



## Development Review Committee Meeting

Wednesday, March 04, 2026 at 1:00 PM

Theodore D. Washington Municipal Building, Henry "Emmett" McCracken Jr. Council Chambers,  
20 Bridge Street, Bluffton, SC

### AGENDA

All Applications can be viewed on the Town of Bluffton's Permit Finder page  
<https://www.townofbluffton.us/permit/>

**I. CALL TO ORDER**

**II. ROLL CALL**

**III. PUBLIC COMMENT**

**IV. OLD BUSINESS**

**V. NEW BUSINESS**

- 1. Bruin Road District PUD (PUD Master Plan):** A request by Kurt's Investments, LLC, for review of a Planned Unit Development (PUD) Master Plan application. The Applicant proposes a mixed-use development with associated infrastructure. The property is currently zoned Neighborhood Core-Historic District (NC-HD), Residential General (RG), and Neighborhood General-Historic District (NG-HD) and consists of approximately 7.26 acres identified by tax map numbers R610 039 00A 0024 0000, R610 039 00A 030B 0000, R610 039 00A 0030 0000, R610 039 00A 0048 0000, R610 039 00A 0026 0000, R610 039 00A 0027 0000, R610 039 00A 0029 0000, R610 039 00A 030D 0000, R610 044 000 0126 0000 located east of Bluffton Road north of Bruin Road. (MP-01-26-020087) (Staff - Dan Frazier)

**VI. DISCUSSION**

**VII. ADJOURNMENT**

**NEXT MEETING DATE: Wednesday, March 11, 2026**

*“FOIA Compliance – Public notification of this meeting has been published and posted in compliance with the Freedom of Information Act and the Town of Bluffton policies.”*

*In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the Town of Bluffton will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. The Town of Bluffton Council Chambers are ADA compatible. Auditory accommodations are available. Any person requiring further accommodation should contact the Town of Bluffton ADA Coordinator at 843.706.4500 or [adacoordinator@townofbluffton.com](mailto:adacoordinator@townofbluffton.com) as soon as possible but no later than 48 hours before the scheduled event.*

*Executive Session – The public body may vote to go into executive session for any item identified for action on the agenda.*

*\*Please note that each member of the public may speak at one public comment session and a form must be filled out and given to the Town Clerk. To submit a public comment online, please click here:*

*<https://www.townofbluffton.sc.gov/FormCenter/Town-15/Public-Comment-60>*

*Public comment is limited to 3 minutes per speaker.*

**March 4, 2026**  
**Development Review Committee Staff Comments**

**Bruin Road District PUD (PUD Master Plan):** A request by Kurt's Investments, LLC, for review of a Planned Unit Development (PUD) Master Plan application. The Applicant proposes a mixed-use development with associated infrastructure. The property is currently zoned Neighborhood Core-Historic District (NC-HD), Residential General (RG), and Neighborhood General-Historic District (NG-HD) and consists of approximately 7.26 acres identified by tax map numbers R610 039 00A 0024 0000, R610 039 00A 030B 0000, R610 039 00A 0030 0000, R610 039 00A 0048 0000, R610 039 00A 0026 0000, R610 039 00A 0027 0000, R610 039 00A 0029 0000, R610 039 00A 030D 0000, R610 044 000 0126 0000 located east of Bluffton Road north of Bruin Road. (MP-01-26-020087) (Staff - Dan Frazier)

**\*Based on the substantial revisions required, a resubmittal of the PUD Master Plan application will return to the Development Review Committee for review and comment.**

**Staff comments for the proposed PUD Master Plan Application are as follows:**

- 1. Additional Applications Needed for Submittal**
  - a. Zoning Map Amendment
  - b. UDO Zoning Text Amendment (Still needed)
  - c. PUD Master Plan
  - d. PUD Text (Still Needed)
  - e. Provide readable PDF and Word Versions of the documents.
  - f. Provide Individual PDFs of each exhibit.
  - g. Provide tabbed booklet indexing each item, including individually plastic pockets for maps and exhibits.
  
- 2. Cover Letter**
  - a. Describe why there is a need for a Planned Unit Development. Why doesn't the existing zone districts work?
  - b. Reference to preservation and community needs, however, nothing is being preserved and no community meetings have been held. Staff is recommending that the applicant holds a community meeting for residential input on their proposed plan.
  - c. Thoughtful Design: references smaller footprints, however, they are proposing that they are allowed to have larger footprints than what is currently allowed in the UDO,
  - d. Appropriate scale: states the PUD is lower traffic counts, however, they are proposing more units than are currently entitled.

