

CLAYTON & SPOEDE LAND USE ANALYSIS MEMORANDUM

Re: NE Clayton & Spoede Area **To:** Frontenac Planning & Zoning
Commission & Board of Aldermen
Date: 09/28/2012 **From:** John Brancaglione
CC: Bob Shelton
John Morgan
Kevin O'Keefe
File

AREA DESCRIPTION AND INTRODUCTION

In accord with our services agreement with the City of Frontenac, we are providing our planning analysis and comments regarding an area consisting of nine (9) parcels located at the northeast corner of Clayton and Spoede Roads (the "Area"). The Area is bounded on the west by Spoede Road, on the south by Clayton Road, on the east by the City's property that includes City Hall, and on the north by I-64. The Area encompasses approximately 15 acres. The Ladue School District's Early Childhood Center complex occupies 4 of the 9 parcels, comprises approximately 9 of the 15 acres (60%), and includes the buildings, parking areas, and 2 soccer fields. Four of the remaining 5 parcels are occupied by single-family residences. Three of the 9 parcels are vacant. **Plate 1**, in the **Appendix** to this memorandum, depicts the Area and the parcels involved.

The Ladue School District parcels are presently for sale, as this site and existing facilities are no longer of use to the district. It is our understanding that three of the four single-family housing units are also under option for sale.

Our analysis of the Area is intended to address several planning and market issues, including:

- Current land uses, both as they exist and in the context of the larger surrounding area;
- The current market status of the properties;
- The possible future land use scenarios that might be appropriate for the Area in terms of typical urban planning principles;

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- The extent to which real estate market conditions relate to or may impact potential land uses;
- The impacts on the surrounding land uses that may result from any plausible future land use scenarios for the subject site; and the degree to which any impacts may be mitigated through site design;
- The benefits for the City of Frontenac that could result from any of the identified future land use scenarios in terms of an improved appearance to a key entry to the community. High-quality development of any type in any community at a prominent location creates an impression that the community is a good place to make a substantial investment. This combination of appearance and investment supports adjacent and community-wide property values and creates real estate market confidence.
- The benefits for the City of Frontenac that could result from any of the identified future land use scenarios in terms of increased revenues. The School District parcels constitute 60% of the Area, are vacant, and do not contribute any tax revenue to the City in their current use. Although revenue generation should not be an overriding factor in the land use decision process, the City staff, officials, and residents must be cognizant of how land uses support the revenue streams that allow the City to fund and maintain the level of municipal services that businesses and residents have come to expect and that sustain the City's desirability. The variety of revenues that are generated from these land use scenarios have the effect of keeping property owner tax burdens lower and serve to level overall revenue fluctuation from various economic and other factors, very few of which the City can control; and
- Any changes to the City's Comprehensive Plan or Zoning ordinance that may be required in order to enable any future development scenarios.

EXISTING LAND USE AND PHYSICAL CHARACTERISTICS

Plate 2 in the **Appendix** to this memorandum shows the current land uses of both the Area and the surrounding properties. As noted above, the majority of the Area is comprised of the Ladue School District Early Childhood Center. This consists of three larger buildings fronting Clayton Road between Huntleigh Downs Road and Clayton Court Drive just east of the Clayton/Spoede intersection. A smaller building is located to the rear of the larger center building. A larger parcel, located behind the buildings

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to the north, is a soccer field as is the northern section of the main School District parcel. A smaller parcel to the west of the soccer field is vacant as is a smaller parcel on the Clayton Road frontage to the west of the main building complex. Four single-family residences front to the east side of Spoede Road and a vacant parcel is located at the northeast corner of the Area at I-64 and Spoede Road.

In the context of the surrounding environs, the Area is located across from large single-family residences on the south (across Clayton Road) and west (across Spoede Road). I-64 borders the Area on the north and public, semi-public, and commercial uses are located to the east of the site, all the way to Lindbergh Boulevard. The northern end of Plaza Frontenac and the freestanding Brio, St. Louis Bread Company, and Bricktop restaurant sites are located to the east of the Area on the south side of Clayton Road.

Topographically, the area is highest just north of Clayton Road (at about 603 ft. above MSL) and drops off to the north, so that the lower soccer field portion of the Ladue School District property and the two parcels to the west are approximately 16 feet lower in elevation at their lowest point (at about 587 ft. above MSL) (according to St. Louis County topography mapping and Google Earth GIS data). The residential properties are wooded, and a drainage swale traverses the northwest corner of the Area.

