

January 30, 2026

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Via E-Mail

Tez Hawkins, Planner
Town of Eagle, Community Development
200 Broadway
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Re: Preliminary Subdivision Plan Application for 104 Capitol Street, 110 Capitol Street, 124 Capitol Street, 130 Capitol Street, 217 East Second Street, 103 Howard Street, 123 Howard Street, and 137 Howard Street

Dear Tez:

This firm represents Eagle Multifamily LLC (the “**Applicant**”), with respect to certain real property located at 104 Capitol Street, 110 Capitol Street, 124 Capitol Street, 130 Capitol Street, 217 East Second Street, 103 Howard Street, 123 Howard Street, and 137 Howard Street (the “**Lots**”) in the Town of Eagle (the “**Town**”). This letter is submitted in support of the Applicant’s request to consolidate the Property, consisting of eight lots, into a single lot pursuant to the Town’s Land Use and Development Code (“**LUDC**”) (the “**Application**” or “**Prelim Plan**”). As you are aware, a separate Right of Way Vacation application is being processed concurrently with this Application, as it is required for complete consolidation of the Property into a single lot as contemplated herein.

This Application is step two in a three step Major Subdivision Process, with the first step – Sketch Plan – having been completed in May of last year. Prior to submitting this Application, the Applicant’s representatives, Diana Caruso Jenkins, Cory Rutz, and Alison Perry, met with Town staff, Peyton Heitzman, Tez Hawkins, Ryan Johnson, Tom Gosiorowski, and Richard Peterson-Cremer, to discuss this Application on October 28, 2025.

A. Property Background and Context

The Lots total approximately 1.4348¹ acres of land occupying the northwest quadrant of the intersection of East Second Street and Howard Street. The Lots comprise the entirety of the block, except for the Town’s Right of Way which is approximately .0918 acres and runs north to south through the center of the block, accessible from East Second Street and dead-ending prior to where it would intersect Grand Avenue, if not for the inaccessibility due to grade change. If the Right of Way Vacation application is approved, as necessary in connection with the contemplated Project (defined below), the Project area will be approximately 1.53 acres, which is the acreage

¹ As provided in the Existing Conditions Site Map, by Marcin Engineering LLC, dated October 16, 2024.

referenced throughout this Application with respect to the final consolidated lot request. The Lots together with the existing Right of Way are referred to herein as the “**Property.**”

The Property block is bound by East Second Street, Howard Street, Grand Avenue, and Capitol Street. Currently, the Property consists mostly of a vacant dirt lot, except for a remaining two-story structure, shed and single wide mobile home in the southwest quadrant of the Property. Directly east across Howard Street is the United Methodist Church, an approximately 14,847 square foot structure that sits somewhat uphill from the Property. Further north on the east side of Howard Street are two single-family homes. South of the Property, on the south side of East Second Street, sits a two-story single-family home and a two-story commercial structure. To the east of the Property, across Capitol Street, are a single wide mobile home and two two-story structures. Directly north of the Property is Grand Avenue and a stretch of the Eagle River.

The Applicant intends to redevelop the Property and the balance of the block as a multi-family residential in-fill development that will provide an activated entry to Town from Grand Avenue, significant affordable and local employee housing and underground parking in support of a pedestrian-focused community asset just one block from Historic Downtown Eagle (the “**Project**”). The Project will include eight multi-family residential buildings with 101 total units, consisting of 43 one-bedroom units, 46 two-bedroom units, and 12 three-bedroom units, with each unit having private outdoor space.

As noted above, this Prelim Plan is the second of three steps in the Town’s Major Subdivision process. Although the request herein removes lot lines (i.e., consolidating the lot rather than dividing lots), Town staff made the determination that a Major Subdivision process would be required. We note this to explain any confusion that may arise during the review process and to clarify that no new lots are being created by this Application. This Application requests the Lots be consolidated into a single lot, which concurrently requires Right of Way Vacation.

We respectfully request the Project applications, inclusive of the Rezoning, this Prelim Plan and the Right of Way Vacation, be reviewed and approved concurrently, if feasible. We appreciate the Town’s willingness to work with the Applicant team to date and look forward to continuing to collaborate on the most efficient path towards review and approval of all applications in connection with the Project.

B. Analysis of Prelim Plan Criteria.

Pursuant to LUDC Section 4.17.100.D.3.d., the Planning and Zoning Commission shall review and recommend on and Town Council shall review and decide on the preliminary plan application based on the following criteria:

1. *Comprehensive Plan. The preliminary plan is consistent with applicable provisions of the Comprehensive Plan.*

The Project will further a significant number of 2021 Amended Elevate Eagle Comprehensive Plan (“**Comp Plan**”) Goals and Policies. A summary overview of the Project’s Comp Plan consistency is provided in **Attachment A** hereto.

The Applicant team understands the concept of “density” was discussed frequently during the Sketch Plan process. The density concept with respect to the Comp Plan is discussed thoroughly in the Rezoning

application narrative (*See* Rezoning application narrative Section B.1), which describes how the Project meets Comp Plan density recommendations. As explained below, the Rezoning application narrative is a more relevant location for this discussion and, therefore, will not be detailed in full herein. If Town staff, Planning & Zoning Commission or Town Council would like to see the discussion repeated in this narrative, the Applicant team would be happy to do so, but in the interest of Town resources and efficiency, this Comprehensive Plan criteria section focuses more closely on the impacts of the Prelim Plan and, particularly, the consolidation of the Lots.

For clarity-sake the following is a high-level explanation of why the density concept is best considered in connection with the Rezoning Application, then below is an analysis of the Prelim Plan's Comp Plan consistency.

The Sketch Plan process clarified the Planning & Zoning Commission and Town Council positions that "density" can be based on two separate considerations: (a) density based on dwelling units which regulates development in the form of a maximum dwelling unit cap and (b) density of physical building structure, also referred to as the bulk and scale of buildings, which regulates development by restricting use of property with measurable development standards. Each of these conditions are regulated by zoning or the appropriate zone district, which then applies either (a) a dwelling unit per acre permission and/or (b) bulk and scale requirements in the form of development standards. The Applicant team understands that Planning & Zoning Commission and Town Council have chosen to regulate density in the CMU1 district's (the ultimate zone district of the Property, if approved through the Rezoning application) bulk and scale, rather than a dwelling unit per acre standard as contemplated by the Comp Plan. For this reason, so long as the Project complies with the underlying zoning, the proposed density does not result in Comp Plan inconsistency.

Aside from the Comp Plan's dwelling unit per acre recommendations, the Future Land Use Map ("FLUM") provides anticipated land uses. The FLUM contemplates the Property and surrounding areas be developed to support residential multi-family uses. Both the Medium Density Residential and Downtown Neighborhood detail sheets (the existing classifications for the Property on the FLUM) note primary uses include "multi-family"² consistent with the Project. This multi-family land use type is particularly advanced by the Prelim Plan. The Project contemplates primarily for-sale housing units with integrated amenities and systems, characteristics of multi-family development. In particular, the resulting advancement of the proposed lot consolidation allows resources to be pooled, resulting in larger, higher quality shared spaces throughout the development. For example, without the lot consolidation, the underground parking garage is not possible and, therefore, a large surface-level parking lot would be required in connection with the Project, encompassing what could be natural space land area or dwellings. Having multiple small lots and major Project disconnection would also require additional utility infrastructure independently serving each building and, again, using that space for accessory infrastructure rather than housing more individuals and families. Finally, a disjointed development with multiple separate lots cannot provide a consistent outdoor space for residents. As contemplated, the Project will provide a 7,140 square foot courtyard. This is a significant increase from the original Project design which envisioned two smaller, discontinuous courtyards at approximately 2,000 square feet each. The

² Comp Plan, pgs. 36 and 41.

