

# **CITY OF RICHMOND**

# REPORT TO COMMITTEE

TO PLANNING- OCT. 2, 2001

4045-20

FILE:

DATE: September 27, 2001

TO:

Planning Committee

FROM:

**Terry Crowe** 

Manager, Policy Planning

Joe Erceg

Manager, Development Applications

RE:

McLennan South Sub-Area Plan Implementation Status

## STAFF RECOMMENDATION

That Council direct staff to prepare terms of reference to undertake a "targeted review" of key issues affecting the implementation of the McLennan South Sub-Area Plan in 2002, including the mitigation of road and servicing costs, building heights, and park/school site development, as per the report from the Managers of Policy Planning and Development Applications dated September 27, 2001.

Terry Crowe

Manager, Policy Planning

Att. 5

Joe Erceg

Manager, Development Applications

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CONCURRENCE OF GENERAL MAMAGER

#### STAFF REPORT

## **ORIGIN**

Planning Committee, at their meeting held September 18, 2001, adopted the following resolution:

"As a result of the ensuing discussion, it was agreed that a progress report, which would include i) the progress of implementing the [McLennan South Sub-]Area Plan, ii) the configuration of the proposed ring road, iii) the location and status of the current applications and pre-application development proposals, and iv) sewer and water details, would be provided at the next Planning Committee meeting."

The purpose of this report is to respond to the above referral.

## THE PLAN

In preparing the City Centre Area Plan, it was determined that Section 15-4-6, the McLennan South area, should be included within the City Centre's boundaries and form a new downtown residential neighbourhood. In January 1995, Council requested that a plan be prepared to guide the development of this area, and on May 21, 1996, a sub-area plan was adopted.

Through the planning process, it was decided that McLennan South should be the lowest density of the City Centre's residential neighbourhoods, ranging from a high of 2½ to 3 storey townhouses in the west down to clusters of triplex/duplex/single-family dwellings and a large area of single-family homes in the east. (Attachment 1) In fact, in the eastern half of the neighbourhood the plan assumes that many existing houses will remain for the foreseeable future as their owners expressed a strong interest in simply selling/redeveloping their backlands. In response, the plan recommends that aspects of the neighbourhood's attractive, somewhat rural, single-family character should be maintained and emulated in the area's new development.

Key to meeting the objectives set out in the plan is the establishment of a combined neighbourhood park/school site between Heather Street and Ash Street, south of General Currie Road, and a number of new roads. While the park/school site is intended to meet the long-term needs of the neighbourhood and is not likely to be constructed until the area's population has increased substantially, the roads are to be incrementally established as development proceeds in order that they may support the area's proposed densification and address community sensitivities to the potential traffic impacts of new development (i.e. noise, increased volumes, and rat running). Two primary features of McLennan South's proposed road network are:

• The "ring road", which is intended as a "circulator" road providing the higher density residential areas proposed around the perimeter of the neighbourhood with convenient road links to adjacent arterial roads (i.e. Blundell Road, Garden City Road, Granville Avenue, and No. 4 Road). It is expected that the establishment of this route and its arterial connector roads (i.e. the recently constructed extension of Jones Road) will reduce traffic impacts on the neighbourhood's existing roads. (Attachment 2, "collector roads")

- New north-south streets (Attachment 2, new "local roads") are intended to break down the neighbourhood's large blocks to:
  - a) Support key principles of the City Centre Area Plan, including the establishment of small, pedestrian-oriented blocks and a high proportion of street-fronting dwellings (versus projects that are more internalized with units primarily fronting private driveways); and
  - b) Facilitate the legal subdivision of backlands for the purpose of creating new single-family lots (which must, by definition, front onto a public street).

# IMPLEMENTATION STATUS OF KEY PLAN OBJECTIVES

#### Services

During the plan preparation process, the installation of sanitary sewers was identified as a neighbourhood priority, and one that the community did not wish to see delayed. As sanitary sewers are not funded under the City's Development Cost Charge (DCC) program, it is Richmond's usual practise to require developers to front-end this work on a project-by-project basis as residential redevelopment progresses. This would have left the timing of sewer installation in McLennan South to the mercy of the residential market. However, at the urging of the community, Richmond instead selected to front-end this work itself (without any mechanism in place to recoup the costs). After a detailed staff review of McLennan South, the installation of sanitary sewers commenced in July 1998, along the neighbourhood's existing roads. This alignment allowed for the retention of significant stands of trees and aided in the replacement of ditches with storm sewers, the upgrade of existing watermains, and the removal of peat from all the area's existing road rights-of-ways (e.g. works covered by Richmond's DCC program). Construction was complete in December 1999 (as shown in **Attachment 3**).

