

Referral from City of Littleton **Clayton Family Farms**

The City of Littleton has received an application for rezoning and plan approval and the case has been referred to the Town of Columbine Valley for their comments. The Town staff has prepared this report to assist the Town Planning and Zoning Commission and the Board of Trustee's in their review. The report has been revised to reflect the recommendations of the Planning Commission and public comments and to correct errors contained in the original report.

I. Description Of The Site, Existing Zoning, Proposed Zoning and Development

The application proposes to rezone a 4.2 acre parcel located at the southwest corner of Bowles Avenue and Watson Lane and develop the site with 26 single family residential units. The applicant is Clayton Family Farms LLC. The property is currently zoned RE (City of Littleton). The proposed zoning is PDR. The following illustrations show the site plan and architectural renderings. Table 1 compares the development standards specified for the existing zoning and the standards proposed in the planned development.

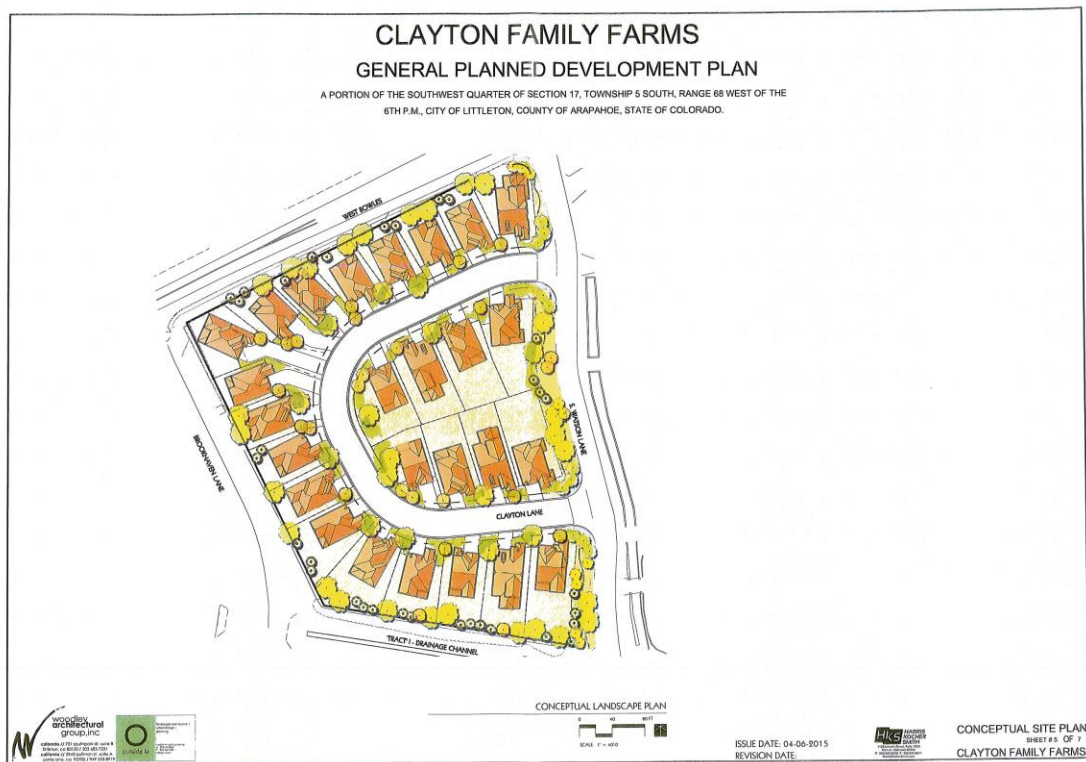




Table 1

Standard	Existing	Proposed
Zoning	RE (Residential Estates)	PDR (Planned Development Residential)
Density (DU's Acre)	2.0 DU's Acre (Max)	6.6 DU's Acre
Number of Lots	7 (max)	26
Minimum Lot Size	26,000 S.F.	4,500 S.F.
Average Lot Size	N/A	(Estimated 5,200 S.F.)
Open Space		
Common	Not Stated	Not Stated
Unobstructed (Includes Yards)	50%	40%
Building Height (Maximum)	30'	30'
Setbacks		
Front	20'	5'
Side	5'/10'	5'
Rear	20'	5'
Minimum Distance Between Buildings	10'/20'	10'
Parking (Off-Street)	2 per unit required by City Regulations	2 per unit required by City Regulations

Character of Adjacent Areas

The area adjacent to and near the Clayton Farms site is primarily low density residential and is characterized as follows:

To the north, across Bowles Avenue is Knights Addition to the City of Littleton. This is a single family residential neighborhood developed in the 1960's. It is zoned R-3 (Littleton) and the estimated density is 3.5 DU's per acre.

