

Planning Staff Analysis

CA25-0001a / Craver Ranch MPC

City Council District #2

REQUEST:

To modify the Future Land Use Map on a 2,499-acre property to change the designation from Rural Areas and Master Planned Community.

STAFF RECOMMENDATION:

Staff recommends approval of the request as it complies with the criteria in Section 2.4.5.E of the Denton Development Code (DDC) for approval of all applications, and Section 2.7.1D of the DDC for approval of a comprehensive plan amendment.

SITE DATA:

The various parcels comprising the subject property were annexed into the City of Denton between 2008 and 2009 for the purpose of regulating land use. Parcels within the subject property were initially given the placeholder zoning designation of Rural Residential (RD-5x) upon annexation which transitioned to Rural Residential (RR) with the adoption of the 2019 Denton Development Code. Most of the subject property is undeveloped or used for farming and grazing. The entire subject area is located within the City limits.

The property is partially encumbered by Floodplain with a flowage easement intended to support drainage from Ray Roberts Lake in the event of a significant rain event. Additionally, an approved Environmentally Sensitive Area (ESA) field assessment shows the presence of Floodplain, Water Related Habitat and Riparian Buffers ESAs within the subject property. As discussed herein, the requested amendment considers these encumbrances as part of the proposed Master Planned Community (MPC) designation. The proposed amendment would not alter these encumbrances, and subsequent development applications must comply with all applicable regulations prior to disturbing these areas.

The 2022 Denton Mobility Plan and Thoroughfare Map reflects a plan for 2 north-to-south future Secondary Arterials and one west-to-east future Secondary Arterial. Per the Mobility Plan, the Secondary Arterial classification is intended to provide shorter connections and carry less traffic, providing more land access. The applicant has concurrently submitted a Mobility Plan Amendment (item MPA25-0003) to shift a portion of the west-to-east roadway alignment south to avoid multiple encroachments onto the aforementioned flood related encumbrances, specifically at the widest point of the floodplain. There are no proposed changes to the classification of these future roadways.

Portions of the following area roadways abut the subject property:

- **FM 2153** is a Texas Department of Transportation (TXDOT) roadway classified as a secondary arterial per the Denton 2022 Mobility Plan. The section of this roadway abutting the subject property is currently constructed with 2-lanes and a posted speed limit of 55 miles per hour (mph). The typical section of a Secondary Arterial is comprised of 110 feet of right-of-way width with 4 lanes of traffic and target speeds ranging from 35 to 40 mph. TXDOT currently has no plans to expand this roadway.
- **FM 2164** is a TXDOT roadway classified as a primary arterial per the Denton 2022 Mobility Plan. The section of this roadway abutting the subject property is currently constructed with 2-lanes and a posted speed limit of 60 mph. The typical section of a Primary Arterial is comprised of 135 feet of right-of-way width with 6 lanes of traffic and target speeds ranging from 40 to 45 mph. TXDOT currently has no plans to expand this roadway.

- **Shepard Road** is primarily a Denton County roadway classified as a secondary arterial per the Denton 2022 Mobility Plan. Approximately 1,415 feet of the subject property's total 3,300 feet of frontage along this roadway is owned and maintained by the City of Denton. The entire section of this roadway abutting the subject property is currently constructed as 2-lanes and a posted speed limit of 35 mph. The typical section of a Secondary Arterial is comprised of 110 feet of right-of-way width with 4 lanes of traffic and target speeds ranging from 35 to 40 mph. Denton County currently has no plans to expand this roadway.
- **Gribble Springs Road** is a Denton County roadway classified as a secondary arterial per the Denton 2022 Mobility Plan. The section of this roadway abutting the subject property is currently constructed as 2-lanes and a posted speed limit of 35 mph. The typical section of a Secondary Arterial is comprised of 110 feet of right-of-way width with 4 lanes of traffic and target speeds ranging from 35 to 40 mph. Denton County currently has no plans to expand this roadway.