From a redevelopment standpoint, no further sanitary sewer or water works should be required in the west half of the neighbourhood, as multiple-family projects in this area will be adequately served by the recently constructed services. In the east half of the neighbourhood, however, the creation of new single-family lots through the subdivision of existing backlands will require that sanitary sewer and water lines be extended along the area's proposed new roads. While staff have no specific information regarding the financial implications of these additional works on McLennan South's single-family area, the higher per unit cost of servicing this area may be an impediment to its development.

### Park/School Site

The plan directs that a 4.9 ha (12 ac) combined neighbourhood park/elementary school site be established, including 3.2 ha (8 ac) for park use and 1.6 ha (4 ac) for school use. Currently the City and School District own 4.8 ha (11.9 ac) in the vicinity of the designated park/school site, including 3.4 ha (8.4 ac) by the City and 1.4 ha (3.5 ac) by the School District. In order to provide optimum park and school site configurations, two additional lots should be acquired and a City/School District land trade is anticipated. No schedule has been set for these undertakings, or for the site's construction. Until residential development warrants the provision of the park/school, the City and School District intend to rent out the homes located on the site.

With regard to funding of the park, the townhouse project at the intersection of Garden City Road and Jones Road (**Attachment 4**, Application #1) contributed \$67,000 towards design of the park, in lieu of indoor amenity space, as a condition of rezoning. Three other projects are currently considering a similar approach, which could provide an additional +/-\$140,000 for future park development. (**Attachment 4**, Applications #5, 6, and 10)

## Development

The sub-area plan divides McLennan South into four general land use areas: 3-storey townhouses, 2½-storey townhouses, triplex/duplex/single-family clusters, and single-family houses. **Attachment 4** sets out the sub-area's recent history of completed, pending, and anticipated rezoning applications in these areas, together with a map locating each project.

While development was slow in McLennan South with only four applications for rezoning between 1996 and 2000, five applications were received in the first nine months of 2001, and three more are anticipated before year-end. Staff's review of the area's rezoning applications indicates four key findings as follows:

- 1. Current Development Focus: For the most part, development activity is centred west of Ash Street, in the areas designated for 3 and 2½ storey townhouses. The higher densities permitted in these areas offer developers the potential for a greater return on their investment, and a greater ability to accommodate and absorb the cost of off-site improvements (i.e. road dedication, road construction, and frontage works). Furthermore, townhouse projects typically are not dependent on McLennan South's proposed new roads as their sole means of access. This makes it easier for them to accommodate the neighbourhood's somewhat random progression of new road construction than is the case with single-family development.\* (\*See item 2, below)
- 2. Single-Family Development Challenges: McLennan South's proposed single-family area requires that new roads be put in place in order for new, accessible legal lots to be created from existing backlands. And, these roads will be more expensive than those in the neighbourhood's multiple-family areas as they must provide sanitary sewer, telephone, cablevision, and hydro services to the area's new lots (whereas multiple-family parcels will typically access existing services in existing roads). Under ideal conditions, lots fronting General Currie Road or the "ring road" would redevelop first, followed in turn by adjacent neighbours until each block was completely redeveloped. Unfortunately, ideal situations are rarely achievable. Various developers, realtors, and owners in the single-family area have been in frequent contact with staff over the past two years, exploring ways to overcome the challenge of lot-by-lot subdivision in an area that requires a continuous, coordinated road system to facilitate conventional development. Only recently have staff received information to suggest that a developer may be willing to pursue a project in this area (Attachment 4, Application #12). This proposal includes the development of a portion of the "ring road" and a "local road" (e.g. a north-south road), which if put in place would facilitate additional projects on neighbouring properties. It is staff's understanding though that the financial success of this project may depend on the City's support of two key factors:
  - Measures to reduce the cost of the "ring road" to the project (see Item 3, below); and
  - An amendment to the sub-area plan to permit secondary suites in the area designated for single-family homes.
- 3. Mitigation of Road Costs: Projects west of Heather Street have contributed most towards the plan's proposed road network, or more specifically, the "ring road". Developers of these projects have raised concerns with regard to the financial impact of the "ring road" on their projects, but have worked hard with staff to make its implementation practical and affordable. As a result, both staff and the developers seem to agree that the resulting projects are superior with regard to project livability and marketability to what could have been achieved without the "ring road" in place.

