

NEIGHBORHOOD PLAN AMENDMENT REVIEW SHEET

NEIGHBORHOOD PLAN: Heritage Hills/Windsor Hills Combined

CASE#: NPA-2015-0028.01

DATE FILED: July 22, 2015 (In-cycle)

PROJECT NAME: Cameron Skilled Nursing Facility

PC DATE: October 27, 2015
October 13, 2015

ADDRESS: 8324 Cameron Road

DISTRICT AREA: 4

SITE AREA: 6.909 acres

OWNER/APPLICANT: Madison Valley Mortgage-Cameron Industrial Park, LLC (Larry Vineyard)

AGENT: Cunningham-Allen, Inc. (Jana Rice)

TYPE OF AMENDMENT:

Change in Future Land Use Designation

From: Industry

To: Office

Base District Zoning Change

Related Zoning Case: C14-2015-0100

From: LI-NP

To: GO-NP

NEIGHBORHOOD PLAN ADOPTION DATE: January 13, 2011

PLANNING COMMISSION RECOMMENDATION:

October 27, 2015 – Approved on consent agenda. [N. Zaragoza-1st; J. Schissler-2nd] Vote: 11-0 [J. Thompson absent; one vacancy].

October 13, 2015 – The case was postponed on the consent agenda at the request of staff to the October 27, 2015 hearing date. [N. Zaragoza – 1st; J. Stevens – 2nd] Vote: 11-0 [S. Oliver absent; one vacancy].

STAFF RECOMMENDATION: Recommended.

BASIS FOR STAFF'S RECOMMENDATION: The applicant proposes to change the land use on the future land use map (FLUM) from Industry to Office for property located within an industrial office park. Although the plan suggests the continuation of the industrial office park uses, staff believes the office land use is not incompatible for the area because the property will not have direct access to the internal areas of the industrial park, but will only have ingress/egress from Cameron Road.

Below are the goals and recommendations that support the plan amendment request:

Industrial Park located around Connor Lane and Rutherford Lane - #9

The HHNPA is home to a large industrial park, located on the west side of Cameron Road, which extends north almost to E. Rundberg Lane, and south to US HWY 183/E. Anderson Lane. Its location next to two major freeways, including I-35, make it an ideal location for job growth in the future.

There are a variety of uses located in this industrial district, including office complexes, research and development facilities, regional sales offices, light manufacturing facilities (such as Siemens), and several warehouse and distribution centers. This portion of the Planning Area is designated as 'Industrial' on the Future Land Use Map and makes up 15% of the land area in the HHNPA. Another 16% of the HHNPA is classified as 'undeveloped' land, with most this land being located within the boundaries of the HHNPA industrial district. This industrial district presents a great opportunity for the creation of highly desirable well-paying high tech jobs. The community wants developers locating in this area to be sensitive to the nearby residential neighborhood located to the west of the industrial district. The community supports development in the industrial district, especially office parks, which mitigate the impact of traffic, noise, light, odor, and limits after hour operations (including truck deliveries/pick ups/dumpster pick ups), where the industrial park abuts the residential neighborhood. The desire of the community is to preserve existing single family neighborhoods, while supporting an aesthetically attractive, job creating industrial district that will contribute to the economic well-being of this area.

REC 44: Support the continued development of office park land uses within that portion of the industrial park that abuts the single family subdivision to the west, paying special consideration to locate loading bays, dumpster areas, and lighting away from the adjacent residences. (RP: COA, HHWHCNP)

LAND USE DESCRIPTIONS

EXISTING LAND USE ON THE PROPERTY

Industry - Areas reserved for manufacturing and related uses that provide employment but are generally not compatible with other areas with lower intensity use. Industry includes general warehousing, manufacturing, research and development, and storage of hazardous materials

Purpose

1. To confine potentially hazardous or nuisance-creating activities to defined districts;
2. To preserve areas within the city to increase employment opportunities and increased tax base;
3. To protect the City's strategic advantage as a high tech job center; and
4. To promote manufacturing and distribution activities in areas with access to major transportation systems.

Application

1. Make non-industrial properties in areas with a dominant industrial character compatible with the prevailing land use scheme;
2. Where needed, require a buffer area for industrial property that abuts residentially used land;
3. Industry should be applied to areas that are not appropriate for residential or mixed use development, such as land within the Airport Overlay; 4. In general, mixed use and permanent residential activities are not appropriate in industrial areas. An exception may be the edge of an industrial area along the interface with an area in which residential activities are appropriate. Such exceptions should be considered case by case, with careful attention to both land use compatibility and design;
5. Industry should not be either adjacent to or across the road from single family residential or schools;
6. Use roadways and/or commercial or office uses as a buffer between residential and industry; and
7. Smaller scale "local manufacturing" districts may be appropriate in some locations to preserve employment opportunities and cottage industries of local artisans. In these areas, hazardous industrial uses (i.e. basic industry, recycling centers, and scrap yards) should be prohibited.

PROPOSED LAND USE ON THE PROPERTY

Office - An area that provides for office uses as a transition from residential to commercial uses, or for large planned office areas. Permitted uses include business, professional, and financial offices as well as offices for individuals and non-profit organizations.

Purpose

1. Encourage office-related services in areas that cannot support the traffic generation of commercial uses;
2. Provide for small lot office conversions as a transition from commercial to residential uses; and
3. Preserve sites for employment and office related services.