Applicant team appreciates the Town’s feedback on the courtyard and is excited about the new courtyard space that the building reduction and reconfiguration could provide.

With respect to the Prelim Plan itself and its functionality in the overall Project, the following Comp Plan goals are specifically advanced.

- a. Elevating Our Inclusive Culture. The Eagle community is defined by our welcoming spirit, our appreciation of our neighbors, and support of one another.
 - i. Goal 1-1. Promote a wide range of attainable housing opportunities for young adults, families, aging residents, workforce, and others.

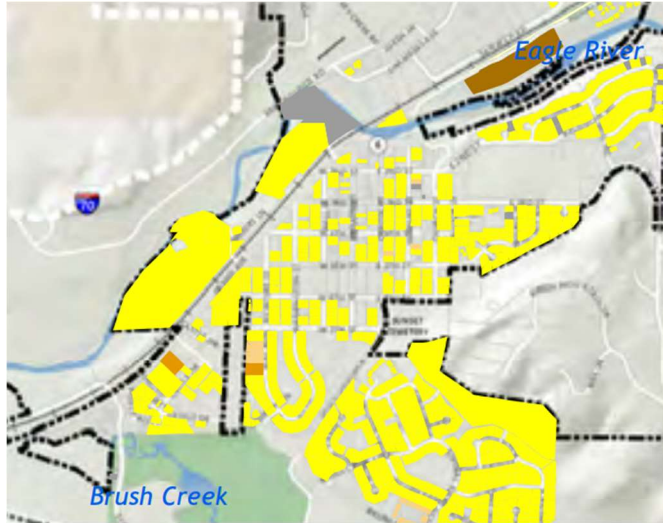
Policies Directly Supported by the Project:

1-1.1. Ensure a healthy mix of housing types and densities (e.g. Single-family, duplex, multifamily, mixed use, and accessory dwelling units) to allow for greater diversity.

1-1.2. Promote and encourage additional senior housing. Utilize the findings from the Eagle County Housing Needs Assessment to determine what regulations are needed, what the demand is, and appropriate areas for senior housing.

1-1.3. Stimulate the creation of workforce housing through town policies, incentives, and regulatory procedures. Collaborate with community partners and the private sector to expand the reach of Eagle’s workforce housing efforts.

The Project contemplates a multi-family residential development of eight separate buildings each providing varying unit sizes – ranging from one to three bedrooms. This variation in bedrooms provides options within the Project, and, essentially, the Project would provide one of the few multi-family housing types in the area with significant single-bedroom dwelling unit availability. Therefore, this Project ensures “a healthy mix of housing types and densities to allow for greater diversity.” Policy 1-1.1. As detailed above, a lot consolidation allows for integrated amenities and systems so that a larger portion of the bulk and scale is utilized for actual housing units rather than the supplemental infrastructure required to support such housing units. Though assumedly somewhat outdated, the below Comp Plan excerpt shows multi-family 4+ unit developments in brown, reflecting no multi-family 4+ unit development within close proximity to downtown, except Eagle Villas just north of Highway 6.



*Figure 4, Comp Plan, p. 82, Excerpt of “Map 2.4 Housing Types in the Town of Eagle - Prepared by Logan Simpson Design” *Multi-family 4+ unit developments in brown.*

Additionally, the Project will “[p]romote and encourage additional senior housing” options, since “a diverse housing stock is a determining factor in retaining older residents based on the ability to down-size or stay in the community.”³ Policy 1-1.2. A multi-family housing option is a particularly desired option for senior community members who seek a home with lower maintenance requirements⁴, centralized and community maintained mechanical systems, compact amenities, and the option to enjoy independent living without becoming isolated outside of the community core. This includes easily accessible garage parking, continuous sidewalks, elevator service, ADA access throughout, bike charging and garage level storage.

Lastly, Policy 1-1.3 seeks stimulation of the creation of workforce housing and notes the need to collaborate with “the private sector to expand the reach of Eagle’s workforce 1-2housing efforts.” Pursuant to LUDC Section 4.02.050.E, the Town’s inclusionary housing requirements for affordable and local employee residency are not applicable to residential developments with less than 10 units. The Applicant team understands that the LUDC only explicitly permits residential developments with 10 units or more in the R-3, R-4, and CMU1 zone districts. This condition resultingly caps the Town’s opportunity for affordable and local employee residences to be developed, unless more properties are brought under R-3, R-4, and CMU1 zone districts. The Property is ideally situated for this purpose.

³ See Comp Plan, p. 83.

⁴ See 2025 Eagle County Regional Housing Needs Assessment, p. 83 (58% of respondents are interested in assistance to maintain home or yard).

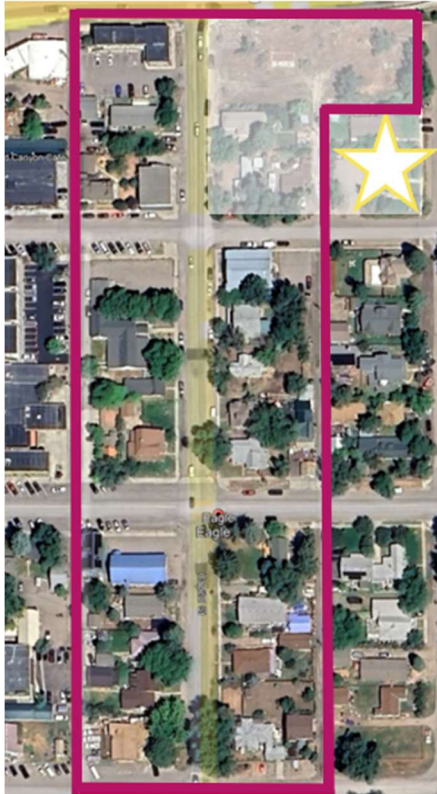


Figure 6

The current locations of R-3 (orange), R-4 (brown), and CMU1 (burgundy) zone districts are reflected in Figure 5 above, an excerpt of the Town zoning map, which shows a roughly .75-mile radius excerpt from the center of Town. All R-3 zoned parcels appear already developed and there are no R-4 parcels in this close proximity to the center of Town. Therefore, the Applicant team understands that the parcels zoned CMU1 are the only remaining parcels that could be developed in a manner that would qualify towards providing *any* affordable and local employee housing near the center of Town.

Of those parcels zoned CMU1, very few are vacant and readily available for multi-family development of 10 or more units. Figure 6 illustrates the current CMU1 zone district boundary and the underlaid 2023 existing conditions. Rezoning the Property provides the opportunity to redevelop an entire Town block. Based on Figure 6, there does not appear to be another parcel with clear ability to immediately provide the high unit count of affordable and local employee housing that the Project could deliver, since the majority of CMU1 is already developed and vacant pockets of land appear to be used for parking. The Project presents a truly unique opportunity to provide a significant amount of affordable and local employee housing that is not currently available near the center of Town, where residents could have convenient access to services, and multi-modal transit.

- ii. Goal 1-2. Expand and diversify the town’s economic opportunities.

Policies Directly Supported by the Project:

- 1-2.5. Provide opportunities for a balanced mix of housing and services to support local businesses, employees, residents, and visitors.
- 1-2.6. As development occurs, ensure the Town’s overall mix of land uses remains aligned with community goals.
- 1-2.8. Encourage continued reinvestment in existing commercial areas.
- 1-2.9. Create a positive business environment that encourages (re)investment and expansion.

