Andrew Chalnick
670 Nowland Farm Rd
South Burlington, VT 05403

December 7, 2021

VIA ELECTRONIC MAIL

South Burlington City Council
City of South Burlington
575 Dorset Street
South Burlington, VT 05403

Re: Public Hearing on Amendments to the City's Land Development Regulations (LDRs)

Dear Councilors:

South Burlington residents petitioned for IZ out of a concern that the LDRs do not sufficiently protect South Burlington's precious natural resources in the face of continued threats to our environment and I applaud the planning commission for all the hard work over three years on the draft LDRs to address these concerns. I know that this process has been deliberate and careful as I witnessed first-hand many of the deliberations.

While the draft LDRs do provide for some increased natural resource protection in the City as compared to the existing regulations, they in some cases remove protection and unfortunately fall short of what science tells us is needed to protect our water, air, bio-diversity and to address climate change.

To strengthen protection for our natural resources I urge the Council to address the following actionable and targeted items prior to finalization of the draft LDRs:

- The minimum density requirement in Conservation PUDs, which forces landowners to build dense developments on natural resources (or – at least – develop a master plan showing the minimum density), should be eliminated, or -- if really intended to just limit the size of homes or lot coverage -- replaced with a transparent rule to that effect (a "McMansion" rule),

- Development, if any, on two parcels (0570-01675 and 0860-0083) that were each identified as priority parcels for conservation by the IZ Open Space Committee should be required under Conservation PUDs (rather than traditional neighborhood PUDs),

Recognizing that certain of the changes in the draft LDRs (including expanded NRP areas and mandatory Conservation PUDs) were intended to provide some protection for buffers, habitat blocks, supporting habitat, meadows, farms and grasslands, the changes fall short of what was

recommended by the experts and I also strongly encourage the City to revisit Article 12 and enact clearer and more direct protections for these resources.

South Burlington will soon be engaging in a process to adopt a Climate Action Plan. Preserving open space will be critical to that plan to avoid emissions, to act as a carbon sink, to provide for bio-diversity and to filter water and buffer against storms. The importance of conserving open space in the face of climate change is stressed in numerous places in the Draft Vermont Climate Acion Plan (the "CAP") released at the end of November.[1] Oher communities have recognized this and incorporated preservation of open space in their Climate Action Plans.[2] Ensuring the LDRs are as strong as possible will give us a running start on our Climate Action Plan.

Attached is a more detailed comment with explanation and support for the items I describe above. I also have a few more technical comments that I articulate below.

Respectfully submitted,

Andrew Chalnick

Andrew Chalnick

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[1] For just a few of many examples, the CAP stresses the "maintain[ence] and expan[sion}of Vermont's natural and working lands' role in the mitigation of climate change through human interventions to reduce the sources and enhance the sinks of greenhouse gases," the "[p]romotion of healthy, connected river corridors, floodplains and wetlands," the adoption of "a state policy of no net-loss of natural and working lands (including active and passively managed forests, agricultural lands, and wetlands) accounting for the transitions of lands within and between these conditions, with aspiration for a net gain," the investment "in strategic conservation in order to increase the pace of permanent conservation towards 30x30 targets," "compact settlements [to]… protect and conserve natural and working lands, critical to ecosystem and public health, natural and community resilience, and Vermont's economy,"and the promotion of "statewide landscape connectivity and forest blocks conservation planning."

[2] For instance, the City of Northfield, Minnesota says in its Climate Action Plan that "[E]missions from how land is used and maintained is an important consideration ... Disturbing natural areas through land conversion (e.g., development, agricultural practices) releases the stored carbon, resulting in GHG emissions… As part of this plan, the City should continue to consider its approach to land use and land cover change as it pertains to emissions – particularly with respect to growth and urban boundary expansion opportunities to store and sequester carbon through wetlands and soil, as well as goals outlined to ensure preservation of agricultural and rural character. Further, the City can look to its natural areas and underutilized spaces to store additional carbon through tree planting and converting turf to native plantings."

DETAILED COMMENTS

The LDRs fall short of what science tell us are needed to protect our water, air, bio-diversity and to address climate change.