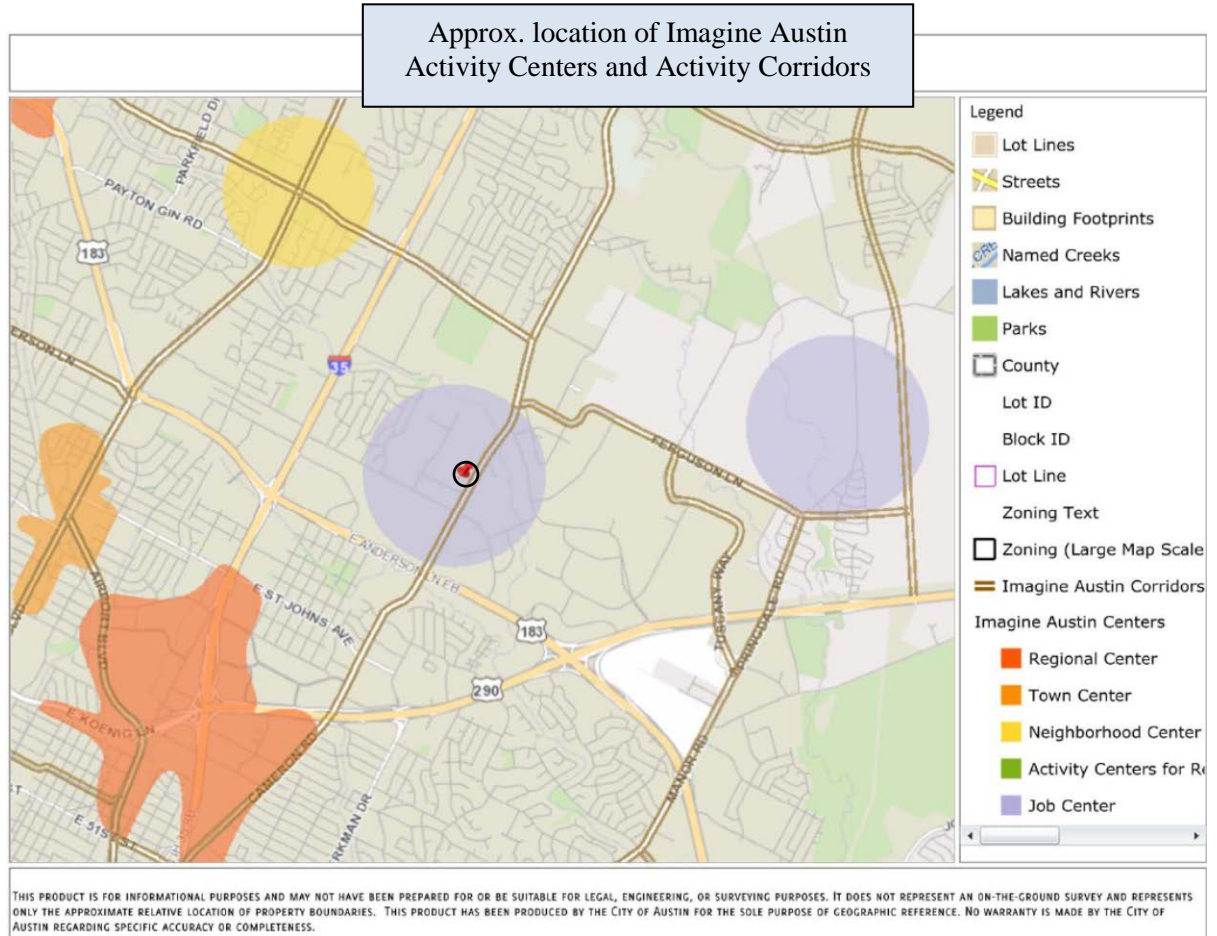
Application

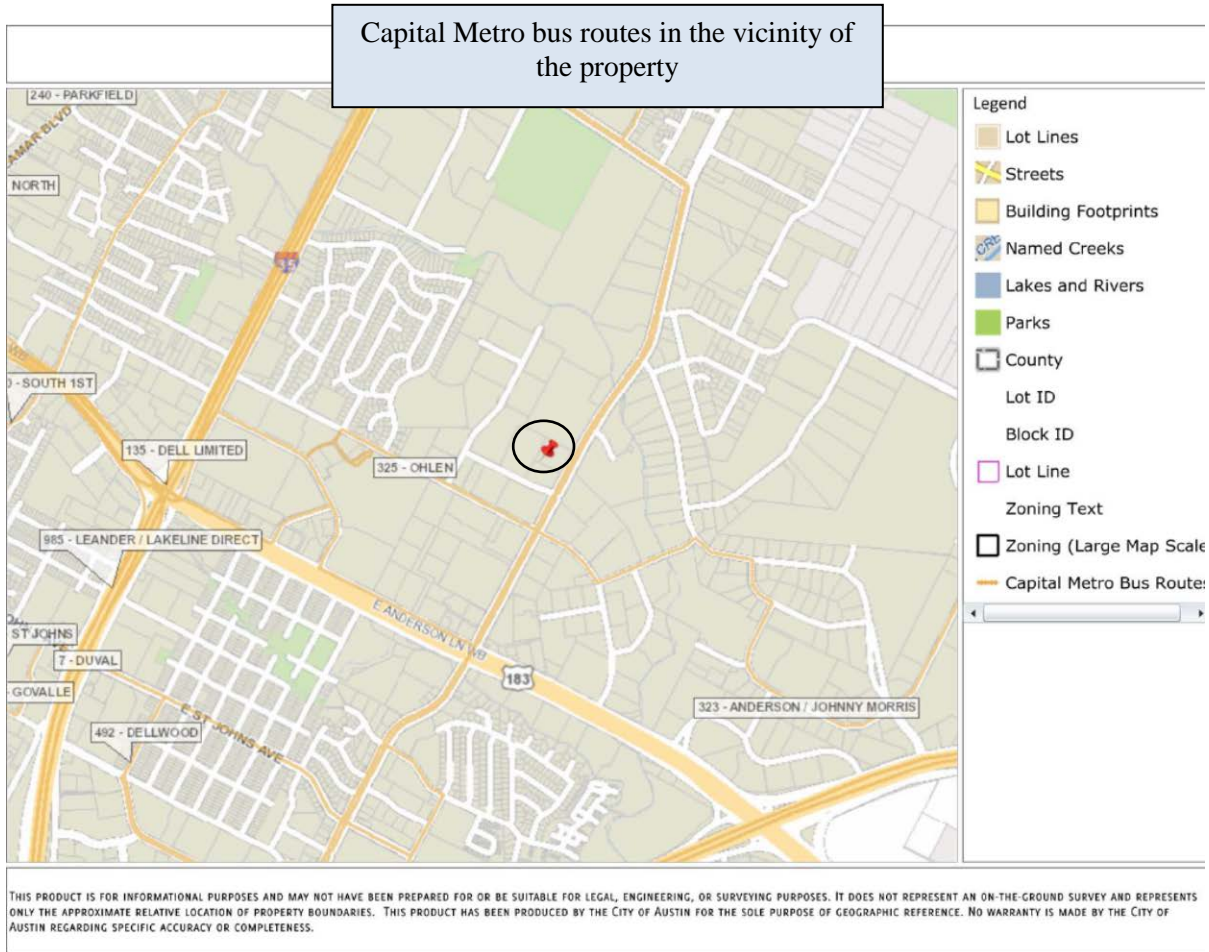
1. Appropriate for low volume streets such as collectors and minor arterials; and
2. Can be used to provide a transition between residential uses and more intense commercial and industrial uses.