To the east, across Watson Lane, in Littleton, is Watson Lane Reserve, a single family residential subdivision developed in 2000. Watson Lane reserve has a density of 1.6 DU's per acre.

To the south, along the west side of Watson Lane are several very low density parcels that are zoned A (Agriculture) in the Town. At the far south of the area is Columbine Valley Estates, a single family residential subdivision containing six homes and developed in 2002. The zoning (Town) is RPD (Residential Planned Development) with a density of .73 DU's per acre.

To the west, is Brookhaven at Columbine Valley, a single family subdivision developed in 2000-2002. The density is 1.06 DU's per acre.

II. Existing and Projected Traffic

Included in the application submitted to the City is a Traffic Impact Study prepared by Kimley-Horn. The study contains existing traffic volume data as well as projected traffic volumes for the Clayton Farms development. The table below is a summary of the traffic data in the study.

Table 2
Traffic Impact Summary

Street	ADT (Average Daily Trips)	AM/PM Peak Hour
<u>Existing</u>		
Bowles Ave.	30,700	3050/3049
Watson Lane	250	25/24
<u>Projected 2017</u>		
Clayton Farms Traffic	304	28/20
<u>Additional Background</u>		
Bowles Ave.	1100	59/80
<u>Total 2017</u>		
Bowles Ave.	31,800	3109/3129
Watson Lane	550	53/54

III. Drainage

A Phase I Drainage Study was included in the referral packet and sent to the Town Engineer for his comments.

V. Design: Site Plan and Architectural Illustrations

The application contains both a "conceptual" landscape plan and architectural renderings that are labeled "For Illustrative Purposes Only".

VI. Referral Comments

The Town staff referred the plan to the following property owners and HOA's:

PROPERTY OWNERS
IN WATSON LANE AREA

Scott Swenson
3220 Lake Ave

Jeffery Berg/Carol Carson
401 Watson Lane

Gary and Karen Ausfahl
600 Watson Lane

Jack and Joanie Lilienthal
701 Watson Lane

Mike and Kate Schmitz
901 Watson Lane

HOA's

Brookhaven at Columbine Valley
Cliff Owens, President

Columbine Valley Estates HOA
Tom Marsh, President

Watson Lane Reserve (Littleton).
Frank Trainer, President.

The complete written comments received are attached to this report.

VII. Findings

The staff has reviewed the application for Clayton Family Farms, visited the site and read the comments received. Based on the review, site visit and comments received, the staff offers the following findings:

A. Justification for Rezoning

A basic planning and legal principle of zoning is that the existing zoning classification is valid. In order to change the zoning classification it must be shown that conditions in the area have changed to the point that the existing zoning is no longer appropriate. *The burden of proof in establishing that conditions have changed is always on the applicant requesting the change. The City is not obligated, nor should they be obligated, to prove that the existing zoning is valid.*

The Clayton Farms application addresses this issue in Section 3, Introduction and Project Overview. Paragraph 2 states "Under its current RE zoning, it presently

allows for 7 single family ½ acre lots. Based on these required lot sizes, the market price of homes built on them would have to range from the high \$1M to \$3Ms." The implied assumption is that the price of the land would require either higher density or very high home prices in order to make the project economically viable. The fallacy in this argument is that the City must consider the asking or paid value of the land in their rezoning decision. The price the applicant is offering or has paid is not a valid zoning consideration unless conditions in the area have changed to the point that the current market value of the land is so high that development under the existing zoning is no longer feasible.