- e. Workforce Housing: additional information is needed including term sheets for how this will be accomplished.
- f. Phased Approach: No phasing plan has been provided.
- g. Team: No information is provided on each group including names, contacts, addresses, phone numbers, email, and if they currently have a business license in the Town.

**3. Project Overview**

- a. Site History & Cultural Relevance: reference to 27 lots for title research, however, only 10 lots are part of the application. Also, no documentation was submitted as stated was produced by Mrs. Marks. Provide documentation.
- b. Design Team: Provide information as stated above. States that the team’s focus is honoring Bluffton’s History, however, that’s not explained. The site is new construction, how are you preserving characteristics that make Bluffton special.
- c. Development Team: no additional information is referenced in the submittal document about Flyway Development and how they plan to bring this project to fruition. Concerning that the site will be graded and nothing else happens. See Car Village at Village at Verdier/Seagrass Station and Parkway apts. In front of Hampton Lake.
- d. Preliminary Community Engagement: discussion of community needs, however, no additional information (market study) is provided.
  - i. It’s stated that the Team wants to better understand what is wanted with facilitated conversations. Additional community meetings will be required.
- e. In-depth Community Engagement: Provide a table with dates, times and participants that have already happened.
- f. Due Diligence: States additional studies and reports will be needed to inform planning and design.
  - i. This information is needed as part of the submittal.
- g. Vision & Impact: The Bruin Road District: states that the building form will mirror the historic architecture and current mass and scale of Old Town.
  - i. The issue is that the applicant is requesting larger building footprints and the ability to connect an unknown number of buildings together.
    - 1. In October of 2025, the UDO Administrator made an interpretation that multiple buildings connected with covered corridors or hallways, are interpreted as one building.
- h. Project Highlights: Why a PUD?
  - i. Statements include that the property is not an up-zoning.

- ii. **Appropriate Scale:** states that base zoning for the parcels allows 42 dwelling units. However, the RG Zoning District allows 4 units per acre. This site currently has 5.429 acres zoned RG, which allows for 21 RDUs. Accessory Dwelling Units associated with a single-family lot does not allow or count as double density.  
Provide an exhibit as to how you determined that 60+ units can be built in the Historic District properties.
- iii. Appropriate Scale (cont.) states that the section of Bluffton Road between State of Mind and Bruin Road is characterized by smaller footprints, historic architecture and no more than three stories. However, the applicant is asking for larger footprints.
- iv. Community Benefit: Boutique hotel that provides public amenities and park programming. No information is provided about the hotel and the amenities. Only a statement.  
Section states that the Bluffton Chamber of Commerce IDs a boutique hotel as critical community need. Please provide and exhibit from BCC as to this being necessary.
- v. Workforce Housing: Update to state Unified Development Ordinance and not zoning.
- vi. Parking Solutions: **Provide a parking study as part of the resubmittal** that demonstrates that the proposed uses can meet a certain threshold for parking.
- vii. Historic Storytelling: Provide this information as an exhibit. Also, it's stated that there are concepts, naming and signage. **Provide a Master Sign program as part of the submittal.**
- viii. Authentic Mix of Uses: The illustrative Master Plan (not listed as any Exhibit but rather placed after the Land Use Table) lists only Mixed-Use and Hospitality, as part of the modification requests, the applicant is requesting to have larger than allowed apartment mansions, however, they are not shown on the overall concept plan.
- ix. Phased Approach: It's stated that it will be phased, however, no phasing plan has been provided. No information on how the site will be developed.

## Supplement to the Zoning Map Amendment

### Section I - Narrative

#### A. Introduction

- a. States 10 parcels that are unimproved. There are three structures on three separate parcels totaling 7.26 acres, however the parcels as ID'ed in the ROD Bk149 Pg142 total 7.899 Acres.
- b. States that the subject parcels will collectively be referred to as the "Property". Then states that the Property is split zoned. "Split-zoned" is a reference to an individual parcel that is located within two or more different zoning districts. None of the parcels that make up this Property are split-zoned.
- c. Inconsistencies throughout document regarding which zoning district regulations will be applied to the property. It is initially introduced as Neighborhood Core and Neighborhood General but refers to only one district in other sections.