Meadows, forests and fields sequester carbon, provide a buffer against flooding, filter pollutants before they can enter Lake Champlain, provide habitat for pollinators, insects and wildlife, filter our air and nourish our souls. With the climate changing, the need for these environmental services will only grow.[3] We learned from Jens Hawkins-Hilke's talk - a conservation planner with the Vermont Department of Fish and Wildlife - that "there is exponentially more biological diversity in the Champlain Valley than there is on Mount Mansfield… If you want to look at where all of the species are, they're at the lower elevations. The living's a lot easier down here. That's why I'm here!"

Science tells us that we need 300-foot buffers around wetlands, rivers and streams but the draft LDRs require only 50, or in some cases, 100-foot buffers.[4]

Science tells us to protect all of the remaining bits of forests and shrublands that provide habitat (the "habitat blocks") for bio-diversity in South Burlington, but a few important recommendations made by Arrowwood Environmental LLC ("Arrowwood"), the consultant hired by the City to assist with developing the LDRs, were rejected in the draft LDRs (as shown in red circles on Attachment A).

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[3] The 2021 Vermont Climate Assessment concludes that roughly 70 bird species are expected to disappear from Vermont in the next 25 years, including the common loon and hermit thrush. Moose numbers are projected to decline. Climate change is making conditions less favorable for several Vermont tree species—including the iconic sugar maple—and exacerbating threats (invasive plants, insects, diseases) to forests. Warming waters will have adverse effects on lakes and rivers, including increased risk of harmful algal blooms and reduced biodiversity. See https://site.uvm.edu/vtclimateassessment/.

[4] The Vermont Agency of Natural Resources concludes that 300-foot buffers on rivers, streams, lakes and ponds are required to provide functional connectivity for many wildlife species. See BioFinder 3.0 Development Report 2019, page 33. The report titled "Mapping Vermont's Natural Heritage" published by the Vermont Fish & Wildlife Department and the Vermont Agency of Natural Resources concludes similarly at page 49 and states "In your town, your specific conservation goals will dictate how wide an area to consider for protection around a stream or lake. These areas are often referred to as riparian buffers ... **a 330-foot buffer will protect nearly all the functions we value, including high-quality cover for many wildlife species**."

Science tells us to provide buffers around the habitat blocks[5] and protection for "supporting habitat" – the meadows that surround the habitat blocks.[6] Especially in South Burlington where the habitat blocks are small, these buffers are critical. The LDRs do not explicitly provide for this protection.

Science tells us to provide protection for grasslands,[7] meadows, farmland and agricultural soil[8] but the draft LDRs fail to do so and even eliminate some protection for these resources.[9]

Do we need to protect more of South Burlington's natural resources? Yes. Don't we already protect enough? No.

South Burlington has already been fragmented into 7,700 separate parcels of land and has 9500 residential homes. 75 percent of the agricultural soils that at one time existed in South Burlington have already been paved over with highways, airport runways, parking lots, buildings, lawns, sports fields or solar farms, and there are an additional 1465 new additional homes in the pipeline (see attached map at Attachment C provided by Planning and Zoning), with 388 of those in the more rural parts of the City. This pipeline does not include the many hundreds of additional homes that are likely coming on the Long Property and the Hill Farm, among others.

Even without the additional homes, traffic is becoming a serious problem in South Burlington, particularly during rush hours. Every watershed in South Burlington is impaired.[10] Midland Avenue

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[5] Arrowwood stated that "**providing buffers to habitat blocks goes a long way towards ensuring the success of South Burlington's habitat blocks in enhancing wildlife diversity and populations within the town."** See Attachment B. The Comprehensive Plan also calls for three-hundred foot buffers (page 2-123): "Continue the designation of a three hundred foot buffer around the perimeter of the Great Swamp and Cheese Factory Swamp as an additional primary natural area subject to the same limits on disturbance, development or subdivision."

[6] In its report Arrowwood states that the supporting habitats "provide additional area wildlife use to fulfill their requirements, venturing into them for food, and to a lesser degree cover, space and water. In South Burlington, supporting habitats are notable for their ability to function as habitat for prey-base species, such as rabbits, rodents, and turkey, which contribute to the survival of wider-ranging wildlife occupying the [habitat blocks]". In their joint presentation to the City Council and Planning Commission Arrowwood said **"supporting habitat plays a big part in the success of the habitat blocks"**.

