CITY OF
EAST GRAND RAPIDS

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JAY GIANOTTI, AICP
ZONING ADMINISTRATOR

MEMORANDUM

TO: Honorable Mayor and City Commissioners
FROM: Jay Gianotti, Zoning Administrator
DATE: May 28, 2025

RE: **Gaslight Investors Planned Unit Development Amendment**
2255 Wealthy St. SE and 515 Lakeside Dr. SE (PPNs 41-14-33-276-032 and 41-14-33-276-029) – Feedback on Draft PUD Amendment and Standards of Review

Action Requested:
That the City Commission reviews and provides input on a draft PUD amendment and resolution as well as provide input related to each one of the Standards of Review in Section 5.49, of the Gaslight Investors PUD based on the revised concept plan presented on May 5, 2025.

Background:
On May 3, 2024, Gaslight Investors submitted an application regarding a revised and amended site plan for the Planned Unit Development (PUD) at 2255 Wealthy St. and 515 Lakeside. The original PUD plan, then referred to as the Jade Pig PUD, was approved in 2004. The first phase of this development was approved and constructed in 2005. No further development on this site has occurred since then. An amendment to this original PUD was approved in 2008, but no construction ever took place. Thus, that approval was voided. A revised concept plan for the site was introduced to the Planning Commission in 2020, but because of factors related to the COVID-19 pandemic, the plan never advanced beyond that stage.

As a major change to the previously approved PUD preliminary plan and agreement, the applicants are required to proceed through the entire PUD approval process for this revised plan. This involves two sets of hearings at the Planning and City Commission levels. A basic timeline of this process, including the current step in this process, is shown in Exhibit 1. This current stage – the PUD concept plan stage – is solely for review of the overall concept plan. Section 5.47 of the zoning ordinance lists the materials that are required at this stage. Note that final building designs, floorplans, and details such as building materials, public/private amenities, and specific tenants or occupants are not provided or required at this stage. The concept plan is

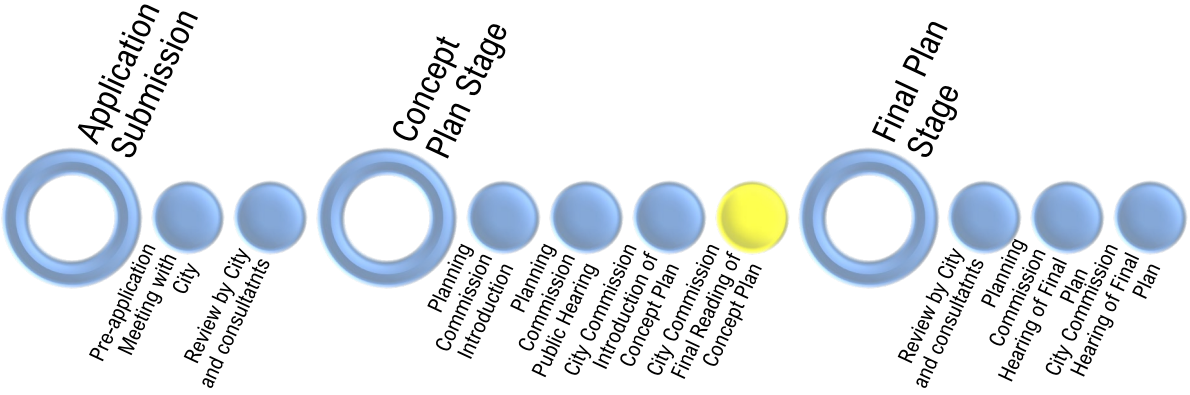


Exhibit 1 – General PUD approval timeline with the current step highlighted in yellow. The formal public hearing of the concept plan was held on February 17, 2025, with an additional revision presented on March 31, 2025. If the concept plan is approved, the final part of this step would be an introduction of a corresponding PUD amendment, followed by a public hearing for the PUD amendment with the Planning Commission and final reading by the City Commission.

intended to simply show the basic layout of proposed buildings, streets, and other important elements that illustrate the intended vision for the site. More detailed designs and requirements, including a legal PUD agreement, are considered at the third and final review stage. The purpose of a concept plan approval is to give the applicants reasonable assurance that their proposed concept is viewed favorably so that the final site plan and detail designs can be produced with confidence. The final site plan will be judged against the approved concept plan to ensure it remains in general compliance with what the City Commission approves. The City Commission may make suggestions or recommendations regarding elements they would like to see in the final plan, but these are not required to be presented or approved at this stage.

Summary of Previous Actions:

To date, the formal review process for this revised concept has lasted nearly one year. A revised concept plan was introduced to the Planning Commission on June 11, 2024. After providing feedback on the presented concept, the Planning Commission voted unanimously to move the concept plan to a public hearing. In the interim, the City hosted an open house on June 24 to give the public a greater opportunity to view the concept plan and ask questions to the developer and architects. Over 40 residents attended this open house; the comments received at this open house are attached to these materials. Table 1 shows a summary of the major themes emerging from the open house feedback. A formal public hearing with the Planning Commission was then held on July 9, 2024. At the end of this meeting, the Planning Commission requested additional information regarding the project's impact on traffic, pedestrian safety, and mobility options. This additional information from the applicants was introduced at a public hearing on November 12. After considering all of this information, the Planning Commission voted 8-1 to recommend approval of the concept plan with the following conditions:

- Comprehensive traffic, pedestrian, bicycle and mobility study to address vehicle, bicycle, foot traffic for the site in the high-traffic season to the satisfaction of the city.
- Physical traffic (vehicle) counts at active times
- The traffic study should be reviewed and verified by city staff
- Delivery truck analysis
- Full utility capacity/impact for stormwater management pursuant to Chapter 28 of the City Code prioritizing natural-based solutions.
- Impact assessment for sanitary sewer, storm sewer, and water system utilities to the city's satisfaction
- A "shade" study to evaluate the effects of building massing on neighboring properties
- Environmental impact assessment for proposed and historical uses to the city's satisfaction.
- Fiscal impact assessment demonstrating the financial feasibility for the development and Gaslight Village as a whole.
- Parking analysis with a balanced solution

Table 1 – Major feedback themes from June 24, 2024 Open House Engagement

Development Design	Circulation/Access	Other
• Excitment for new development • More green space and public space • Concerns about seven-story building height building height • Concerns on parking - amount and location (less street parking)	• Traffic study - take into account vehicles, pedestrians, bicycles, and transit • Consider additional facilities for handling increased traffic, such as traffic light (roundabout not favored) • Keep easy pedestrian access for apartments/condos on Lakeside	• Provide streetscape designs for roads • More emphasis on environmental sustainability • Will increased residential density impact schools?

