

STATEMENT OF JUSTIFICATION

PRELIMINARY PLAN OF SUBDIVISION 4-21050

Renard Industrial

APPLICANT: Renard Lakes Holdings, LLC

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Statement of Justification in Support of Preliminary Plan of Subdivision 4-21050

Applicant/Owner

The Applicant for this Preliminary Subdivision Plan is Renard Lakes Holdings, LLC. Renard Lakes Holdings, LLC is a Maryland Limited Liability Company controlled by Strittmatter Land, LLC. Strittmatter has extensive experience in the development and operation of residential, industrial and mixed-use projects in Prince George's County. Renard Lakes Holdings, LLC ("Renard") is also the owner of the property forming the subject matter of this application.

The Property

The Renard Industrial property consists of approximately 6.09 acres. It is identified as Parcel 30 on Tax Map 135, Grid D-3. Parcel 30 is a deed parcel recorded among the Land Records of Prince George's County in Liber 41581, Folio 277. It has approximately $640\pm$ feet of frontage along the southbound lanes of US Route 301.

The property is zoned I-1 (Light Industrial). A copy of the Zoning Map is marked Exhibit "A" and attached hereto. As shown on Exhibit "A," Parcel 30 is abutted to the north and south by several properties that are also zoned I-1. Immediately west of the property is a certified non-conforming surface mine that is zoned R-S (Residential Suburban). The land immediately north of the

property is wooded and undeveloped. The land on the east side of US Route 301 is zoned R-E (Residential Estate) and is also undeveloped.

Development Proposal/Preliminary Plan of Subdivision

Renard proposes to develop the property with a 30,000 square foot warehouse and 8,000 square foot maintenance facility. Parcel 30 is proposed to be re-identified as Lot 1. Lot 1 will be accessed by a right-in right-out turn from the southbound lanes of US Route 301.

Prince George's County 10-Year Water and Sewer Plan

Pursuant to the adoption of CR-87-2021 on November 2, 2021, the property is in Water Category 4 and Sewer Category 4.

2017 Approved Paywide Green Infrastructure Plan

The green infrastructure network includes designated areas of Countywide environmental significance. It identifies significant natural resources including streams, wetlands, buffers, 100 year floodplains, severe slopes, interior forests, colonial water bird nesting sites and unique habitats. The northern half of the property is in the evaluation area, and there is a small area in the northeast corner of the property that is in the regulated area.

Woodland Conservation Ordinance

A Type 1 Tree Conservation Plan has been included with this Preliminary Plan of Subdivision application.

2009 Master Plan of Transportation

As abovementioned, the property has frontage along the southbound lanes of US Route 301. US Route 301 is designated as a freeway (F-10) by the 2009 Master Plan of Transportation and has a variable right-of-way width of 300-450 feet.

NATURAL RESOURCE INVENTORY

The property is the subject of an approved Natural Resource Inventory Plan (NRI-085-2021) which has been filed with this application.

CONFORMANCE WITH APPLICABLE PROVISIONS OF SUBTITLE 24/SUBDIVISION ORDINANCE

Analysis of the applicable provisions of the Subdivision Ordinance is set forth below:

DIVISION 3 - REQUIREMENTS: PLANNING, DESIGN, AND PUBLIC FACILITIES.

Sec. 24-121. - Planning and design requirements.

- (a) The Planning Board shall require that proposed subdivisions conform to the following:
 - (1) All lots shall be designed to be located wholly within the County and platted in conformance with all of the requirements of the Zoning Ordinance applicable to the subject property.

Proposed Lot 1 is entirely located within Prince George's County and will be platted in conformance with all Zoning Ordinance requirements, including the specific requirements of the I-1 Zone.

(2) In cases where the proposed subdivision is situated in a portion of the Regional District not planned to be served by public water and/or sewerage facilities, proposed lots shall be designed to meet the minimum lot size requirements for individual systems, as contained in Subtitle 22 of this Code and in the Comprehensive Ten Year Water and Sewerage Plan.

This provision is inapplicable as the property is in Water Category 4 and Sewer Category 4.

or planned roadway of arterial or higher classification, they shall be designed to front on either an interior street or a service road. As used in this Section, a planned roadway or transit right-of-way shall mean a road or right-of-way shown in a currently approved State Highway plan, General Plan, or master plan. If a service road is used, it shall connect, where feasible, with a local interior collector street with the point of intersection located at least two hundred (200) feet away from the intersection of any roadway of collector or higher classification.