[7] The 2016 Biofinder report from the Vermont Agency of Natural Resources states that "most of Vermont's grassland habitats occur in the Champlain Valley and "[g]rasslands and shrublands, whether of natural origin or resulting from active land management, are critical to the survival of a suite of bird species in Vermont. Most of **these species will continue to decline in Vermont if grassland habitat is not maintained**."

[8] The 2014 Chittenden County Regional Planning Commission Climate Action Guide sets as a priority strategy for Chittenden County to: "Maintain vegetative landscapes to support carbon sequestration**. Maintaining vegetated landscapes – forests, wetlands, agricultural lands and urban trees and vegetation – is important for continued carbon sequestration. Vegetated landscapes also help with climate adaptation by absorbing precipitation, reducing stormwater runoff, maintaining natural habitats and reducing the urban heat island effect**."

[9] The draft LDRs eliminate Article 9.06(B)(3) which limited "encroachment" on these resources.

[10] The flows from all of the surface and groundwater systems in the city eventually reach Lake Champlain. Potash Brook is classified as "stormwater-impaired" by the State of Vermont Department of Environmental Conservation. Muddy Brook is listed as an impaired watershed due to elevated levels of toxins, nutrients, and temperature.

has bisected the Great Swamp in direct conflict with the advice of City consultants and in contravention of the Comprehensive Plan.[11] When does it end?[12] The overwhelming public sentiment at all of the hearings for the draft regulations was to significantly slow new development in favor of more environmental protection, and even more so if one excludes stakeholders with direct financial interests.

In addition to the environmental impacts, building residential homes on natural resources is proven to be fiscally unsound. Studies universally show that building residential homes on opens spaces results in higher taxes. One study concludes that for every dollar of property tax revenue from a new residential home built on former open space the cost to the City and taxpayers will be $1.19 for new infrastructure and services. Another summarized dozens of studies and concluded that "While residential development brings with it new tax (and fee) revenue, it also brings demand for local government services. The cost of providing these services exceeds the revenue generated by the new houses in every case studied".[13] These studies do not even take into account the eco-system services that are lost when natural resources are developed. The Earth Economics report commissioned by the City Council estimates the value of the ecosystems in the priority open spaces — those identified by the Interim Zoning Open Space Committee —would be between $73 and $240 million over the next twenty years. When eco-system benefits are taken into account, it becomes obvious that developing natural resources for residential homes is fiscally reckless.[14]

South Burlington's objective for these watersheds are found on page 2-92 of the Comprehensive Plan: "Protect and improve watershed, stream, and wetland system natural processes, specifically for stormwater treatment, riparian and aquatic habitat, and floodplain and river corridor protection."

[11] The Comprehensive Plan directs the City to "Consult the Arrowwood Environmental SEQ Environmental Assessment regarding environmental resources, conditions, and possible strategies for protecting wildlife habitat values through conservation, restoration and development." Page (3-39). Among the recommendations in this report are that "The Great Swamp should be protected from development by a minimum of a 300-foot isolation buffer within which development and human intrusion, other than walking, does not occur." And "[t]he Upland Forest surrounding the Great Swamp should have no paved roads or development within its current boundaries. It should remain un-fragmented."

[12] In just two short decades, we have departed so far from the recommendations of experts that called for allowing just 4 homes per 100 acres in the SEQ. See letter from April of 2002 the Conservation Law Foundation which wrote to the City that "[t]o maintain the rural, agricultural and natural features of the SEQ, the overall densities in the area should be low. The Town Zoning and Subdivision regulations should focus on an overall low density for the area instead of managing growth by setting standards for lot size. A significant portion of this area, where agricultural uses are present and can continue, should maintain a density of 25 acres per unit. To allow large tracts of land to remain in agriculture with this density, small lots sizes should be allowed, provided the overall density for a particular area is maintained. **With this model, a 100-acre parcel at a density of 25 acres per unit could have 4 units. With a maximum lot size of 1/3 acre, less than 2 acres would be used for development while 98 would be available for agricultural uses**."

[13] Jeffrey H. Dorfman, "The Fiscal Impacts of Land Uses on Local Government"; Land Use Studies Initiative and Department of Agricultural & Applied Economics, The University of Georgia, April 2006

[14] The report by John Stewart ("Report on the Additional Revenues Generated from New Housing Developments vs. the Additional Costs to the City" (March 12, 2020)) that the City commissioned which purported to find that development would not lead to higher taxes is flawed because it does not take into account the impact of a growing population on homestead education taxes. By neglecting education taxes, the report fails to factor in that as South Burlington's population increases the need for more school infrastructure will increase which will

Would putting in place all of these environmental protections be inconsistent with the important goal of ensuring South Burlington does its part in providing access to affordable housing? No.