In connection with Goal 1-2, the Project offers a unique opportunity to develop housing opportunities in close proximity to downtown. As discussed during the July 18, 2023 Recode hearings, members of the Planning Commission recognize that downtown

businesses cannot succeed without additional people and that CMU1 is “a good transition to increase density for downtown.” The Project not only presents an opportunity for new residents to support businesses, but for individuals seeking employment in the Town to be more likely to do. Housing shortages are a leading factor in towns attracting new employees and retaining existing ones. Without stable housing, people are less likely to move to or stay in a community, which disincentivizes business viability. The Project’s location supports resident’s ability to walk or bike into downtown, take nearby public transit, or easily hop on the highway to commute to jobs throughout the County. Therefore, the Project contributes to a “balanced mix of housing and services to support local businesses, employees, residents, and visitors,” will directly benefit local businesses, and provide the demand needed to “support reinvestment and expansion” of those businesses. Policy 1-2.5, Policy 1-2.8, and Policy 1-2.9.

The Project will “ensure the Town’s overall mix of land uses remains aligned with community goals.” The Project aligns with significant community goals as outlined in the Comp Plan and described herein. Additionally, though, since Comp Plan adoption, the Town adopted an Economic Development Plan in October 2023. The Economic Development Plan highlights the need for residential land uses, which states that “Housing costs and availability [were] the highest impediment to business growth based on survey responses with 63 percent of respondents identifying it as high or somewhat of an impediment... The lack of housing supply and affordable units makes it extremely difficult to attract new employees... This increase in Eagle’s housing supply is necessary for a sustainable economy and economic growth.”⁵ Policy 1-2.6.

- b. Elevating Our Unique Character. The Town of Eagle’s eclectic neighborhoods, framed by Castle Peak, the Sawatch Range, and the Eagle River, provide the ideal setting to celebrate our western heritage and adventurous spirit.
 - i. Goal 2-1. Enhance the vibrancy and viability of downtown. The character of downtown is defined by a small-town neighborhood feel and includes residential blocks as well as commercial and mixed-use. The development style establishes a unique and intimate relationship between buildings and the street. Historic resources are preserved, and new development is reflective of historic development patterns, character, and style.

Policies Directly Supported by the Project:

2-1.5. Encourage sensitive infill development to better support Broadway Street through increased building height, that complements and retains the character, scale, and massing of historic structures.

2-1.7. New development is encouraged to include landscaping consistent with the mature area including extended sidewalks, pedestrian amenities, and parking enhancements.

2-1.8. Create new and enhance existing gathering spaces for social interaction.

⁵ Economic Development Plan, October 2023, page 59.

2-1.10. Encourage, where appropriate, increased density near the Downtown core.

In connection with the Project’s rezoning, the Project will be regulated by the CMUI zone district regulations, which were recently crafted by the Town with the understanding that the CMUI zone district is in close proximity to and, in the case of many parcels, directly abutting the Broadway District. The Project will utilize building heights as permitted under the LUDC and consistent design principles as Town historic structures.

The Project will include landscaping along all frontages and a communal, landscaped 7,140 square foot courtyard for residents – creating “gathering spaces for social interaction” both within the development and along its edges. Policy 2-1.8. By consolidating the block and placing a single parking entry to the proposed parking garage at the north end of Howard Street (a dead end), the Project eliminates as many human-vehicular interactions as possible. This intentional design choice benefits all users of the surrounding streets – pedestrians, cyclists, and vehicle users – by reducing curb cuts and, therefore, potential traffic conflicts, creating a human-focused sidewalk space that can spark human interactions, and encourage multi-modal forms of transit due to having supportive, safe infrastructure to do so. The perimeter treatment of the Project will allow all Town residents and, particularly, surrounding neighbors to safely travel along the perimeter streetscapes of the Property after the Project is completed. Policy 2-1.7.; Policy 2-1.8. Lastly, the Property is well situated to increase density in close proximity to the Downtown core, providing additional residents to enjoy existing businesses. Policy 2-1.10.

- ii. Goal 2-2. Reinforce Broadway Street as the heart of the community, from the Eagle River to Town park. The character of Broadway is defined by a small-town main street feel and includes the commercial heart of the community. Historic resources should be preserved, and new development should reflect historic development patterns, character, and style.

Policies Directly Supported by the Project:

2-2.6. Encourage infill and the redevelopment of rundown, outdated, or underutilized parcels on Highway 6 to support Broadway.



Figure 7

Underutilized parcels along Highway 6 in a location supportive of Broadway Street appear to include three parcels zoned Public & Civic 1 on a hillside adjacent to Bluffs Road and the block in which the Property is located. No other parcels along Highway 6 appear vacant at this time, based on the limited public information available to the Applicant team. Since the Public & Civic 1 parcels appear to have limited development potential, this Policy 2-2.6 seems to be almost directly referencing the block in which the Property is located. As described under Goal 1-2, the best way to support the Town’s businesses is through increased residents who can enjoy those businesses, as the Project will deliver. Therefore, Policy 2-2.6 could not be better served than by the Project which proposes concentrated, residential units, in close proximity to Broadway Street, on an underutilized site along Highway 6.

- iii. Goal 2-3. Celebrate the town’s unique small-town character.

Policies Directly Supported by the Project:

2-3.3. Ensure new development builds upon and adds value to Eagle’s unique community.

The most effective way to add value to community is through its residents. Eagle is a beautiful community comprised of civic-minded, hardworking individuals. Community character derives from its people, and the Project will provide significant construction of affordable and local employee units – within walking distance of the heart of the community.

- iv. Goal 2-4. Connect Eagle’s unique neighborhoods physically and visually through a walkable and trail-oriented environment with high-quality wayfinding.

Policies Directly Supported by the Project:

2-4.1. Enhance pedestrian access and amenities, and public gathering areas to promote social interaction.

As described under Goal 2-1, the Project will include landscaping along all frontages, as well as a communal, landscaped 7,140 square foot courtyard for residents – creating gathering spaces for social interaction both within the development and along its perimeter. Bicycle infrastructure, lighting, and seating areas will support additional community interaction and, notably, the lack of vehicle conflicts will greatly increase safety and comfort within the public realm.

- v. Goal 2-5. Maintain and improve the appearance of Eagle by establishing and reinforcing the town’s identity and sense of place.

Policies Directly Supported by the Project:

2-5.2. Enhance gateways and streetscapes to reflect the Town’s unique identity, providing a clear sense of arrival.

2-5.3. Minimize the extension of mixed-use areas away from the Town Center in order to promote Broadway Street as the heart of the community

As described under Goal 2-1, the Property and balance of the block is positioned adjacent to a major Town entryway – Grand Avenue – yet has remained partially vacant for over a decade. The Project team is working with Town staff to ensure the Project design along and near Grand Avenue is consistent with the Town’s vision for the Grand Avenue Corridor Plan improvements. Policy 2-5.2. Although CMU1 permits a mix of uses, the Project contemplates only residential units and accessory uses to support those residences. The Project team understands that the Town has acknowledged poor pedestrian accessibility from Grand Avenue to the Property, due to grade change,

rendering it better suited for non-commercial uses. The Property and balance of the block is located on the edge of the CMU1 district and, therefore, is well situated to support primarily residential uses, directly supporting the intention behind Policy 2-5.3 to minimize mixed use areas too far from the center of Town. Therefore, future residents will instead travel the three blocks west to enjoy coffee at Red Canyon Café or meet up with friends at Brush Creek Saloon.