Proposed Lot 1 fronts exclusively on the southbound lanes of US Route 301 which as noted above is classified as a freeway. It is proposed to be accessed by a single right-in right-out turn. A variation request seeking relief from this provision has been filed with this application.

(4) Residential lots adjacent to existing or planned roadways of arterial classification shall be platted with a minimum depth of one hundred and fifty (150) feet. Residential lots adjacent to an existing or planned roadway of freeway or higher classification, or an existing or planned transit right-of-way, shall be platted with a depth of three hundred (300) feet. Adequate protection and screening from traffic nuisances shall be provided by earthen berms, plant materials, fencing, and/or the establishment of a building restriction line, when appropriate.

This provision is inapplicable as no residential lots are proposed.

(5) The preliminary plan and final plat shall conform to the area master plan, including maps and text, unless the Planning Board finds that events have occurred to render the relevant recommendations within the comprehensive plan no longer appropriate, is no longer applicable, or the District Council has not imposed the recommended zoning. Notwithstanding any other requirement of this Section, a proposed preliminary plan or final plat of subdivision may designed to conform with the land use recommendations for centers, as approved within current County general plan. In such cases, the Planning Board may approve a preliminary plan application as may be designed to conform with the land use policy recommendations for centers, as duly approved within the current General Plan.

The project is located in Planning Area 85A and is governed by the Subregion 5 Master Plan and SMA. The Future Land Use Map in the Subregion 5 Master Plan recommends industrial development for the property. A copy of this map is marked Exhibit "B" and attached hereto. The proposed development also conforms to the vision, policies, and strategies contained within the General Plan Prince George's 2035. Like the Subregion 5 Master Plan, the General Plan's "Generalized Future Land Use Map" recommends industrial/employment development for the property. A copy of this map is marked Exhibit "C" and attached hereto. The property is also designated within the "Established Communities" Growth Policy Area. This Preliminary Subdivision Plan conforms with the above goals. The proposed warehouse and maintenance facility adhere to the vision for industrial development of the property.

(6) When indicated by a master plan or the General Plan or when requested by a public agency, land may be placed in reservation, pursuant to Division 7 of this Subtitle.

There are no recommendations in either the Master Plan or General Plan that require reservation of any land included in this Preliminary Subdivision Plan.

(7) Provision shall be made for the eventual ownership of outlots or residue parcels by incorporating them into platted lots or into adjacent parcels or by other means deemed acceptable by the Planning Board.

This provision is inapplicable as no residue parcels or outlots are proposed on the Plan.

(8) Corner lots shall be rounded with a radius of not less than twenty (20) feet or provided with an equivalent truncation.

This provision is inapplicable as no corner lots are proposed on the Plan.

(9) Walkways, with rights-of-way not less than ten (10) feet wide, shall be provided through all blocks over seven hundred fifty (750) feet long, when deemed necessary by the Planning Board.

No blocks over 750 feet long are being proposed. Therefore, this provision is inapplicable.

(10) Generally, subdivisions shall be designed to avoid unnecessary and costly roads, utility extensions, grading, and energy consumption.

This subdivision will be designed so as to avoid unnecessary and costly roads or utility extensions. A single point of access to US 301, an existing road, is proposed.

(11) Significant natural features which are impossible or difficult to reproduce, such as waterways, streams, hills, wooded lands, and specimen trees, should be preserved to the degree practicable.

Regulated features, including streams and floodplain areas, to the extent reasonably practical, are proposed to be preserved.

- (12) Lot size averaging may be permitted for preliminary plans accepted prior to July 1, 2006 in accordance with the Zoning Ordinance when the Planning Board finds that:
 - (A) The subdivision design provides for better access, protects or enhances historic resource or natural features and amenities, or otherwise provides for a better environment than that which could be achieved by the exclusive use of standard lots.
 - (B) The subdivision design provides for an adequate transition between the proposed sizes and locations of lots and the lots, or lot size standards, of any adjacent residentially zoned parcels.
 - (C) The subdivision design, where applicable, provides for an adequate transition between the proposed natural features of the site and any natural features of adjacent parcels.

This provision is inapplicable as a single industrial lot is proposed.

(13) Generally, lots, except at corners, should have access to only one (1) street.

Proposed Lot 1 will have access only to US Route 301 through a right-in right-out turn.