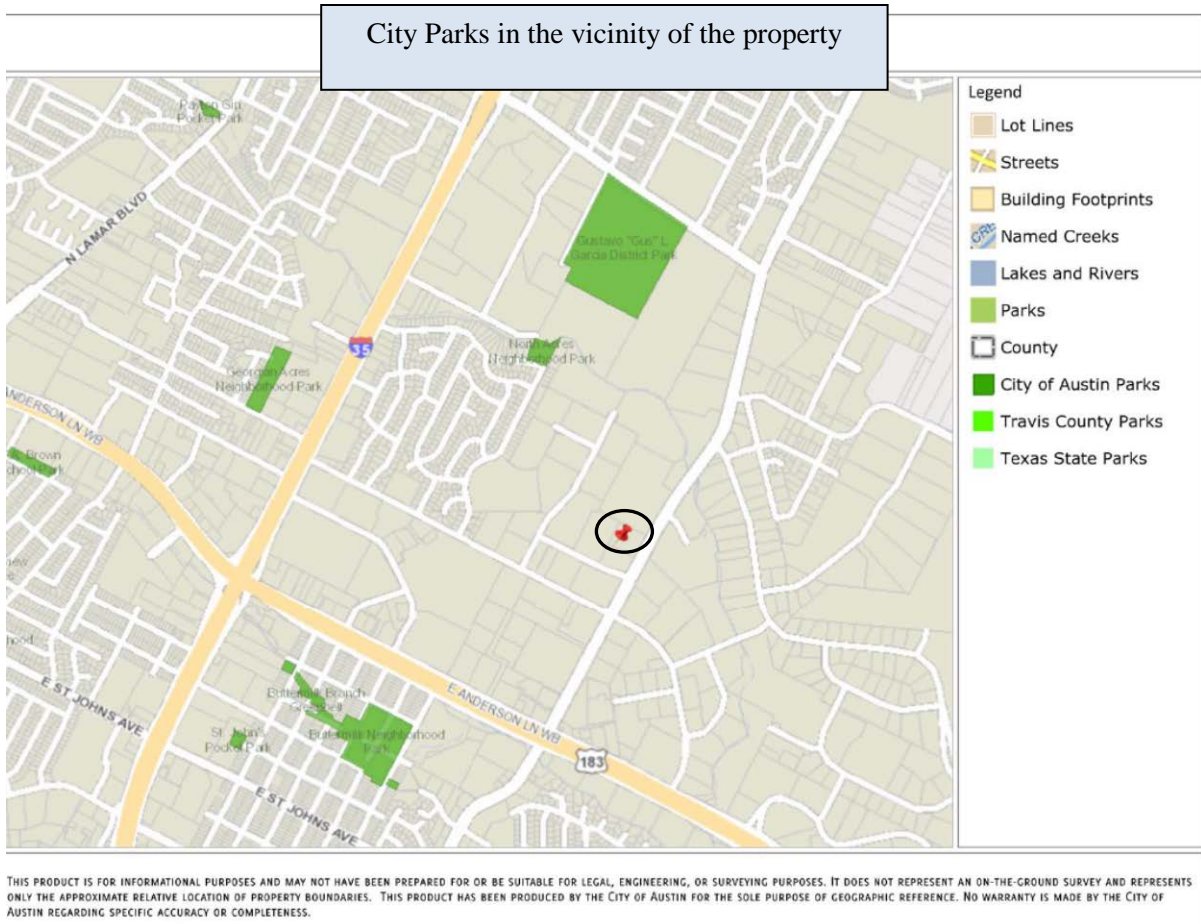
IMAGINE AUSTIN PLANNING PRINCIPLES

1. Create complete neighborhoods across Austin that provide a mix of housing types to suit a variety of household needs and incomes, offer a variety of transportation options, and have easy access to daily needs such as schools, retail, employment, community services, and parks and other recreation options.
 - ***The applicant proposes to change the land use to office with the intent to open a skilled nursing facility. A skilled nursing facility will help people who live in the area age in place. The transit map on page six shows the Capital Metro bus routes in the vicinity. The property is near Hart Elementary school and near retail and other uses.***
2. Support the development of compact and connected activity centers and corridors that are well-served by public transit and designed to promote walking and bicycling as a way of reducing household expenditures for housing and transportation.
 - ***The property is located with a Jobs Center as identified on the Imagine Austin Growth Concept Map and is located on an Activity Corridor.***
3. Protect neighborhood character by ensuring context-sensitive development and directing more intensive development to activity centers and corridors, redevelopment, and infill sites.
 - ***The property is located with a Jobs Center as identified on the Imagine Austin Growth Concept Map and is located on an Activity Corridor.***
4. Expand the number and variety of housing choices throughout Austin to meet the financial and lifestyle needs of our diverse population.
 - ***The applicant proposes to build a skilled nursing facility which could expand the housing options for the people who live in the area within City.***
5. Ensure harmonious transitions between adjacent land uses and development intensities.
 - ***The office land use is appropriate for the area because it will not have access to the internal streets of the industrial park.***
6. Protect Austin's natural resources and environmental systems by limiting land use and transportation development over environmentally sensitive areas and preserve open space and protect the function of the resource.
 - ***The property is not located within an environmental sensitive area.***

7. Integrate and expand green infrastructure—preserves and parks, community gardens, trails, stream corridors, green streets, greenways, and the trails system—into the urban environment and transportation network.
 - *Not applicable.*
8. Protect, preserve and promote historically and culturally significant areas.
 - *Not applicable.*
9. Encourage active and healthy lifestyles by promoting walking and biking, healthy food choices, access to affordable healthcare, and to recreational opportunities.
 - *Not directly applicable.*
10. Expand the economic base, create job opportunities, and promote education to support a strong and adaptable workforce.
 - *The proposed nursing facility could provide jobs for the area.*
11. Sustain and grow Austin’s live music, festivals, theater, film, digital media, and new creative art forms.
 - *Not applicable.*
12. Provide public facilities and services that reduce greenhouse gas emissions, decrease water and energy usage, increase waste diversion, ensure the health and safety of the public, and support compact, connected, and complete communities.
 - *Not applicable.*







IMAGINE AUSTIN GROWTH CONCEPT MAP

Definitions

Neighborhood Centers - The smallest and least intense of the three mixed-use centers are neighborhood centers. As with the regional and town centers, neighborhood centers are walkable, bikable, and supported by transit. The greatest density of people and activities in neighborhood centers will likely be concentrated on several blocks or around one or two intersections. However, depending on localized conditions, different neighborhood centers can be very different places. If a neighborhood center is designated on an existing commercial area, such as a shopping center or mall, it could represent redevelopment or the addition of housing. A new neighborhood center may be focused on a dense, mixed-use core surrounded by a mix of housing. In other instances, new or redevelopment may occur incrementally and concentrate people and activities along several blocks or around one or two intersections. Neighborhood centers will be more locally focused than either a regional or a town center. Businesses and services—grocery and department stores, doctors and dentists, shops, branch libraries, dry cleaners, hair salons, schools, restaurants, and other small and local businesses—will generally serve the center and surrounding neighborhoods.

Town Centers - Although less intense than regional centers, town centers are also where many people will live and work. Town centers will have large and small employers, although fewer than in regional centers. these employers will have regional customer and employee

bases, and provide goods and services for the center as well as the surrounding areas. The buildings found in a town center will range in size from one-to three-story houses, duplexes, townhouses, and rowhouses, to low-to midrise apartments, mixed use buildings, and office buildings. These centers will also be important hubs in the transit system.

Job Centers - Job centers accommodate those businesses not well-suited for residential or environmentally- sensitive areas. These centers take advantage of existing transportation infrastructure such as arterial roadways, freeways, or the Austin-Bergstrom International airport. Job centers will mostly contain office parks, manufacturing, warehouses, logistics, and other businesses with similar demands and operating characteristics. They should nevertheless become more pedestrian and bicycle friendly, in part by better accommodating services for the people who work in those centers. While many of these centers are currently best served by car, the growth Concept map offers transportation choices such as light rail and bus rapid transit to increase commuter options.

Corridors - Activity corridors have a dual nature. They are the connections that link activity centers and other key destinations to one another and allow people to travel throughout the city and region by bicycle, transit, or automobile. Corridors are also characterized by a variety of activities and types of buildings located along the roadway — shopping, restaurants and cafés, parks, schools, single-family houses, apartments, public buildings, houses of worship, mixed-use buildings, and offices. Along many corridors, there will be both large and small redevelopment sites. These redevelopment opportunities may be continuous along stretches of the corridor. There may also be a series of small neighborhood centers, connected by the roadway. Other corridors may have fewer redevelopment opportunities, but already have a mixture of uses, and could provide critical transportation connections. As a corridor evolves, sites that do not redevelop may transition from one use to another, such as a service station becoming a restaurant or a large retail space being divided into several storefronts. To improve mobility along an activity corridor, new and redevelopment should reduce per capita car use and increase walking, bicycling, and transit use. Intensity of land use should correspond to the availability of quality transit, public space, and walkable destinations. Site design should use building arrangement and open space to reduce walking distance to transit and destinations, achieve safety and comfort, and draw people outdoors.

BACKGROUND: The application was filed on July 22, 2015, which is in-cycle for neighborhood planning areas located on the east side of I.H.-35.

The applicant proposes to change the land use on the future land use map from Industry to Office. The proposed zoning change is from LI-NP to GO-NP with the intent to open a skilled nursing facility. The applicant's summary letter on page 11 -12 provides more information on the proposed use.

PUBLIC MEETINGS: The ordinance-required community meeting was held on September 29, 2015. Eighty-two community meeting notices were mailed to the property owners and

utility account holders within 500 feet of the property, in addition to the neighborhood organizations and environmental groups registered on the community registry who requested notification for the area.

On September 29, 2015, the date of the community meeting, one planning contact team member attended the meeting in addition to the applicant and city staff. No questions were asked at the meeting.

The Heritage Hills/Windsor Hills Planning Contact Team supports the plan amendment and zoning change request. See their letter on page 13.