- c. Elevating Our Relationship with the Environment. The Town of Eagle celebrates and preserves a unique connection with our environment by minimizing growth impacts to our water and wildlife resources.
 - i. Goal 4-2. Find a balance between recreation and preservation along riparian areas to protect habitats and water quality.

Policies Directly Supported by the Project:

4-2.1. Preserve and protect the quality of and integrity of wetlands, rivers, streams, and riparian areas.

4-2.4. Support and enhance water conservation by implementing the adopted 2020 Water Efficiency Plan.

Policy 4-2.1. is particularly fulfilled through in-fill development and the Town's consistent support thereof. In order to constrain sprawl and an ever-present push to develop housing into currently natural lands, in-fill development should be the Town's first defense. In-fill development is the most attainable way to preserve and protect the quality lands that support wildlife, natural ecosystems and human recreation without rejecting the much-needed housing throughout the Town and surrounding communities. The Property does just that – given its an already disturbed and municipally served site with access to water, sewer, gas, electric and communications infrastructure, as well as the surrounding roadway network.

The Project will provide currently-absent stormwater infrastructure to the Property, which will capture water from Town that flows naturally to the Property. Additionally, the Project infrastructure has been strategically designed to route water from the roofs, walkways and decks, courtyard and surrounding block area to deliver flows to the stormwater system in place at the nearby roundabout and ultimately travel to the Eagle River, where it belongs. By vacating the alley, as contemplated by the Right of Way Vacation application, and creating a fully condensed lot requested by this Prelim Plan, the Project will provide stormwater management for the entirety of the block. As a result, potential erosion will decrease and a more comprehensive stormwater system can be integrated into the Town's existing stormwater system.

With respect to the Town of Eagle Water Efficiency & Conservation Plan (October 2020), greater efficiency will be achieved by block consolidation and creation of the underground parking garage, which allows the Project to provide a central plant to serve residents' hot water, heating and cooling needs. While every unit will have individual controls, utilizing the efficiency of a central plant reduces water and energy use and costs to homeowners.

Throughout the Project, WaterSense certified indoor fixtures will be used and the Project will be constructed in compliance with the current International Building Code, International Residential Code and International Plumbing Code, which reflect modern efficiency standards like reduced maximum flow rates on fixtures. The Project team would be happy to distribute educational materials co-branded with WaterWise/Town of Eagle to future residents of the Project.

ii. Goal 4-3. Support and demonstrate sustainability.

Policies Directly Supported by the Project:

4-3.1. Enhance or create a tree canopy in new development areas or existing urban areas where tree cover is lacking.

4-3.2. Promote energy efficient designs and building codes that encourage energy conscious lifestyles and reduce overall energy consumption. (a. Encourage all construction efforts to utilize green building practices.)

4-3.6. Encourage site designs and alternative transit incentives that reduce the demand for automobile trips in the area.

Currently the northern and eastern portions of the Property are completely devoid of trees and landscaping, and there are minimal plantings in the southwest corner of the Property. Prelim Plan approval will allow an integrated development plan resulting in each block face planted to Town standards, including tree cover, as well as the 7,140 square foot courtyard internal to the Project. The result is a Project that brings tree canopy into the urban fabric for both Project residents, as well as members of the public to enjoy. Policy 4-3.1.

The Project design, and particularly the building layout supported by the Prelim Plan, will result in pooled and, therefore, more efficient resource use to support future residents. This Project will use resources more efficiently and with less waste. For example, each dwelling unit will use less energy per household than single-family homes, largely because shared walls reduce heat loss and gain. Additionally, the larger-scale centralized

systems that will serve dwelling units are more efficient than dispersing these resources throughout 100+ single family homes. The structural steel insulated panels provide higher insulation values than traditional construction which translates to higher heating and cooling efficiency and lower utility costs for residents. Also, in Colorado, it is not uncommon for individuals to heat up their cars in the winter or “remote idle,” but the heated parking garage will remove any need to do so. Policy 4-3.2.

Lastly, but notably, the Project’s concentration of housing units in close proximity to downtown means future residents will have less need for personal vehicle use due to easy, safe access to enjoy Town by walking or biking, as well as convenient access to public transit throughout Town and the greater region. The ability to provide the underground parking garage, fully reliant on lot consolidated requested by this Prelim Plan, directly correlates to an increased in individuals and families having access to such a convenient location to call home. Policy 4-3.6.

- d. Elevating Our Connections. The Town of Eagle strives to offer a variety of technology, communication, and transportation choices to connect our community, locally and globally.
 - i. Goal 5-1. Expand our public transportation network and options.

Policies Directly Supported by the Project:

5-1.2. Enhance ease of active modes of transportation.

5-1.4. Promote the development of compact neighborhoods in close proximity to public transit options, and allowing increased residential, retail, and mixed-use densities in areas close to transit stops.

5-1.5. Support transit-oriented development, and improvements that promote multimodal transportation options.

The Project will significantly improve the pedestrian and cycling experience along Capitol Street, 2nd Street, and Howard Street through use of streetlights, landscaping – including tree cover, protected crossings, and a redeveloped sidewalk network. Additionally, the Project will provide short term outdoor bicycle parking for 11 or more bicycles and private garage storage for resident bicycles and bicycle charging stations in the parking garage. Policy 5-1.2. Compact neighborhoods are characterized by high density development with a mix of land uses in close proximity with accessible transportation options for all. The result is a vibrant, yet resource-efficient community, that avoids unnecessary sprawl. The Project integrates each of these elements as described throughout this Application. Policy 5-1.4. Lastly, the Project is located within

walking distance of three Core Transit stops - Chambers Park-n-Ride, the Fifth Street stop and Eagle County Building stop, each approximately .4 miles away. Policy 5-1.5. The Project location provides an excellent opportunity for individuals who are employed nearby and rely upon public transportation.

ii. Goal 5-2. Improve vehicular traffic circulation.

Policies Directly Supported by the Project:

5-2.1. Ensure adequate access to and appropriate mobility options within the Town. (a) Improve circulation on US Highway 6/Grand Avenue. (b) Design the vehicular network to anticipate future development and transportation needs. (c) Locate high traffic generating land uses close to collector and arterial roadways and transit centers.

5-2.2. Ensure streets effectively accommodate transit, bicycles, pedestrians and other transportation options as determined appropriate.

Upon future feedback from review agencies and traffic consultants, the Applicant will address traffic measures required to address transportation needs. For now, the Project is being considered at an appropriate time whereby the Town is working diligently on the adjacent Grand Avenue Corridor Plan. The Grand Avenue Corridor Plan contemplates an expanded street to carry additional vehicular capacity, along with protected bicycle and pedestrian infrastructure. The Applicant looks forward to continuing to communicate with Town representatives on how the Project and the Grand Avenue Corridor plans can develop efficiently together. The Project will be located on the edge of Town directly adjacent to the main arterial street, allowing easy access to and from the Project without the added impact on the community of channeling additional vehicles throughout the network of Town streets. Policy 5-2.1. The Project will include enhanced public right of ways along each streetscape complete with pedestrian and cyclist infrastructure, as well as easy access to transit within a short walk or drive. The Applicant will work with Town staff and review agencies to ensure proposed plans are appropriate for the area. Policy 5-2.2.

iii. Goal 5-3. Expand the network of safe and convenient pedestrian and bicycle circulation.