Key measures proposed to reduce the financial impact of the "ring road" on affected projects include:

- Reduced road standards (e.g. narrower rights-of-way widths);
- Staff assistance in the coordination of adjacent projects/properties in order to reduce dedication requirements and associated costs; and
- Staff recommendation that developers of the east-west portions of the "ring road" and its
  arterial connectors be eligible to receive credits towards the roads portion of their
  Development Cost Charges (DCC). (It is currently proposed, that this recommendation
  be made to Council on a project-by-project basis in the context of individual rezoning
  applications.)

It should be noted that all three of the measures noted above are considered key to the continuing development of McLennan South. Application #1 (Attachment 4, Molnar/Narland) was required to extend Jones Road and construct a portion of the "ring road" without benefit of these measures, and on this basis argued for a net developable density far in excess of the base density set out in the sub-area plan (e.g. 0.93 floor area ratio/FAR versus 0.75 FAR). In the end, however, this density and the form of development it generated were not considered acceptable to the market, the project was built at a lower density (e.g. 0.82 FAR), and the developer suffered financially. On this basis, staff believe that +/-0.8 FAR is the maximum practical developable density in this area under the current plan, and that the City will have to employ the measures described above and others to minimize the economic impact of the proposed road network on current and future projects.

4. **Building Heights:** In McLennan South's "2½ storey townhouse" area, the base density is stipulated as 0.60 FAR net (with net density being the density calculated on the site area after dedications). The term "base" is used to signal that a higher density may be supported under special circumstances (i.e. where dedications are very large). Elsewhere in Richmond, townhouse projects developed at densities upwards of 0.60 FAR are often three storeys in height. In staff's experience, where possible, developers will try to maximize the number of two storey units in projects of this density, but the need to provide adequate common and private open space frequently forces them to three storeys. A similar problem is faced in some of Richmond's small-lot single-family zones (i.e. CD/61 in Odlinwood), where a density of 0.6 FAR and a 2½ storey height leave little yard space for residents.

This is the problem faced by an anticipated application on the east side of Heather Street (Attachment 4, Application #11). This project's road dedication requirements include a ½ width of a north-south "local road" making it typical of projects throughout the "2½ storey townhouse" area. At a net density of 0.6-0.7 FAR the developer is only able to restrict the project to 2½ storeys if city-wide Development Permit Guideline requirements for open space are waived. At three storeys, on the other hand, the developer is able to provide adequate open space, a well laid out project, good street orientation, and attractive unit designs. In light of this, staff have indicated a willingness to support an amendment to the sub-area plan to permit a greater number of storeys, and will be considering if such an amendment should apply to the entire "2½ storey townhouse" area, plus the "triplex/duplex/single-family cluster area" (as the latter's base density of 0.55 FAR may increase beyond 0.6 FAR due to dedications, etc.). It should be noted here that if such an amendment was adopted, the resulting building height would still be lower than that of the "3 storey townhouse" area as the latter actually permits four storeys, including three residential storeys over one storey of at-grade parking (though no such project has been built as yet).

#### Roads

As set out earlier in this report, the sub-area plan directs that McLennan South's existing road network be expanded with the addition of (i) the "ring road" and its arterial connectors (i.e. extensions of Jones Road, Bennett Road, and two links to No. 4 Road), and (ii) "local roads" running north-south along the rear property lines of the neighbourhood's existing lots. **Attachment 5** illustrates the progress made to date on the implementation of the "ring road" and its connectors. Of the neighbourhood's twelve rezoning applications, seven have or are proposed to contribute to the establishment of the "ring road" system. Five of these applications (including one completed, three pending, and one anticipated) are located between Garden City Road and Heather Street, making this the most advanced portion of the neighbourhood. East of this, the large amount of land controlled by the City and School District for park/school use should aid in the extension of the south leg of the "ring road" to Ash Street; and, Application #12, an anticipated rezoning to permit a 6 lot, single-family subdivision, will be the first to extend the "ring road" through the single-family area to Bridge Street (assuming that the road's construction can be made cost effective).