South Burlington should be proud that it presently has over 800 "income-restricted" homes (including rentals). Also, based on the assessed values shown on the 2021 Grand List, 64% of all housing units in South Burlington have an assessed value of less than $300,000, and only 3% have an assessed value of more than $600,000. South Burlington was recently rated seventh on a list of the top cities in Vermont (with populations over 5,000) which are the most affordable cities in which to own a home. South Burlington certainly seems to be doing its fair share.

And, we can do more. There are infill and redevelopment opportunities in South Burlington to responsibly further develop in a way which protects the environment and ensures good quality housing near we people work. There are creative opportunities to re-purpose large scale commercial areas that are no longer functioning as intended. Re-purposing failing commercial areas is a win-win for the environment and the economy, and can provide dynamic attractive housing opportunities for people across all income levels. "Case Studies in Retrofitting Suburbia: Urban Design Strategies for Urgent Challenges" (2021) by June Williamson and Ellen Dunham-Jones describes how defunct shopping malls, parking lots, and other obsolete suburban development patterns across the country are being retrofitted to address current urgent challenges they weren't designed for: improving public health, increasing resilience in the face of climate change, leveraging social capital for equity, supporting an aging society, competing for jobs, and disrupting automobile dependence.

The draft Vermont Climate Action plan recognizes that infill, redevelopment and conservation of natural resources is key to addressing climate change and provides at pages 218 and 219:

> "When thoughtfully planned, compact settlement, including infill and redevelopment, can also support many of the State's climate goals and actions, including energy efficiency, greenhouse gas emissions reductions, community climate resilience and adaptation, and preservation of the resilience and sequestration benefits provided by healthy natural and working lands… [C]ompact settlements … protect and conserve natural and working lands, critical to ecosystem and public health, natural and community resilience, and Vermont's economy."

To strengthen protection for our natural resources in the LDRs, I urge the Council to address the actionable and targeted items described in more detail below prior to finalization of the draft LDRs and during the 150-day window following the date the regulations were warned. Recognizing that certain of the changes in the draft LDRs (including expanded NRP areas and mandatory Conservation PUDs) were intended to provide some protection for buffers, habitat blocks, supporting habitat, meadows, farms and grasslands, the changes fall short of what was

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increase the City's budgeted spending per pupil which – under the State's funding formula – will lead to a proportionate increase in education taxes. This is exactly what the City debated in March 2020 when the proposed bond for new school facilities was defeated.

recommended by the experts and I also strongly encourage the City to revisit Article 12 and enact clearer and more direct protections for these resources. I also have a few more technical comments, as described below.

1. ELIMINATE THE MINIMUM DENSITY REQUIREMENT

The draft LDRs would require the buildable portion of a Conservation PUD development to contain a minimum of 4 units/acre. So, a landowner who owns a large parcel in the SEQ would **NOT BE PERMITTED** to conserve the parcel along with building a handful of homes for his/her children or for sale.[15] Rather, a land owner on – say – ten acres would be required to build a minimum of twelve homes (or – at the least – develop a master plan showing at least 12 homes).

Where would all of these homes be required? On the exact resources – the buffers, supporting habitats, grasslands, farmlands and eliminated habitat blocks – that the experts told us should be protected from development!

At various meetings at which this provision was discussed, the reason given by staff for a minimum density requirement is to provide developers certainty in the face of potential community opposition. But, as staff relayed the concerns of landowners it seemed the sentiment was the exact opposite. Landowners want to conserve their land, but also carve out some lots for their families or for sale. I have not spoken to a single land-owning neighbor who favors being forced to build more homes than they would otherwise desire. Those who spoke at the planning commission meetings were opposed.

It makes no sense to force a landowner in a rural area who wishes to conserve more of his or her natural resources to build dense developments on these resources against his or her will.

What makes the provision particularly strange and confusing is that – as stressed by staff in response to public comments – the actual requirement is just to file a master plan that shows the density. Landowners would be required to incur significant expense to prepare and submit a master plan which satisfies the minimum density requirement, but would not then have to actually build anything.