Policies Directly Supported by the Project:

5-3.2. Ensure efficient multimodal connectivity between all residential areas and public destinations.

5-3.3. Encourage a compact development pattern.

Currently, much of the surrounding neighborhood, including the Property and surrounding block, lack infrastructure to support the safety and comfort of multimodal users. Supportive infrastructure is present just one block over on 2nd Street between Broadway Street and Capitol Street, so the Project's continuation of such infrastructure will not only serve the Project itself but provide a link to downtown. Policy 5-3.2. With the adjacent compact development just west of the Property, the Property and surrounding block present an opportunity to increase the Town's compact development scheme, which will reduce sprawl into surrounding traditional neighborhoods. Policy 5-3.3.

2. *Sketch plan. The preliminary plan is substantially consistent with the recommendations made by Planning and Zoning Commission and Town Council at sketch plan application.*

As evidenced by this Application, the Applicant team has taken the time required to significantly rework the Project since being introduced at the Sketch Plan phase, in order to fully respond to the recommendations made by Planning and Zoning Commission and Town Council, while ensuring Project viability. Those recommendations and responsive Project elements are detailed as follows:

- a. Items noted in Sketch Plan, Planning & Zoning Commission Staff Report, dated April 1, 2025 and Sketch Plan, Town Council Staff Report, dated May 13, 2025.
 - i. Summary of comments from Town agencies (consistent in Staff Report for both Planning & Zoning Commission and Town Council):

- Town Open Space Department, Eagle County Community Development, CDOT, and CPW provided responses stating that they have no comments or concerns.

Response: Noted.

- Town Public Works Department: *Coordinate on-street or ROW improvements with the Capitol Street Reconstruction Project and Grand Ave Corridor Project; technical comments regarding site-specific civil engineering items, including drainage, sidewalk details, utility alignment and clearances, design of on-street parking, and structural design details; Right of Way Vacation Comments (addressed by Applicant separately in Right of Way Vacation application narrative); need additional traffic information due to existing LOS F and context of Town Grand Ave. improvements.*

Response: The Project team has worked extensively with Town of Eagle Public Works to design an integrated Grand Avenue infrastructure that situates the improved Town sidewalk on the north portion of the Property. Through meetings on July 17, October 3, October 10 and December 9, 2025 a shared retaining wall has been

designed that will create an expanded sidewalk platform and expanded area for Grand Avenue improvements. It also provides a potential platform for public art or aesthetics, as determined by the Town. *See Civil Set provided with this Application.* This design also incorporates a deep well planter for trees and landscaping along the Grand Avenue frontage. *See Architectural Set provided with this Application.*

Parallel parking has been incorporated into the streetscapes and an improved end of street element on Howard Street will replace the concrete crash barriers currently in place. *See Site Plans provided with this Application.*

The Project will provide additional sidewalks, landscaping, lighting and new stormwater infrastructure that does not currently exist throughout and surrounding the Property. The new stormwater management program on the 100 block has been coordinated with the existing Town stormwater system that is in place at the roundabout. *See Drainage Study and Civil Set provided with this Application.*

The Traffic Study has been updated to adjust for the reduction in unit numbers from Sketch Plan to this Application, but also has been re-calculated in the low rise (1-3 stories) apartment category which carries a higher trip count per unit. Note that the previous project plan at the Sketch Plan phase included four stories and utilized the mid-rise (4-7 stories) apartment count (fewer trips per unit). The approach of the current study intentionally shows the worst case traffic generation scenario for a downtown residential building to ensure infrastructure capacity is sufficient. *See Traffic Study provided with this Application.*

- Core Transit: *Applicant should work with the Town to ensure that walksheds between the two nearby transit stops are safe for, and supportive of multimodal use; discuss accessibility to transit for all with Core Transit.*

Response: The Project will provide new sidewalks where none currently exist and a highly improved pedestrian realm, connecting to existing and planned new sidewalks on Grand Avenue with integrated corridor improvements. Sidewalks and access points will be ADA compliant and new lighting will enhance safety throughout. Consistent with the Transit Capacity and Quality of Service Manual (TRB, 3rd Edition), which defines pedestrian access distances of approximately 0.25 to 0.5 miles (5 to 10 minutes), an 8-minute network-based walkshed was applied using actual sidewalk routes. The Property is located approximately midway between two transit stops, each within this 8-minute walking threshold. This configuration falls within accepted transit access standards and supports the assumption that a meaningful share of site-generated trips may be accommodated by transit.

- Town Economic Development and Housing: *Need to provide a housing plan to demonstrate compliance with the LERP Guidelines; Separately, should Capitol Flats pursue an inclusion into the Downtown Development Authority district, the Fiscal*

Impact Analysis will need to be adjusted to include projected assessed valuations for the Eagle DDA as a taxing entity.

Response: In compliance with the LERP Guidelines, the Project will provide 15 restricted AMI units (15%) at or below 140% AMI based on the Eagle County Affordable Housing Guidelines initial sales price matrix, and 35 resident-occupied units (35%). The Project team has discussed annexing into the Downtown Development Authority at some point but currently is not within the Authority's boundaries. The fiscal impact analysis has been provided as supplemental, but not required, information and has been updated to reflect the current plans.

- Town Sustainability Specialist: *Site design recommendations regarding bike signage, providing efficient space for cardboard collection, adding compost infrastructure to align with the Town's net zero action plan, utilizing electricity to power the buildings central plant to remain in line with the Town's net zero carbon emissions by 2030 goal, installing rooftop solar, and integrating sustainable construction materials.*

Response: See below summary of site design contributions in response to the Town Sustainability Specialist comments:

- Use of structural steel framing, brick masonry, and metal siding which support sustainable building practices through material durability, recyclability, and reduced long-term maintenance.
- Bike signage program for Project will create recognizable bicycle corridor through and around the Property. Wayfinding elements will guide cyclists to site entrances, bicycle parking areas, and nearby trail connections while maintaining compatibility with the Project's architectural and streetscape character.
- The centrally located heating, cooling, and domestic hot water plant within the garage is proposed to be fueled by natural gas due to considerations of cost efficiency, operational reliability, and overall environmental performance. A centralized gas-fired system allows for higher thermal efficiency and simplified maintenance compared to distributing individual electric systems across each dwelling unit. Concentrating equipment in a single plant reduces redundancy, improves serviceability, and lowers long-term replacement and repair costs. Studies by the National Renewable Energy Laboratory and the U.S. Department of Energy show that air-source heat pump efficiency declines significantly in cold climates, often requiring supplemental electric resistance heating. Gas-fired systems maintain consistent thermal efficiency across low outdoor temperatures, which can

result in lower peak energy demand and more predictable performance in mountain environments.⁶

- Rooftop solar photovoltaic panels will be integrated to offset a portion of the common-area electrical demand and reduce reliance on grid-supplied power. Solar generation will primarily serve building systems such as corridor lighting, elevators, garage ventilation, and other shared loads. Panel placement will be coordinated with architectural design and mechanical equipment to minimize visual impacts from the public right-of-way and preserve the building’s intended form and character.
 - In coordination with Vail Honeywagon, the Project will provide on-site single stream recycling. Composting will be provided in bear proof bins. On site management will ensure trash, recycling and compost collection stays orderly and sanitary.
 - The Project will provide a dedicated cardboard/recycling collection area, designed to allow easy resident use while maintaining direct service access for collection vehicles, and minimizing conflicts with pedestrian or vehicular circulation.
- CGS: *If conditions indicative of subsidence or sinkhole formation are encountered during construction, an alternative building site should be considered, or the feasibility of mitigation should be evaluated.*

Response: Noted.