SURROUNDING ZONING AND USES:

Northwest: Extraterritorial Jurisdiction (ETJ) 1 & 2 Zoning: None (ETJ 1 & 2) Use: Undeveloped, Agriculture, Single-family residential	North: FM 2153, ETJ 1 Zoning: None (ETJ 1), RR Use: Undeveloped, Agriculture, Single-family residential	Northeast: Zoning: RR Use: Undeveloped, Agriculture
West: FM 2164, ETJ 1 & 2 Zoning: None (ETJ 1 & 2), Rural Residential (RR) Use: Undeveloped, Agriculture, Single-family residential	SUBJECT PROPERTY	East: FM 2153, ETJ 1 Zoning: None (ETJ 1), RR Use: Undeveloped, Agriculture, Single-family residential
Southwest: ETJ 1 Zoning: None (ETJ 1) Use: Undeveloped, Agriculture, Single-family residential	South: Gribble Springs Road and Shepard Road Zoning: None (ETJ 1), RR Use: Undeveloped, Agriculture, Single-family residential	Southeast: FM 2153, Shepard Road Zoning: None (ETJ 1), RR Use: Undeveloped

CONSIDERATIONS:

A. Section 2.4.5.E of the DDC provides approval criteria applicable to all applications.

1. *General Criteria*

a. *Unless otherwise specified in this DDC, City review and decision-making bodies must review all development applications submitted pursuant to this subchapter for compliance with the general review criteria stated below.*

The review criteria were applied as required.

b. *The application may also be subject to additional review criteria specific to the type of application, as set forth in sections 2.5 through 2.9.*

Section 2.7.1D of the DDC applies to this Comprehensive Plan Amendment request. An analysis of this request per those criteria can be found below in Consideration B.

- c. *If there is a conflict between the general review criteria in this section and the specific review criteria in sections 2.5 through 2.9, the applicable review criteria in sections 2.5 through 2.9 controls.*

There are no conflicts between the general criteria and the criteria specific for comprehensive plan amendments.

2. *Prior Approvals*

Under the direction of the City Council, approximately 1,652 acres of the subject property was annexed in 2008 with the remaining 848 acres following suit in 2009. The annexation ordinances stated the annexation's purpose was to allow the city to ensure development consistent with the Denton Comprehensive Plan. There was no significant discussion regarding the future land use of this area during the adoption of the Denton 2040 Comprehensive Plan, and the plan update ultimately carried forward a land use designation consistent with the previous plan and the existing agricultural use of the property.

On March 4, 2025, the Denton City Council passed a resolution of support for the creation of a Municipal Management District (MMD) to be considered during the State of Texas' 2025 Legislative session, during which the Legislature approved the creation of the MMD.

There are no other prior land use approvals, plans, development agreements, or plat approvals.

3. *Consistent with the Comprehensive Plan and Other Applicable Plans*

The decision-making authority:

- a. *Shall weigh competing goals, policies, and strategies.*

The Denton 2040 Comprehensive Plan contains goals related to land use, fiscal and economic vitality, community character and urban design, parks and the environment, housing, community health and safety, infrastructure, and mobility. Saff acknowledges the following competing goals related to this proposal:

- Goal LU-1: Grow Compactly – Achieve sound, sustainable growth in compact development patterns with balanced land uses planned in coordination with transportation and infrastructure systems.
 - *The above-stated goal calls for a compact development pattern within the City, and this development does not immediately follow that goal as the property is somewhat isolated from the City's core. However, this must be balanced with the growth patterns for the DFW region, which has seen substantial growth northwards in Collin and Denton Counties in recent years and has lead to progression on plans for the Denton County Outer Loop that would provide connection directly from the Colling County Outer Loop to I-35N and bring substantial demand for growth to this area.*