LAND USE/DEVELOPMENT POTENTIAL

Based on input we have received from the development community since we began this assignment from the City, it is clear that there is a market for the properties in the Area, though not in their present use. A review of the current land uses in the context of the location suggests why that is the case. The Early Childhood Center was built for specific purposes: and it seems clear that the School District's decision to sell the property means that it considered other locations better suited to this use. The District also recognized that the location of its holdings were far more valuable (in terms of an asset) for other uses. More importantly, the Early Childhood Center buildings were constructed for specific purposes with amenities (e.g. restrooms, drinking fountains, and other design features) that were sized and located with small children in mind. This would make the buildings prohibitively costly to convert to any other use.

The residential properties are located at what is a very busy location, from a traffic standpoint, and close to a major highway with Average Daily Traffic (ADT) in excess of 145,000 vehicles. They also back to an educational use with soccer fields in their "backyard". The land use environment surrounding the four residential parcels coupled with a potential sale of the School District property may have motivated three of

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the four owners to accept sale options. We were unable to find current traffic count data for Clayton Road or Spoede in this vicinity. However, based on counts we could find on some other similar roadways such as Ballas and Lindbergh near the Area, we believe that ADT on these routes may be in the vicinity of 8,000 for the leg of Spoede between the highway and Clayton Road and upper teens to not more than 20,000 for the leg of Clayton Road between Lindbergh and Spoede. It should be noted that in order to determine the traffic impacts of any proposed development scenario, it will be necessary to conduct traffic counts on these roadway segments to gather current and accurate information.

In considering the likely appropriate land use scenarios, we've considered a variety of factors, as well as those noted above. The following discussion outlines these considerations.

Retail Development

Purely from the standpoint of the City's revenue base, consideration should be given to the potential for reuse of the entire 15 acres comprising the Area for retail purposes. As noted in the Branding Document component of the City's Strategic Plan, the City's retail base, when sales and other taxes are combined, represents approximately 75% of the City's total revenue. The sales taxes that accrue to the City from high-quality and stable retail development will exceed the revenue contribution of any other land use. The City's existing retail sales tax base is one reason that the overall property tax rate in the City is relatively low compared to some other areas. For example, the 2011 residential tax rate for a property in Frontenac with a tax code of "117J" was 6.0544. By comparison, the residential tax rate for a property located in Webster Groves with a tax code of "134H" was 9.1059 (50% higher!).¹ We would also note that this sales tax base contributes funding for the City's Fire/EMS services which are substantial property tax levying entities when operating as stand-alone taxing districts.

The City has limited opportunities for retail development, with the Area being one of two locations where retail development is possible. The other location is the Shriners'

¹ This comparison points to what is often the difference in residential taxes between cities with a high-generation retail land use component, versus one with little retail land use and or uses which are less productive in terms of sales. Webster Groves is a "B" or "pool" city for sales tax purposes. Its relatively smaller retail land use base means that it is more advantageous from a revenue standpoint to derive its sales tax revenue on a per-capita basis as part of the St. Louis County pool. Its higher residential property taxes are most likely the result of this situation.

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Hospital site on Lindbergh, which is nearly the same size (14 acres). The Shriners site doesn't have the topographic challenges of the Area, but is similarly burdened by buildings that are an impediment to reuse. We believe that this parcel represents an opportunity for a logical extension to Plaza Frontenac and would likely involve a different style of retail development than would be appropriate for the Area.

Some of the locations in the City that have been occupied by retail land uses have been marginal locations. This applies to the properties on the west side of Lindbergh Boulevard, north of I-64. The concrete medians along Lindbergh act as a barrier to convenient access for retail business. Over time, none of the retail uses north of German Boulevard have survived for long on this stretch of roadway. Breckenridge Interiors moved from this location some time ago, and the Fur Centre just announced their pending relocation from this area as well. These relocations mean significant sales tax losses to the City. We have been told by commercial real estate brokers that retailers of standing will simply not consider locations along Lindbergh north of I-64. These same sources indicated that recent attempts by real estate brokers to market a 15-acre tract on the east side of Lindbergh, at German Boulevard in Ladue, to retail entities have been rebuffed.