B. Background – No comments

C. Property – Proposed Use and Development

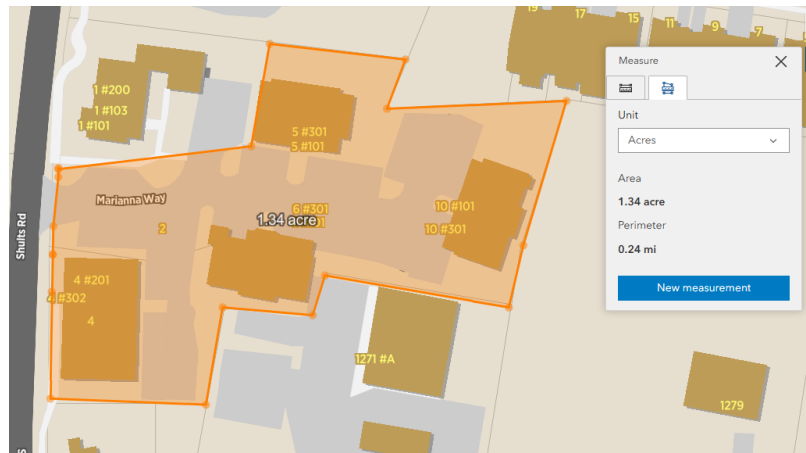
- a. Staff will not support the removal of any of the PUD Properties from the Old Town Bluffton Historic. **All the remaining PUD Properties will be brought into the Old Town Historic District and be subject to the Certificate of Appropriateness – Historic District (COFA-HD) process.** This will include amending the UDO text to add PUD-HD to the UDO Section 5.15.3 (Regulating Districts).
- b. Anything proposed that varies from the UDO will need to be specifically cited in the PUD text, otherwise the UDO will apply. This includes Old Town signage and parking requirements (UDO Sections 5.15.6.Q. and 5.15.7, respectively).
- c. Proposing 96 RDUs,
  - 10k Retail
  - 10k Restaurant
  - 12k Office
  - 85 Room Hotel
- d. States a mix of commercial, lodging, duplex, triplex, village apt. house, village lodge, commercial units in the form of Main Street Buildings, commercial cottages and live-work units. States final design to be completed after PUD rezoning is approved. The Concept Master Plan is the time to layout how the site will be developed. There are multiple entitlements listed above, however, the illustrative master plan only shows Hospitality and Mixed-Use.
- e. States a written Housing Agreement will be recorded with the ROD. **Provide a copy of the proposed Housing Agreement as part of the resubmittal.**

- f. States there is a need for additional hospitality and lodging, however, there is no information provided as to what is considered hospitality. **Provide information documenting the established need for additional hospitality and lodging.**
- g. References the inclusion of a “high-quality hospitality and/or an Inn in the area”. The UDO says an inn consists of 6-12 rooms and a hotel is more than 13 rooms. Earlier sections mention a boutique hotel up to 85 rooms, but the inclusion of “or” makes it possible that only 12 will be provided.

D. Traffic Impact and Access Study – land use

Exhibit G (Transportation Impact Analysis) needs additional review and discussion.

- a. No information is provided as to how the applicant came to a conclusion as to what is currently allowed in each district.
- b. The Traffic Consultant used a by-right count based on the site being able to accommodate 100 Multi-Family Units, 10,000 SF of Retail/Shops, 10,000 SF of Restaurant, 25,000 SF of General Office, 18 Single Family Residents and 18 Short Term Rental Units.
- c. The total project is 7.29 acres, of that 5.429 acres are zoned Residential General or roughly 74.4% of the site. Neighborhood Core-HD – 1.34 Acres = 18.3% of the Project & Neighborhood General-HD – 1.13 Acres = 15.5% of the Project. Based on the acreage **Staff believe that there could only be roughly 7,000 SF of Commercial and roughly 40 RDUs in the Historic District and 21 RDUs in the Residential General zoning district.**
  - i. Staff came to this conclusion by using a similarly sized development, Old Village Square. Old Village Sq. 1.34 acres – 4 buildings, 1k sf retail and 5 units per building.)