Has the area changed to the point that the existing zoning is no longer valid? Since 2000, there have been three residential developments in the immediate area. These are:

1. Brookhaven Estates; Approved 8/22/2000
2. Columbine Valley Estates; Approved 5/20/2002
3. Watson Lane Reserve (Littleton); Approved 9/10/2000

Table 3 shows the development standards, under the current RE zoning for the Clayton Farms property compared to other development in the area since year 2000.

Table 3

Standard	Clayton Family Farms	Brookhaven Estates	Columbine Valley Estates	Watson Lane Reserve
Acreage	4.2	27.4	8.2	7.6
Zoning	RE	RPD	RPD	RE-PUD
Density (DU's Acre)	2.0 DU's Acre (Max)	1.06	.73	1.6
Lots-Number*	7 Max	29	6	11
Minimum Size	26,000 S.F.	18,000 S.F.	41,366 S.F.	21,200 S.F.
Average Size	Not Stated	21,254 S.F.	42,434 S.F.	23,853 S.F.
Open Space Public or Common	Not Stated	21.8%	24%	Not Stated
Building Height	30'	35'	32'	30'
Setbacks				
Front	20'	20'	25'	25'
Side	5'/10'	8'	20'	5'
Rear	20'	40'	60'/40'	20'
Minimum Distance Between Buildings	10'	16'	40'	15'

*Lots developed since Year 2000

It is clear that the character of the area has not changed. In fact, the three approved developments since 2000 are very similar, in terms of development standards, to what would be allowed on the Clayton property if developed under its current zoning.

B. Compatibility with the Adjacent Land Uses

It is not the zoning, per se, that concerns the Town staff. The requested PDR zoning allows flexibility in design and it the common practice for rezoning's in Columbine Valley. However the development standards, especially the density, lot sizes and setbacks are significantly different than other development in the area. This is best shown by the following maps which illustrate the visual appearance of the proposed Clayton Farms development with the three adjacent or nearby residential neighborhoods. All the maps are at the same scale 1":150'.

The applicant also states that the proposed development would be similar to Willowcroft Manor. The differences between Clayton Family Farms and Willowcroft Manor are illustrated on the forth map.





CLAYTON FAMILY FARMS - CITY OF LITTLETON



CLAYTON FAMILY FARMS - DEVELOPMENT STANDARDS
 DENSITY: 8.28 DWELLING UNITS/ACRE
 LOT SIZES
 MINIMUM: 4,500 SF
 AVERAGE: 5,188 SF
 SETBACKS
 FRONT: 5 FT
 SIDE: 5 FT
 REAR: 5 FT
 MAXIMUM HEIGHT: 30 FT
 OPEN SPACE: 50% UNOBSTRUCTED

COLUMBINE VALLEY ESTATES - TOWN OF COLUMBINE VALLEY



COLUMBINE VALLEY ESTATES - DEVELOPMENT STANDARDS
 DENSITY: 0.73 DWELLING UNITS/ACRE
 LOT SIZES
 MINIMUM: 41,382 SF
 AVERAGE: 42,450 SF
 SETBACKS
 FRONT: 25 FT
 SIDE: 20 FT
 REAR: 80 FT OR 40 FT (LOT DEPENDENT)
 MAXIMUM HEIGHT: 32 FT
 OPEN SPACE: 28.8% (COMMON)

CLAYTON FAMILY FARMS - COLUMBINE VALLEY ESTATES COMPARISON



MAY 12, 2015



CLAYTON FAMILY FARMS - CITY OF LITTLETON



CLAYTON FAMILY FARMS - DEVELOPMENT STANDARDS
 DENSITY: 8.28 DWELLING UNITS/ACRE
 LOT SIZES:
 MINIMUM: 4,500 SF
 AVERAGE: 5,188 SF
 SETBACKS
 FRONT: 5 FT
 SIDE: 5 FT
 REAR: 5 FT
 MAXIMUM HEIGHT: 30 FT
 OPEN SPACE: 50% UNOBSTRUCTED

WILLOWCROFT MANOR - TOWN OF COLUMBINE VALLEY



WILLOWCROFT - DEVELOPMENT STANDARDS
 DENSITY: 2.86 DWELLING UNITS/ACRE
 LOT SIZES: 6,978 SF MINIMUM / 7,788 SF AVERAGE
 SETBACKS
 FRONT: 20 FT
 SIDE: 5 FT
 REAR: 10 FT
 MAXIMUM HEIGHT: 30 FT
 OPEN SPACE: 24.4% (COMMON)