(14) If an entrance feature or gateway sign is proposed in a residential subdivision, it shall be identified on the preliminary plan on a separate Homeowners' Association parcel, or easement located on a homeowner's lot, and be designed in accordance with the standards in Section 27-624 of the Zoning Ordinance. A Homeowners' Association or other entity or person designated in a maintenance arrangement approved by the Department of Permitting, Inspections, and Enforcement, shall be responsible for the maintenance of the entrance feature or gateway sign.

This provision is inapplicable as the Subdivision proposes industrial development.

(15) The Planning Board shall not approve a preliminary plan of subdivision until evidence is submitted that a stormwater management concept plan has been approved by the Department of Permitting, Inspections, and Enforcement or the municipality having approval authority, unless the Planning Board finds that such approval will not affect the subdivision.

A Stormwater Management Concept Plan has been filed and is currently under review. It proposes a stormwater management pond in the northeast corner of the property.

(16) Except as indicated in Section 24-132, the subdivision shall be designed and platted in accordance with the provisions for woodland conservation and tree preservation contained in Subtitle 25.

A site development concept plan has been filed. A Type 1 Tree Conservation Plan has been filed with this application and will be approved by the Planning Board as part of the approval of this Preliminary Subdivision Plan.

(17) Historic resources should be preserved.

No historic resources are located on the property. (See Historic Checklist filed with this application.)

(18) Significant archeological sites identified in accordance with Planning Board Guidelines the Archeological Review should be preserved in place, to the extent practicable and should interpreted be as appropriate.

It is the Applicant's belief and understanding that no archeological review will be required for this Preliminary

Subdivision Plan. The Applicant is unaware of any archeological sites located on the property. The applicant has submitted an Historic Pre-Submittal Checklist for pre-acceptance review. The Checklist has been signed by staff and indicates no archaeological review or study is required.

19) Condominium townhouse dwelling units approved after September 1, 2012 shall conform to the lot standards of this Subtitle and Subtitle 27 for possible future conversion to fee simple lots.

No condominium townhouse units are proposed and therefore this provision is inapplicable.

Sec. 24-122. - Public facilities requirements.

(a) When utility easements are required by a public utility company, the subdivider shall include the following statement in the dedication documents: Utility easements are granted pursuant to the declaration recorded among the County Land Records in Liber 3703 at Folio 748.

A 10-foot public utility easement will be provided along the property's frontage on US Route 301.

(b) Land for public facilities, shown on the General Plan, functional master plans and/or area master plans, and watershed plans shall be reserved, dedicated, or otherwise provided for.

No public facilities are shown on the General Plan or on the Master Plan which impact this property. A Stormwater Management Concept Plan has been filed and is currently under review. The Applicant

believes that appropriate measures are being proposed to handle and treat all stormwater runoff as required by applicable ordinances.

(c) Stormwater management facilities, existing or proposed as part of the development, shall have sufficient capacity to convey surface water runoff.

See above response.

24-122.01. - Adequacy of public facilities.

(a) The Planning Board may not approve a preliminary plan of subdivision if it finds that adequate public facilities do not exist or are not programmed for the area within which the proposed subdivision is located, as defined in the "Guidelines for the Mitigation of Adequate Public Facilities" Public Safety Infrastructure" and "Guidelines for the Analysis of the Traffic Impact of Development Proposals." The Planning Board shall require adequate public facilities, as provided in this Section and in Division 4 of this Subtitle.

Given that only one lot is proposed, and that the resulting number of peak hour trips is substantially less than 50 trips, a full Traffic Impact Analysis is not required by the Guidelines. Still, a Transportation Impact Analysis is included with this application which demonstrates adequacy of traffic conditions for the proposed development. This study was filed given the Applicant's request for an access permit from US 301 into the Property, which will be reviewed by the State Highway Administration.

DIVISION 4 - REQUIREMENTS: TRANSPORTATION AND CIRCULATION Sec. 24-123 - General Requirements.

(a) The Planning Board shall require that preliminary plan conform to the following:

(1) The rights-of-way of all highways, streets, and transit facilities shown on the General Plan, functional master plans, and area master plans shall be shown on the preliminary plan and, when reserved or dedicated, shown on the final plat.

All rights-of-way will be observed on the Preliminary Subdivision Plan.

(2) All proposed streets shall be continuous and in alignment with existing or platted streets in adjoining subdivisions so as to create a street network that is functional and easily understandable. Generally, streets should cross other streets at right angles.

This Subdivision does not propose the dedication of any new public streets.