CITY COUNCIL DATE: November 12, 2015 **ACTION:**

CASE MANAGER: Maureen Meredith **PHONE:** (512) 974-2695

EMAIL: maureen.meredith@austintexas.gov

Applicant's Summary Letter



July 20, 2015

Mr. Greg Guernsey, Director
Development Services Department
City of Austin
505 Barton Springs Road, 5th Floor
Austin, Texas 78704

RE: Cameron Skilled Nursing Facility
Neighborhood Plan Amendment Summary Letter
CAI Project No. : 621-0101

Dear Mr. Guernsey:

Please allow this letter to serve as the request for a Neighborhood Plan Amendment within the Heritage Hills Neighborhood Planning Area for the Cameron Skilled Nursing Facility project on a 6.909 acre tract, from Limited Industrial-Neighborhood Plan (LI-NP) to General Office-Neighborhood Plan (GO-NP).

The property consists of 6.909 acres located at the Northeast corner of the intersection of Cameron Road and Park Center Drive, Austin, Texas; legally described as Lots 1 and 2, Block B, Cameron Road Corporate Park Phase 1, a subdivision in Travis County, Texas, and recorded in Volume 100, Pages 303-305 of the Plat Records of Travis County, Texas. The property is identified by tax identification numbers 02-3320-0501 and 02-3320-0502.

The site is bordered on the east by Cameron Road, on the south by Park Center Drive, on the west by a call center, and on the north by an abandoned light industrial building. Plans for this site are unclear. Across Cameron Road is the Asian American Resource Center.

Cameron Skilled Nursing Facility will be a premier Nursing and Rehabilitation Facility in Austin, Texas consisting of 59,500 square feet of heated and cooled space. It will contain 56 semi-private rooms and 28 private rooms for a total of 140 resident beds. It will have a full kitchen and dining facilities and related amenities including flat screen televisions with cable in all suites, Wi-Fi, Salon and Spa Service, Community Life Enrichment Programs, Fine Dining and refrigerators in most suites. The center will be heavily oriented to provide various therapies, including physical, speech, occupational, cardiac, and IV, and will accordingly include large therapy areas. The project will be sited to protect existing trees and will have walking paths and tranquil gardens.

This project fits with the goals of the Neighborhood Plan in that it is a use that provides a senior living option and will provide employment options for the area, as well. The development will present an aesthetically pleasing building and grounds with landscaping and sidewalks along

Mr. Greg Guernsey, Director
July 20, 2015
Page 2 of 2

Cameron Road and Park Center Drive. Please review the enclosed photographs of an existing project that is the model for this site, and the proposed conceptual site plan.

The property is presently a legal lot; therefore no final plat will be required.

The property is located within the Little Walnut Creek watershed which is classified as Urban. The site drains generally from the northwest corner to the southeast corner. The max elevation is 641 and the minimum elevation 620.

No portion of this property is located within the 1% annual chance floodplain according to the FEMA Insurance Rate Map for Williamson County, Texas, Map No. 48453C0460J, and dated August 18, 2014. The property is not located within the Edwards Aquifer Recharge Zone.

We respectfully request staff support for the proposed Neighborhood Plan Amendment from LI-NP to GO-NP. Should you have any questions or require additional information, please feel free to contact me.

Sincerely,

CUNNINGHAM | ALLEN, INC.



Jana Havelka Rice
Senior Land Planner

c:\6210101\documents\4 governmental review phase\application packages\7-20-15 neighborhood plan amendment summary letter.doc

Letter from the Heritage Hills/Windsor Hills PCT

From: Diana Everett

Sent: Tuesday, September 01, 2015 8:59 AM

To: Meredith, Maureen; Heritage Hills Homeowners Assoc (heritagehillswoodbridge@); Linda Krueger; Jana Rice

Cc: Chaffin, Heather

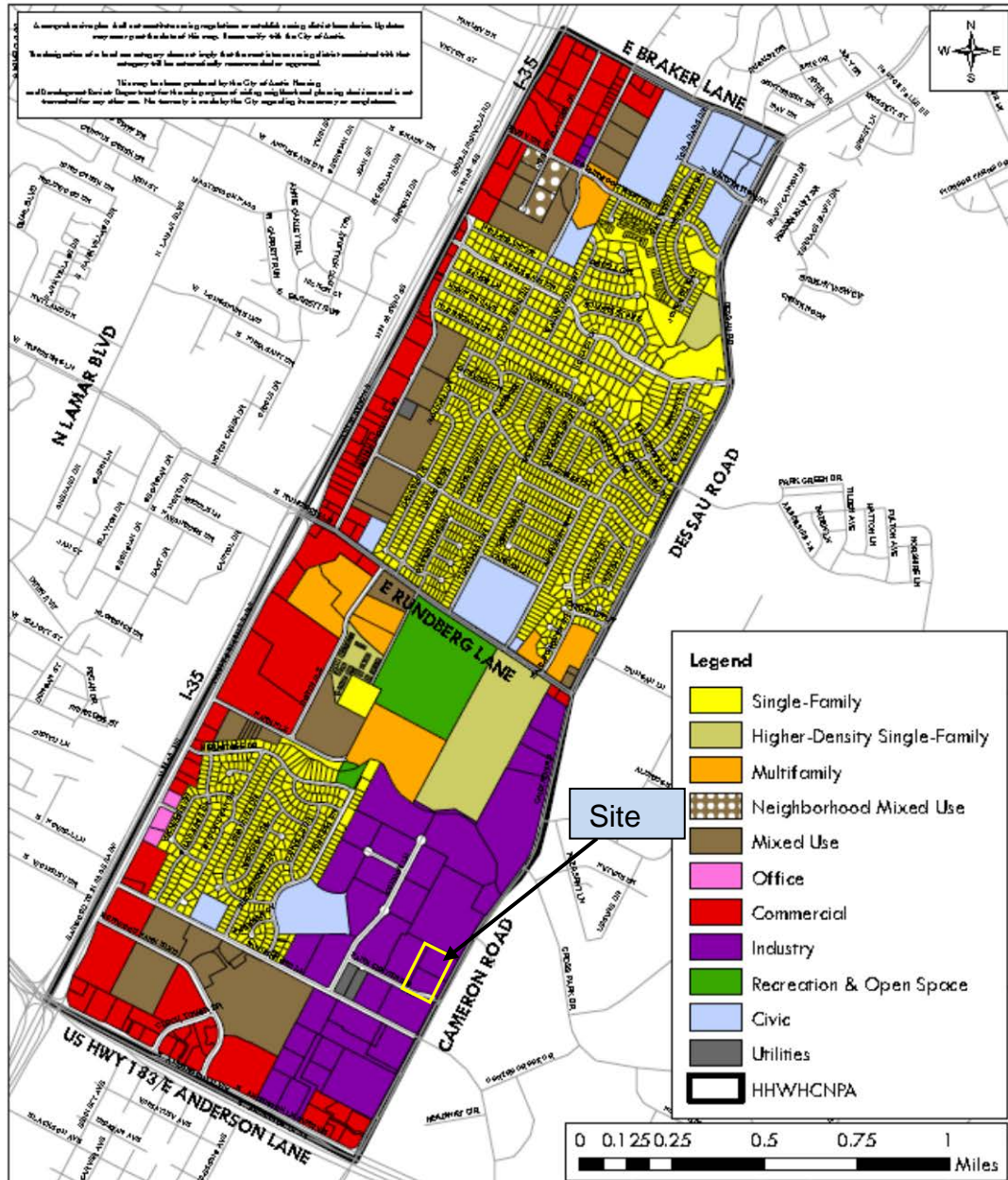
Subject: HH-WB-WH Contact Team

The HHWBWH Contact Team meeting was held last night, Aug 31, at the Gus Garcia Recreation Center. A presentation was made by Jana Rice and Larry Vineyard concerning the attached request for a zoning change for 8324 Cameron Road from a LI-NP (Limited Industrial-Neighborhood Plan) to a GO-NP (General Office-Neighborhood Plan).