Though not explicitly stated, the City interprets that these conditions would need to be met at the final plan stage. Additionally, the Planning Commission requested the City to increase the public notification radius for this project to 1,000' instead of the standard 300' set forth in State law.

This version of the concept plan was introduced to the City Commission at their January 21, 2025 meeting, where it was unanimously voted to advance the concept plan to a public hearing. This public hearing was held on February 17, 2025 at the EGR Performing Arts Center. An additional open house was held on February 4 to allow residents the opportunity to view the proposed concept plan, including this revision. Additional public comments regarding the proposed concept plan have been made at various master plan subarea meetings, planning commission meetings, and city commission meetings throughout the year. After the February 17 public hearing, the applicants made revisions to the concept plan to reduce the overall density and building heights. This revised concept was presented at the March 31, 2025 City Commission meeting and further tweaked to the most recent iteration presented on May 5, 2025.

In the concept now under consideration, one proposed building has been removed, resulting in a total of nine buildings on the site and allowing for more open space. In conjunction with this change, Building E has been relocated to act as a terminus to the entry drive from Bagley Ave. Several buildings have been reduced in height; now, none exceed five stories compared to one building originally featuring seven stories. The height of the new parking deck has also been reduced. To make up for the loss of parking capacity, additional surface parking has been added to the site. In response to multiple requests for additional greenspace, a larger outdoor amenity area has been added to the north of Building E. Table 2 shows a brief summary of major changes to the site plan from 2004 to now. The applicants have provided preliminary analysis to address some of the comments made at the Planning Commission public hearing. These include an updated parking study, additional renderings illustrating building massing and pedestrian activity, updated multi-modal movement diagrams, and a proposed timeline for preparing the final traffic, parking, and multimodal impact studies. These are included with these materials along with the original submission materials

Table 2 – Summary of major PUD plan changes from approved 2004 plan to 2025 proposed plan

Approved 2004 PUD	Proposed 2024 PUD Amendment (May 2025)
7 total buildings with retention of existing parking garage • 2 Commercial buildings • 1 Parking garage (existing) • 1 Mixed-use building (commercial & residential) • 3 Residential buildings	9 total buildings (2 already constructed) including new parking garage • 2 Commercial buildings (existing) • 1 Parking garage (new) • 3 Mixed-use buildings (commercial and residential) • 1 Residential building • 2 rows of Townhouses
Tallest building: 7-stories, 79' height, solely for residential use	Tallest building: 5-stories, appx. 70' max. height, mixed-use (commercial and residential)
107 residential units (condominiums)	149 residential units, including condos, apartments, and townhomes. Project is committed to reserving approximately 10% of the residential units as attainable rental units that range between 100% and 120% of the area medium income (AMI).
99,420 s.f. commercial	109,430 s.f. commercial
687 total parking spaces (only 414 present)	523 total parking spaces

After extensive discussion and feedback, the City Commission allowed the City and consultants to prepare an amendment and resolution to approve a revised concept plan based on the May 5 version of the concept plan. This was initially discussed at the May 19, 2025 City Commission meeting. Feedback at that time from the public and Commissioners has been reviewed and used to revise these materials. This is included in the agenda materials for further discussion.

Concept Plan vs. Final Plan:

As noted throughout this process, the PUD approval process involves first the approval of a concept plan, then the later approval of a final plan before any development can begin. The following sections explain the differences to help reduce confusion about what is expected at each step.

Concept Plan The concept plan is the first plan for development that is reviewed. It is only intended to show the general relationships between the buildings and circulation on the land, including basic massing, location, and function. The overall intent of a concept plan is to show what might be possible to develop. For example, if someone was looking to develop a vacant residential lot, they would first need to create a concept for the lot showing where the house and any accessory buildings would go, how access to the house and accessory buildings will be handled, and a check for what the limits for development might be based on factors such as budget, intended usage, and ordinance requirements. The owner might have specific ideas about what appliances, fixtures, materials, furniture, and other items they might want in the finished home and lot, but these points are irrelevant to consider without an accepted concept plan in place. For these reasons, it is not practical or expected to see such details with the concept plan. This does not mean that any requested studies and additional information are not important, only that the plan must pass through this phase first to allow for the plan development required to give those studies any real-life meaning.

Final Plan The final plan is the second and final plan for development that is reviewed. This plan includes the final design of the proposed buildings, including locations, façade design and shape, floorplans, materials, etc., as well as final designs and locations for roadways, public amenities, landscaping, and the like. With this level of detail, it will be possible to provide more comprehensive studies related to parking, traffic, environmental, infrastructure, and other items required with a PUD plan approval. The final plan is also judged based on conformity with an approved concept plan. Crucially, the final plan cannot be created, much less reviewed, without an approved concept plan first because it is not feasible to create such details without having an approved concept as its basis.