Only two of the neighbourhood's twelve applications are currently in a position to contribute to McLennan South's system of "local roads". One anticipated in the neighbourhood's "2½ townhouse" area (Applications #11), will be required to dedicate land for the road and fund its construction, but this "local road" will likely not be built until its rights-of-way can be connected to an existing road (i.e. Heather Street, General Currie Road, or Ash Street) via future adjacent development. The other project anticipated to contribute to "local road" development is Application #12, mentioned above as a contributor to the "ring road". The location and size of this project's site could be the key to opening up the block bounded by Bridge Street, General Currie Road, Ash Street, and Granville Avenue for single-family (and triplex/duplex/single-family cluster) development. By providing a leg of the "ring road", critical public access to the block's proposed "local road" will be established, which in turn will support Application #12's proposed subdivision, together with the subdivision of adjacent backlands.

## **NEXT STEPS**

This report's review of the current status of services, park/school development, residential rezoning applications, and roads in McLennan South highlights several key findings, the implications of which should be considered as the City's moves forward with implementation of the sub-area plan.

- While the City has made a significant contribution to the installation of services in McLennan South and road development is expected to pick up substantially as a result of pending and anticipated applications, it appears that the cost of new roads, and in the single-family area additional services, will make it necessary for the City to employ a variety of measures to mitigate the impact of these costs including, among other things, DCC credits for the east-west legs of the "ring road" and its arterial connectors.
- While land has been secured for the school/park site, there is no plan in place for its development. In light of the neighbourhood's recently accelerated development and the possibility that a large number of developers could select to contribute money towards the design and construction of the park, the City can expect pressure to establish a strategy and schedule for the park's construction.

 While it is encouraging to see that the number of development applications in McLennan South has increased substantially over the course of 2001, there has been little activity east of Heather Street and two anticipated applications in that eastern area would require OCP amendments. This suggests that there may be challenges to developing east of Heather Street that should be addressed on an area-wide, rather than project-by-project, basis.

The City could select to pursue one of three alternative approaches to addressing the challenges described above:

## 1. Maintain the status quo

This approach would continue to see issues addressed on a project-by-project basis in the context of rezoning applications.

Pros:

A project-oriented approach provides the City and community with "real life" illustrations of each issue and its possible solutions as it arises through proposed developments.

Cons:

This approach places developers in a position of significant risk (e.g. due to unclear uses, timing, costs, etc.), which may continue to discourage applications in the neighbourhood's more challenging areas east of Heather Street.

# 2. Undertake a targeted review of specific issues

This approach would see the City undertake targeted investigations, with community input, into solutions for the three key challenges identified in this report:

- The mitigation of road/servicing costs, especially in the "single-family" area;
- Building heights in the "2½ storey townhouse" and "triplex/duplex/single-family cluster" areas; and
- A strategy for development of McLennan South's park/school site.

Pros:

This approach would focus attention the neighbourhood's special challenges without calling into question the validity of pending rezoning applications and the assumptions upon which they are based.

Cons:

Issues may arise through this process that cannot be adequately addressed due to the intentionally narrow focus of the proposed investigations.

# 3. Undertake an overall review of the sub-area plan

This approach would see the entire sub-area plan laid open for public and City review.

Pros:

This approach would allow for a thorough review of the plan, including issues that have not as yet been identified.

Cons:

Delays and increased risk to pending applications as a result of this process could lead to their withdrawal and, in turn, the loss of a substantial amount of committed road and park development. In addition, a comprehensive review process could raise concerns with those area residents who expected the plan to provide them with a sense of stability and certainty for the future of their community.

Recommendation:

Based on the strengths and weaknesses of the various options, staff recommend that the second approach, "a targeted review of specific issues", be pursued.

# FINANCIAL IMPACT

None at this time, however, if it was determined that the City should undertake an overall or targeted review of the sub-area plan, specific terms of reference and a budget would need to be established for that work.

