@comcast.net

410-984-0273

(Telephone)

(Fax)

Contact Person:

Mickey Day

Fisher, Collins & Carter, Inc.

(Name of Petition Preparer, Surveyor/Engineering/Architect
or Agent/Developer)

10272 Baltimore National Pike

(Address)

Ellicott City, Maryland 21042

(City, State, Zip Code)

E-Mail stephanie@fcc-eng.com

410-461-2855

(Telephone)

410-750 -3784

(Fax)

Contact Person:

Stephanie Tuite

Howard County Department of Planning and Zoning
Division of Land Development

**INITIAL SUBMISSION
ALTERNATIVE COMPLIANCE WORKSHEET
(For DPZ Use Only)**

Project Name Howard County Fairgrounds DPZ File No. _____
DPZ Plan Reviewer _____ Submission Date _____
Plan Consultant Representative _____ Time _____

- I. **Application Requirements** *Indicate Yes, No or N/A*
- a. Application is complete _____
 - b. Required number of plans and applications are provided..... _____
 ___ Plans (15 sets on County Road or
 ___ Applications 19 sets on State Road)
 - c. Supplemental Information is provided _____
 - d. Certification of pre-submission community meeting and summary of community
comments with dated responses to all meeting attendees within 60 days is provided
and three week notice given to DPZ and County Council, if applicable _____
 - e. Certification of pre-submission HPC advisory meeting for new projects in
Historic District or listed in Historic Sites Inventory _____
 - f. Photographs of existing structures (for Historic Preservation Review) _____
 - g. MAA Approval Letter (if applicable) _____
 - h. Written summary of Route 1 Manual/Route 40 Design Manual compliance (if applic) _____
 - i. DAP project design recommendation for Route 1/Route 40 projects _____

- II. **Fee Computation** **Fee**
- Number of alternative compliance sections requested _____
- * Base Fee for first two alternative compliance sections (**\$450**)..... _____
- Fee for each additional alternative compliance section (___ additional alternative compliances x **\$50** each)
- _____
- * (Maximum fee of **\$350** for Agricultural Preservation parcels)

TOTAL _____

III. **Certification**

Cash Receipt No. _____ Amount _____

SAP Acct 1000000000-3000-3000000000-PWPW000000000000-432530

Check issued by _____

- ___ Alternative Compliance application is accepted for processing.
- ___ Scheduled SRC meeting date.
- ___ Alternative Compliance application is rejected.

Reason: _____

___ Resubmission is accepted. Date _____ Staff initials _____

Comments/Notes _____

Howard County Fairgrounds Association
Alternative Compliance Justification

On behalf of our clients, Howard County Fair Association, developer of the property at Howard County Fairgrounds, 2210 Fairgrounds Road, West Friendship, Maryland, 21794, we are requesting Alternative Compliance from the following Section of the Howard County Subdivision and Land Development Regulations (Regulations):

Section 16.155 (a) - A site development plan, approved by the Department of Planning and Zoning, is required for:

(1) Non-Residential:

(i) New or expanded nonresidential development, including commercial, industrial, institutional and utility development, plus public buildings, schools and other public facilities, but excluding road, water, sewer or drainage improvements and development associated with a use permit approved by the Department in accordance with section 128 of the zoning regulations.

Howard County Fairgrounds is an existing group of parcels zoned B-2 with a number of existing structures that were built around 1978 and are planned to remain. Two new steel building additions are proposed next to an existing steel building with open interior for exhibitor show space located well within the heart of the fairground property and not in close proximity to the exterior boundary. All existing and proposed improvements within this area are shown on the "Alternative Compliance Plan".

Justification for the alternative compliance from Section 16.155(a)(1)(i) is as follows:

a. "Summarize any extraordinary hardships or practical difficulties which may result from strict compliance with the Regulations."

As stated above, the property is currently zoned B-2 and the existing site improvements date back to around 1978 and there is no site development plan of record for the property. The owner wishes to only add the two steel buildings adjacent to and adjoining an existing steel building within the property. There are many existing structures already existing on-site. The existing access is being utilized as well as a group of existing tar & chip private roads on-site. Only portions of the existing asphalt are being replaced to regrade and improve the storm drainage system along with ramps at the rear of the proposed structure. No new driveways or access roads are proposed. To require the property be subject to a full site development plan review and approval for these proposed structures within the middle of the property where so many other structures are built with no plans of record would be burdensome to the owner.

b. "Verify that the intent of the Regulations will be served to a greater extent through the implementation of the alternative proposal."

Although the intent of the regulations is to have Site Development Plans for all non-residential properties, subjecting the owner to a full site development plan review and approval for these

Howard County Fairgrounds Alternative Compliance Petition Justification (continued)

improvements would be burdensome. An "Alternative Compliance Plan" will be submitted on mylar for signature to serve as record for the existing and proposed improvements in this area of the property. Since this "plan of record" will be submitted and the proposed additions are well within the middle of the property, it should not be looked at as an impact to the public.

c. "Substantiate that approval of the alternative compliance will not be detrimental to the public interests."

This alternative compliance will not be detrimental to the public interest, as stated above, since the "Alternative Compliance Plan" will be submitted on mylar for signature by county agencies to serve as record for the existing and proposed improvements in this portion of the site, therefore it should not be viewed as detrimental to the public interest.

Also, the Division of Land Development policy memo dated May 1, 2011 states that an applicant may submit as an alternative compliance petition application for consideration instead of the standard site development plan when minor alterations or additions are proposed to any existing structures. When compared to the amount of structures that already exist on the property, the proposed additions are minor in nature. A Simplified Environmental Concept Plan was already reviewed and approved showing stormwater management for the proposed additions, therefore this application should not be viewed as detrimental to the public interest.

d. "Confirm that approval of the alternative compliance will not nullify the intent of the Regulations."

As stated above, we feel the proposed additions to an already developed property of this size should be considered minor in nature when compared to the amount and size of structures that already exist on the property. Due to the fact that these additions are well within the interior of the property far from the exterior boundary and the fact that stormwater management is proposed for the improvements, this should not be seen as a nullification of the intent of the Regulations and should be seen as in compliance with the referenced policy memo.

W.O. 07070-6001