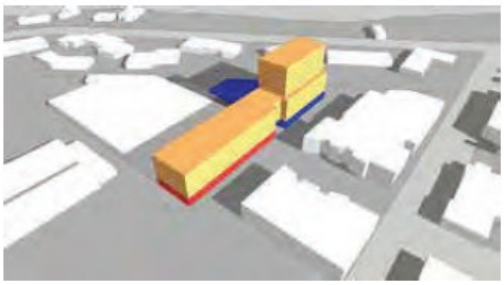
It should be stressed that approving the concept plan in its current form does not mean that the City is barred from requesting or requiring further modifications at the Final Plan stage. Similarly, it is expected that refinements to the concept plan will be made in the Final Plan stage as the overall uses are more clearly defined, the building & amenity designs are developed, and more detailed studies are completed. If any issues or concerns arise as a result of these additional studies or other items, the City and Commissions can still require they be corrected before approving the final plan.

One other point to mention is that for the purposes of approving the concept plan, ***the first and foremost responsibility is to follow the required standards of review for the concept that the applicant is presenting.*** Throughout this process, multiple ideas of what could be developed here have been proffered. However, the standards of review must only be judged on what the applicant has presented, not what other alternatives might exist. This is no different from any other zoning or site plan review that the City does: ***if the plan presented by the applicant meets the required standards of review, regardless of if other things could be developed, then the concept plan must be approved. Any vote to deny must be reasonably linked to one of the standards of review.*** Similarly, topics that have been brought up that are not listed as one of the standards of review cannot be used as a basis of denial.

To aid the City Commission in their review, the City plans to discuss each of these standards extensively tonight to summarize the City's analysis in conjunction with various consultants. The Commission is invited to ask questions and provide feedback on each of the criteria as it is discussed. The Commission is also requested to complete and submit the attached standards of review worksheet in conjunction with this review.

Review of Standards:

To approve a major change to a PUD agreement, the following criteria under Section 5.49 must be met. ***If all criteria are met, then the Commission is required to grant approval.***



Village Address Perspective



Village Address Perspective Land Use

Exhibit 2 – Renderings of preferred PUD site concepts from the 2018 City Master Plan

A. The proposed PUD complies with the intent and all qualifying conditions of §§ 5.41 and 5.42 of this article, respectively.

Staff comments: City staff and consultants believe that this standard is met. The overall mix of uses is quite similar to the originally approved PUD and provides many of the same benefits as the original plan. The revisions from 2024 to now have retained a generally mixed-use development character. Additionally, the 2018 City Master Plan showed having mid-rise building up to seven stories as the preferred development concept for the site. Exhibit 2 shows these renderings for comparison.

There have been multiple comments that the standards in Section 5.47 of the zoning ordinance, pertaining to concept plan review, have not been met. In the City's and consultant's view, these standards have all been met to the extent that valid information can be provided at this stage. Table 2 goes over this in more detail.

B. The uses conducted within the proposed PUD, the PUD's impact on the community and other aspects of the PUD are consistent with the city's master plan.

Staff comments: City staff and consultants believe that this standard is met. The 2018 Master Plan provides guidance on what the preferred intent of this area should be. If anything, the proposed uses are more varied than originally conceived. Of note:

- The proposed plan calls for appx. 31,930 s.f. of new commercial space for a total of 109,430 s.f.. By comparison, only appx. 99,420 s.f. of total commercial space was proposed in the original PUD agreement.
- The number of residential units in this proposed plan would be 149 units. These are comprised of different types of housing such as apartments, condominiums, and townhouses. By comparison, the originally approved PUD plan had 107 housing units, all of them being apartments. The applicant's materials also indicate a commitment to providing market-rate housing with this plan which was not present in the original plan.
- The main access for the PUD from the north would be rerouted to connect with Shopping Center Drive at the Greenwood/Lakeside intersection. The existing vehicular access point to the east of Reeds Lake Blvd. would be converted solely to pedestrian access (though the existing access road to Lakewood Hills Apartments would remain.) This may be preferable from a traffic management standpoint as the current north vehicular access is offset less than 100' from Reeds Lake Blvd. While the City's Master Plan indicates a proposed road connection to the Reeds Lake Blvd. intersection, the overall intent of this recommendation is understood simply to provide a clear and easily accessible north-south connection between Wealthy and Lakeside. In that light, strict adherence to the Master Plan is not necessary if the general intent is still there and current data shows that a better alternative is available[1]. Compared to the previously presented concepts, however, the overall circulation through the site is less direct as multiple parking lots need to be traversed to pass from north to south

[1] Though not specifically referenced in the Master Plan, the proposed concept also allows for future connections to the D&W Shopping Center site should opportunities arise.

Table 2 – Summary of Section 5.47 Concept Plan Standards

STANDARD OF REVIEW	STAFF COMMENTS
1. PUD Concept Site Plan, plus list or requirement information.	City staff and consultants reviewed this and found that all elements listed in this section that are relevant to this request are present.
2. Concept plan narrative	This was provided in the applicant's original submission materials.
3. Table of modification	This was provided in the applicant's original submission materials.
4. Phasing Plan	This is not applicable at this time as the applicants have not indicated multiple phases of construction.
5. Additional information requested by the Planning Commission	This section lists examples of items that can be reviewed if *requested by the Planning Commission* (emphasis added) at the concept plan stage. Any examples listed in this item are not mandatory unless specifically requested. Even then, some studies cannot be fully completed without the details provided in a final plan, meaning the concept plan needs to be approved first to allow the final plan to be created. Nonetheless, the following studies have been provided with the plan to date: • Preliminary Traffic/Parking Study – Fleis & Vandenbrink, Progressive Companies • Environmental & Soil Concerns – Prein & Newhof • Preliminary Utility Analysis – City • Building Code Requirements – Cascade Building Inspection Services (attached to materials) • Public Safety Review – EGR Public Safety Dept. (attached to materials) Based on the level of detail required and expected at the concept plan phase, City staff and consultants believe that this standard is met to allow the plan to move to the final plan stage. In summary, the general consensus with these studies is that there are no immediate concerns at this point, though additional studies will still be necessary with the final plan phase. Additional studies can still be required at the final plan stage.