So, what then is the real intent of this strange provision? Perhaps it is to simply limit the sizes of homes and/or lots, or limit lot coverage. I am not sure.

This provision should be eliminated. But, if the real intent of the minimum density requirement is to limit the size of homes, or to limit lot coverage, the planning commission should be directed to consider this in a way that is more transparent to the public by limiting the sizes of new homes or lots, or limiting lot coverage, consistent with the goals and social values of the community (a

[15] There is a "2-acre carveout" from this requirement, but the carveout is so small it will likely have only very limited utility. One alternative to eliminating the minimum density requirement could be to increase the size of the carve-out.

"McMansion" rule). It would be interesting to explore such a rule in connection with a re-think around TDRs which would allow homeowners who want larger homes to purchase TDRs to allow up-sizing (24 V.S.A. § 4423 – the Vermont enabling legislation for TDRs - allows TDRs to be used to increase "building bulk" and/or "floor area to lot size").

If the council decides not to eliminate minimum density, 15.C.05 (F)(4)(a) should at a minimum be re-drafted so that landowners that are not immediately served by public infrastructure would be exempt from the minimum density requirement. This would require re-drafting 15.C.05 (F)(4)(a) as follows (suggested additions in **bold** and deletions ~~struck~~):

> "The Development Review Board may grant a reduction or waiver of this minimum where an applicant demonstrates that the Development Area has a lack of available public infrastructure **immediately adjacent to** ~~in the vicinity of~~ the Development Area ~~and physical site constraints precluding on-site infrastructure which together make the Development Area not capable of achieving the minimum required density~~."

2. REQUIRE CONSERVATION PUDS WITH RESPECT TO TWO PRIORITY OPEN SPACE PARCELS

Two parcels -- 0570-01675 and 0860-00835 -- identified as priority parcels for conservation by the Interim Zoning Open Space Committee would lose protection in the draft LDRs as compared to the existing regulations. The adopted LDRs should require that development, if any, on both of these parcels be under Conservation PUDs.

- Parcel 0570-01675. First, the draft LDRs would re-zone a portion of parcel 0570-01675 from SEQ Neighborhood Residential (SEQ-NR) to SEQ Village Residential (SEQ-VR). Because VR zoning is carved out from the Conservation PUD requirements in the SEQ, the impact of this re-zoning would – I believe – require any development on the parcel under the draft LDRs to be under a Traditional Neighborhood Development ("TND") PUD rather than a Conservation PUD. It makes no sense to require a traditional neighborhood to be built across a parcel identified as a high priority for conservation. Moreover, the western portion of this parcel is part of the Great Swamp and the eastern portion was identified in an Arrowwood assessment from 2004 as open space that should remain as unfragmented as possible.[16] The zoning for parcel 0570-01675 should remain as is – SEQ Neighborhood Residential -- and development, if any, should be under a Conservation PUD.
- Parcel 0860-00835. Second, the draft LDRs would re-zone parcel 0860-00835 (commonly referred to as the "Hill Farm") from Industrial & Open Space to Residential 7 – Neighborhood Commercial. This seems inconsistent with the Comprehensive Plan which unambiguously designates the property as farmland that should be conserved with only

[16] See the "WILDLIFE AND NATURAL COMMUNITIES ASSESSMENT of the SOUTH EAST QUADRANT, SOUTH BURLINGTON VERMONT" performed by Arrowwood Environmental in 2004 which states that "[t]he Great Swamp, and the upland forest and shrubby fields that surround it, comprise a 400-500 acre cluster of contiguous and varied wildlife habitat… **Adjacent open spaces, including the large fields west of Dorset Street, should remain as unfragmented as possible**."

limited encroachment. Coupled with the findings of the Open Space Committee, this parcel should be re-zoned to Residential 7 – Neighborhood Commercial only if in connection with this re-zoning any development is required to be under a Conservation PUD. One way to potentially accomplish the appropriate level of environmental protection could be to zone this parcel as SEQ-NR, instead of R7-NC.