We also point out that the opening of one or both of the high-end outlet malls in the Chesterfield Valley will have at least a temporary impact on sales at Plaza Frontenac. Therefore, we believe that it is prudent for the City to evaluate the potential for retail development of the Area. Given what we believe the timing of any potential redevelopment of the Shriners' property might be (a 2014 start at best), consideration of retail development of the Area could begin earlier.

In considering the potential for retail development, we believe it is necessary to consider the ability for the retail commercial real estate market to absorb new locations. The best land use plan in urban planning principles and terms must also have a basis in market reality or the plan may never be implemented. Like most US metro areas, St. Louis was overbuilt with retail space before the recession. Too many retail entities were competing for the same population within these metro areas because population growth was not sufficient, the number of new housing units was beginning to slow, salaries were beginning to stagnate, and unemployment was mounting. Vacancy rates began to rise as retailers folded or exited soft markets (Linens 'N Things, Borders, CompUSA, etc.). However, we have seen strong retail locations with solid demographics survive this scenario, and where those locations did experience increased vacancies, they have been among the first to backfill spaces. Also, locations with high-income demographics and retailers selling higher end merchandise seemed to suffer the least.

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When considering the potential for retail development of the Area, we believe that Frontenac’s location, demographics, and presence of high end retailers support the premise that there is a retail market potential for specialty retailers.² This is confirmed by an ESRI Retail Market Profile that we obtained for a five-mile ring around the Area. In certain categories such as Furniture & Home Furnishings; Specialty Food, Wine, & Liquor; Clothing & Clothing Accessories; and Health & Personal Care, there is a retail gap that represents leakage to other locations outside the ring, or surplus spending power of more than \$20 million.³ This doesn’t account for the potential capture of retailers not already in the market area or the St. Louis market.

We believe that in light of the Area’s location, frontage on arterial roadways, proximity to interchanges with I-64 and Plaza Frontenac, and the predominance of commercial and semi-public uses to the east, the use of the Area for retail development creates a logical linkage that supports this land use category and market reality. In this instance, we believe any potential negative land use relationships between potential retail development of the Area and the adjoining residential uses can be mitigated through proper site planning and architectural design. In addition, considering the sales tax losses from retail development on Lindbergh north of I-64, the City should at least consider this potential. However, we believe that any consideration for retail development will have several impediments and impacts that must be addressed or mitigated. We’ve outlined these below:

- The Comprehensive Plan Future Land Use Map depicts Planned Single-Family Residential development for the Area. Therefore, the Comprehensive Plan will need revision.
- The current zoning of the Area is R-1, One Acre Residence and therefore a rezoning would be required to permit commercial development. Such a rezoning

² The term “specialty retailers” is typically used to refer to a type of retail use that caters to a specific clientele (often based on demographic factors), carries an array of merchandise in a particular category (such as those noted above), and is a destination (i.e. has a larger market area draw because of what is being sold). Often these types of retailers are attracted to a location because there is a hole or gap in the market for that category of merchandise.

³ Retailer decisions to locate at a particular site are usually based on a variety of factors that include the presence of complimentary retailers (those selling merchandise in categories that might be part of a combined shopping trip), evidence that consumers are traveling farther to purchase the products they want to sell (i.e. the money is being spent in another market area hence the term “leakage”), that there is simply no other retailer selling the type, mix, or price range of merchandise they would be selling, or some combination of all of these factors.