(particularly around Building E.) With this in mind, a comprehensive traffic impact and pedestrian study will be required with the final plan submittal. The study should include additional information on traffic flow and traffic mitigation strategies with this proposed concept.

While there has been extensive discussion on the scale of this proposed concept plan compared to other residential and commercial areas in the City, it is important to note that much of the proposed development would meet the City's existing zoning ordinance requirements. Table 3 analyzes this in more detail. Based on the proposed development in this concept plan, development on the 2255 Wealthy parcel is only compared to C-1 standards, and development on the 515 Lakeside Parcel is only compared to MFR standards. As shown here and in Table 4 below, ***the proposed development would already meet most of the standard C-1 and MFR zoning requirements***. The deviations that do appear are mostly related to height and parking. ***These should not be seen as deficiencies*** as PUD zoning allows for allowances outside of traditional zoning. The main focus of the PUD review, then, should be on how any deviations from the zoning ordinance are handled in the concept plan. For example:

- While the height of the proposed buildings exceeds the zoning ordinance requirements, it would be less than the concept plan that was approved in 2004 and amended in 2008. ***Additionally, the adjacent Lakewood Hills Apartments development has a consent agreement in place that allows them to construct three new buildings up to 5 stories and 48' in height to the roof midpoint. This agreement is still in effect and has no expiration date, meaning it could be***

Table 3 – Comparison of PUD Development Features with Standard Zoning Requirements

implemented at any time. In this light, the height of the proposed buildings at the Gaslight

Standard	Requirement	Compliant?	Comments
C-1 Standards (2255 Wealthy Parcel)			
Min. Area	0 s.f.	✓	
Min. Lot Width	0'	✓	
Min Front Setback	0'	✓	
Min. Side Setback	0'	✓	
Min. Rear Setback	0'	✓	
Max. Building Height	40' 3 stories	✗	Tallest building up to 5 stories, though 2004 PUD approval allowed up to 7 stories and 79' height. See Table 5 for additional height comparisons.
Parking – Commercial	Varies	T.B.D. with Final Plan	More details of commercial uses needed to judge
Parking – Residential	1.5 spaces/d.u.	✗	PUD allocates 1 space/d.u., though this could be mitigated with shared parking
MFR Standards (515 Lakeside Parcel)			
Min. Lot Area/unit	2,100 s.f.	✓	
Min. Lot Width	n/a	n/a	
Min. Front Setback	10'	✓	
Max. Front Setback	25'	✓	
Min. Side Setback	10'	✓	
Min. Street Side Setback	12'	✓	
Min. Rear Setback	25'	✗	Parking garage appears to have <25' setback from rear (south) lot line
Max. Building Height	35'	T.B.D. with Final Plan	More details of building design needed to judge
	2.5 stories	✗	Building F would have at least 3 stories; Townhouses could qualify as 2.5 stories if highest story is less than 50% of area of floor below it
Max. Building Coverage	60% lot area	✓	City estimates proposed building coverage to be 44% of lot area
Max. Lot Coverage	80% lot area	✓	City estimates proposed total lot coverage to be 74% of lot area
Rooftop terrace setback, Front	20'	T.B.D. with Final Plan	More details of building design needed to judge
Rooftop terrace setback, Side	10'	T.B.D. with Final Plan	More details of building design needed to judge
Rooftop terrace setback, Rear	25'	T.B.D. with Final Plan	More details of building design needed to judge
Max. Uninterrupted building façade	30'	T.B.D. with Final Plan	More details of building design needed to judge
Min. Access Driveway width	24'	✓	
Min. Access Driveway Side Setback	5'	✓	
Parking	1.1-1.8 spaces/d.u., based on # bedrooms	✗	Townhouses (G & H) provide 2 parking spaces per unit. Building F allocates 1 space/d.u., though surface spaces around Building F could also be used to satisfy demand in off-hours.

Investors site would be very comparable to the Lakewood Hills Apartments concept plan. Finally, as will be discussed below, the City's current master plan currently recommends this site to be used for a mid-rise mixed-use development as proposed in this concept plan.

- While the zoning ordinance generally requires more off-street parking than what this concept plan provides for, the parking studies done to date have concluded that with shared parking, the

parking needs for these uses can still be met with the parking lots and structures proposed[2]. This could constitute an overall benefit as fewer parking areas can leave room for other desirable open space and amenities.

There have been multiple comments regarding the site's original PUD approval in 2004 and why the current concept plan appears to deviate from that. Parking and streetscaping have been examples of items citied in this regard. It should be noted that, with regards to streetscaping, many of the provisions in the 2004 PUD amendment were specific to the City's overall update of the Wealthy Street landscaping at the same time, so any references to those conditions would already have been fulfilled. References to contributions for other street improvements are deemed better handled with the PUD agreement at the final plan stage. With regards to parking and usage of the former parking deck, the City Commission has already approved the demolition of the old deck so any conditions related to that would be nullified. Any other conditions related to parking would also be deemed more appropriate in the PUD agreement made with the final plan.

It is also worth noting that the originally approved 2004 PUD plan also had multiple deviations from the zoning ordinance at the time. Examples include:

- The tallest buildings in the 2004 PUD were seven stories and 79' height to the midpoint of the roof. The maximum allowable height at the time was 2 stories at 28' height in the C-1 District and 2.5 stories and 35' in the MFR District. At least five originally proposed buildings would have exceeded this requirement.
- Building 5 had a total of 38 dwelling units as planned. The MFR Regulations at the time limited the maximum number of dwelling units in a building to 24, and then only with ZBA approval.
- The 2004 PUD had a total of 687 parking spaces for the site, including the former Jacobson's parking deck. This is still less than what would have normally been required at the time; the Findings of Fact from 2004 suggest that between 750-812 parking spaces would normally have been required for the proposed uses in total.