CLAYTON FAMILY FARMS - WILLOWCROFT MANOR COMPARISON



MAY 12, 2015



C. Traffic

The Traffic Impact Study is based on standard methodology, and for the most part, the Town staff takes no issue with the study's data and projections. There are some discrepancies that should be noted:

1. The projections for future traffic are extended to year 2017 and the Watson Lane 2017 volumes only account for addition of the Clayton Farms development. This is valid in that it is unlikely that any of the other vacant or underdeveloped properties will be developed by year 2017. However, the normal practice in traffic impact studies is to provide projections 15 to 20 years in the future. The Clayton Farms study does not provide that projection.
2. The analysis of the existing and projected traffic indicate no left turn at Bowles Avenue for northbound Watson Lane traffic. The study states that this left turn movement is "restricted". In fact, there is no sign prohibiting the left turn movement and those movements are made, especially during the off peak hours. We are concerned that there could be serious safety issues for both vehicular and pedestrian traffic in the future.
3. There may be a line of sight problem at Bowles Avenue for northbound Watson Lane traffic. The traffic study does not address this.
4. The study also contains errors concerning the two adjacent streets. Bowles Avenue is not controlled by CDOT. It was turned back to Littleton several years ago and the City is the permitting agency. Brookhaven Lane is not a private street. It is a public street in the Town of Columbine Valley.

The LOS (Level of Service) projection for the Watson Lane/Bowles Avenue intersection is LOS-D which is considered acceptable. The major problem now and in the future is how to accommodate the northbound Watson Lane drivers that desire to go west. The City should be asked to consider an additional exclusive right lane from Watson Lane to Federal with an apron or turn-around that would enable drivers to reverse direction. This would require cooperation from South Suburban Parks and Recreation.

D. Drainage

The Town Engineer has briefly reviewed the Phase I Drainage Study and made the following comments:

1. Sheet 5. The proposed condition plan does not address stormwater in terms of water quality, rate, or volume. This is not compliant with any current development criteria. If a beat-the-peak exception to the detention requirement is proposed, the analysis is likely to fail on the hydraulics of the small culverts under Watson Lane. The discharge from the Brookhaven regional pond maximizes the capacity of the Watson Lane culverts in the major design storm event. At a minimum, a detailed hydraulic analysis, including hydrologic routing information from the Brookhaven Pond discharge and the proposed development will be necessary to ensure adequate capacity of the Watson Lane culverts. If the proposed plan discharges downstream of Watson Lane, a similar analysis will be required to ensure the tailwater condition caused by the shallow slope of the Watson Lane roadside swale at the east end of the Watson Lane Drainageway D culverts does not adversely impact the culvert capacity.
2. Sheet 5. The proposed plan suggests surface runoff from the proposed development crossing Watson Lane. Given the dead-end access to multiple properties in both Littleton and Columbine Valley, roadway capacity limits on not only Clayton Lane but also Watson Lane need to be considered. And, without any further detail on stormwater flow paths it can only be assumed storm flows are across the road and would not meet single lane dry access for emergency vehicles during a storm event.

E. Design

As stated, the site plan submitted is conceptual. There is no scale or lot dimensions. Without this basic information, the Town staff is unable to comment.

The General Development Plan contains considerable detail relating to development and design standards. The plan detail also mentions specific model types (Colorado Farmhouse, Beaver Creek, Urban Mountain) However, there are no illustrations showing these specific model types. The Town staff, as a general practice, does not evaluate architectural design. In Columbine Valley that judgement is deferred to the Planning and Zoning Commission. However, the residents of the area do have opinions concerning the structural design and those concerns are included in the following Section.

F. Comments of Adjacent and Nearby Property Owners and HOA's

Comments were received from the following:

Jack and Joanie Lilienthal
Columbine Valley Estates HOA
Brookhaven HOA
Watson Reserve HOA (Littleton)

In summary the concerns expressed are:

1. The density is completely out of character with existing area neighborhoods.
 2. The lot size sizes in the area are 4-5 times that proposed for Clayton Farms
 3. The architectural fit and design are inconsistent with the neighborhood standards.
 4. The possible traffic hazard .
1. Questions concerning drainage impact on adjacent properties.