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- should only be based on a specific site plan (i.e. a “planned development” procedure), and thus changes may be needed to the City’s zoning code to create and/or strengthen such a process.
- To be viable for retail development purposes (and probably most other uses as well), the Area must have access from both Spoede and Clayton Roads. The most logical access on Spoede will likely mean alignment with the I-64 ramp and the signalization of that intersection. It will also probably be necessary to install a synchronizer system to coordinate a new signal at this location with the one at Clayton Road. While retail development of the Area is likely to generate some additional traffic, we don’t think it is likely to be significant because retail customers will likely be drawn from those already shopping in the area and thus will already be in the traffic stream. In addition, unlike some other uses such as office development, retail uses typically do not generate major levels of AM and PM peak traffic volumes.
 - Any retail development will need to maximize the use of the site and take advantage of the topography differential by providing for structured parking on the north portion of the site. This will add significantly to the development costs.
 - Building and site design will need to “internalize” the development with a courtyard-type design. Buildings along Clayton Road and Spoede will need to be set closer to the street, with front and rear facades of high quality architectural and landscape design with parking in the center of the development. This would create the appearance of a small-town commercial district of the type which typically abuts a residential area. This is not dissimilar to shopping districts in some southern California, Florida, and Arizona communities and the Garden District in New Orleans. Lighting will need to be carefully controlled so as to retain the light on site. We think that proper architectural and site design may be able to mitigate any significant negative impacts on nearby properties. Certainly, the guidelines for commercial building development outlined in Strategy 5 of the City’s Strategic Plan should be applied.
 - Ideally, proposed retail or restaurant establishments should be unique to the St. Louis market and not be a relocation from other developments within the City unless such a relocation would occur as a result of the need for expansion and the business would be otherwise lost to the City. We would note that, given the likely costs associated with retail development of the Area, only retailers who can afford higher rents are likely to be interested in the site.

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Retail development of the Area will yield the highest revenue returns to the City and would yield the second highest revenue returns to the other taxing districts whose revenues are derived largely from property taxes. In addition, St. Louis County would also have substantial gains from County-levied sales taxes. Property tax yields for the City from retail development will be greater than they would be from most types of residential development (except for higher-density luxury residential). Retail commercial property is taxed on an assessment ratio of 32% of market value, while residential property is taxed on a 19% ratio. Retail property is typically valued on an income basis based on the rental income, and therefore its construction cost may have less relationship to the market value for assessment purposes, in part because rent per square foot for retail space is often less than office space, for example. However, a brief review of Frontenac retail values from St. Louis County suggests that retail property values in the City are above the norm, probably due to the higher level of finishes in Frontenac retail buildings and the probability that rent levels are above the norm.

From an Area property owner standpoint, an all-retail scenario will probably yield one of the higher values in terms of sale price for each of the parcels. However, this will be affected by the density that the City will ultimately allow for the development and the costs associated with this type of plan (i.e. parking structure and roadway and signalization costs, particularly on Spoede). The overall cost of developing an area versus the income that can be derived from the development plays a major role in determining what can be paid for the properties. The value of this property, from a location standpoint, coupled with the probable development costs, will mean that increased density and retail development (at least for some portion of the Area) will yield higher value to the existing property owners.

Mixed-Use Development

Another scenario that could be plausible for the Area (both in a physical and market context) is a mixed-use development that combines office (or medical office), residential, and/or retail. Using the topography of the Area, it would be possible to build an office building and a luxury senior-living⁴ building on the northern portion of the Area on top of a parking structure. These would be low rise, multi-story structures. The south portion of the site could be devoted to retail uses. A variation on this scheme would

⁴ For the purposes of this analysis, the term “luxury senior-living” is intended to mean a for-profit higher-density apartment or condominium development that is fully taxed at residential property tax rates and ratios and is not developed and owned by a not-for-profit entity.

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combine only the residential and retail components. In this instance the residential development might be a combination of building types. Some of the same factors associated with retail development would apply, and the addition of office development would add other impacts.

- The Comprehensive Plan Future Land Use Map depicts Planned Single-Family Residential development for the Area. Therefore, the Comprehensive Plan will need revision.
- The current zoning of the Area is R-1, One Acre Residence, and therefore a rezoning would be required to permit this mix of land uses. Such a rezoning should only be based on a specific site plan (i.e. a “planned development” procedure), and thus changes may be needed to the City’s zoning code to create and/or strengthen such a process.
- To be viable for the office and retail development components of a mixed use site plan, the Area will need access from both Spoede and Clayton Roads. The most logical access on Spoede will mean alignment with the I-64 ramp and probably the signalization of that intersection and synchronization with the signal at Clayton Road. Office development of the Area will generate additional traffic in the AM and PM peak time periods and may have some significant impact on traffic flow at those times. This would need further study.
- Building and site design for the retail development components follow the same principles discussed above. Retail buildings fronting Clayton Road and Spoede will need to be set closer to the street, with front and rear facades of high quality architectural and landscape design with parking in the center of the development. Lighting will need to be carefully controlled so as to retain the light on site. We think that proper site design may be able to mitigate any significant negative impacts on nearby properties.
- In order to be economically feasible, the office and luxury senior living buildings may need to have density levels that are not found elsewhere in the City, and thus will dictate multi-story (3 to 5 story) structures. With proper attention to design, a mixed-use development of the Area could accommodate such density and height and ameliorate adverse impact by taking on the character of a “town center” type of development on a smaller scale.
- As noted above, the retail development component should comprise retail or restaurant establishments that are unique to the St. Louis market and not be a

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relocation from other developments in the City, unless the business would relocate for expansion purposes and would be forced to locate outside the City. Again, given the likely costs associated with a mixed-use development of the Area, only retailers who can afford higher rents are likely to be interested in the site.