- ii. Summary of public comments and Project responsiveness (consistent in Staff Report for both Planning & Zoning Commission and Town Council):

Impression of Impacts	Subject	Detail

⁶ Jon Winkler & Sugi Ramaraj, Field Validation of Air-Source Heat Pumps for Cold Climates (NREL/TP-5500-84745, U.S. Dept. of Energy); J. Winkler et al., Cold Climate Air-Source Heat Pump Demonstration and Analysis: Experimental Study (NREL/TP-5500-89413, U.S. Dept. of Energy).

<p>Negative Impacts</p>	<p>Traffic</p>	<p><i>Concern over traffic to Capitol Street and Howard Street with respect to adjacent neighborhoods and businesses.</i></p> <p><u>Response:</u> Please see updated Traffic Study submitted with this Application. Additionally, please note the site design components like single garage entry, sidewalks, lighting and street improvements which contribute to a reduction in street conflicts.</p>
	<p>Traffic, Pedestrian, and Cyclist Safety.</p>	<p><i>Concerns about safety impacts to the residents and children who recreate along Howard Street North of Second Street the access to the Proposed development.</i></p> <p><u>Response:</u> Any development on this Project will bring some level of vehicle uptick to this Property and the noted streets. The Applicant team is sensitive to this concern of safety and strategically designed the parking garage access with this in mind. Placing the parking garage entry at the top of Howard Street reduces potential conflicts with pedestrians to the greatest extent possible as the vehicle turns (when conflicts most commonly arise) will occur in a location isolated from heavier pedestrian areas. Although there is no way to avoid vehicles being present on Howard Street, this option mitigates safety concerns to the greatest extent possible. Additionally, the surrounding neighbors will enjoy safer, designated pedestrian areas along these streets, and have no concern for curb cuts and pedestrian/vehicle conflicts while travelling down every other portion of the Project street scape. Overall, the new infrastructure will provide a more pleasant atmosphere for vehicles, pedestrians and cyclists travelling the surrounding streets.</p>
	<p>Density and Character</p>	<p><i>Concern that density, scale, mass, and height of the Project do not align with the character of the area and do not protect the adjacent neighborhoods.</i></p> <p><u>Response:</u> The Project has been revised to adhere fully to CMU1 development standards. Additionally, since the Sketch Plan process, the Town amended the LUDC to include a building spacing requirement for the CMU1 zone district, of which the Project complies. Though not regulated by the CMU1 zoning regulations, the Applicant team has already significantly reduced the number of dwelling units in the Project from 171 to 101.</p>

	Parking	<p><i>Removal of existing on-street parking will generate impacts to the surrounding neighborhoods.</i></p> <p><u>Response:</u> The Project now includes on-street parking along Capitol Street, Second Street and Howard Street totaling 20 spaces.</p>
	Demolition	<p><i>Demolition of the building and structures currently taking place before there's a development approval gives the impression that the Proposed Development has been approved and will create undesirable visual impacts of vacant lots.</i></p> <p><u>Response:</u> The Project has multiple entitlements procedures and opportunities for public engagement prior to final development approvals. The Town's noticing requirements will ensure the public is looped into the procedure moving forward.</p>
Positive Impacts	Housing	<p><i>Support for the Proposed Development's affordable and resident occupied housing in this area of the Town.</i></p> <p><u>Response:</u> The Applicant team agrees that this Property and Project type will bring much-needed housing to the community – market-rate housing, employee housing, and affordable housing – in an amount that would be difficult if not impossible to achieve on another property in such great proximity to downtown Eagle.</p>

<p>Infill Development</p>	<p><i>Support for infill development on these parcels with the quality architectural components shown in the application. Commercial development should also be considered here.</i></p> <p><u>Response:</u> The Applicant team is very excited to bring a high-quality, architecturally desirable development to this particular Property near a major Town entry point. Based on the CMU1 district designation, it is understandable that the public may seek commercial on the Property, but the Sketch Plan process revealed that commercial is not desirable in this location and instead the Town would benefit from more residents to enjoy currently existing commercial development nearby. Additionally, although CMU1 is a “mixed use” zone district, some mixed-use zone districts are best served when although there is a mix of uses in the area, specific sites receive customized treatment based on community need, which is the goal with this Property and Project.</p> <p>In considering potential population increase, if no current Eagle residents move into the Project, the Applicant team projects the Project will create an increase of 51 people per year, which is .67% population increase per year for four years for a total of 2.69% at full buildout with 100% new residents to Town.</p>
<p>Economic Development</p>	<p><i>Encouragement for density on these parcels that will support the downtown and Broadway District businesses.</i></p> <p><u>Response:</u> The Applicant team agrees that businesses need more support and look forward to welcoming more residents to such a convenient location to enjoy those businesses.</p>
<p>Parking</p>	<p><i>Underground parking will mitigate parking impacts to existing on-street parking in the surrounding neighborhoods by new residents.</i></p> <p><u>Response:</u> The Applicant team agrees and acknowledges the need to provide housing while mitigating any unnecessary negative impacts on the surrounding neighbors. For this reason, the underground parking garage is essential to a well-design Project that respects the neighborhood.</p>

- b. Summary of comments received from Planning & Zoning Commissioners and Town Council Members during discussion at Sketch Plan, Planning & Zoning Commission Hearing, dated April 1, 2025 and Sketch Plan, Town Council Hearing, dated May 13, 2025.

iii. Planning & Zoning Commissioners' Feedback:

- *Lack of compliance with landscape buffer.*

Response: The Project fully complies with the landscape buffer requirements and provides 10 feet of landscape buffer along each street frontage, with certain areas exceeding that requirement. See *Architectural Set, Landscaping Plan, Sheet A1.3* for a summary of plantings, which also illustrates terrace spaces and planters throughout the Project.

- *Lack of compliance with underlying zone district height allowance.*

Response: The Project now complies with the underlying zone district height allowance of 35 feet with four-foot parapets exceeding that height, as permitted pursuant to the LUDC.

- *Lack of outdoor recreation space within the Project.*

Response: The Project now includes a much larger landscaped courtyard (7,140 square feet) than initially conceptualized complete with seating areas, fire pit, mixed landscaping and trees, as well as a dedicated pet relief area.

- *Existing low traffic rating in this area.*

Response: Please see the updated Traffic Study provided with this Application.

- *On street parking being removed.*

Response: The Project now includes on street parking along Capitol Street, Second Street and Howard Street totaling 20 spaces.

- *Density of Project at 171 Units (112 Units/acre).*

Response: If viewed from a density of residents (i.e. dwelling units), the Project now has 101 Units, a significant reduction, resulting in 66 Units/acre. Additionally, the Project complies with the mass and scale density permissions regulated by the CMU1 zone district development standards.

- *Seeking more visual break and some spacing across buildings.*

Response: Since the Sketch Plan process, the Town amended the LUDC to include a building spacing requirement for the CMU1 zone district, of which the Project complies. Notably, the two street frontages expecting heavier pedestrian traffic (Capitol Street and Second Street) each have two pedestrian walkways, as a result of building spacing, and one of each pedestrian walkway on each frontage has sight lines to the landscaped courtyard interior to the Project, providing visual relief from buildings for the public passing by.