The complete written comments are attached to this report.

Summary of Findings

The Town staff and the residents of the area are not opposed to development of the Clayton Farms property nor are they opposed to the zoning classification (PDR) that has been requested. However, both the staff and the residents have major concerns with the proposed development standards, specifically the density and setbacks. We have clearly shown that the proposed development standards would be in conflict with the character of the adjoining and nearby neighborhoods.

The staff also has concerns about the traffic impact. Specifically, there is a problem with the desire to go west from the intersection of Bowles Avenue and Watson Lane.

VIII. Recommendations

This is a referral from the City of Littleton and the City staff will conduct a much more thorough analysis than is contained in this report. We recognize that any final decision on this application is solely the responsibility of the City, but we also know that it is custom to acknowledge the concerns of neighboring jurisdictions and their residents.

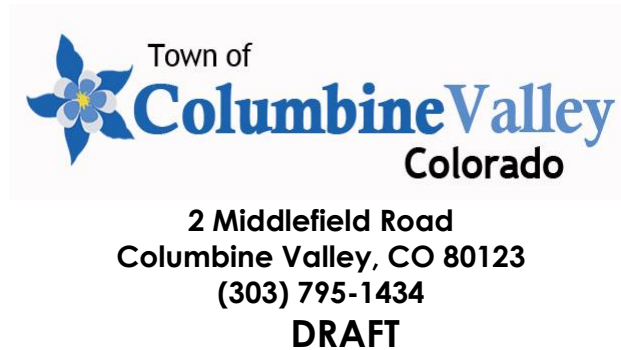
We have prepared a draft letter from the Mayor of Columbine Valley to the Littleton Planning Commission. This letter summarizes the concerns of the Town and its residents.

At their meeting on May 12th, the Planning Commission unanimously approved the following motion:

MOTION by Commissioner Dotson and a second by Commissioner Armstrong to direct staff to revise the draft letter to the City of Littleton Planning and Zoning Commission concerning the development at Clayton Family Farms to reflect comments made by the public, HOA representatives and Commissioners and to make clear that the Town of Columbine Valley Planning and Zoning Commission is unanimously opposed to the development as submitted to the City.

The motion was approved by the Planning and Zoning Commission (5-0).

The draft letter has been revised to reflect the concerns expressed by the Planning Commission and the public at the May 12th meeting. It is recommended that the Mayor be authorized to send a letter to the City of Littleton expressing the concerns of the Town. A draft letter for the Trustees consideration is included.



May 20, 2015

**Jan Dickinson, City Planner
Community Development
City of Littleton
2255 W. Berry Ave.
Littleton, CO 80120**

RE: Clayton Family Farms

Dear Jan:

The Board of Trustees of Columbine Valley appreciates the opportunity to comment on the proposed rezoning and development plan submitted by Clayton Family Farms. We also appreciate the assistance and cooperation you have given our staff as they reviewed the proposal. The Board recognizes that Littleton has full responsibility and authority concerning land use decisions within your boundaries. Our comments are intended to convey our concerns and suggestions for consideration during the City's review of the application.

The application has been reviewed by our staff and was the subject of public meetings held by our Planning and Zoning Commission on May 12, 2015 and by the Board of Trustees on May 19, 2015. Both of these meetings were well attended by area residents, including some residents of the Watson Lane Reserve in Littleton.

We have major concerns with the development standards proposed in the plan, especially the density and setbacks, and with the design commitments. We also have some comments and suggestions relating to the traffic impact. Specifically, our concerns, comments and suggestions are:

A. Density, Lot Size, Setbacks

At 6.6 DU's per acre, the density far exceeds that in any of the adjacent and nearby neighborhoods. In addition, the lot sizes and setbacks are

significantly smaller. The following table illustrates this disparity by comparing the Clayton Farms proposal with developments in the area that have been built since year 2000.