## CONCLUSION

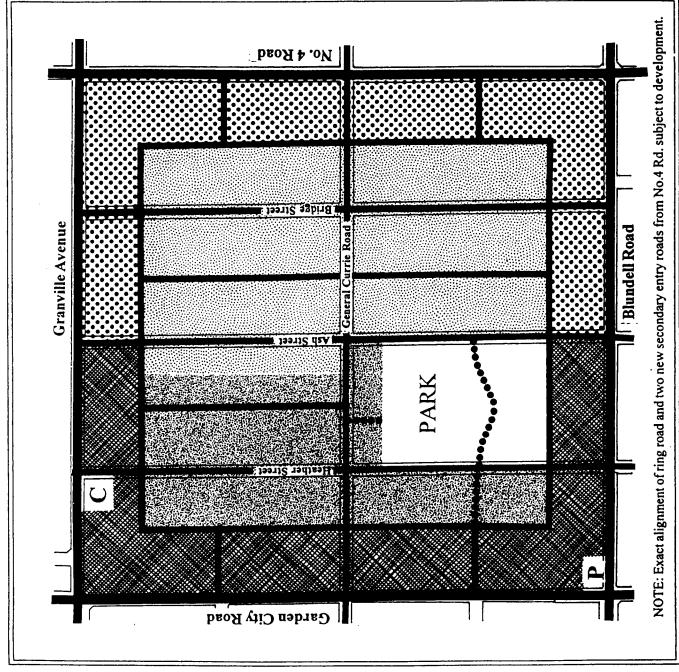
The McLennan South Sub-Area Plan was adopted in 1996. Since that time, the City has made a significant investment in the area in the form of sanitary sewers, other services, and the acquisition of park land, while development activity has lagged. Only recently has this pattern begun to change. In this regard, the report finds that development of McLennan South, especially east of Heather Street, must overcome a number of significant challenges. In response, staff recommend that a "targeted review" of the sub-area plan be undertaken focussing on the mitigation of road/servicing costs, building heights, and park development.

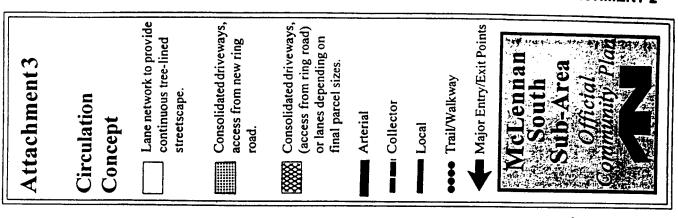
Suzanne Carter-Huffman Senior Planner/Urban Design

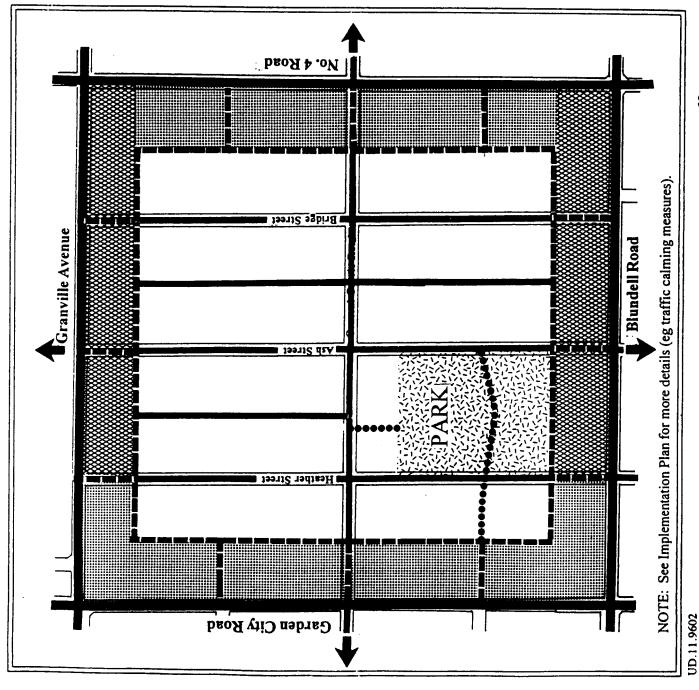
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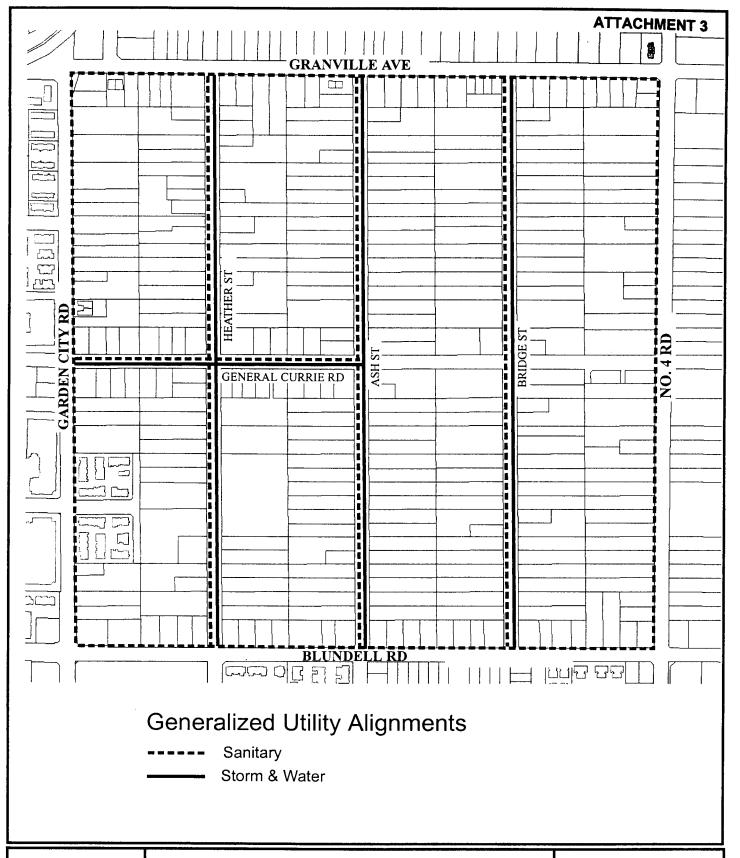
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#### Triplex, Duplex, Single Family Residential, Townhouse up level, Triplex, Duplex, Single Family 0.75 base F.A.R. to 3 storeys over 1 parking Residential, 2 1/2 storeys Townhouse, Triplex, Duplex, Single Family, 2"storeys Residential, 2112 storeys max. 0.55 base F.A.R. Residential, Historic Sub-Area **Neighbourhood Pub** Attachment 1 South 0.60 base F.A.R. 0.55 base F.A.R. ■●●● Trail / Walkway SingleFamily Land Use Church