A 120 bed skilled nursing facility is planned for this site once the zoning change is approved. The facility will provide approximately 100 job positions to care for approximately 120 residents. The facility will care for permanent residents, physical rehab patients, and temporary residents (recovering from surgery, accidents, etc.). Approximately 80 beds will be provided for Medicaid residents. There will be private and semi-private rooms. This facility will not be certified for memory care.

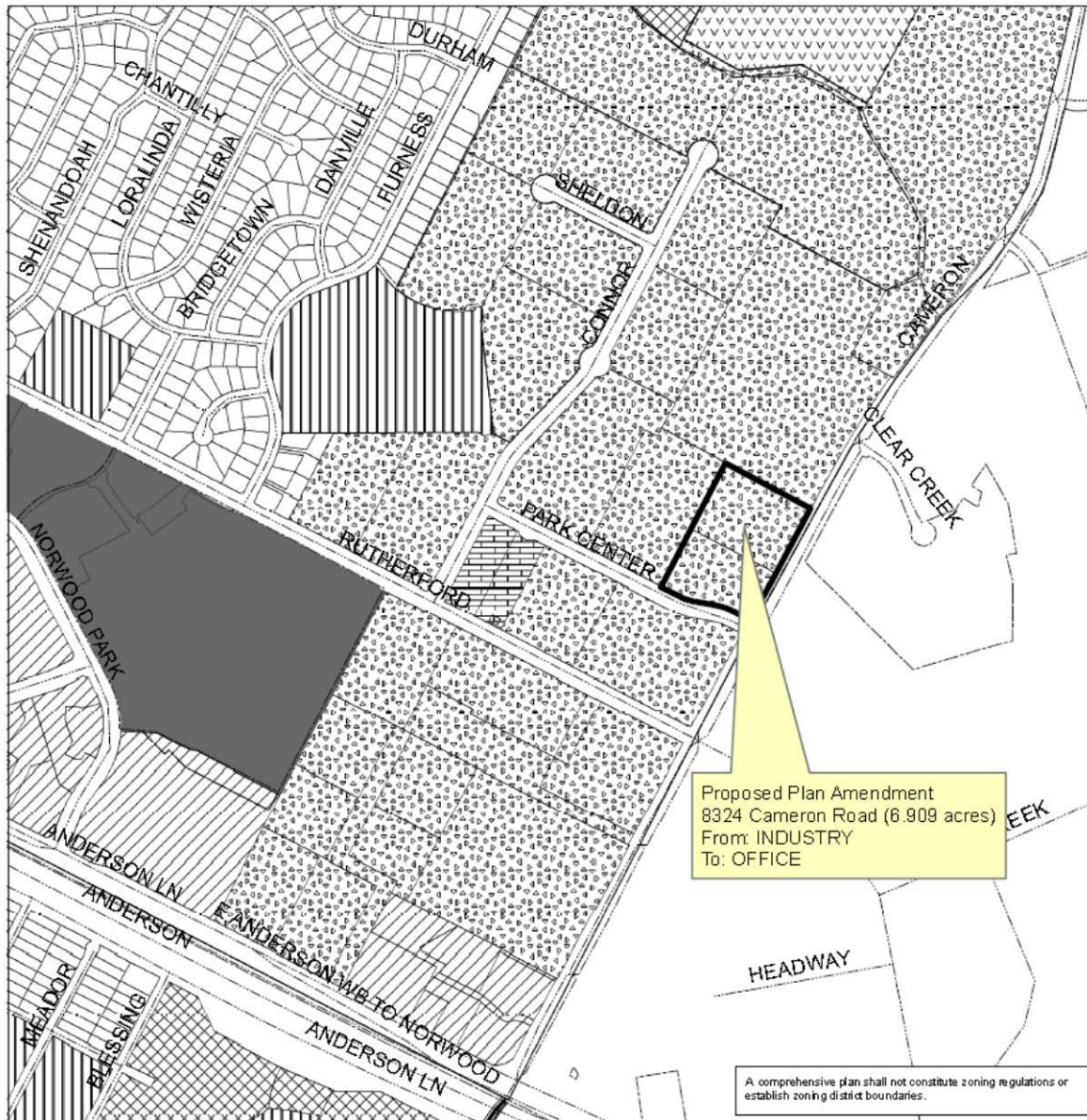
The consensus of the attendees was to approve the zoning change from LI-NP to GO-NP. The City of Austin will hold a community meeting to discuss this zoning change on September 29, 2015 at 6:30 pm at the Gus Garcia Recreation Center. Notices will be center to the neighborhood around September 14.

Diana Everett



Heritage Hills/Windsor Hills Combined Neighborhood Planning Area Future Land Use Map

Created 9/3/10



Heritage Hills/Windsor Hills Combined Neighborhood Plan NPA-2015-0028.01

This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries.

This product has been produced by the Planning and Development Review for the sole purpose of geographic reference. No warranty is made by the City of Austin regarding specific accuracy or completeness.



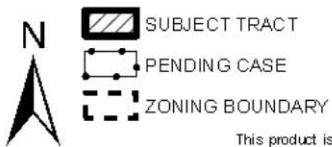
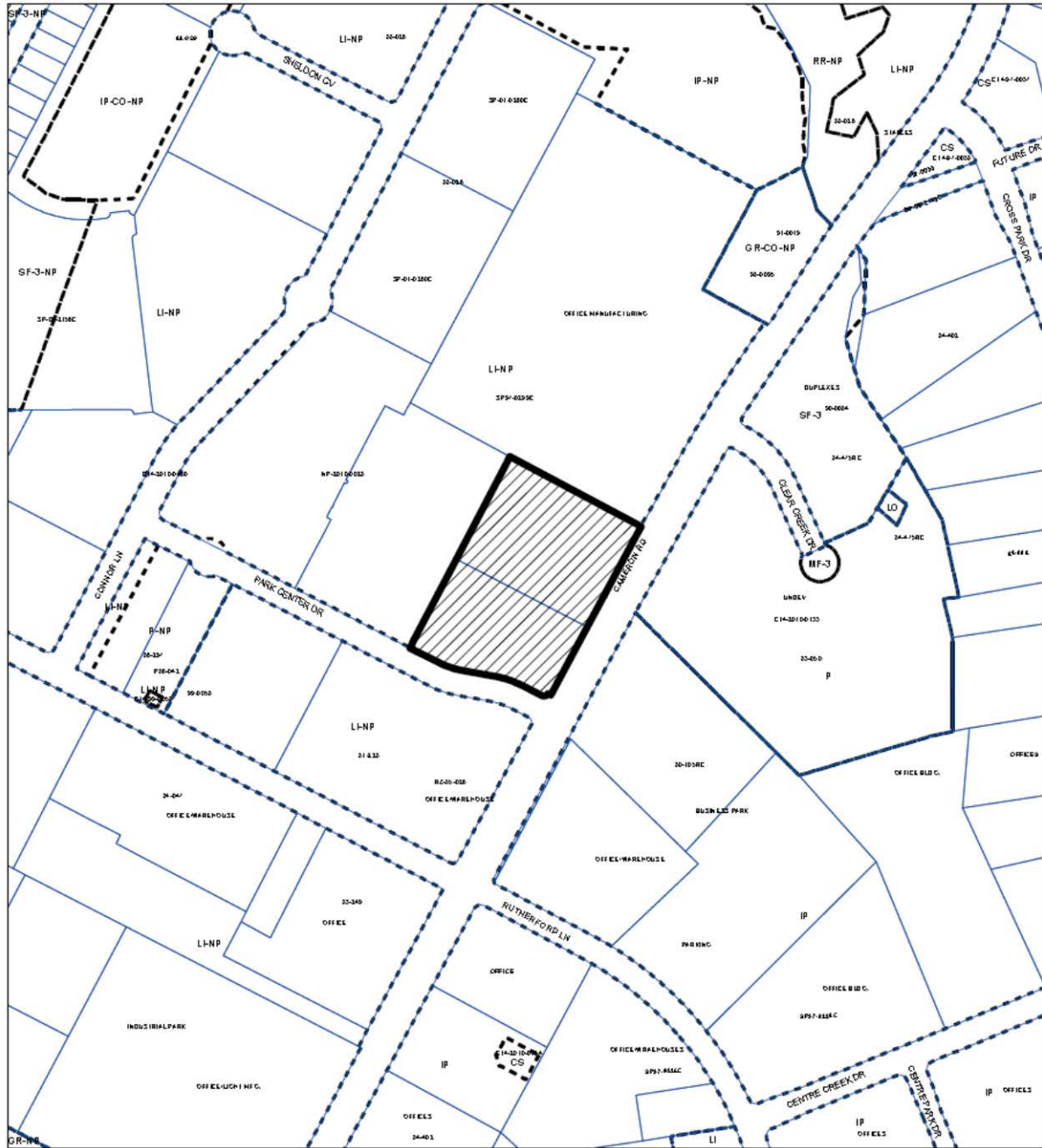
City of Austin
Planning and Zoning Department
Created on July 15, 2015_M Meredith