- *Additionally, Action 2.4 calls for use of the Denton Mobility Plan and Capital Improvement Plan (CIP) to coordinate mobility and infrastructure planning to be consistent with the Land Use Element, and today's these adopted infrastructure plans are in conflict with the Agriculture land use designation. Each of the three proposed secondary arterials that transect the subject property are intended to support approximately 29,000 trips per day, which translates to a density significantly higher than the 1 unit per 5 acres prescribed by the Agriculture FLUM. Similarly, the 2018 Water Distribution System Master Plan and coordinated capital improvement projects anticipated different development within this area, extending the Central Pressure Plane to cover the entire subject property and proposing to increase the capacity of the pump station, water treatment plant at the Lake Ray Roberts Water Treatment Plant by 2028.*
- **Goal LU-4: Grow Resourcefully – Manage growth for wise use of land resources with staged, contiguous, and compatible development.**
 - *Action 2.11 calls for promotion of the development of Master Planned Communities (MPCs) and Planned Developments that are consistent with the long-term vision of the Preferred Land Preservation Plan and FLUM. Although the proposed amendment would change the FLUM of the subject property in a way that would facilitate non-contiguous development, it would not conflict with the Preferred Land Preservation Plan as existing regulations and easements on the property ensure existing ESAs and anticipated wildlife corridors on the property would be preserved. The proposed MPC designation would allow the city to ensure that a subsequent planned development considers the City's long-term vision.*
- **Goal FEV-5: Design a fiscally advantageous land use pattern paired with fiscally responsible infrastructure management and investment.**
 - *Action 3.10 calls for utilizing fiscal tools that incentivize development while offsetting its cost to the community. Being one of the largest contiguous areas owned by a single entity remaining within the city limits, the requested amendment provides the City with support to negotiate specific components of a master planned community with interested developers to minimize infrastructure costs and ensure adequate community amenities are provided to support development within the subject property as well as the surrounding areas both within the city and the city's ETJ. Support of a Municipal Management District, as a fiscal tool, is intended to require future residents to pay for future infrastructure without causing the city to incur additional debt to fund improvements within this area. Additionally, the use of development and operating agreements with the MMD ensures the developer and district partner with the City for completion of significant infrastructure projects identified on the City's mobility and utility master plans.*
- **Goal FEV-6: Ensure that new development pays its fair and proportionate share of the cost to maintain current levels of services such as public safety, parks and recreation, streets, and utilities.**

- *Action 3.14 calls for working with developers to share the cost of necessary public service investments and Action 3.15 calls for establishing dedicated revenues to fund necessary expansions of capital infrastructure to accommodate growth. As discussed above, the MPC designation and creation of the MMD provides support to negotiate this cost share through development and operational agreements that would account for the construction of adequate infrastructure and facilities needed to serve the development.*
 - Goal HN-1: Develop and maintain a housing stock that meets the needs of all residents with a diverse array of choices in type, cost, and location.
 - *Action 7.6 calls for encouragement of innovative housing development in mixed-use centers and corridors, Master Planned Communities (MPCs), and through residential development in rural areas that protect rural character. Accordingly, the requested amendment would provide for the creation of a Master Planned Community for 2,500 acres located at the northern most edge of the City and would include up to 7,091 single-family residential units, 1,084 townhome or zero-lot line units, and 1,015 multifamily residential units which could be reallocated towards townhome or zero-lot line units.*
- b. *May approve an application that furthers the overall goals of the Comprehensive Plan even if the development does not match the future land use designation in the Comprehensive Plan.*

The request is to amend the future land use designation. As discussed above, the proposed amendment would help meet other goals of the Comprehensive Plan. It is important to note that while the proposed MPC designation may not initially appear consistent with the Rural Areas and Agriculture designations that would remain on surrounding properties in the area, the vast majority of those areas that are shaded on the FLUM are within the City's ETJ. While the City may have established a vision for how those areas could be used should they annex into the City someday, the City does not have any land use authority to control what develops on those properties. This is already being seen with applications for Municipal Utility Districts in the northernmost portions of the City's ETJ adjacent to Sanger.

4. *Compliance with this DDC*

- a. *The proposed development shall comply with all applicable standards in this DDC, unless the standard is to be lawfully modified.*

This request is for a Comprehensive Plan Amendment, which provides the City's policy direction, but cannot be used to modify development standards. Therefore, any future development of this site must comply with applicable standards in the DDC unless those standards are modified through the Planned Development application.