3. ALLOW FOR MORE FLEXIBILITY AS TO HOW LAND IS TO BE CONSERVED IN CONNECTION WITH CONSERVATION PUDS

On a technical note, the LDRS should allow landowners more flexibility to establish how land is conserved in connection with Conservation PUDs. The TDR regulations permit landowners to demonstrate that there is a "plan that permanently encumbers the land against further land subdivision and development in a form acceptable to the City Attorney" and I would recommend the same standard be adopted for Conservation PUDs. Suggested additions in **bold** below:

"15.c.05 (E)(1)(d): The Conservation Area(s) must be identified on the PUD Master Plan, and shown and noted as a "Conservation Lot" on preliminary and final subdivision plats, and in associated deeds and association agreements, as undivided, permanently protected Open Space to be managed and maintained in single or common ownership under an Open Space Plan approved by the DRB. Options to ensure permanent protection and sustainable long-term management of conserved resources include:

(i) A conservation easement that prohibits future subdivision and development, and defines the range of permitted activities, to be held by the City or a qualified nonprofit organization acceptable to the DRB and City Attorney, such as a land trust or conservancy; or

(ii) Dedication of land in fee simple to the City, or a qualified nonprofit conservation organization acceptable to the DRB and City Attorney; or

(iii) Such other plan that permanently encumbers the land against further land subdivision and development in a form acceptable to the City Attorney."

4. AMEND THE SUB-DIVISION RULES TO ALLOW FOR CONSERVATION

On another technical note, the sub-division rules are complex but seem to require any landowner that wishes to conserve a portion of his or her land to submit a Master Plan for development of the rest. If so, the sub-division rules must be amended to allow any landowner the freedom to conserve any portion of his or her land without submitting a Master Plan for development on the remaining portion.

Attachment A – Habitat Block Revisions

Lighter Green Areas were deleted from the Arrowwood Habitat Block Mapping

Attachment B – Letter from Arrowwood Environmental in Support of Buffers

ARROWWOOD ENVIRONMENTAL
950 BERT WHITE ROAD
HUNTINGTON, VT 05462
(802 434-7276 FAX: (802) 329-2259

To: City Council and Planning Commission, City of South Burlington
From: Jeff Parsons, Arrowwood Environmental
Subject: Habitat Block Buffers
Date: March 26, 2021

This memo is in response to a request by Ray Gonda, the Chairperson of the South Burlington Conservation Committee to provide some general information regarding the wildlife values of buffers as they relate to habitat blocks in South Burlington.

In 2020, Arrowwood Environmental mapped habitat blocks for the City of South Burlington (see *City of South Burlington Habitat Block Assessment & Ranking 2020*). Within that document forested areas at least 20 acres in size were mapped and their relative values as wildlife habitat were assessed.

Each habitat block was assessed for several wildlife habitat elements such as: size, connectedness with other blocks, the presence of wetlands and surface waters, and the diversity of tree canopy types and heights. The habitat blocks were assessed both for their own individual habitat characteristics and for their connections to other blocks. In addition, the supporting habitats surrounding each block were assessed.

Ecologists, including those at Arrowwood Environmental, recognize the value of viewing habitat blocks (both in South Burlington and elsewhere) within a broader landscape context. When broadening the context, especially in areas where habitat blocks are relatively small (like those in South Burlington) – the lands surrounding habitat blocks become important.

The undeveloped lands adjacent to habitat blocks serve to add wildlife value to the mapped habitat blocks. Undeveloped buffers adjacent to habitat blocks provide a greater separation between wildlife populations and more intense human activities and human intrusions. These buffers help filter out intrusive noise, lights, and on the ground human activities – many of which can disturb and disrupt a wide-variety of wildlife species. Buffers also serve to provide some separation between roaming pets and wildlife. Buffering habitat blocks from disruptive human activities can enhance wildlife diversity within blocks.

Undeveloped buffers can also facilitate access to some wildlife habitat elements that can increase overall wildlife diversity within a block. Wildlife may seek out space, cover, breeding, and feeding opportunities in nearby old fields, orchards, herbaceous wetlands, and shrublands. This non-forest habitat potentially provides abundant feeding opportunities for predator and prey alike.

In conclusion, providing buffers to habitat blocks goes a long way towards ensuring the success of South Burlington's habitat blocks in enhancing wildlife diversity and populations within the town.