In all these cases, the City Commission determined that allowing these and any other deviations were acceptable based on the benefits provided by the plan as a whole, including increased open/green space and the provision of a wider variety of housing options for the City. Thus, the City Commission determined that none of these items were a detriment in this location or with the approved plan. The same must be considered in this amended concept plan review: while these comparisons to the zoning ordinance have been provided as a reference, the concept plan does not need to fully comply with the zoning ordinance requirements. Instead, the concept plan must be judged as a whole as to whether the plan's benefits outweigh what would normally be permissible.

With regards to residential density, the City also compared the proposed density to other larger multi-family developments in the City[3]. These results are shown in Table 4, generally ordered from lowest to highest density. In summary:

[2] Shared parking presumes that different uses have different parking demands during the day (for example, parking for residential uses may not be needed during daytime hours, and parking needs for commercial/office uses may be lessened in evening hours) and thus the provided parking spaces can be used to help satisfy parking requirements for multiple uses.
[3] Other single lots with 2-5 dwelling units have even higher densities, but are excluded from this table as they are not wholly representative comparisons.

- All of these developments, regardless of their zoning, would be compliant with the City's current maximum residential density requirements for multi-family developments.
- The proposed Gaslight Investors concept plan would not be the densest residential development in the City. That would be Croswell Mews, which is developed at 19.8 du/acre.
- The current density of Lakewood Hills Apartments is 14 du/acre. This is higher than the proposed 13.1 du/acre density of the 515 Lakeside parcel. If/when their 65-unit plan per their consent agreement is constructed, that would jump to 17.9 du/acre, higher than the residential density of the entire proposed Gaslight Investors concept plan.
- Even if the proposed density exceeded what the zoning ordinance would normally allow, the general PUD requirements specifically allow "modifications from the density, area, height and placement requirements for the stated district(s)."[4]

Table 4 – Comparison of Multi-Family Residential Densities in EGR

Multi-Family Development	Residential Density (d.u./acre)
Greenwood Park Townhomes	6.8
Lake Shore Club	12.8
Schoolhouse Condos	13.0
Lakewood Hills Apartments (as developed)	14.0
Gaslight Investors PUD (515 Lakeside parcel only)	13.1
Gaslight Investors PUD (full site)	17.5
Bagley Townhomes (original development)	17.5
Lakewood Hills Apartments (per consent agreement)	17.9
Croswell Mews	19.8
Maximum allowed by zoning ordinance in MFR District	20.7

There have been multiple questions about how the residential density calculation was made. To this point, the residential density has been expressed as the number of dwelling units per acre of land, or "gross density." The 20.7 du/acre maximum residential density is derived from the MFR district standards: every new MFR dwelling unit requires 2,100 s.f. of lot area. (43,560 ÷ 2,100 = 20.7) The standard clearly states that the *entire lot area* needs to be measured to make that calculation[5]. There have been some suggestions that the areas of existing buildings, as well as areas without buildings, should be excluded in determining gross density. This assertion is not supported by the zoning ordinance. Gross density is clearly defined as the number of dwelling units per acre *of land*, not each individual building or area of buildings[6]. Excluding the existing buildings on the site is not appropriate in considering density as all of the buildings represent a single, integrated development regardless of the specific building usage. With all of this being said, it should be noted that these standards only apply to the MFR District. Previous materials have shown residential density for the entire site as a reference point, but technically, there is no residential density limit in the C-1 District. To be sure, any housing component in the C-1 District would still need to meet all of the site plan review criteria including traffic, stormwater, utilities, emergency access, etc., but presuming all of those standards were met, there would be no specific limit on the number of residential units that could be developed.

Though not required at this stage, more details on the mix of uses in the development and how they complement each other would be helpful at the final plan stage. This could be included as part of the requested fiscal analysis, noting aspects like the relationship of anchor tenants and associated buildings, how the different uses (small retail, larger retail, mixed-uses, and residential) work hand in hand, and why and how the development works together and benefits Gaslight Village as a whole, and more broadly other nearby commercial areas such as Breton Village.

C. *The proposed PUD shall be designed, constructed, operated and maintained in a manner harmonious with the character of adjacent property, the surrounding uses of land, the natural environment and the capacity of public services and facilities affected by the development.*

[4] See Section 5.44C of the zoning ordinance.
[5] See Section 5.30A2 of the zoning ordinance.
[6] See Section 5.8 of the zoning ordinance.

Staff comments: City staff and consultants believe that this standard is met. As noted above, height, density, and layout shown are all consistent with the Master Plan and surrounding area development. The concept plan shows the basic building forms and layout that are being proposed. This level of detail is sufficient to meet this standard at the concept plan stage as discussed above. More detailed building and amenity designs will be required with the final plan. Review of capacity for public services (sanitary sewer, storm water, potable water, etc.), public safety, environmental, facilities, etc. will also be performed with the final plan and reviewed by the City. As discussed further below, the studies and reports that have been provided to date have not identified any impediment to the approval of this concept plan.

D. *The PUD shall not change the essential character of the surrounding area.*

Staff comments: City staff and consultants believe that this standard is met. This land was originally part of the historic Ramona Park, a popular amusement park. Upon closing, Jacobson's Department Store and Ramona Medical Center were developed on this land. Historical materials related to these uses are provided for reference. Surrounding areas are generally zoned either C-1 Commercial or MFR Multi-Family Residential. Thus, this part of the City has always been home to higher-density uses. A basic timeline showing different activities on the former Ramona Park land is attached as Exhibit 4.

At the various public hearings and comment periods, several topics of concern were brought forth by residents and Commissioners. Some of these topics are discussed in more detail below.

Building Height The tallest building in this revised plan is proposed to be five stories. The number of stories is fewer than what was approved in 2004. While overall building heights are not provided with this concept, it is noted that the tallest building in the previous concept reached seven stories and 94' height. Also, the height of the proposed five-story buildings was listed as being 70' height. This is generally aligned with the original PUD approval that called for a maximum building height of 79' at the roof midpoint. For comparison purposes, estimated building heights for other buildings in the City/general Gaslight Village area are provided in Table 5.