0 250 500 1,000 Feet

Legend

- Core Transit Corridors
- NPA CASES
- Civic
- Commercial
- Higher-Density Single-Family
- Industry
- Mixed Use
- Multi-Family
- Single-Family
- Utilities



1" = 400'

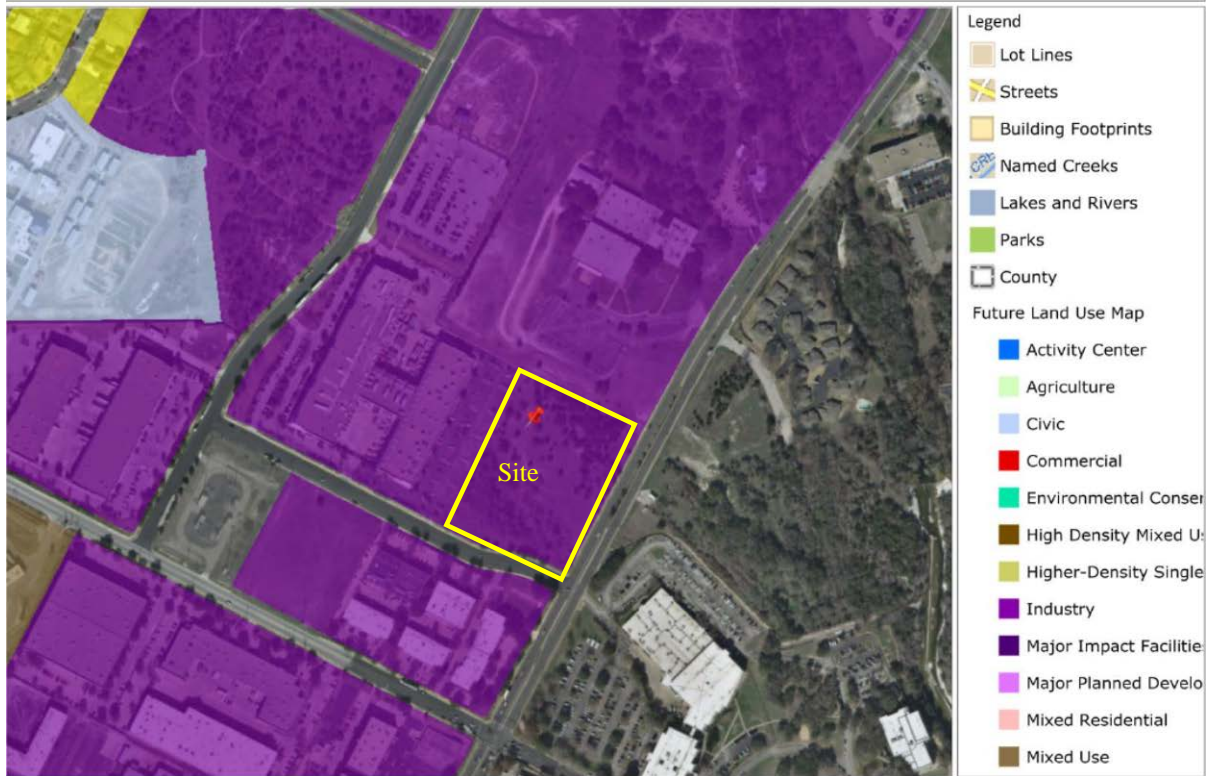
ZONING
ZONING CASE#: C14-2015-0100



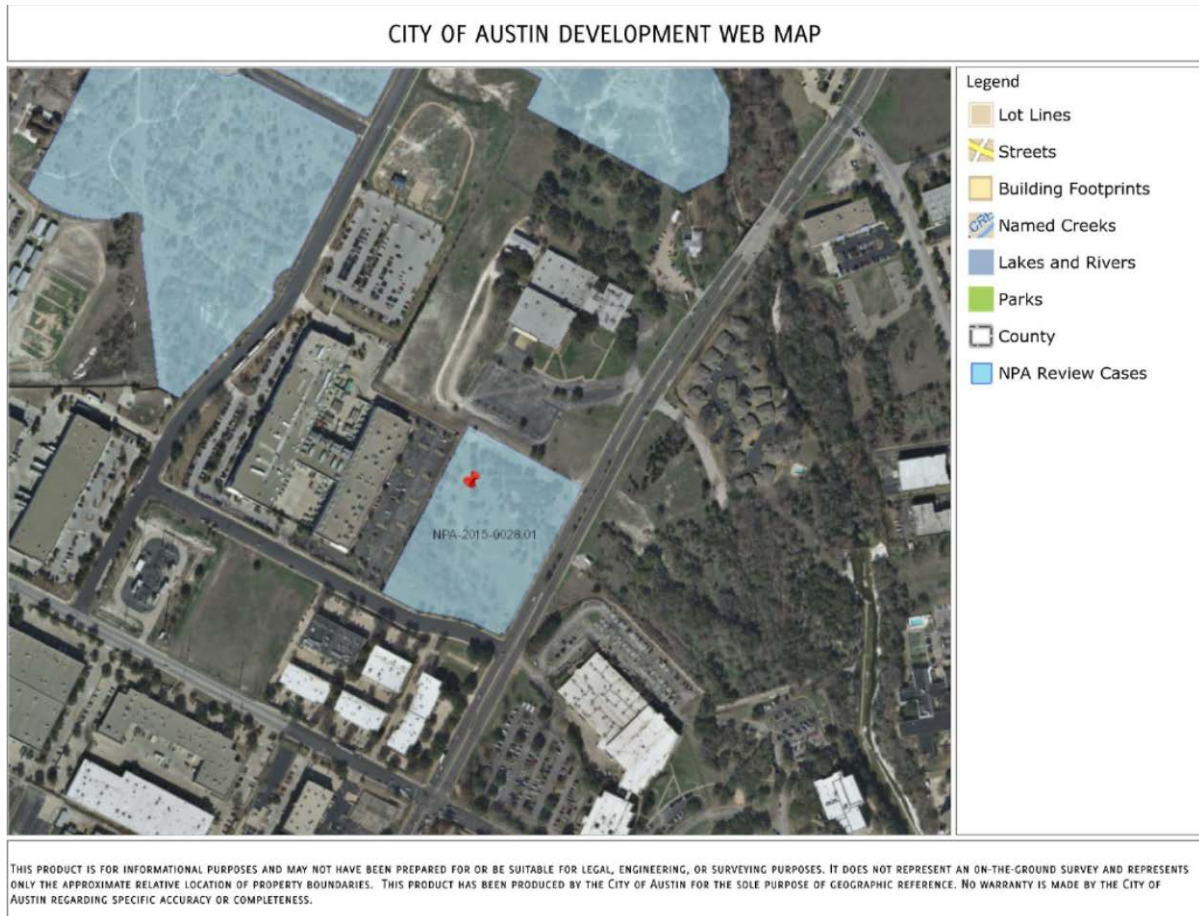
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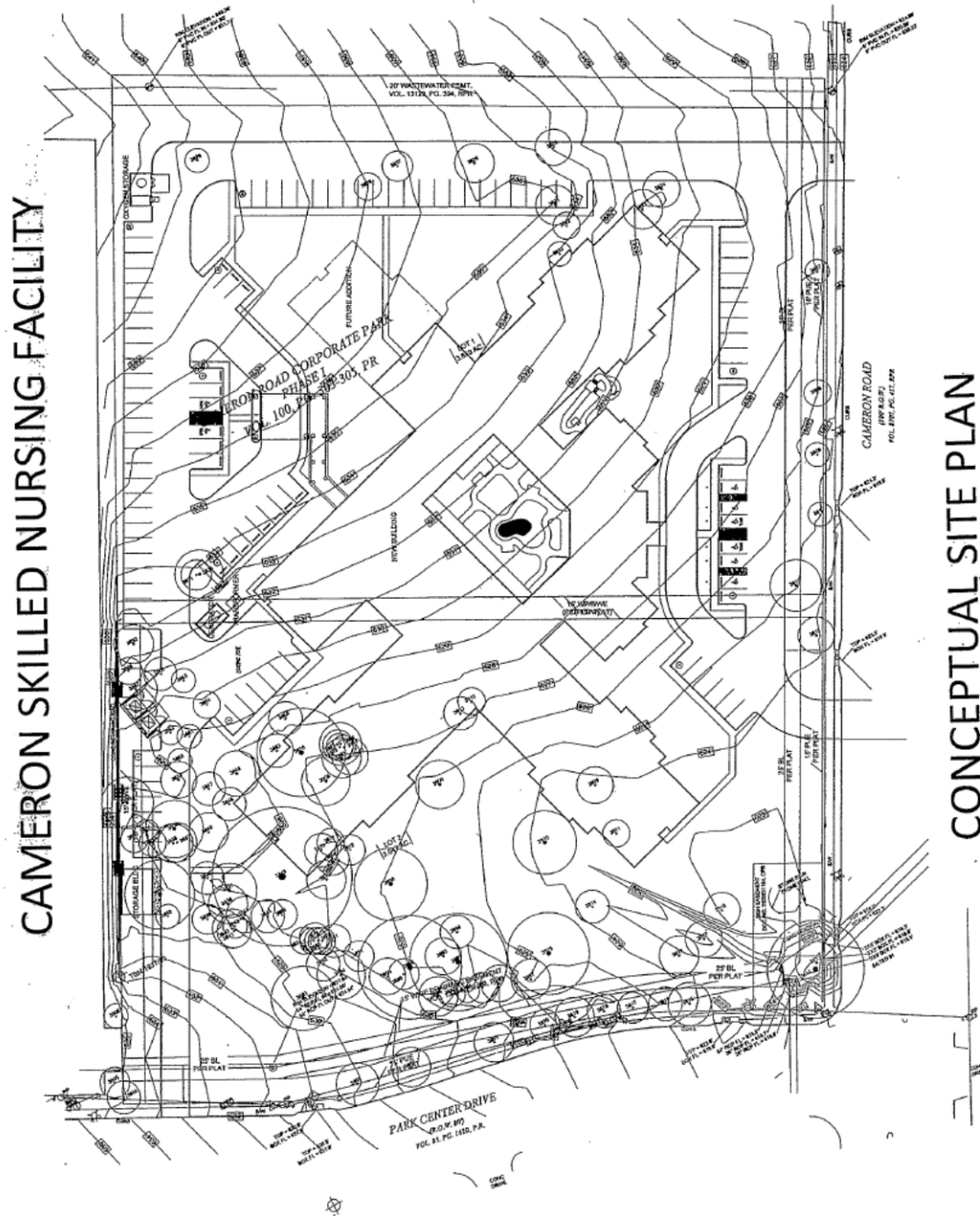
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CITY OF AUSTIN DEVELOPMENT WEB MAP