- b. *Compliance with these standards is applied at the level of detail required for the subject submittal.*

The request is for an amendment to Denton 2040 Comprehensive Plan FLUM and has provided sufficient detail for the subject submittal. Subsequent applications associated with development of parcels within the subject property must provide an increasing level of detail to demonstrate that the proposal will be able to meet the standards in the DDC.

5. *Compliance with Other Applicable Regulations*

This proposed Comprehensive Plan Amendment complies with all other applicable regulations. Subsequent applications associated with the future development of the property must also demonstrate compliance at the time of review and approval.

6. *Consistent with Interlocal and Development Agreements*

There are currently no interlocal or development agreements for the subject property. The City Council provided consent to the creation of the Municipal Management District. As discussed herein, there are pending development and operational agreements tentatively scheduled for City Council action at the December 2, 2025 meeting.

7. *Minimizes Adverse Environmental Impacts*

As discussed above, a set of Floodplain, Water Related Habitat and Riparian Buffer ESAs exists onsite, nested within existing FEMA floodplain. City review of any future proposed development would require civil engineering plans and a full analysis of all site conditions, including ESAs, drainage, and tree preservation. Any proposed impacts to confirmed ESAs beyond the limited scope of encroachments permitted by the DDC will require approval through the Alternative ESA Plan process prior to any land-disturbing activity. Furthermore, development of the site must meet all DDC tree preservation requirements, and due to the nature of the floodplain on the site it is contained within a flowage easement controlled by the Corp of Engineers, further limiting what modifications could occur to that part of the property.

8. *Minimizes Adverse Impacts on Surrounding Property*

9. The proposed revision to the Future Land Use Map minimizes adverse impacts on surrounding property. The Master Planned Community Future Land Use designation would provide support for a large-scale development establishing the land uses, densities and intensities of development, and character of the area. Due to the size of the subject property, having development of it planned comprehensively will be advantageous to residents in the surrounding area much more so than if development of the land area were to occur in a piece-meal fashion, because this gives the City an opportunity to ensure connectivity and public access to parks, open spaces, and trails throughout the development as well as providing for visual consistency in the design of perimeter fences, buffers, and landscaping. *Minimizes Adverse Fiscal Impacts*

No Fiscal Impact Analysis was completed for the requested Future Land Use Map amendment as no development plans or change of zoning are proposed with this project. Fiscal Impact Analyses will be completed with any future rezoning requests. It can generally be assumed that commercial and industrial development will increase revenue compared to the limited uses allowed today such as large-lot single-family homes and agriculture.

10. *Compliance with Utility, Service, and Improvement Standards*

This proposed Comprehensive Plan Amendment is not expected to negatively impact utilities, services, or improvement standards. The proposed Master Planned Community designation is intended to encourage the development of cohesive mixed-use development with phased construction of utilities, services, and improvements in compliance with the City's standards. Additionally, as discussed herein, a MMD has been created to help support the extension of utilities and infrastructure to the development, and the City Council will be asked to consider entering into project and operating agreements with the developer and the MMD related to these projects.

11. *Provides Adequate Road Systems*

As discussed above, the applicant has concurrently submitted a request to amend the Thoroughfare Map portion of the Mobility Plan to adjust a portion of a proposed west-to-east roadway alignment south to avoid multiple encroachments into floodplain related encumbrances, specifically at the widest point of the floodplain. The applicants utilized a Traffic Demand Model to confirm adequate road capacity exists as provided by the existing built conditions and classifications of future internal and perimeter roadways. Therefore, there are no proposed changes to the classification of these future roadways. A detailed analysis of the roadway conditions is provided for in the Mobility Plan Amendment Request (MPA25-0003), which is also on the Planning and Zoning Commission's November 19, 2025 Agenda.

12. *Provides Adequate Public Services and Facilities*

This Comprehensive Plan Amendment request will not affect public services and facilities. As stated above, the Master Planned Community FULM designation is intended to encourage comprehensively planned out public services and facilities. The companion Planned Development application (PD25-0003), which is also on this same agenda for consideration, includes a development plan that reflects the inclusion of parks, school sites, and public safety facilities throughout the development.