Standard	Clayton Fam. Farms	Brookhaven Estates	Columbine Valley Estates	Watson Lane Reserve
Acreage	4.2	27.4	8.2	7.6
Zoning	PDR	RPD	RPD	RE-PUD
Density (DU's Acre)	6.6	1.06	.73	1.6
Lots-Number*	26	29	6	11
Minimum Size	4,500 S.F.	18,000 S.F.	41,366 S.F.	21,200 S.F.
Average Size	5,200 S.F.	21,254 S.F.	42,434 S.F.	23,853 S.F.
Open Space Public or Common	Not Stated	21.8%	24%	Not Stated
Building Height (Maximum)	30'	35'	32'	30'
Setbacks				
Front	5'	20'	25'	25'
Side	5'	8'	20'	5'
Rear	5'	40'	60'/40'	20'
Minimum Distance Between Buildings	10'	16'	40'	15'
Parking (Off-Street)	Not Stated	3+ per unit	3+ per unit plus 8 visitor	Not Stated

* Lots developed since year 2000

The Board does not object to the PD-R designation. The use of a planned development approach provides both land owners and the City with more flexibility and is the common practice in Columbine Valley. We do however have serious concerns with the density, lot sizes and setbacks and are requesting that they be revised to be more compatible with those in the adjacent and nearby neighborhoods.

B. Design

The site plan submitted with the application is "Conceptual". The lot lines and streets are not dimensioned. The architectural renderings are labeled "For Illustrative Purposes Only" and provide no assurances as to what will actually be built. We would like to see, at a minimum,

1. A preliminary plat showing lot dimensions or inclusion of lot dimensions on the site plan.
2. Illustrations of the actual models mentioned in the General Development Plan.

C. Traffic

The Traffic Impact Analysis appears to adhere to the accepted methodology for studies of this type and we do not dispute the traffic generation numbers. However, the study only projects traffic through the development of Clayton Farms in Year 2017. It is typical for traffic studies to project the additional background traffic through a 15-20 year horizon. In the Town of Columbine Valley portion of the Watson Lane area there are number of vacant and undeveloped parcels and our staff has estimated that future development of those parcels could generate from 25-50 additional single family residences.

The traffic study projects that all northbound traffic on Watson Lane will turn right at Bowles Avenue because the left turn movement is "restricted". However, there is no sign prohibiting the left turn movement and in fact, there are drivers that make that movement, and sometimes in the AM peak hour. We can, with some assurance, project that 20-30% of the northbound traffic on Watson Lane will desire to go West on Bowles Avenue. The unspoken assumption is that those drivers will make a right turn and then, at some point, reverse direction to go west. How this is accomplished is not known. We are requesting that:

1. The applicant have the Traffic Study updated to provide a 15-20 year forecast and factor in future development potential in the Watson Lane area.
- 2.. The City consider the installation of an additional, exclusive right lane on Bowles Avenue from Watson Lane to Federal Blvd., and the construction of a turn-around that would allow traffic to have full-turning movements at a signalized intersection. We recognize that this would require cooperation from South Suburban Parks and Recreation District.

3. There may be a "line of sight" problem at the Bowles Avenue/Watson Lane intersection.
4. The traffic congestions on Bowles Avenue is such that any new "high density" development should be deferred until the congestion problem is addressed.

D. Drainage

Our engineers have expressed reservations over the adequacy of the drainage study submitted with the application.

We would like to have the opportunity to express our concerns and present our suggestions at the City Planning Commission meeting. A representative of the Town will make our presentation and we would request sufficient time allotted for our presentation which should not take more than 10 minutes.

Again, thank you for his opportunity to comment.

Sincerely;

Gale Christy, Mayor

Written Comments Received

Columbine Valley Estates

May 4, 2015

Mr. Phil Sieber
Town Planner
Town of Columbine Valley, Colorado
2 Middlefield Road
Columbine Valley, CO 80123

Dear Phil:

The Columbine Valley Estates HOA has reviewed the application for rezoning and development plan submitted to the City of Littleton pertaining to the Clayton Family Farms located at the corner of Bowles Ave. and Watson Lane adjoining the Town of Columbine Valley. As a result, we strongly object to this plan as presented for the following reasons:

1. The density of this proposed development is completely out of character with the existing neighborhood. As you point out in your letter, the density per acre in the existing community is 2.0 DU's per acre (Max) and the proposed development plan (26 Units on 4.2 Acres) would result in a density of 6.6 DU's per acre, an increase of over 3 fold. This development plan can in no way be considered to preserve the existing character of the neighborhood.
2. The lot size of the proposed development is estimated to be 5,200 S.F. per unit. The lot size of the existing community is 26,000 S.F. (Min) per unit resulting in a 5 fold reduction in lot size. Once again, in no way can this be considered to preserve the existing character of the neighborhood.
3. By design, Watson Lane is intended to present a country lane character. It is a 24' wide street with an already dangerous intersection at Bowles Ave. Turns onto Bowles Ave. from Watson Lane or onto Watson Lane from Bowles Ave. is a problem with the traffic patterns

today. To at least double this problem presents an unacceptable situation to the neighborhood.

Phil, I want to thank you for your attention to this proposed rezoning and development plan. Although it is the city of Littleton, if implemented as proposed, it will have a very negative impact on our neighborhood and indeed, the Town of Columbine Valley. We stand ready to actively support the defeat of this plan as proposed.

Sincerely,

Tom Marsh
President, Columbine Valley Estates HOA

Watson Lane Reserve (Littleton)

April 30, 2015

Frank Trainer

Phil

Our major concerns with the development are:

The proposed development is more than inconsistent with the neighborhood – it's a radical departure.

- 6.6 houses per acre in an area zoned for 2 houses per acre
- The architectural fit and design are inconsistent with the neighborhood standards

We will look to you to evaluate the drainage issues, but the absence of a drainage collection area and the elimination of most of the surface area with impervious material is problematic. Similarly, we will look to you to evaluate the traffic. Unquestionably this is a cumulative process and the potential development on Watson Lane should be taken into account. I was struck by your comment the other day that Littleton didn't want to connect with Brookhaven (by road) in order to maintain its rural country road character. It's clearly losing this character.

When we met with Jan Dickinson and Glen VanNimwegen a couple of months ago they said that single story development of this property, which would be amenable to seniors, would be consistent with the Littleton's Comprehensive Development Plan. The proposed development is for two story houses.

Finally, we find it offensive that the drawing he showed us in January in no way bears any resemblance to the conceptual drawings submitted with his proposal. It deception, pure and simple.

Lilienthal

May 5, 2015

Dear Phil,

Jack and I would be firmly against a PUD of this density. It would diminish the ambiance of Watson Ln. and existing homes on Watson Ln. would no doubt lose the quality they have now. BUT, the main reason we would be so against this proposal is the unsafe traffic hazard it would create. It is a nightmare for present residents on Watson Ln. to try to go West on Bowles at almost any time of day, but impossible at peak times of day. Adding 26+ cars all going any direction onto Bowles would increase an already unsafe egress onto Bowles. This property should have a PUD not exceeding the current zoning. Watson Ln. If there is a car parked in front of one of the homes has a tight squeeze when two cars are trying to navigate in both directions. It would create a bottleneck waiting to get onto Bowles. Presently the road will only accommodate 1 car turning I either direction, so if there is a LONG wait for someone to go west, no one can go east either as there is only one lane for either turn. Watson Ln. was never designed to be a major roadway and this property being right at the outlet would require a major traffic revamp. 7 units would be consistent with the neighborhood and would be less traffic to impact the situation. Thank you, Joanie and Jack
Lilienthal

Brookhaven HOA
Comments Concerning The Development of the Clayton Property
May 6, 2015

The following comments concerning the proposed development of the Clayton Property represent the input of a majority of Brookhaven at Columbine Valley HOA homeowners. **There were no dissenting opinions to those stated below.** We believe the issues related to increased traffic congestion and drainage rise to the level of "serious health and safety concerns" which must be resolved before the project can even reasonably be reviewed by the City of Littleton Town Planner.