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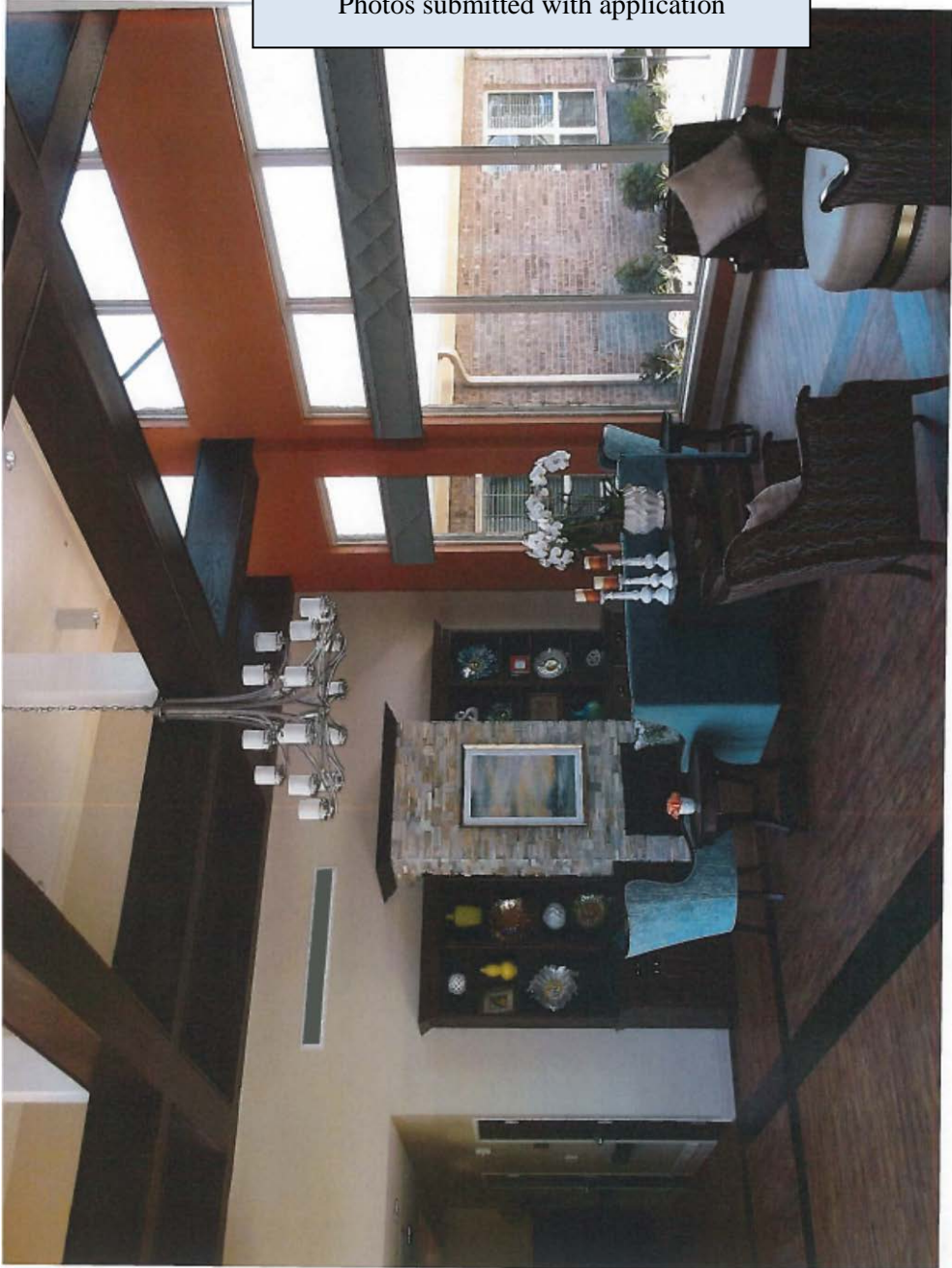
Photos submitted with application



Photos submitted with application



Photos submitted with application



Photos submitted with application



Photos submitted with application



Applicant Criteria Worksheet Submitted with application

CAMERON SKILLED NURSING FACILITY

Provide this information with your plan amendment application for the pre-application meeting with staff and also when you formally submit the application to the In-Take Division.