- d. The TIA needs to be updated to reflect actual by-right entitlements to accurately assess the impact of the proposed development request. Staff

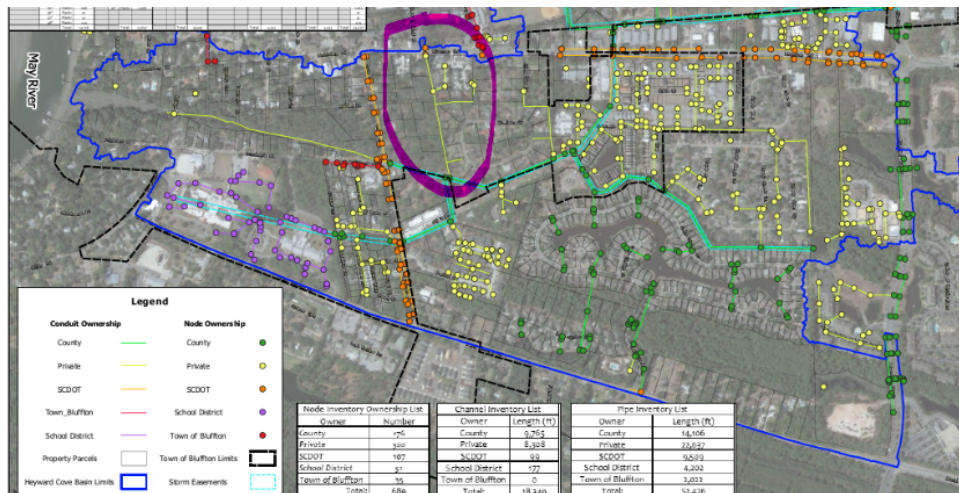
does not agree with the TIA's By-Right assumptions included in the Project Trip Generation Summary.

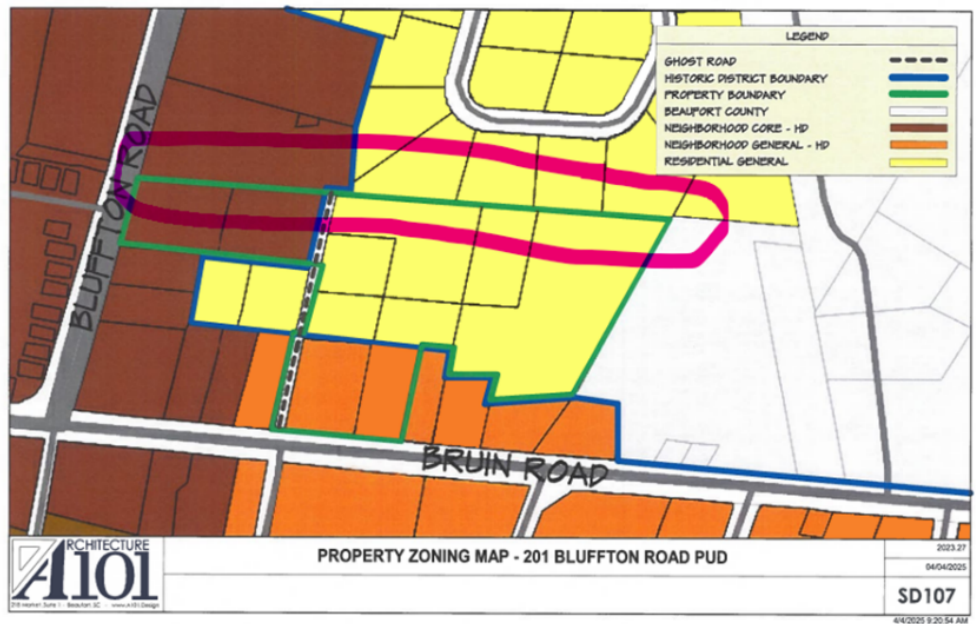
- e. The TIA states that there is an assumption of a 48% internal capture rate. Please show where this is an acceptable amount. Typically you could estimate anywhere between 10-30%. Even at 30% that is for high-intensity mixed-use, which this is not.
- f. **TIA will be reassessed with Staff, our consultant and SCDOT to determine if improvements are needed as a result of the new document.**

E. **Ghost Roads** – Applicant will need to formally request/petition to Town Council to take ownership of the Ghost Roads. Provide a connectivity exhibit that explicitly shows how your proposed alternative street grid provides equal or better public-access both pedestrian and vehicular compared to the original Martin subdivision intended. Contact the Town Manager to discuss steps needed.

F. **Stormwater** The following comments are from our watershed management division.

- For the purpose of this submittal, feasibility of BMPs has not been determined. Therefore, general BMP locations and allocated surface area for retention and detention BMPs must be shown.
- Remove Stormwater Calculator from the application.
- The subject development property has drainage features related to Heyward Cove drainage network that ultimately outfalls into the County's 1972 USDA Project. There may be need for maintenance of channel and/or upgrade based on proposed development that should be taken into consideration during permitting and plan review. Images will be provided highlighting drainage information.