The proposed Clayton Farms Development Plan needs significant modification due to the following issues:

- Development increases traffic danger: The proposed development will significantly increase the already dangerous situation existing at the intersection of Bowles and Watson Lane. A redesign of the Watson Lane/ Bowles / Federal interchange needs to be undertaken. Without an improvement, increased traffic exiting and entering Watson Lane will significantly increase the danger for pedestrians and cyclist crossing Watson Lane at the corner as well as drivers making the turn. Further, if Watson Lane is restricted to right in, right out this will create an unacceptable traffic condition for Brookhaven as Watson Lane residents travelling west on Bowles will most likely circle through Brookhaven to turn right into Watson Lane. Today, there are 26 homes along Watson Lane that could grow to 82 units over the next several years if Littleton and Columbine Valley approve a medium density level of housing units for the open acreage along Watson Lane (higher if Littleton approves the 26 proposed units at Clayton Farm). Not addressing traffic problems now will only worsen a bad situation.
- Proposed housing density does not fit with the surrounding neighborhoods: The proposed density of six homes per acre is unacceptable and should be reduced to a level consistent with the existing zoning (2 DU per acre and minimum lot size of 26,000 sq. ft.) The immediate surrounding developments, Watson Lane and Brookhaven Estate homes have densities of 1.6 DU and 1.1 DU, respectively. The near-by Willowcroft development has a density of 2.9 DU, less than half of the proposed Clayton farms density.
- Flood Drainage Plan is unacceptable: There is no provision for a rainwater retention area in the Clayton Farms development. The preliminary plan assumes that rain will be channeled into the Urban Drainage Ditch that runs south of Clayton Farms. The Urban Drainage Ditch is built on land owned by Brookhaven HOA. We will not allow the Clayton Farm development to channel their incremental drainage into the Urban Drainage Ditch across our land because it will increase the flood risk to our community by adding an incremental quantity of water to our retention area.
- Proposed plan totally disregards open space and green areas and is, therefore, inconsistent with the surrounding neighborhoods: Brookhaven open space is 22.5% of the total acreage. Based on the preliminary drawings of Clayton Farms, there is no provision for open space. Brookhaven HOA believes there should be a

comparable allowance for open space to maintain the overall appearance of the area.

- No plan exists to deter damage to the Urban Drainage Ditch and access path during construction: Development of the property will require significant movement of dirt that, if not properly managed, will potentially damage or destroy the Urban Drainage Ditch or access, and/or block required flow of rain water. Such actions will potentially increase the flood risk for Brookhaven homeowners.
- Street width appears inadequate (not specified on the renderings): The short driveways shown in the drawings will limit parking. The situation will create fire safety issues for the City of Littleton and the homes in Brookhaven HOA and on Watson Lane adjacent to Clayton Farms. Additionally, residents or visitors may end up parking on Brookhaven streets and crossing the proposed short wall. This would be totally unacceptable.
- Proposed requirement for a brick wall consistent with Brookhaven and Willowcroft: The City of Littleton should require a wall along the Brookhaven boundary and the Urban Drainage ditch consistent with the Brookhaven six-foot brick wall. In a meeting with Brookhaven homeowners, Mr. Healy indicated trees may be planted to create an equivalent barrier. Given the proposed five-foot setbacks, it is highly doubtful that trees of any significance could be planted as a barrier.
- Renderings of Clayton Farms are misleading: The Developer should provide realistic renderings that do not use trees drawn between homes to give the appearance of larger houses. The five-foot setbacks would most likely not allow room for trees as shown.
- There is no indication that there will be an Homeowners Association (HOA): If an HOA is not contemplated, it should be added to the plan to ensure long-term exterior and landscaping consistency as residents modify and improve their homes.
- There is no specification of exterior materials to be used in construction: These materials should be specified and consistent with the surrounding homes on Watson Lane and in Brookhaven. Even with a significant reduction in housing density, the homes could still be inconsistent with the surrounding neighborhoods unless the exterior materials are comparable.

Other Important Note: In discussions with Brookhaven homeowners, Mr. Healy made a comment that the driveway easement that exists from the Kelley property (3430 West Bowles) may be retained as a bike path or walkway. Per the easement agreement, this easement will no longer exist once the Kelley home is razed. The easement agreement limits the use to that of a driveway for the existing home. Any new building or modification to the existing building must be approved by the Brookhaven HOA for the easement to continue to be used. It is highly unlikely the Brookhaven HOA would approve continuation of the agreement.