Attachment C – Map of Pending Housing

Map source: https://arcg.is/1WKuTK (accessed on 12/6/2021)

Map Key:

- Yellow with dashed-lines: Sketch
- Yellow: Application submitted at preliminary plat stage
- Orange: Some level of approval granted, but not final plat
- Pink: Final plat approved
- Blue: Construction underway at some level (homes or infrastructure)

Totals as shown on Map:

Sketch	3	**In Construction**	52
			43
Preliminary Plat Filed	74		4
	61		50
	37		14
			11
Pre-final plat	390		10
	135		139
	15		25
	18		25
Final Plat Approved	131	**Total**	1465
	18		
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	32		
	5		
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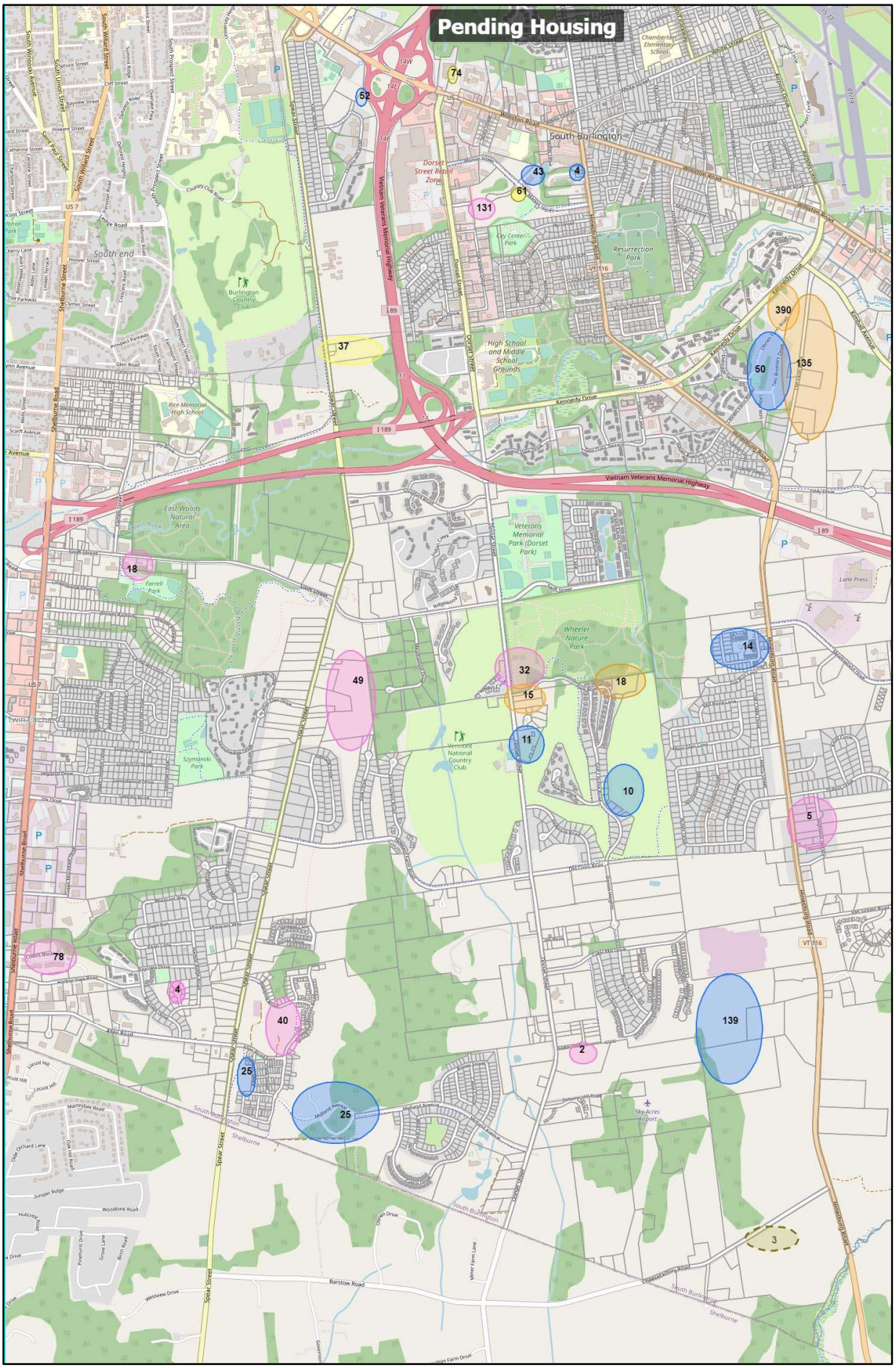
Pending Housing
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