Taken From: Article 16: Neighborhood Plan Amendment Ordinance

§ 25-1-810 - RECOMMENDATION CRITERIA.

(A) The director may not recommend approval of a neighborhood plan amendment unless the requirements of Subsections (B) and (C) are satisfied.

(B) The applicant must demonstrate that:

(1) the proposed amendment is appropriate because of a mapping or textual error or omission made when the original plan was adopted or during subsequent amendments;

Does this criterion apply to your proposed plan amendment application? ___ Yes ___ No

If there was a mapping error, explain here and provide documentation: N/A

(2) the denial of the proposed amendment would jeopardize public health, safety, or welfare;

Does this criterion apply to your application? ___ Yes ___ No

If this condition applies, explain here N/A

(3) the proposed amendment is appropriate:

(a) because of a material change in circumstances since the adoption of the plan; and

(b) denial would result in a hardship to the applicant;

Does this criteria apply to your application? ___ Yes ___ No

If yes, explain here N/A

(4) the proposed project:

(a) provides environmental protection that is superior to the protection that would otherwise be achieved under existing zoning and development regulations;

Does this criterion apply to your application? ___ Yes ___ No

If yes, explain here N/A

or

(b) promotes the recruitment or retention of an employment center with 100 or more employees;

Does either one of these criterion apply to your application? Yes X No

If yes, explain here Although the proposed nursing facility will provide the following categories of jobs, it may not employ over 100 people: nursing staff, therapists, housekeeping, dietitians, administrators.

(5) the proposed amendment is consistent with the goals and objectives of the neighborhood plan;

List the goals and objectives from the plan that you feel support your plan amendment request, along with your rational for why it meets these goals/objectives. Use separate document if necessary:

This project would fit within the category of being a major employer because it is a nursing facility that will provide housing for all income levels of senior care. Employees would include nursing staff, therapists, housekeeping, dietitians, and administrators. (page 31 of the Heritage Hills/Windsor Hills Neighborhood Plan)

(You can find the plan document here http://www.cityofwindsorhills.com/DocumentCenter/View/1111/Heritage-Hills-Windsor-Hills-Neighborhood-Plan
or

(6) the proposed amendment promotes additional S.M.A.R.T. Housing opportunities.

Is this a S.M.A.R.T. Housing project? Yes X No

If yes, explain here and provide the letter from Neighborhood Housing and Community Development

(C) The applicant must demonstrate that:

(1) the proposed amendment complies with applicable regulations and standards established by Title 25 (Land Development), the objectives of Chapter 25-2 (Zoning), and the purposes of the zoning district proposed for the subject property; and

(2) the proposed amendment is consistent with sound planning principles. (See attached)

LAND USE PLANNING PRINCIPLES

You can find the Guide to Land Use Standards here:

If you believe a principle does not apply to your proposed plan amendment application, write "Not applicable".

1. Ensure that the decision will not create an arbitrary development pattern;

Provide your analysis here: Allowing the proposed Nursing Facility use will not be creating an arbitrary development pattern. It's location, at the northwest corner of Cameron Road and Park Center Drive, has adequate utility and roadway infrastructure. The proposed Nursing Facility provides a very attractive transitional use from the Cameron Road Neighborhood Entry corridor to the adjacent call center and other light industrial uses.

2. Ensure an adequate and diverse supply of housing for all income levels;

Provide your analysis here: The community will benefit immensely from this state of the art nursing facility because it provides housing for seniors of all income levels including Medicaid, private pay, insurance covered, and Medicare patients, as well as others in need of these services.

3. Minimize negative effects between incompatible land uses;

Provide your analysis here: A Nursing Facility use will not have a negative impact in this area. The site is located on the corner of Cameron Road and Park Center Drive. An existing call center is located to the west of the proposed site and an abandoned industrial building is located to the north of the site.

4. Recognize suitable areas for public uses, such as hospitals and schools that will minimize the impacts to residential areas;

Provide your analysis here: This area is suitable for the proposed Nursing Facility. It is located on the corner of Cameron Road and Park Center Drive in an area with some light industrial uses which is not near residential neighborhoods.

5. Discourage intense uses within or adjacent to residential areas;

Provide your analysis here: The proposed Nursing Facility is not an intense use and is not adjacent to any residential neighborhoods.

6. Ensure neighborhood businesses are planned to minimize adverse effects to the neighborhood;

Provide your analysis here: The proposed business of a Nursing Facility will not have adverse effects to the neighborhood. It is not adjacent to residential areas. It will provide senior housing for all income levels and will provide employment for a variety of job levels.

7. Minimize development in floodplains and environmentally sensitive areas;

Provide your analysis here: This is not applicable. There is no floodplain nor any environmentally sensitive area on this site.

8. Promote goals that provide additional environmental protection;

Provide your analysis here: This is not an environmentally sensitive area. It is located within the Desired Development Zone. The proposed Nursing Facility layout will be sensitive to preserving existing trees on the site.

9. Consider regulations that address public safety as they pertain to future developments (e.g. overlay zones, pipeline ordinances that limit residential development);

Provide your analysis here: N/A

10. Ensure adequate transition between adjacent land uses and development intensities;

Provide your analysis here: The proposed Nursing Facility land use, located on the northwest corner of Cameron Road and Park Center Drive, is a reasonable transition to the adjacent call center to the west and unused light industrial building to the north.

11. Protect and promote historically and culturally significant areas;

Provide your analysis here: This area is not historically or culturally significant.

12. Recognize current City Council priorities; (Look at the Imagine Austin Comprehensive Plan Document found here: <http://austintexas.gov/department/imagining-austin-downloaded-center>. Appendix E. Framework for Decision Making, pages A-57 through A-58.)

Provide your analysis here: 1.) Under Prosperous, this use will provide employment for a variety of job levels. 2.) Under Livable, this proposal is designed to increase the perception of safety and achieves the highest standard of design with this state of the art Nursing Facility. 3.) Under a Community that values and respects people, this proposed Nursing Facility will provide health and human service facilities.

13. Avoid creating undesirable precedents;

Provide your analysis here: This project is not creating an undesirable precedent. One of the goals of the Neighborhood Plan is to provide a diverse housing mix which allows families and seniors to stay in the Planning Area. This Nursing Facility project will provide housing for seniors of all incomes, as well as others in need of these services.

14. Promote expansion of the economic base and create job opportunities;

Provide your analysis here: This use will create job opportunities. There will be positions for nurses, therapists, housekeeping personnel, dietitians, and administrators.

15. Ensure similar treatment of land use decisions on similar properties;

Provide your analysis here: N/A

16. Balance individual property rights with community interests and goals;

Provide your analysis here: The community will benefit immensely from this state of the art nursing facility because it provides housing for seniors of all income levels including Medicaid, private pay, insurance covered, and Medicare patients, as well as others in need of these services.

17. Consider infrastructure when making land use decisions;

Provide your analysis here: The existing infrastructure of utilities and roadways will accommodate the proposed Nursing Facility.

18. Promote development that serves the needs of a diverse population.

Provide your analysis here: The proposed nursing facility will provide housing for seniors of all income levels, as well as others in need of nursing or rehabilitation services.