- Document language should be updated to reflect applicability of current stormwater regulations and not specifically the SOLOCO Guidelines.
- Coordinate and provide documentation of approval from Beaufort County for the proposed encroachment of site work into the existing County-owned ditch and maintenance easement.
- The culvert that runs under Bruin Road is currently under sized and most likely will need to be upgraded per the Heyward Cove Comprehensive Drainage Study. Will need to follow up with Beaufort County and SCDOT.
- Conflict between Preserved and planted trees and BMP locations.

## Section II - Rezoning Criteria

- Section 3.g Compatibility with surrounding uses and zoning districts – aesthetics. Application states (a) they propose that the development and design standards of the adjacent NC-HD zoning be made applicable to the PUD and (b) are not seeking any deviations or exceptions to the Town’s Building and Development Standards.
  - This section needs to be updated.
    - This thought process makes it confusing as to what you are proposing to do. If you want to create a PUD, it needs to be clear as to what exactly you want.

- The applicant is asking for larger building footprints and square footage, reductions in parking regulations and the ability to have multiple buildings connected to each other.
- Spell check, multiple errors

**Section III - Planned Unit Development Review Criteria**

- Section F – states that the applicant proposes to adopt the design and development criteria of the NC-HD and NG-HD districts. This contradicts the Rezoning Criteria listed above. (Section 3.g)

**Section IV - Text Amendment Review Criteria**

**Section V - PUD Master Plan**

- Check for spelling errors (Mater v. Master)
- All comments provided in Section 5 PUD Master Plan apply to Section 2 Rezoning Criteria and any other application review criteria associated with this submittal.
- Section 4.a – statement that, per the TIA, that the PUD will create less traffic.
  - See comment from TIA Assessment above. The TIA needs to be adjusted to reflect actual current entitlements.
- Section 4.b – statement about not seeking any variations or deviations.
  - See comments above regarding the requested modifications.
- Section 4.f – States that the development, per the TIA, will create less volume.
  - Update TIA to reflect accurate volumes of traffic and future traffic. See previous comments related to by-right comparison.
- Section 4.g - Same comment regarding not seeking any deviations.
  - See comment above about modification.
- Section 5. – Ability to be served by adequate public services.
  - Provide ‘will serve’ letters from all public agencies.
- Section 6 – Demonstrating innovating site planning.
  - The statement provided does not explain how the Applicant is doing this. There is not enough information to meet this criterion.
- Section 7 – Ability of site to accommodate the densities.
  - Staff does not believe that the entitlements being requested can actually fit on the property. Provide a capacity study showing full capacity while meeting parking, stormwater and open space requirements.
- Section 8 – Conformance with adopted plans and polices.
  - Update this Section to identify what adopted plans with references to each section that this plan is in conformance with.

**Unified Development Ordinance Modifications**

The following comments are based on the proposed modifications that would be included in the PUD.

- Section 5.3.7.B.2.a Adjacent Use Buffers.
  - Applicant’s request – “A 10-foot-wide landscape buffer shall be required along the perimeter of the PUD unless the adjacent use is determined by the Administrator to be a compatible use.”
  - Staff’s recommendation – A 10-foot-wide landscape buffer is required around the entire PUD. Where conflicts arise with any and all utility easements, additional buffer width may be required as determined by the UDO Administrator.
- Section 5.3.7.E.1 Foundation Plantings
  - Applicant’s Request – “The average 8-foot-wide planting area may extend across lot lines for lots or parcels within the PUD.”
  - Staff Response – Provide additional information on this regulation. It’s unclear how this will be applied.
- Section 5.11.3 Parking Calculations
  - Applicant’s request – Insert new Section 5.11.3.D
    - Staff Response – There is no section “C”, also, it seems that this modification should be the Section 5.11.3.A.
    - Consideration should be made to review this entire section and rethink how this section should be drafted.
  - Applicant Request – Section 5.11.3.A “Within the Bruin Road District, shared parking may allow for the 30 percent reduction...”
    - Staff Response – Update the language to the following, “Within the Bruin Road District, shared parking may allow for a reduction of up to 30 percent based upon the compatibility...” also the following needs to be added, “The Applicant shall provide a parking study to justify the number of spaces for shared parking. The Applicant shall provide a shared parking easement that must be approved by the UDO Administrator and be recorded with Beaufort County to allow the shared parking arrangement between property owners/ tenants.”
  - Applicant’s Request – Section 5.11.3.C.a – “All commercial uses except lodging shall be 4 spaces per 1,000 SF.”
    - Staff Response – Ancillary uses associated with lodging (hotels) should be counted towards meeting the 4/1000 parking requirements. If a restaurant is associated with a hotel that is intended to be used by

patrons other than those staying at the hotel, the appropriate amount of parking will need to be provided.