- (3) All internal subdivision streets shall be wholly within the County and shall not be designed to directly connect to an adjacent county unless the applicant has obtained the prior written approval of the District Council and the appropriate land use authority of the adjacent County.
 - (A) An applicant must file a written request for said approval. The request shall be filed with the Clerk of the District Council. The District Council must either approve or disapprove said request within forty-five (45) days from the date of filing. Failure of the District Council to act within said forty-five (45) day period shall constitute an approval of the request. For purposes of this provision an internal subdivision street shall be deemed to be a public roadway having a right-of-way width of eighty (80) feet or less.
 - (B) After public hearing before the District Council, the Council shall not allow the proposed bi-county subdivision unless it finds that delivery of public safety services, utility services, and tax collection will be timely and adequate for the lots in Prince George's County.

This Subdivision does not propose any internal private roads.

(4) All streets proposed for dedication to public use shall be designed to the standards of the County road ordinance and street standards for width and minimum curve radii or to the standards of municipalities having jurisdiction. Variations from these standards may be granted by the Planning Board upon the recommendation of the Department of Permitting, Inspections, and Enforcement or upon the recommendation of the municipality or other governmental authority having jurisdiction.

See above response.

(5) Arterial highways shall have a minimum right-of-way width of one hundred and twenty (120) feet; collector streets, a minimum right-of-way width of eighty (80) feet; and parkways, such right-of-way width as may be designated by the Planning Board. The width of secondary subdivision streets shall be not less than fifty (50) feet and the width of primary subdivision streets not less than sixty (60) feet.

This provision is inapplicable.

(6) Land for bike trails and pedestrian circulation systems shall be shown on the preliminary plan and, where dedicated or reserved, shown on the final plat when the trails are indicated on a master plan, the County Trails Plan, or where the property abuts an existing or dedicated trail, unless the Board finds that previously proposed trails are no longer warranted.

It is the Applicant's understanding and belief that no bike or pedestrian trails are required for this subdivision.

Sec. 24-124 - Adequate roads required.

- (a) Before any preliminary plan may be approved, the Planning Board shall find that:
 - (1) There will be adequate access roads available to service traffic which would be generated by the proposed subdivision, or there is a proposal for such roads on an adopted and approved master plan and construction schedule with one hundred percent (100%) of the construction funds allocated within the adopted County Capital Improvement

the current State Consolidated Program, within Transportation Program, and/or such roads are incorporated facilities specific public financing implementation program as defined in Section 27 -107.01(186.1); and

(2) The traffic generated by the proposed subdivision will be accommodated on major intersections and major roadways within the established study area such that they will be functioning below the minimum peak-hour service levels adopted by the Planning Board in the "Guidelines for the Analysis of the Traffic Impact of Development Proposals," as may be amended from time to time (hereinafter the "study area" refers to major intersections and major roadways as defined in the "Guidelines").

A transportation study has been provided with this application which demonstrates that major roadways and intersections will accommodate traffic generated by the proposed subdivision at acceptable levels.

Sec. 24-125 - Commercial and industrial subdivisions.

In the case of a commercial or industrial subdivision which fronts on an arterial road or a road of greater capacity, the applicant may be required to provide information relating to traffic safety and efficiency, such as access points, directional signing, internal circulation, and general parking proposals. If the Planning Board finds that there is a probability of traffic hazard or serious impairment of circulation, it may impose such conditions as are needed to protect the public health and safety.

See above response.

Sec. 24-128 - Private Roads and Easements.

(a) No subdivision plan or plan of development (however designated) shall be approved that provides for a private road, right-of-way, or easement as the means of vehicular access to any lot, and no building permit shall be issued for the construction of any building in a subdivision unless such building is to be located on a lot or parcel of land having frontage on and direct vehicular access to a public street, except as hereinafter provided.

This provision is inapplicable as the property will be accessed only by US Route 301.

DIVISION 5 - REQUIREMENTS: ENVIRONMENTAL AND PARKS.

Sec. 24-129 - One hundred (100) year floodplain.