- *Positive impacts recognized by Planning & Zoning Commission included appreciation of the high quality architectural design of the Project, density of housing units providing so much LERP and affordable housing, underground parking, development of large in-fill site, and acknowledgement that no additional commercial is needed in this location due to existing challenges of nearby downtown businesses.*

Response: All positive impacts remain present in the Project.

- ii. Town Council Members' Feedback: ***Town Council Members shared feedback generally consistent with the Planning & Zoning Commissioners. Therefore, below are select items that came up frequently or differed somewhat from the Planning & Zoning Commission.**

- *Lack of outdoor recreation space within the Project.*

Response: The Project now includes a much larger landscaped courtyard (7,140 square feet) than initially conceptualized complete with seating areas, fire pit, mixed landscaping and trees, as well as a dedicated pet relief area.

- *Density of Project at 171 Units (112 Units/acre).*

Response: If viewed from a density of residents (i.e. dwelling units), the Project now has 101 Units, a significant reduction, resulting in 66 Units/acre. Additionally, the project complies with the mass and scale density permissions regulated by the CMU1 zone district development standards.

- *Discussion regarding the fact that the Comp Plan is somewhat contradictory in goals and policies. For example, many of the goals are fundamentally inconsistent with the Comp Plan's "recommended density" for this area. Further, density should stem from the three-dimensional "box" of development rather than dwelling units because a dwelling unit cap leads to large dwelling units that ultimately encompass the same mass and scale but provide less housing.*

Response: As noted above, the Rezoning Application narrative is a more relevant location for this discussion and, therefore, will not be detailed in full herein. Nevertheless, the Applicant team highlights here that there are multiple understandings of “density” and Town Council expressed during the Sketch Plan hearing, as well as the Recode hearings, that the CMU1 district was decidedly drafted to not have dwelling unit caps. With that being the case, and recognizing the Comp Plan as a non-binding, guiding document, the development standards in the underlying zone district must regulate density by mass and scale for this Project. The Comp Plan goals and policies that do not directly contemplate or potentially conflict with development standards can be better relied upon when there is inconsistency. Additionally, during the June 24, 2025, Town Council meeting, Town Council members reaffirmed this decision in discussing the intention to avoid a dwelling unit per acre requirement as a method to regulate density.

- *Acknowledgement that the Comp Plan and Recode do not align, but Town Council’s job is to meet as many goals as realistically possible when reviewing projects.*

Response: The Applicant team agrees. The Comp Plan is not a regulatory document. It is a non-binding, guiding document to aid in sound decision making with respect to the Town’s long-term planning. Comprehensive plans and land use codes are commonly inconsistent due to amendment timelines. For that reason, comprehensive plans must serve a supportive role and be viewed as living, breathing documents that should be considered in the context of their application. The development standards for the underlying zone district provide the regulatory framework for the Project, and the Comp Plan serves to ensure the Project can fulfill many goals of the Comp Plan. As discussed above, the Project is incredibly consistent with Comp Plan goals and in some ways is unique in delivering on goals in a way that not all properties can, due to logistical limitations of land throughout Town.

- *Positive impacts recognized by Town Council included appreciation of the high quality architectural design of the Project, density of housing units providing so much LERP and affordable housing, underground parking, development of large in-fill site, happy to see ownership units and increased vibrancy for the Town.*

Response: All positive impacts remain present in the Project.

3. LUDC standards. *The preliminary plan complies with the applicable standards of this LUDC.*

As reflect in this Application, the Project complies with the applicable standards of the LUDC. The Applicant team understands that Staff will review and confirm compliance by considering the Application materials in entirety, but the below summary is provided to highlight foundational standards of the LUDC and standards which prompted further conversation at the Sketch Plan phase.

- i. Section 4.02.010. – Comp Plan Consistency.

See response above regarding Comp Plan consistency.

ii. Section 4.04.050. – LERP.

At the proposed unit count, the Project will provide 15 restricted AMI units and 35 resident-occupied units.

iii. Section 4.04.030 – Neighborhood Protection Standards. The Project will locate trash receptables/dumpsters adjacent to the parking garage entry on Howard Street where they will be screened by the building structure on each side.

See *Architectural Set, Level 1 Overall Floor Plan, Sheet A.2.3.*

iv. Section 4.04.040.C. - Commercial Mixed-Use (CMU1), Lot and Dimensional Standards.

▪ Minimum Lot Area of 6,250 square feet.

This Application is requesting a combined lot size of 66,498 square feet.

▪ Maximum Lot Coverage of 70%.

The Project proposes a lot coverage of 62%.

▪ Build-to/Setbacks.

The Project adheres to all setbacks and build-to requirements, including the front build-to line coverage of 65%. Additionally, in many locations the buildings are further recessed from the street beyond the required setbacks due to variation in design. See Site Plan provided with this Application.

▪ Maximum Building Footprint of 7,000 square feet.

The Project meets the maximum building footprint requirement. Building 1 is 6,331 square feet, Building 2 is 6,525 square feet, Building 3 is 3,261 square feet, Building 4 is 2,585 square feet, Building 5 is 5,284 square feet, Building 6 is 5,126 square feet, Building 7 is 6,998 square feet, and Building 8 is 2,501 square feet.

▪ Maximum Building Height of 35 feet.

The Project buildings are 35 feet tall.

▪ Minimum Distance Between Principal Buildings on Single Lot of 10 feet.

The Project buildings are spaced at least 10 feet from one another.

- v. Section 4.10.030. – Design Standards for All Sites.

See Architectural Set.

- vi. Section 4.10.040. - Residential structure and site design standards.

See Architectural Set.

- vii. Section 4.11.030. – Requirements for all landscaping.

See Architectural Set, Landscaping Plan, Sheet A1.3.

- viii. Section 4.12.040. - Required off-street vehicle parking.

The Project is required to provide 183 spaces (203 spaces minus the applicable 10% reduction), but the Project proposes to provide 268 spaces in order to ensure no parking demand onto adjacent neighborhood streets.

- ix. Section 4.12.050. - Bicycle parking.

The Project will provide 202 stored bicycle spaces in the garage (two per dwelling unit), as well as one exterior parking rack with capacity for 12 bicycles. Additionally, an ebike charging area and additional bicycle parking area will be provided in the garage.

- x. Section 4.12.070. - Vehicle parking access, location, and design.

During the Sketch Plan process, Town staff recommended (1) mitigating potential on-street parking by ensuring the garage permitted clearance for vehicles with roof racks. mitigation of potential on-street parking, consideration of vehicles with roof racks, and (2) considering possible queuing congestion at the garage entrance.

The garage entry has been designed to accommodate standard vehicles with roof racks. Additionally, accessible van parking clearance heights have been confirmed on the upper garage level.

To ensure no queuing outside of the garage on Howard Street, the garage door is inset with space on the entry way for a vehicle to pull entirely off of Howard Street and stop before entering the garage. Windshield or license plate transponders will be utilized to provide automatic door opening and minimal stoppages. Both incoming and outgoing ramp lanes have their own garage door, eliminating conflict.

- xi. Chapter 4.15- Subdivision Design and Improvement Standards.

The Project team looks forward to working with referral agencies, like the school district, in finalizing subdivision improvements obligations and commitments.