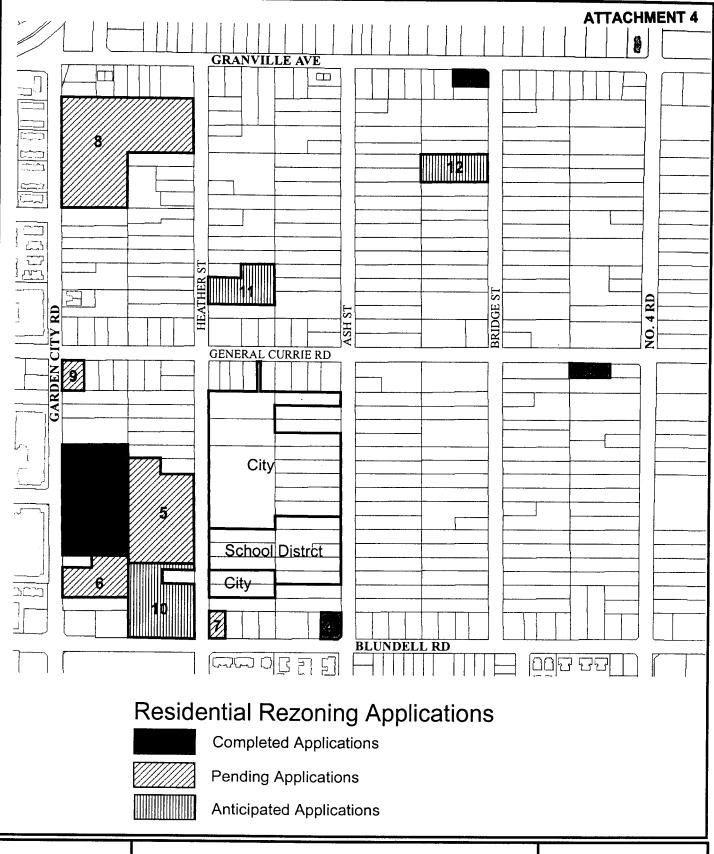


McLennan South 15-4-6 101

Original Date: 09/28/01

Revision Date:

Note: Dimensions are in METRES





McLennan South 15-4-6

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# MCLENNAN SOUTH: RECENT REZONING APPLICATION HISTORY

The following three tables are intended to provide a brief overview of recent rezoning applications in the McLennan South sub-area of the City Centre. The tables give information with regard to completed, pending, and anticipated applications. The last category refers to projects that have been discussed in detail with City staff, and the developers or their representatives have specifically stated that an application is being prepared for submission shortly.

The tables highlight those projects that must, according to the sub-area plan, provide portions of the "ring road" and/or a "local road". Also highlighted are factors that have arisen through various application review processes that have either set a benchmark for future development that was not made clear in the plan, or is indicative of issues that are expected to reoccur as development of McLennan South continues. For example, the "built out" density of Application #1 is considered, by staff, to be the maximum practical density in the "3 storey townhome" area, and Application #5, when adopted, will define "2½ storey townhomes" (e.g. no such OCP/zoning definition currently exists).