- (a) Land shall be platted in a manner that protects the public against loss of life or property due to the one hundred (100) year flood, while minimizing the public and private costs of flood control measures. The Planning Board shall require that proposed subdivisions conform to the following:
 - (1) Except as provided in Paragraphs (2) and (3), lots shall comply with the minimum net lot areas prescribed by the Zoning Ordinance, exclusive of any land area within the one hundred (100) year floodplain.
 - (2) In the R-A and O-S Zones, where any lot contains a floodplain area, there shall be a minimum of forty thousand (40,000) contiguous square feet of area exclusive of any land within the one hundred (100) year floodplain.
 - (3) In the R-E Zone, and in the R-R Zone for the purposes of compliance with Section 24-128(b)(1)(B), any area of a lot in excess of twenty thousand (20,000) contiguous square feet may be in the one hundred (100) year floodplain provided that such lot is to be served by a public water and sewerage system, and is in water and sewer service area category one, two, or three at the time of approval of the final plat of subdivision.
 - (4) The floodplain areas shall be delineated in accordance with Section 27-124.01 of Subtitle 27 of this Code.
 - (5) A twenty-five (25) foot setback from the floodplain shall be established for residences as a building restriction line.
 - (6) In the event that the proposed subdivision is located partially or fully within an area covered by an officially adopted comprehensive watershed management plan, the Planning Board shall require conformity to such plan.

- (b) In the case of a proposed subdivision which includes a one hundred (100) year floodplain area along a stream, unless such area is to become a public park or recreation area maintained by a designated responsible public authority, the area shall be denoted upon the final plat as a floodplain easement. Such easement shall include provisions for ingress and egress, where practicable. The floodplain easement area may be used, if necessary, for utility lines and/or storm drainage facilities, open-type fencing, or passive recreation, provided that no structures are built that would interfere with the flood conveyance capacity of such easement area.
- (c) The floodplain associated with a watercourse having less than fifty (50) acres of watershed upstream may be excluded from the floodplain area computation, subject to the approval of the Department of the Environment in accordance with the provisions of Subtitle 4 of this Code.

There is a small area of 100-year floodplain in the northeast corner of the property. The proposed Subdivision conforms with the above requirements.

- Sec. 24-130 Stream, wetland, and water quality protection and stormwater management.
 - (a) Proposed subdivisions shall be designed to minimize the effects of development on land, streams and wetlands, to assist in the attainment and maintenance of water quality standards, and to preserve and enhance the environmental quality of stream valleys.

There are no wetlands on site. There is however, a small stream that crosses the northeast corner of the property. The Applicant proposes to preserve these sensitive features.

- (b) The Planning Board shall require that proposed subdivisions conform to the following:
- (1) The preliminary plan shall demonstrate adequate control of the increased runoff due to the ten (10) year storm or such other standards as State law or the County shall adopt.

- (2) The stormwater control shall be provided on-site unless the Planning Board, on recommendation from the County, waives this requirement.
- (3) The submission of a storm drainage and stormwater management concept plan, and approval thereof by the County, may be required prior to preliminary plan approval.
- (4) Where a property is partially or totally within an area covered by an adopted Watershed Plan, the preliminary plan shall conform to such plan.
- Critical Areas Overlay Zones the preliminary plan and all plans associated with the subject application shall demonstrate the preservation and/or restoration of regulated environmental features in a natural state to the fullest extent possible consistent with the guidance provided by the Environmental Technical Manual established by Subtitle 25. Any lot with an impact shall demonstrate sufficient net lot area where a net lot area is required pursuant to Subtitle 27, for the reasonable development of the lot outside the regulated feature. All regulated environmental features shall be placed in a conservation easement and depicted on the final plat.
- (c) The submission of a sediment control concept study, and approval thereof by the Soil Conservation District, may be required prior to final plat approval.

As noted above, a Conceptual Stormwater Management Plan has been submitted and is currently under review. All sensitive environmental features will be preserved to the greatest extent possible.

CONCLUSION

Based on the foregoing, the applicant respectfully submits that all required statutory criteria are met and satisfied. Therefore, the applicant requests that this Preliminary Subdivision Plan be approved as submitted.