Table 5 – Height comparison of prominent buildings in EGR

Building	Appx. Height
Blodgett Hospital (2008 addition)	72'
Blodgett Hospital (other wings)	42'-90'
EGR High School (Fine Arts wing)	88'
EGR Middle School (adjacent to Reeds Lake)	47'
Gaslight Investors PUD (estimate based on previous submissions)	70'
Lakewood Hills Apartments (per consent agreement)	48'
Wealthy Elementary School	53'

Site Density Overall, the proposed residential density would be 17.5 units per acre, which is less than the maximum allowed density in the MFR District for new construction (20.7 units per acre).[7] If considering the 515 Lakeside parcel on its own, the proposed residential density of that parcel would only be 13.1 units per acre. Additionally, only 41 of the proposed 149 residential units (27.5%) would be on the 515 Lakeside parcel closest to existing residential neighborhoods. By contrast, the previous concepts from 2004, 2008, and 2020 had most of the proposed residential units concentrated on the 515 Lakeside parcel.

Connections to Existing Apartments/Condos There were multiple comments regarding connections to other surrounding uses such as the apartments and condominiums to the east. While such opportunities may exist, they would likely require cooperation from adjacent property owners to be established. Thus, no such outside connections are part of this concept plan.

Open Space/Public Space In previous meetings, there was strong interest in having a portion of the site devoted to green space and public space. The most recent iteration of the concept plan has increased the amount of green space in the development, including a larger area for an "outdoor resident amenity area" to the north of Building E. However, placing this open space behind the building may not satisfy the interest in having a larger public gathering space. Swapping the locations

[7] Putting it another way, if the entire PUD site were to be zoned MFR, the maximum number of dwelling units that could be developed is approximately 178.

of Building E and the open space could create a space more conducive for public events and usage while still allowing space for a residential amenity area.

Transition The revised plan creates a more desirable transition of uses consistent with the established character of the surrounding area. Commercial uses and taller buildings are clustered at the south end of the site, creating a smooth integration with the Gaslight Village businesses, while development at the north end is limited to residential in scale with the established uses to the east, west, and north.

Regardless of any issues that may have been identified above, the City believes that enough detail and information has been presented to date to allow for concept plan approval. Any issues requiring resolution would need to be addressed and resolved at the Final Plan phase.

E. *The PUD shall not be hazardous to adjacent property or involve uses, activities, materials or equipment which will be detrimental to the health, safety or welfare of persons or property through the excessive production of traffic, noise, smoke, fumes or glare.*

Staff comments: City staff and consultants believe that this standard is met. To date, the developers have submitted a preliminary traffic study performed by Fleis & Vandenbrink and a Trip Generation Analysis (prepared in mid-April) ahead of the planned formal traffic study. These are attached to these materials, along with a companion analysis from the City's traffic consultant. These studies concluded the following:

- The projected trip generation for the current concept plan is less than what was recorded while Jacobson's and Ramona Medical Center were in operation. The trip generation is also projected to be similar or slightly higher than the PUD concept that was originally approved in 2004.
- The north site entry is anticipated to be the most heavily used, wherever it is located. The study concluded that the existing intersection at Lakeside/Shopping Center Road provided the best northern access point to the site. As noted at the July public hearing and in Subsection B above, even though the City's master plan does not specifically reference this regarding a north/south connection through the site, a connection at the Lakeside/Shopping Center intersection would still meet the overall intent of this recommendation.
- Alternatives for additional or alternative northern access points involving the existing driveway and the existing Reeds Lake Blvd. intersection were studied, but both found significant conflicts with other access points and would increase the potential for vehicle and pedestrian conflicts.
- Some minor modifications to the Lakeside/Shopping Center intersection and the Wealthy/Lovett intersection may be necessary to mitigate traffic from the project. Signal modifications at Wealthy/Lakeside are also recommended to accommodate additional traffic volumes.
- The parking analysis concluded that, when accounting for shared parking, the project had sufficient parking capacity for the entire site. It should be noted this is a preliminary conclusion based on a general large-scale view of the proposed uses. More detailed parking analysis may not be possible until the final plan stage.
- The study does not appear to address traffic impacts by delivery/freight vehicles. Nor does it appear to discuss pedestrian traffic in much detail, only to note that most of the trips generated would be vehicular. As this is still only a concept plan, it might not be possible to fully study these topics at this time.
- The Planning Commission and consultants also requested information such as updated traffic counts, crash history, pedestrian/bike interaction analysis, intersection level of service analysis, and parking evaluation. Parking is discussed in more detail below. The City has provided the applicants with their own historical data on the other topics. This data is used as baseline data in the submitted preliminary traffic study, which is what will be utilized in relationship to actual traffic counts that will be performed in the Spring along with comparisons to projections taken from the ITE manual.
- The "Anticipated Project Schedule" references a safety study as part of their multimodal impact analysis. While the introductory letter references modifications related to reducing vehicle and pedestrian conflicts in the site, it is not entirely clear what the full scope of the safety study is.

The applicants have also provided basic renderings and diagrams showing the general circulation routes for different users. Of note, the proposed bicycle circulation drawing shows a main north-south bike route connecting Lakeside and Wealthy without intermingling with the internal road network. Access points to bike rack stations are noted and would utilize other planned pedestrian infrastructure. Otherwise, these

drawings do not provide much detail on what specific types of amenities will be incorporated. The City has recommended adopting various recommendations from the National Association of City Transportation Officials (NACTO) and other professional engineering design manuals in other areas such as pedestrian pathways and integrated public amenities.

At this time, the City and its consultants have noted the following items regarding general circulation and parking in this concept plan.