4. *Infrastructure and services. The preliminary plan provides evidence that public water and sewer system connections can be efficiently implemented.*

As noted in Sketch Plan, Town Council Staff Report, dated May 13, 2025. (p. 645), the “Town does have adequate facilities to support development with regard to water, wastewater, and stormwater.” In preparing this Application, the Project team’s consulting engineers met with Town staff and Public Works multiple times, including July 17, October 3, October 10 and December 9, 2025. The Property is currently served by water and sewer, and the infrastructure changes primarily include pulling back the service to the Property perimeter and removing the abandoned lines. Existing water and sewer infrastructure is sufficient to continue serving the Property based upon the proposed use and Project design. The Project will supply new stormwater infrastructure, where there has historically been none. The stormwater plans have been coordinated to tie in with existing pipes to the Eagle River at the roundabout. *See Civil Set provided with this Application.*

5. *Phasing. The Plan proposes reasonable project phasing in terms of infrastructure capacity, transportation connections, provision of open space and trails, and any other aspect of the development that will be developed across multiple phases.*

The Project construction is intended to align with the Grand Avenue improvements, which are slated to begin in Spring 2027. Following site preparation and excavation, the garage will first be constructed in coordination with the future Grand Avenue retaining wall. Subsequently, the Grand Avenue-facing buildings will encompass the first phase of residential structure, and the Capitol Street-facing buildings will follow in 2028. The Second Street- and Howard Street-facing buildings will follow.

C. Conclusion.

For the foregoing reasons, the Application meets and complies with the applicable preliminary plan criteria. As such, on behalf of the Applicant, we respectfully request that the Town approve the Application. We look forward to working with you on this Application.

Sincerely,



Diana Caruso Jenkins

For the Firm

Attachment A

Plan Point	Goal Statement (Elevate Eagle Comprehensive Plan)	Project Consistency
ELEVATING OUR INCLUSIVE CULTURE		
1-1	Promote a wide range of attainable housing opportunities for young adults, families, aging residents, workforce, and others. (Elevate Eagle p. 40)	<ul style="list-style-type: none"> • Provides 101 total for-sale residences, including 15 AMI and 35 Resident occupied homes within downtown Eagle. • Three-story, ≤35 ft design aligns with small-town scale and historic context. • Heated below-grade garage relocates parking underground, improving pedestrian environment and aesthetics. • Private courtyards and patios provide outdoor living spaces for each residence.
1-2	Expand and diversify the Town’s economic opportunities. (Elevate Eagle p. 42)	<ul style="list-style-type: none"> • Creates new opportunities for residents to live and work in the downtown core, supporting local employment. • Consolidates 1.5-acre block, fostering mixed-income ownership housing that strengthens downtown vitality. • Supports nearby businesses by increasing year-round population within walking and biking distance.
ELEVATING OUR UNIQUE CHARACTER		
2-1	Enhance the vibrancy and viability of Downtown. (Elevate Eagle p. 44)	<ul style="list-style-type: none"> • Redevelops an underutilized block with compatible infill reflecting Eagle’s historic small-town character. • Brick and metal façades echo the traditional downtown palette while integrating modern sustainability. • Stepped-back upper levels reduce massing at the street and maintain the pedestrian scale.
2-2	Reinforce Broadway Street as the heart of the community, from the Eagle River to Town Park. (Elevate Eagle p. 46)	<ul style="list-style-type: none"> • Located one block off Broadway, the Project adds permanent residents who support downtown shops and restaurants. • Maintains Eagle’s traditional street grid, walkability, and scale consistent with Town Core. • Creates streetscapes that invite pedestrian activity and neighborhood interaction.
2-3	Celebrate the Town’s unique small-town character. (Elevate Eagle p. 47)	<ul style="list-style-type: none"> • Provides high-quality infill that enhances Eagle’s architectural integrity and blends with existing buildings. • Lighting is dark-sky compliant; infrastructure reuses existing utilities where feasible. • Design fosters neighborhood connectivity and complements surrounding development.
2-4	Connect Eagle’s unique neighborhoods physically and visually through a walkable and trail-oriented environment. (Elevate Eagle p. 49)	<ul style="list-style-type: none"> • Adds sidewalks, landscaped areas, and bike amenities that link to existing downtown networks. • Garage design eliminates curb cuts, reducing pedestrian–vehicle conflicts. • Courtyard and perimeter treatments create new public-oriented gathering spaces downtown.
2-5	Maintain and improve the appearance of Eagle by reinforcing identity and sense of place. (Elevate Eagle p. 50)	<ul style="list-style-type: none"> • Reinforces Eagle’s gateway identity with architecture anchoring Grand Avenue. • Underground parking allows expanded sidewalks, shade trees, and landscaping. • Encourages interaction through shared courtyard and gathering spaces.

ELEVATING OUR ADVENTUROUS LIFESTYLE		
3-1	Promote the Town’s unique activities (fly fishing, rafting, mountain biking, etc.). (Elevate Eagle p. 52)	<ul style="list-style-type: none"> • Adds year-round residents who support and participate in Eagle’s outdoor recreation economy. • Provides direct connections to trail and bike networks near Grand Avenue and Brush Creek corridors.
3-3	Maintain the incredible trail and park system and find new opportunities for connections. (Elevate Eagle p. 53)	<ul style="list-style-type: none"> • Creates walkable, bikeable routes connecting residents to nearby parks, trails, and the Eagle River. • Includes secure bike storage, e-bike charging, and dedicated garage gear storage to promote active recreation.
ELEVATING OUR RELATIONSHIP WITH THE ENVIRONMENT		
4-1	Preserve natural open space and wildlife habitats. (Elevate Eagle p. 56)	<ul style="list-style-type: none"> • Infill redevelopment replaces underutilized lots without expanding the Town boundary. • Preserves surrounding open space by directing growth to the Town core.
4-2	Find balance between recreation and preservation along riparian areas. (Elevate Eagle p. 58)	<ul style="list-style-type: none"> • Installs modern stormwater infrastructure to protect water quality and reduce erosion. • Integrates water-efficient landscaping and drainage linked to the town system.
4-3	Support and demonstrate sustainability. (Elevate Eagle p. 60)	<ul style="list-style-type: none"> • Uses central heating/cooling plants to reduce energy and water consumption. • Employs durable materials, energy-efficient design, and abundant natural light. • Provides conduit for solar energy and EV charging in the heated garage. • Supports Eagle County’s Climate Action goals through reduced vehicle idling and multimodal connectivity.
4-4	Plan for safety and resiliency by mitigating potential natural hazards. (Elevate Eagle p. 62)	<ul style="list-style-type: none"> • Located on previously developed land with gentle grades and minimal hazard risk. • Incorporates modern fire suppression, drainage, and stormwater systems to enhance resilience.
ELEVATING OUR CONNECTIONS		
5-1	Expand public transportation network and options. (Elevate Eagle p. 64)	<ul style="list-style-type: none"> • Proximity to Core Transit and bus stops supports transit-oriented living. • Encourages active transportation with heated bike storage and e-bike charging.
5-2	Improve vehicular traffic circulation. (Elevate Eagle p. 66)	<ul style="list-style-type: none"> • Consolidation of driveways reduces turning conflicts on Capitol and Second Streets. Garage access concentrated off Howard Street improves circulation and safety. Pedestrian Easement across Grand Avenue frontage to enable improved road and sidewalk functions.
5-3	Expand safe and convenient pedestrian and bicycle circulation. (Elevate Eagle p. 68)	<ul style="list-style-type: none"> • Adds sidewalks, landscaping, and curb/gutter improvements enhancing pedestrian comfort. • Removes on-street parking conflicts, freeing travel lanes for bikes and pedestrians.
5-5	Use technology to connect the community and improve quality of life. (Elevate Eagle p. 70)	<ul style="list-style-type: none"> • High-speed internet infrastructure enables live/work opportunities downtown.