Mixed-use development of the site could also yield significant revenue returns to the City and to the other taxing districts with respect to property taxes. Office development may have values comparable to or greater than retail. Also, the luxury senior living development component will likely yield higher values per acre than traditional single-family, residential development. However, in this case, the City will realize less revenue from sales taxes since the amount of the Area devoted to retail development will be reduced compared to the all-retail scenario discussed above. For the property owners involved, this land use scenario will also tend to increase the value of the property for sale purposes. However, again, this will be affected by the ultimate density allowed by the City and the substantial development costs that would be involved with such a plan.

Residential Development

The current zoning of the Area as R-1, One Acre Residential, is certainly a plausible scenario for the Area given the proximity of large-lot residential uses to the west and south. However, it is one that is not likely to make economic or market sense. The costs associated with demolition of the School District buildings will be substantial (even if there are no environmental issues to contend with) and the topographic change means that houses developed on the northern section of the Area will be in a relative “hole” unless there is substantial fill brought on to the site. We also do not believe that lots which back to the highway and the sound wall along it will be particularly desirable for the type and value of the homes that would need to be built.

The Comprehensive Plan seems to recognize the need to treat this location as unique. The Land Use Plan designates the Area as “Single Family Residential - Planned”. Page 32 of the Plan discusses the need to provide alternative housing types, particularly for existing residents who want to down-size but remain in the City. Villa-style units are also discussed on that page, as well as the need to create Planned Residential Development zoning provisions.

We believe that development of a mix of high-quality housing types that might appeal to both seniors and empty nesters could be a good use of the Area. Again, we would encourage the City to consider providing for higher density housing that might include

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a “Gatesworth” style development on the northern part of the site built on top of a parking structure, with lower-density villa or townhouse style units on the southern half of the Area. This would provide a mix of higher-end housing commensurate with the other housing quality and type in the City. There are several caveats and factors that would need to be addressed.

- As in the other land use scenarios discussed above, the Comprehensive Plan and Zoning Ordinance will need to be revised to accommodate such a vision.
- Access for the development will be needed from Spoede; however, signalization may not be needed (depending on the ultimate density of the development). It will be important for the need for this to be evaluated as part of any site plan proposal.
- Building and site design will be just as important for this use and, as in the other scenarios discussed above, the desirability of this development scenario will probably be enhanced if the development is “internalized”, i.e. the units are backed to both Clayton and Spoede, so that it has the feel of being a subdivision “community”.
- It should be noted that some elements of this development concept could be combined with a retail component. However, we are not sure that “villa” or townhome type units could be successfully integrated with a retail component but are open to having that demonstrated.

Development of the Area solely for residential use of virtually any density will yield the least economic benefit to the City because no sales taxes will be generated. Even the densest residential development we can envision appropriate for these properties will not yield the total amount of revenue gained from either of the other land use scenarios discussed previously. From a property owner viewpoint, this is the development scenario that has the least value relative to potential sale price. Many of the development costs are the same for residential development as they are for the other types, and it is more difficult to pass those costs on to potential buyers/tenants of the senior living, villa, or townhome units.

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SUMMARY

We believe that any of the development scenarios we have discussed above are viable considerations for the City for the Area properties. They each have certain benefits and challenges which are recapped below.

- If treated as a whole, the properties that comprise the Area are well-located for a variety of uses but have development challenges that will be costly for almost any use.
- The development scenarios that have the greatest economic benefit to the City are those which also have the greatest benefit to the current property owners.
- Residential development is likely to have the least impact on the nearby residential uses although this is a location that already has significant traffic and other public, semi-public, and commercial uses and is between two interstate highway interchanges. We believe that it is possible to mitigate or minimize the potentially undesirable impacts from the types of retail, and higher density housing land uses with proper architectural styling and site design. Office development will have negative traffic impacts that will be more difficult to mitigate.
- Any development proposal for the Area will need to be subject to an extensive site plan review, and changes in the Comprehensive Plan and the Zoning code will be needed for virtually any scenario, except for R-1 residential uses.
- Development components that might be multi-story structures such as office buildings and luxury residential structures with structured parking (whether or not devoted to senior living) should be located on the northern portion of the site.