13. *Rational Phasing Plan*

As stated in the project narrative, the applicant anticipates a complete development of the entire 2,499-acre subject property. The Master Planned Community designation provides support for a Planned Development zoning district that includes a rational phasing plan. This phasing plan can be found with the other PD application materials under agenda item PD25-0003.

B. Section 2.7.1D of the DDC states that an application for a Comprehensive Plan Amendment may be approved only following a determination that the proposed amendment:

1. Is consistent with the overall purpose and intent of the Comprehensive Plan and that any one of the following criteria has been met:

a. *There was an error in the original Comprehensive Plan adoption;*

The Future Land Use Map was based upon an existing land use analysis, growth capacity, and the preferred growth concept. The Agriculture designation was not an error and reflected existing conditions at the time. However, as discussed herein, the Denton 2040 Comprehensive Plan underestimated the City's population growth projections, the City's ETJ has experienced significant growth and development pressure, and TXDOT's plans for the construction of the Denton County Outer Loop have significantly progressed since the Plan's adoption. Additionally, the Denton 2040 Comprehensive Plan was only intended to serve as an update to the existing Denton Plan 2030, meaning extensive analysis and substantive changes to the plan were not made. Based on the meeting records, robust discussion did not occur concerning the land uses appropriate for the tracts of land near the northern most edge of the City during this update, and the land use assumptions that previously existed were carried forward based on no change to existing land uses at that time. Therefore, while a specific error did not occur with the adoption of the Denton 2040 Comprehensive Plan, it is possible that the limited scope of the update did not account for all conditions, as detailed further in the considerations below. The applicant has stated that market conditions are now ripe for the development

of the subject property. Hence the applicant's seeking consideration of this amendment at this time.

- b. *The City Council failed to take into account then-existing facts, projections, or trends that were reasonably foreseeable to exist in the future;*

The City Council did not fail to take into account then-existing facts regarding development or land use in the area. Staff only recently began receiving serious development inquiries for the subject property that were inconsistent with current zoning and the Future Land Use designations. However, as discussed under consideration A.3 above, projections and trends prompted both the 2022 Mobility Plan and the 2018 Water Distribution system Master Plan to reflect infrastructure improvements within the area to support substantial growth and development. The roadways reflected on the 2022 Mobility Plan for the area are consistent with both Denton County and TXDOTs planned roadway capacity in the area as well, which includes the extension of the Outer Loop. Recent development inquiries were likely spurred by development trends to the east of the City as well as TXDOT's progressing plans for the Denton County Outer Loop.

- c. *Events, trends, or facts after adoption of the Comprehensive Plan have changed the City Council's original findings made upon plan adoption; or*

The Denton 2040 Comprehensive Plan identified a population of 139,869 supported by 58,085 total housing units in 2020. Assuming a 3.19% annual growth rate and using an average household size of 2.41 persons per household, the Plan projected a population of 229,192 and a housing demand of 95,179 units by 2040. Since the adoption of the Denton 2040 Comprehensive Plan, the City has seen population growth that exceeds what the Plan estimated.

Following the update of the Denton 2040 Comprehensive Plan, the US Census American Community Survey (ACS) estimated the city's population at 158,361 in 2023, reflecting an annual growth rate of approximately 4.4% as opposed to the 3.1% assumed by the Plan. Should this trend continue, the City could instead anticipate a population of 331,369 and housing demand of approximately 137,498 units, 42,319 more units than anticipated in the Plan by 2040. Per City permitting data and DCAD annual housing data, the City's inventory of housing units, completed and platted for construction as of October 2024, is approximately 73,053 units. It is key for the City to plan for the development of the additional 64,445 units needed to support these updated population projections. This information was presented in a work session to the Planning and Zoning Commission on January 2, 2025.