- Applicant Request – Section 5.11.3.C.b.1 – “1 space for 1 bedroom units & studios.”
    - Staff Response – Staff is not supportive of this section – at a minimum for a one bedroom or studio unit a minimum of 1.5 parking spaces would be acceptable.
  - Applicant Request – Section 5.11.3.C.c – “Lodging shall be 1 space per room for rent plus two spaces per 1,000 SF of ancillary office use.”
    - Staff Response – See comment above regarding ancillary uses to hotels. This needs to be updated to say, “Lodging shall be 1 space per room for rent plus four spaces per 1,000 SF of ancillary commercial use.”
  - Applicant Request – ADD the following Section 5.11.4.A.2 “Golf cart parking shall count toward parking requirements within the Bruin Road District but shall not constitute more than 20% of overall spaces when combined with compact spaces.”
    - Staff Response – In April of 2024, Town Council passed an Ordinance that completely contradicts this request. Staff is not supportive of allowing for golf cart parking to count towards the required parking for a development.
  - Applicant Request – Delete Section 5.11.4.A.3 Parallel Spaces
    - Staff Response – Same comment as stated above, staff is not supportive of this request.
  - Staff is requesting a Parking Management Plan that outlines how you will prevent the ‘parking creep’ of overflow parking out to the public right-of-way and parking into adjacent properties.
- Section 5.15.5.A Neighborhood Core Historic District (NC-HD)

It is completely confusing and complicated as to what is being proposed. Staff is recommending that the Applicant creates a separate section that outlines all of the building types being proposed in the Bruin Road PUD. The title proposed is misleading and implies that all of the properties in the PUD are zoned Neighborhood Core, Center or General Historic District.

    - Applicant Request – “All Building Types allowed within NC-HD, NCE-HD and NG and the following.”
      - Staff response –
    - Applicant Request – Village Apartment House (Building Type)

- Staff Response – Applicant describes the Village Apartment House as a Mansion Apartment House and under the characteristics, it’s described as a center hall and as a large estate house (which does not exist in the UDO). Update document.
- Staff Response – Size Range states 12,000 SF which is a specific number. Applicant needs to update the plan to provide an actual range.
- Staff Response – Maximum Footprint is listed as 4,000 SF and the height is 2-2.5 stories. The size range and max foot print are not consistent. It’s impossible to have a 12,000 SF unit if the maximum footprint limits the building to no more than 10,800 SF (2 stories at 4,000 SF and the max of the half story is 2,800 SF or 70% of the second floor).
- Staff Response – Units may be rentals or condominiums. It should be noted that if proposed as Short Term Rentals (STRs), the Town allows for one STR per property.
- Applicant Request – Village Lodge (adaptation of Main Street Building)  
It’s staff perspective that the Applicant should look to create a building type specifically for a hotel. Trying to mimic the Main Street Building makes it more complicated than creating a new building type. Considering looking to outside assistance with creating this new building type.
  - Staff Response – Under General, it states ‘Mixed-Use Building,’ is a mixed-use building an actual building with a mix of uses or is it a hotel building?
  - Staff Response – Size Range, same comment as above, this is a specific number and not an actual range. Update accordingly.
  - Staff Response – Restrictions, the text states that a connector may be used to connect multiple buildings with no limitations. There is no description as to what the connectors will be. Is it useable square footage? There’s no description of length between buildings. Town Staff has reservations in this.
- Staff is requesting that a Maximum Aggregate Building Length requirement. Staff’s concern is that this allows for one massive monolithic structure connected by hallways which completely destroys the Old Town mass and scale.

**Illustrative Master Plan**

The following comments are based on the illustrative maps that were provided in the submittal.