Our task in responding to the City's request for this planning analysis is not, as we understand it, intended to result in a recommendation for one particular land use scenario. Rather, we have analyzed the potential for redevelopment of the parcels that comprise the Area. We believe that any of the scenarios we have described above are appropriate, both in an urban planning and a market context.

In considering any of the plausible development scenarios that we have outlined, the City should evaluate the need to maximize its opportunities for retail development. The locations where it can logically occur are limited to only two significant sites, nei-

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ther of which is sizable. Under the current sales tax structure of St. Louis County, cities that are point-of-sale (or “A”) cities have to protect their ability to maintain their sales tax base. This is particularly true in communities like Frontenac where, if it were a “B” sales tax sharing community, revenue would drop dramatically because of the low level of density of the City’s residential areas. This low density housing pattern translates to a lower population base. Since “B” cities acquire sales tax revenues based on population (not based on the sales taxes generated within the city boundaries), Frontenac would be at a disadvantage. Therefore, we would encourage the City to give consideration to proposals for retail development of this site for the variety of reasons we have discussed earlier in this memorandum.

Low-density residential development of these properties (including at villa or townhome density levels) does not seem to us to be economically viable, given the underlying costs of property acquisition and site development. Having said this, it is not without possibility that a development entity might be able to make the “numbers” work; but we think that significant design compromises might be made to keep the unit costs in line with what even high-income buyer/tenants would pay for such units. However, the mixed-use scenario combining higher density luxury residential with retail uses is a viable alternative whose impacts could be managed or mitigated.

While we can envision office development as a component of commercial use of the Area based on location and other factors, it is, in our opinion, the one that has the greatest potential negative impact from a traffic standpoint. Absent input from a qualified traffic engineer that might indicate possible mitigation of these impacts, we cannot endorse office uses at any significant density. As an added note, based on our last review of the I-64 corridor office market, there is significant vacancy in established, high-quality office buildings along this corridor. We don’t envision office development to be a viable market option at this time (absent some unique user that might want an iconic location and would occupy an entire building). New office development at this location would, in all probability, be unable to compete with rent offerings in existing buildings in the corridor.

As may be apparent from our analysis, we are indicating that retail development or a mixed-use scenario that combines retail with higher-density luxury living (senior or otherwise) of the Area are the development alternatives that we believe to be of greatest benefit to the City with the least impact on properties in the immediate vicinity (subject to the caveats we noted). As noted earlier in this document, the redevelopment of the Area will probably be subject to some extraordinary development costs for a variety of factors. As an inducement to getting the best development (from a land use standpoint) and highest quality (from a site and architectural design standpoint), the City

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may want to consider the potential use of financing incentives that are available via State statutes. These might include real estate tax abatement under the provisions of either Chapter 100 or 353, special property tax assessments or added sales taxes provided in the Community Improvement District (CID) statute, or the added sales tax provisions of the Transportation Development Districts (TDD) statute. Note that we are not making this suggestion lightly.

Given the location of the Area and its environs and therefore the development income potential that may exist, the ability to make a project scenario such as we've described be economically feasible may negate the need for and use of incentives. On the other hand, if the development costs are as significant as we suspect they may be, allowing the increased density we noted previously in this memorandum and potentially providing for the use of one or a combination of the incentives noted *may be* worthy of consideration. However, only a development proposal which can satisfy certain criteria should receive such consideration. In addition, any established criteria can be incorporated in a development agreement document and/or Planned Development zoning approval ordinance.

An evaluation for City provision of financial incentives to a proposed development of the Area should include, but not necessarily be limited to a development proposal which:

- would deliver a paramount project in terms of architectural and site design;
- minimize impact on adjacent residential properties;
- is of significant financial benefit to the City; *and*
- demonstrates and documents a need for such assistance.