- Truck/service traffic would be directed away from the main interior road into a one-way service road accessed at the SE corner of the property (next to Chase Bank) and travelling northward. While this arrangement would help separate truck traffic from visitor traffic, it does have the potential to increase truck traffic on Lakeside Drive and Wealthy Street. This was not addressed by the preliminary traffic study, though it may not be possible to accurately model these impacts at the concept plan stage.
- The currently proposed plan would feature 523 parking spaces, which is a reduction from the 687 originally approved in 2004. However, the following should be noted.
    - Only 414 of the 687 parking spaces approved in 2004 were reportedly present. The remaining parking spaces were in building phases that were never constructed. Thus, if fully built as proposed, there would still be a net increase of 109 parking spaces over what is currently existing.[8]
    - The City's parking regulations have changed significantly since the original PUD was approved. In most cases, fewer parking spaces are now required compared to 2004 and plans with fewer than the required number of parking spaces can still be approved at the City's discretion.
    - Parking studies done in conjunction with the 2018 Master Plan showed that only 59% of all parking spaces in Gaslight Village were utilized on a typical weekday.
    - It should be noted that the applicants are using a different parking standard compared to the City's, which may result in fewer parking spaces than the zoning ordinance would normally require. However, taking shared parking and the other factors noted above into consideration, having fewer total parking spaces on site compared to the original plan may not be a significant concern, even with the increased amount of commercial and residential space. More detailed analysis may be useful at the final plan stage when the proposed uses are more clearly defined.
- Related to the above, it is anticipated that the 515 Lakeside parcel may be used for temporary surface parking while the new buildings and parking garage are under construction. If so, the final PUD agreement should include specific language stating when the temporary lot is to be removed, that the City has the right to remove the lot if the development does not move forward, and that the lot be built to City standards when in use.
- The location and orientation of parking lots and residential ingress/egress should be carefully considered to prevent conflicts with through traffic. Examples include:
    - Much of the surface parking in the north half of the site is perpendicular to the throughway. Angled parking could provide better visibility and safety for parking in these areas, though this may reduce the number of parking spaces.
    - Vehicular access to the residential parking for Buildings F-H should be studied to determine if it is located an appropriate distance from the Lakeside/Greenwood/Shopping Center intersection to prevent traffic conflicts.
    - The network of parking lots around Building E could be confusing in terms of overall circulation through the site as a whole. Alternatives to reduce surface parking in this area and provide a more direct throughway should be considered. This could include swapping the locations of Building E and the proposed open space.

[8] On October 21, the City Commission approved a temporary agreement with Gaslight Investors to allow for the demolition of the existing parking deck for safety concerns, based on the fact that the upper level has been closed for a substantial amount of time without impacting parking availability for the constructed portion of the development. This would technically remove approximately 198 parking spaces from the current PUD. Surface parking on the ground level will remain. The temporary agreement still requires Gaslight Investors to provide an appropriate amount of parking whenever any new development occurs and allows the City to require additional parking for existing facilities if the demand dictates it.

It is noted that the level of detail required at this concept plan stage may not allow for a complete modeling or analysis of these items and may be significantly altered when presented with more detailed data at the final plan review stage. The applicant has committed to performing a complete traffic study while schools are in session to better gauge impacts when traffic is at its highest. The City also recommends that a traffic impact/pedestrian study be submitted with the final plan review. Nonetheless, the City believes that there is sufficient detail provided at this time to find that this standard is met.

Consultants from Progressive Companies have provided companion analysis of the traffic and parking data provided by the applicants. These memos are attached to these materials. Jeremy Chapman provided a memo regarding a parking and traffic historical comparison for the site. Exhibit 3, copied from his memo, summarized his findings. In short, Mr. Chapman concluded that the anticipated vehicular traffic for the proposed concept plan would generally be similar or less than for the concept plan that was approved in 2004. The one data point that was higher – Saturday peak traffic – was comparable to traffic for the former Jacobson's/Ramona Medical Center development. As a follow-up to this study, Progressive Companies performed an additional analysis to estimate how many new trips the proposed development would generate. This is summarized in Exhibit 4. In short, of the 7,451 total trips the entire proposed development was estimated to generate, 70% of those trips were already projected to be occurring with the current 77,500 s.f. of commercial development. Taken together, the proposed concept plan is not expected to generate more traffic compared to previous plans and development for the PUD site.

Time Period	Jacobsen's + Ramona Medical Center	2004 PUD	2025 Concept
A.M. Peak	90 Trips	245 Trips	244 Trips
Noon Peak	585 Trips	560 Trips	551 Trips
P.M. Peak	620 Trips	539 Trips	514 Trips
School P.M. Peak	550 Trips	587 Trips	560 Trips
Saturday Peak	665 Trips	384 Trips	672 Trips

Exhibit 3 – Traffic/trip generation historical comparison between currently proposed concept plan and historical uses/plans. Please see section F in the supporting materials for further analysis and discussion.

	Average Daily Trips	A.M. Peak			M.D. Peak			P.M. Peak			Saturday Peak		
		In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Total Development Trips	7451	154	112	266	282	304	586	288	316	604	378	345	723
Existing Buildings A+B	5233	83	51	134	15	10	25	197	205	402	261	241	502
A+B % of Total Trips	70%	54%	46%	50%	5%	3%	4%	68%	65%	67%	69%	70%	69%
Total NEW Trips	**2218**	**71**	**61**	**132**	**267**	**294**	**561**	**91**	**111**	**202**	**117**	**104**	**221**

Exhibit 4 – Estimate of projected new trips the entire proposed PUD would generate. Bottom row indicates projects new generated trips when accounting for existing development.