Following the tables is a map indicating the location of each application by number.

# COMPLETED REZONING APPLICATIONS

Мар #	Address & Applicant	Plan Land Use		Purpose of RZ		Key Development Conditions		Status
1	<ul> <li>9079 &amp; 9088 Jones Road</li> <li>Andre Molnar (RZ)</li> <li>Narland (DP/BP)</li> </ul>	3 storey townhomes 0.75 base FAR	•	R1/F to CD/76 for 73 townhomes 0.93 FAR	•	Dedicate & construct full width of Jones Rd and ½ width of "ring road" Provide 3m row & construct Garden City Rd greenway \$67,000 to park design \$15,000 to public art	•	RZ issued Project constructed Built out at 0.82 FAR
2	7451 No. 4 Road  • Bruno De Angelis	triplex/ duplex/ single-family clusters 0.55 base FAR	•	R1/F to R1/B to subdivide off backlands 0.55 FAR	•	Dedicate ½ width of "ring road" & 6m wide lane	•	Rezoning issued "No build" covenant on new lot until roads constructed
3	7031 Bridge St  • Nick Poon	triplex/ duplex/ single-family clusters 0.55 base FAR	•	R1/F to R1/B for a 4-lot single- family subdivision 0.55 FAR	•	Construct frontage works	•	RZ issued Project constructed
4	9371 Blundell Rd     L & M Pulicci	3 storey townhomes 0.75 base FAR	•	R1/F to CD/28 for 6 townhomes 0.65 FAR	•	Provide 6m lane row & construct Construct frontage works Permitted FAR lower than plan designation due to small lot size	•	Rezoning Issued High cost of off-site works has prompted the applicant to consider re-applying to achieve a higher density

Note: All FAR (floor area ratio) figures are net of road dedications.

# • PENDING REZONING APPLICATIONS

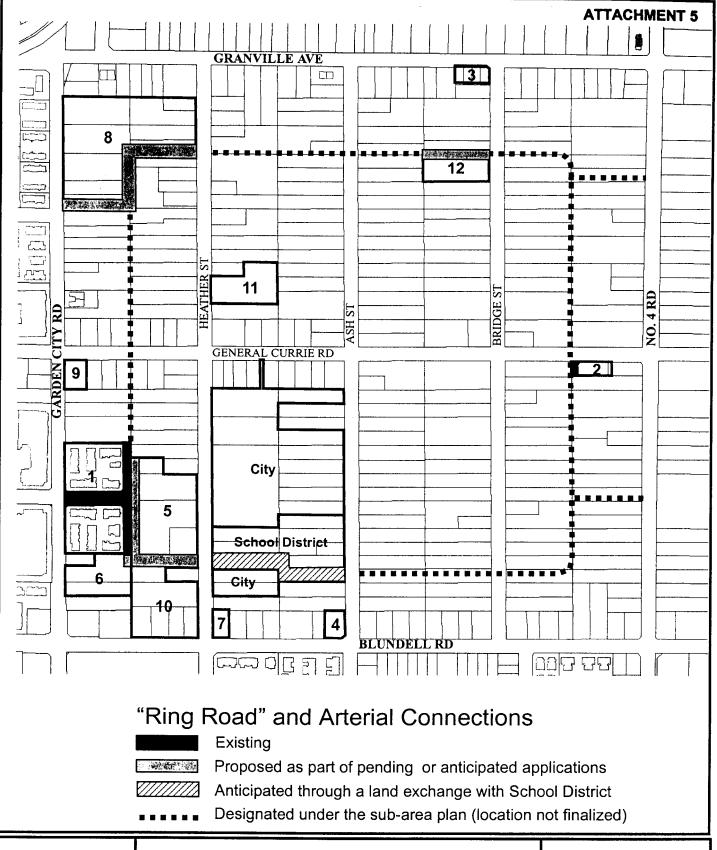
Мар #	Address & Applicant	Plan Land Use		Key Development	Status
5	7591/7611/7651/7691/ 7731 Heather St  • Capital West	2 ½ storey townhomes 0.6 base FAR	• R1/F to CD for 60 2&3 storey townhomes • 0.69 FAR proposed • If adopted, the 2&3 storey mix will define 2 ½ storeys for the OCP	Conditions  Dedicate & construct ½ "ring road" along two sides of site in coordination with Applications #6 & 10  Construct frontage works  \$60,000 to park design & construction  \$36,000 to public art  Staff recommend DCC compensation for a portion of the "ring road"	RZ submitted     Apr/01     Design &     development     conditions are     well     advanced     Draft zoning     prepared
6	7780/7820 Garden City Rd  • 490375 BC Ltd	3 storey townhomes 0.75 base FAR	R1/F to CD for 27+ 3 storey townhomes 0.78+ FAR proposed	Dedicate & construct a corner of the "ring road" in coordination with Applications # 5 & 10 Dedicate 2m road widening along Garden City Rd Provide 3m row & construct Garden City Rd greenway \$27,000+ to park design/construction \$22,000 to public art Staff recommend DCC compensation for a portion of the "ring road"	RZ submitted Apr/01     Design & development conditions are well advanced     Draft zoning prepared
7	9191 Blundell Rd  • Darshan Rangi	3 storey townhomes 0.75 base FAR	R1/F to CD for 7     3 storey townhomes     0.7 FAR proposed	<ul> <li>Provide 6m lane row &amp; construct</li> <li>Construct frontage works</li> <li>Permitted FAR lower than plan due to</li> </ul>	RZ submitted Jan/01 Preliminary Design Panel review scheduled for
8	7060/7140/7180/7220 & 7240 Garden City Rd & 7055/7071/7091/7111 Heather St  Polygon Development (Replaces an earlier application by Loong Ent.)	3 storey townhomes 0.75 base FAR		Dedicate & construct     "ring road" linking     Garden City Rd with     Heather St     Provide 3m row along     Garden City &     construct greenway     Construct frontage     works     Public art TBD	Oct/01  RZ submitted Aug/01  Design & development conditions are well advanced
9	7500 Garden City Rd  • Rocky Sethi  All FAR (floor area ratio	3 storey townhomes 0.75 base FAR	for 9 3 storey townhomes 0.75+ FAR proposed	<ul> <li>Dedicate 2m Garden         City Rd widening</li> <li>Provide 3m row &amp;         construct Garden City         Rd greenway</li> <li>Construct frontage         works</li> </ul>	<ul> <li>RZ submitted Sep/01</li> <li>Changes required due constraints on small lot development</li> </ul>