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MAP APPENDIX

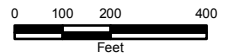


Plate 1
Area Boundary

Clayton/Spoele Land Use Analysis

Legend

 Area Boundary



 September 2012



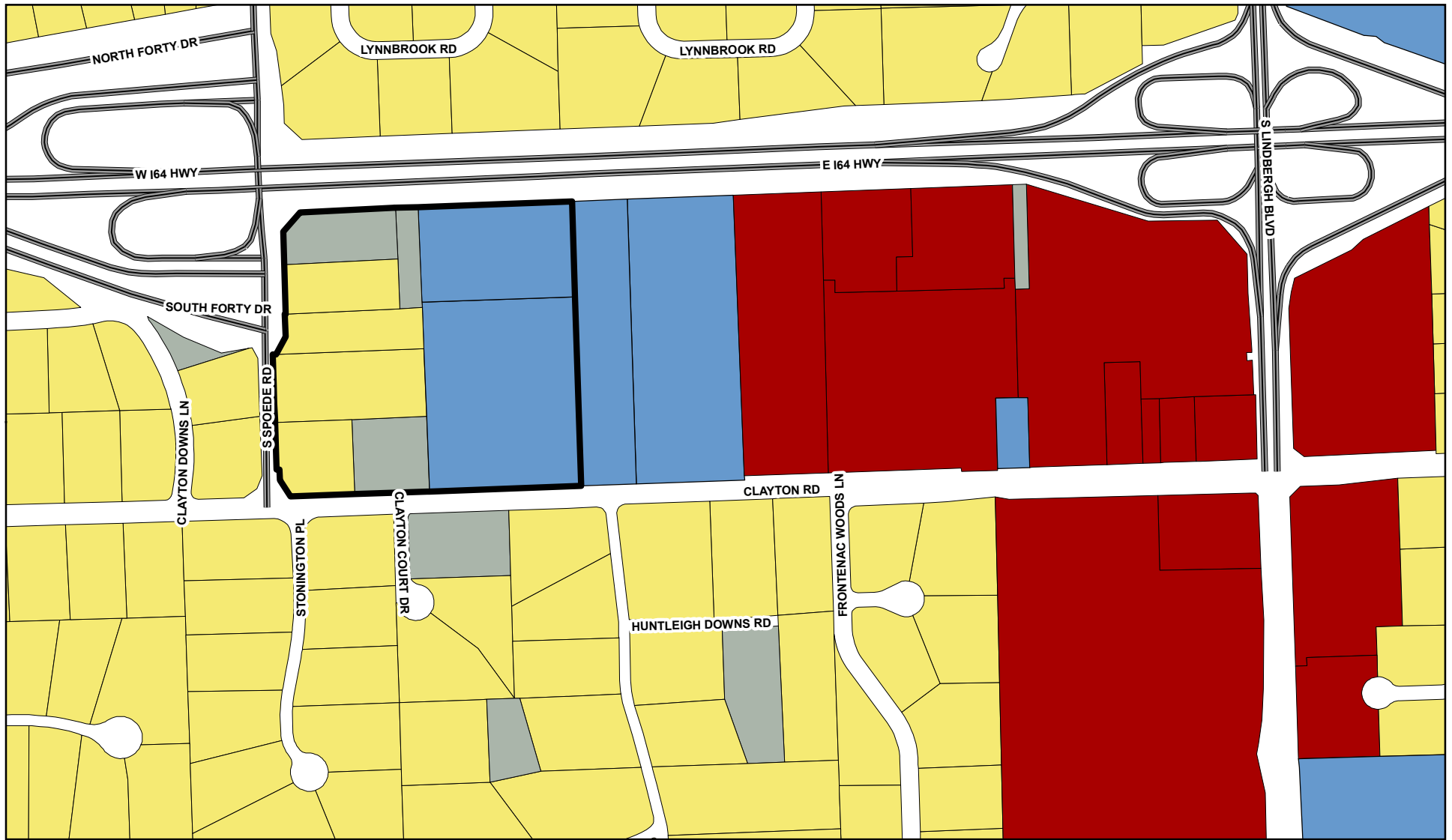
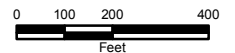


Plate 2
Existing Land Use

Clayton/Spoele Land Use Analysis

Legend

- Area Boundary
- Single-Family Residential
- Commercial
- Public / Semi-Public
- Vacant / Undeveloped Land



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