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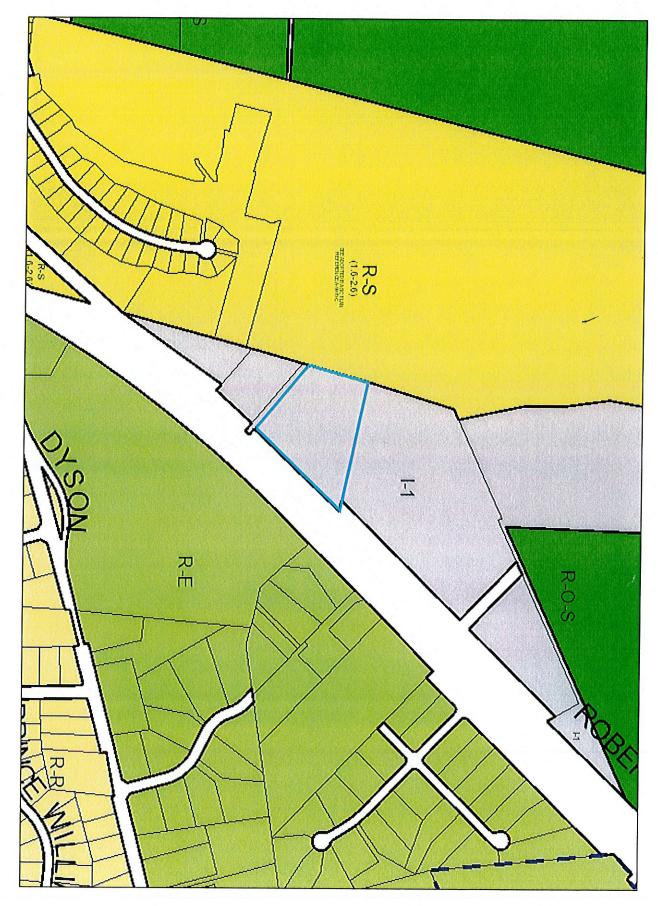
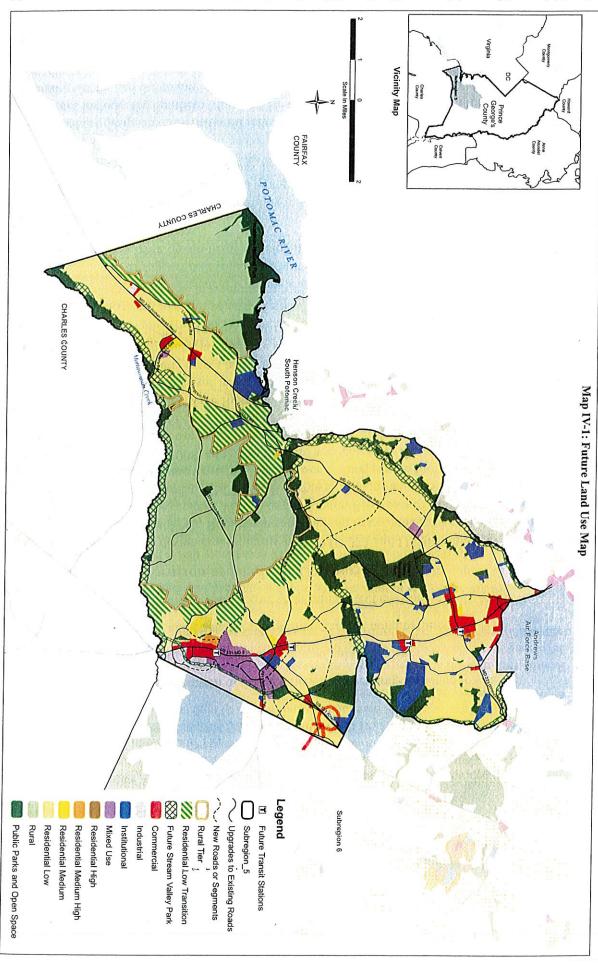
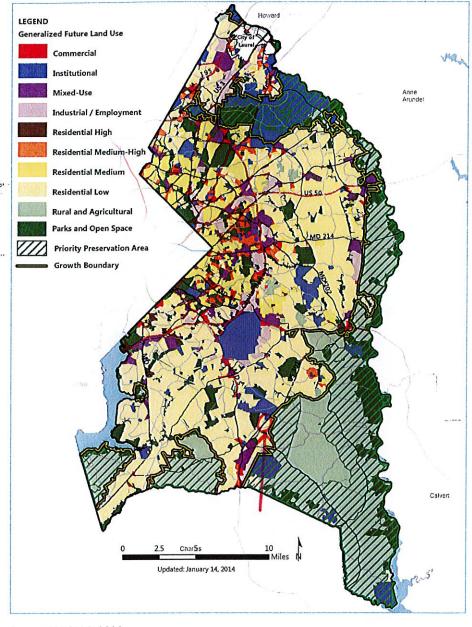


Exhibit "A"





Map 10. Generalized Future Land Use Map

The Generalized **Future Land** Use Map is not a zoning map and is not intended to identify land uses and zoning for specific properties.

Source: M-NCPPC, 2014

This map generalizes future land use designations as shown in approved sector and master plans. It does not follow parcel boundaries, and its land use categories do not identify permitted uses or imply dimensional standards. By definition, this map should be interpreted broadly and is intended to provide a countywide perspective of future land use patterns. To identify the future land use designation for a specific property, please refer to the property's relevant approved sector or master plan.

Exhibit "C"