Note: All FAR (floor area ratio) figures are net of road dedications.

# ANTICIPATED REZONING APPLICATIONS

Мар #	Address & Applicant	Plan Land Use	Purpose of RZ	Key Development Conditions	Status
10	7731/7771/7831 Heather St 9111/9131/9151 Blundell Rd  • Palladium Development	3 storey townhomes 0.75 base FAR	• R1/F to CD for +/-55 2&3 storey townhomes +/-0.75 FAR proposed	<ul> <li>The developer has agreed to dedicate &amp; construct ½ width of the "ring road" along north edge of site in coordination with Applications # 5 &amp; 6</li> <li>Additional conditions will be determined once an application is submitted</li> <li>Staff recommend DCC compensation for the "ring road"</li> </ul>	Lengthy discussions have taken place to coordinate this project with Applications # 5 & 6
11	Westin     Construction	2 ½ storey townhomes 0.6 base FAR	R1/F to CD for +/- 20     3 storey townhomes     +/-0.68 FAR     This application will require an OCP amendment for 3 storey townhomes	<ul> <li>Preliminary drawings indicate the developer will dedicate &amp; construct ½ width of a "local road" along east edge of site</li> <li>Additional conditions will be determined once an application is submitted</li> </ul>	RZ     application     expected     shortly     Staff have     already     provided the     developer     with     preliminary     comments
12	7131 Bridge St  • JAB Enterprises  All FAR (floor area ratio)	Single- family 0.55 base FAR	<ul> <li>R1/F to CD for 6 single-family homes with suites</li> <li>0.55+ FAR</li> <li>This application will require an OCP amendment for suites in the single-family area</li> </ul>	The developer has indicated a willingness to dedicate & construct a ½ width of the "ring road" along the site's north edge & a ½ width of a "local road" along the site's west edge Additional conditions, including the specific density, will be determined once an application is submitted Staff recommend DCC compensation for the "ring road"	RZ     application     expected     shortly     Staff have     already     provided the     developer     with     preliminary     comments

Note: All FAR (floor area ratio) figures are net of road dedications.





McLennan South 15-4-6 106

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