The Texas Demographic Center indicates the City of Denton's population as of January 2025 to be 166,205. This more recent population estimate is consistent with the ACS data noted above and indicates the City is continuing to grow at a rate of more than 4% annually rather than the 3% estimated in the Plan. The approximately 4% annual growth that has been seen since 2020 is consistent with the growth rate that was projected by the City's previous Comprehensive Plan, the Denton Plan 2030. These estimate, coupled with the tremendous overall growth consistently seen over the last few years in the broader DFW area, indicate that the population growth trends projected by the Denton 2040 Comprehensive Plan are not accurate and will need to be updated in the near future.

The proposed amendment is intended to provide support for the master planning of a community containing a significant portion of the additional housing units that would be needed to support the City's growing population.

- d. *Events, trends, or facts after adoption of the Comprehensive Plan have changed the character or condition of an area so as to make the proposed amendment necessary*

An increased interest in Infrastructure Finance Districts (such as Municipal Utility Districts) coupled with private development patterns around the City's rural fringes and within the ETJ seem to indicate an increase demand for City services at a level that is largely beyond the City's control. The proposed Master Planned Community designation would support the master planning of this large area in a way that is flexible to help meet these development pressures without being vulnerable to market trends by providing adequate land area for development within City limits which allows for a mix of uses while remaining compatible with the surrounding rural area in design.

2. *In addition to the above-listed criteria, any proposed amendment is subject to the following additional review standards:*

- a. *That the amendment is not in conflict with any portion of the goals and policies of the plan.*

The proposed amendment is not in conflict with the overall goals and policies of the plan. The intent of this amendment is to encourage the master planning of this 2,499-acre contiguous tract of land. The Comprehensive Plan calls for compact development in conjunction with infrastructure improvements as well as preservation of the rural fringe. Given that there are very few large tracts of undeveloped land within the City limits, as noted above, the City has seen a proliferation of this type of development in its ETJ as Municipal Utility Districts, over which the City has very limited control. This amendment will facilitate a strategically planned development of one of the last large common-ownership tracts within the City limits, rather than encouraging continuation of the development within the City's ETJ where the City has little land use controls.

- b. *That the amendment constitutes a substantial benefit to the city and is not solely for the good or benefit of a particular landowner or owners at a particular point in time.*

As discussed throughout, the proposed amendment is intended to provide support for a comprehensive approach to the development of a fiscally responsible mix of land uses and infrastructure construction that would ultimately serve this development as well as surrounding developments under the City's services.

- c. *The extent to which the proposed amendment and other amendments in the general area are compatible with the land use goals of the plan and that they avoid creation of isolated uses that will cause incompatible community form and a burden on public services and facilities.*

The proposal is compatible with the land use goals as discussed above and would not create isolated uses. The Master Planned Community FLUM designation encourages a mix of uses and strategically planned construction of public utilities and facilities.

- d. *That the development pattern contained in the existing plan does not provide adequate and appropriate optional sites for the use or change being proposed in the amendment.*

The existing plan assigns a Rural or Agricultural FLUM designation to the vast majority of land that was undeveloped or used for agriculture at the time of the Plan's adoption. As discussed above, this approach did not consider growth trends in the broader region that were accounted for in the City's Mobility Plan and infrastructure master plans. Because of these ongoing growth trends and the City's lack of ability to regulate land use in the ETJ, a significant portion of the land that was indicated for Rural or Agriculture use in the City's western and northern ETJ areas has since been planned as moderate density residential developments as Municipal Utility Districts. Within the City limits, aside from the existing Master Planned Communities (Landmark, Cole Ranch, and the Hills of Denton), the subject property is the last large (2,000 acres or more) contiguous area of land owned by one entity currently where a similar type of development can occur under City land use authority.