Christopher Zull has also provided a memo reviewing the preliminary traffic study in more detail. This memo highlights some items that either require more explanation or further investigation, as well as noting that some of the materials provided to the development team may not have been fully utilized. Mr. Zull has noted that some errors and inconsistencies in data have appeared to be corrected in the most recent data submitted by the applicant. At the same time, however, Mr. Zull has noted some concerns with the revised parking and building configuration that area shared by City staff and consultants. (These are listed in the above paragraph.) Despite these concerns, Mr. Zull also agrees with the City that there is still enough data present now to approve the concept plan provided the issues noted are fully addressed in the Spring 2025 traffic study and with the Final plan submission. If any concerns on these or other matters are identified in future studies, they can still be addressed and require correction by the City and Commissions during the Final Plan stage.

One other item of note on this topic relates to a pedestrian mall or permanent pedestrian plaza in the area of the southern private road as suggested by some City Commissioners. Pedestrian malls are not a new

idea; in particular, the 1960-1970s saw a significant development of pedestrian malls in many urban areas. Multiple studies have since been done to analyze their successes and failures. These studies found the vast majority (almost 90%) of these pedestrian malls were not successful and were returned to vehicular or mixed vehicular/pedestrian use. Of the ones that still remain, they generally had several features in common. Table 6 lists these factors with additional City comments. Considering this research, the City has concerns that this PUD location may not be appropriate for a permanent pedestrian mall or plaza. Instead, the following alternatives could be considered:

- Having a streetscape design that allows for temporary street closures for special events.
- Incorporating "Complete Street" or multi-modal elements to allow vehicles, pedestrians, and non-motorized transportation modes to safely and efficiently move through the development.

With regards to noise, smoke, fumes or glare, the City has not identified anything in the concept plan that would cause excessive impacts above and beyond what would be considered normal for a mixed-use development. As noted above, the revised plan creates an appropriate transition pattern of uses which puts like uses near like uses.

Table 6 – Analysis of Positive Pedestrian Mall Factors in Relation to PUD Site

F. *The PUD shall not place demands on public services and facilities in excess of current or anticipated future capacity.*

Staff comments: Detailed analysis is not required at the concept plan stage but will be required with the final plan submission. Similar to traffic/pedestrian analysis, if the building heights/layouts are known from the concept review, detailed utility analysis including sanitary sewer, storm sewer, water, etc. can be completed on a more detailed basis. It should be noted for now that previous studies on this topic

Positive Pedestrian Mall Factor	City Comments
Close Proximity to a Major Regional Attraction, College/University, or Generally High Tourism Activity	The PUD is located in close proximity to Reeds Lake and John Collins Park. However, these may generally be considered seasonal attractions and may not be sufficient to drive year-round demand and support.
Sufficient Density and Commercial Options to Attract Regional Visitors	One consulted study suggested that the proposed residential density could be sufficient to support a pedestrian mall. Others, however, suggest that the development immediately around a pedestrian mall is usually not enough to sustain it. Additionally, the retail mix around a pedestrian mall must be able to attract larger regional populations, such as with larger anchor businesses and uses with staggered operating hours throughout the day. It is not clear how or if the proposed retail space would be able to accommodate this.
Strong Public Transit	The Rapid operates a bus line along Wealthy Street with stops at Regatta Plaza and just east of the existing Chase Bank. More studies would need to be done to determine the impact of existing ridership on the PUD.
Limited Length of Mall (1-4 blocks)	The proposed mixed use corridor in the presented concept appears to fall within this length.
No or Limited Impact To Vehicular Traffic and Parking	Despite the size of the PUD site, there appears to be limited connectivity options with the City's street grid. Creating a permanent pedestrian mall at the south end of the site would likely force most vehicular traffic to access the site to the north via Lakeside Dr., particularly since that is where the bulk of the vehicular parking would be located. This traffic pattern may also be more confusing to navigate and create more congestion than having a continuous north-south vehicular passageway. The condos/apartments to the east would prevent any new vehicular connections in that direction. While there may be potential for a western connection via the D&W Shopping Plaza, this would require a shared access agreement with the property owner and is not guaranteed.

concluded that the current construction would be able to accommodate denser development than what is currently proposed. Studies that are available demonstrate that the currently proposed concept plan aligns with existing infrastructure capacities. At the Final Plan phase, any variations can be accommodated with additional requirements on the developers if needed.

Review and Requested Action:
Tonight, the City Commission is requested to provide feedback on the draft amendment text presented here. All feedback received tonight will be used to revise and refine the amendment text. If the overall feedback is favorable, the following steps would occur. The timing and order of these steps may vary based on meeting dates and public notification requirements.

- City Commission Meeting – Formal Introduction/First Reading of PUD Ordinance Amendment and Findings of Fact.
- Planning Commission Meeting – Public Hearing for PUD Ordinance Amendment Language only (site plan would be inserted to reflect whatever the outcome is through the Final Review Process); Planning Commission to give recommendation on whether amendment should be approved or not.
- City Commission Meeting – Final Reading of PUD Ordinance Amendment and Findings of Fact; vote on whether to approve the amendment or not.

A PUD Evaluation worksheet with the standards of review is provided for all City Commissioners to complete and submit to the City after tonight's meeting. This is being requested to formulate a findings of fact for the concept plan. Supporting materials from previous meetings and hearings are also attached for reference.

For additional context, agendas, and minutes of previous meetings related to this project can be viewed below.

- Planning Commission Agendas
- City Commission Agendas
- EGR YouTube page – Live Streams of City & Planning Commission Meetings

Potential Future Steps:
If a concept plan and PUD Amendment is approved, the project would then enter the Final Plan Phase. The applicant would need to submit a request for Final Plan approval, with more detailed drawings and plans, within two years of the concept plan approval before any new construction can begin. Otherwise, the concept plan approval would automatically be nullified.[9] All conditions made by the City and Planning Commission would need to be satisfied for the Final Plan to be approved.

REVIEWED & APPROVED FOR SUBMISSION:



Shea Charles, City Manager

[9] See Section 5.47E of the zoning ordinance. The City Commission may also approve a deadline extension of up to one year for good cause if requested by the applicant.