- Provide a Site Data Table on the Master Plan. Information should include (but not limited) the following information. Site Area, pervious area, impervious area, parking summary, open space calculations,
- Site Layout. The Master Plan vision should follow a spatial framework which includes an Environmental stewardship.
  - No topography map was provided. Provide a topo survey and design based on the natural contours.
  - The plan should focus on building placement. The current design is reflective of a looped driveway with all on-street parking. The site should be designed with having terminating vistas. This could be achieved by shifting the center to the north slightly and having a building as the terminus for the State of Mind Ext. The entrance off Bruin Road should also shift to the East to align with the center of the development.
  - Site should be designed with providing parking nodes. This puts the emphasis on the buildings and not the parking. The realigned Bruin Road access point, creates a larger area that can accommodate both building and parking lot.
  - As designed, there is not enough information on the plan to show a well thought out plan. There is no information provided regarding street width/cross sections, crosswalks supporting pedestrian circulation, building footprints/orientation, etc. All internal streets are lined with parking, making for a very auto-centric design unfriendly to pedestrians and bicyclists.
  - Connectivity. There is a 24' future access easement with Magnolia Village (to the north) that should be contemplated as another access point providing addition connectivity.
  - Provide a copy of the survey on the site. One was not provided.
  - All existing easements need to be shown.
- Open Space Exhibit
  - There is a 15' sewer easement that runs the length of the northern boundary with Magnolia Village.
  - Tree save is not legible. Update exhibit.
  - Section 5.6.5 of the UDO requires a dedicated 10% open space for residents, provide documentation of this being met.
  - There should be open views to the one identified park area. As proposed, the majority of the park boundary is adjacent to street parking.sewer

- Sewer
- rrrsewer
- For any development or redevelopment activities, regardless of the use, a minimum of twenty percent (20%) of the gross acreage shall be specifically identified and developed or preserved as open space. Section 5.6.5 types of land included states that the UDO Administrator may specify the type open space land to be provided.
  - The 10' perimeter buffer is not a permitted use to meet the 20% open space requirement.

**Land Use Table Exhibit**

- Conflicting names in the table. It's listed as Bruin Road District PUD, and 201 Bruin Road PUD. Pick a name a stick with it.
- The following uses are currently listed as being Conditional in the NC-HD and NG-HD Districts while the Bruin Road PUD is proposing that they are Permitted By-Right Retail Businesses, Restaurants, Low Speed Recreational Vehicle Sales, Short-Term Rental. Updated the table to list these uses as being Conditional. Each use has conditional requirements that will need to be met.

**Comments received from Joe DePauw, Historic Preservation Committee Chair:**

- The “in-depth community engagement” noted in the Project Overview should include the residents of Pinewood. While not within in the town limits this concentrated upzoning would have an outsized impact on their neighborhood.
- The applicant quotes the Comprehensive Plan: The Cultural Resources element of the Comprehensive Plan **instructs the Town to strive to preserve the Town’s historic resources along with compatible infill development**, support the local economy, create a stronger community identity of residents and business owners and generate tourism.
  - However, the response fails to recognize that the requested expansion of the Old Town Historic District does nothing to preserve historic resources. As the applicant states on page 17 “The Property does not contain any significant natural or historic features.” It does not “infill development” between elements of the Historic District it only widens the boundary for modern development. The rezoning is simply an over-expansion of our Town’s most intensive zoning district. The Old Town Historic District extents are well established in relation to our historic resources and have no reason to grow.
- It is inappropriate to use the Old Town Historic District to up-zone Residential General zoning to allow for multi-family and commercial development. Each time

the application addresses this challenge, it insists on referring to a combination of all of the allowed uses in the three zoning districts the various properties fall within (RG, NC-HD and NG-HD). It chooses to ignore the fact that commercial and multi-family are only currently allowed on the four properties fronting the main roads. The vast majority of the property is Residential General and intended to be lower density and compatible with adjacent uses, neighborhoods, and a quieter Bluffton that exists outside of the neighborhood core. Sections addressing items such as noise and density fail to address the vast difference between RG zoning and the proposed commercial and multi-family uses and extensive parking areas.

- Rezoning analysis should focus on the contrast between the allowed uses and scale of development proposed in the rezoning and those currently allowed by Residential General zoning. Bundling the analysis of impacts on the RG zoned properties with those zoned NC-HD and NG-HD zones is inappropriate.
- In addition to the significant upzoning from Residential General zoning that is illustrated by the applicant's own chart (Exhibit C), the application fails to explain why new building types should be allowed a 50% increase in maximum allowable size range from the current largest building in Old Town.