- e. *That the impact of the amendment, when considered cumulatively with other applications and development in the general area, will not adversely impact the city or a portion of the city by:*
- i. *Significantly altering acceptable existing land use patterns;*

The amendment is not anticipated to result in undesirable land use patterns. As discussed herein, the proposed Master Planned Community designation is intended to provide support for the strategic planned development of a comprehensive mix of land uses and the public spaces, utilities, and facilities needed to serve this development and improve service to surrounding areas. The applicants have concurrently submitted a Mobility Plan Amendment to shift a section of the existing west-to-east Secondary Arterial transecting the site to avoid multiple encroachments into the existing floodplain, especially at its widest point. Additionally, the applicant has applied for a Planned Development to establish the zoning necessary for a new mixed use master plan community including 338 acres of park land, approximately 13.5 miles of trails, three sites reserved for Denton and Sanger Independent School Districts (ISD), and up to 7,091 single-family residential units, 1,084 townhome or zero-lot line units, and 1,015 multifamily residential units that may be reallocated towards additional townhome or zero-lot line units. This proposed rezoning would alter the existing land use pattern by allowing for a density of up to 3.4 dwelling units per acre rather than the 1 unit per 5 acres prescribed by the Agriculture FLUM designation, but it would not introduce more intense uses such as heavy industrial and manufacturing. Additionally, when considering the proximity of this development to the City of Sanger and the other planned Municipal Utility Districts in there intermediate ETJ areas between this and Sanger, this will not result in a significantly different or out of place mix of uses in the area by the time this development is complete. This change is balanced by the pending agreements related to the development and operation of the MMD which proposes sharing responsibility to provide infrastructure and providing for a taxing structure where the new development pays its proportionate share of costs for extending public services. These are separate applications and should be considered as individual requests. The simultaneous consideration of the Comprehensive Plan Amendment, Mobility Plan Amendment and Planned Development requests within the same meeting agenda is intended to provide the Commission with a transparent and comprehensive look at the intended development of the property. The operating and development agreements applicable to the property will be considered by City Council separately. These requests are not anticipated to adversely impact the City or any portions thereof.

- ii. *Having significant adverse impacts on public services and facilities that are needed to support the current land use and that cannot be mitigated to the maximum extent feasible;*

As discussed above, the master planned community designation encourages subsequent development applications and zoning be established in a way that provides for adequate public services and facilities needed to support the existing and proposed land uses while minimizing costs incurred by the City.

- iii. *Adversely impacting environmentally sensitive areas or resources; or*

The proposed modification to the Future Land Use Map would not limit the City's ability to regulate tree preservation, stormwater, and development activity within Environmentally Sensitive Areas.

- iv. *Adversely impacting existing uses because of increased traffic on existing systems.*

Existing uses in this area include large lot residential, undeveloped property, and agriculture. The applicant has utilized a Traffic Demand Model to confirm adequate road capacity exists provided by the existing built conditions and classifications of internal and perimeter roadways. Traffic Impact Analysis of each phase of development will determine improvements needed to roadways internal and external to the subject property. The phased construction of adjacent roadways shall require future coordination with TXDOT and Denton County. Regardless of this amendment, the design of TXDOT's proposed Denton County Outer Loop will continue to progress.

- f. *That site conditions, including but not limited to topography, utility corridors/easements, drainage patterns, noise, odors, or environmental contamination, would make development under the current plan designation inappropriate.*

The following site conditions related to the subject property could limit the development of the site under the current designation:

- **Zoning:** Under the current Future Land Use designations, appropriate zoning districts are limited to the Rural Residential. This zoning district and its permitted uses are no longer appropriate for this corridor as the property is adjacent to a future TxDOT Outer Loop. Recent development in the area and development inquiries include denser residential developments representing a much more efficient use of land to accommodate the significant population growth in the broader area.
- **Access:** The Traffic Demand Model indicates that surrounding roadways provide adequate access for a master planned community with varying densities and land uses. A Traffic Impact Analysis will be required prior to all future development to ensure adequate roadway access is provided within the subject property.
- **TXDOT Improvements:** Regardless of this amendment, the design of TXDOT's proposed Denton County Outer Loop will continue to progress. The Denton County Outer Loop is part of a regional highway system, extending east from I-35 North to Collin County and south through Rockwall and Kauman Counties and is intended to serve as freeway connecting these regions. The current Future Land Use designations of Agriculture is not appropriate directly adjacent to this type of corridor.