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Knoxville-Knox County
Metropolitan Planning Commission
City-County Building, Suite 403
400 Main Street
Knoxville, TN 37902

Re: Agenda Item No. 55 – Prime Senior Living
MPC File No. 8-II-17-UR

Dear Commissioners:

I represent Prime Senior Living in its proposed development of the property located at 1920 Falling Waters Road (the "Property").¹ The proposed development is for a senior living facility (the "Development"). The Development will consist of residential units from one to two bedrooms. Each unit will include a kitchen and living area. Additional accommodations include three meals per day, medical care available and daily transportation.

In the recent years, there has been an increased development demand nationwide for senior living facilities that provide the community appeal to its residents, without the extensive needs associated with long term care/nursing home facilities. Presently, this area of Knoxville is underserved with available senior living facilities. Prime Senior Living recently conducted a third-party Senior Housing Analysis, which concluded a much needed demand for senior living facilities for this are of Knoxville.

MPC staff's recommendation for denial of the Development on the basis of the Tennessee Scenic Highway Act [*Tenn. Code Ann. § 54-17-101, et seq.*] (the "Act") is misplaced when considering: (1) the intent and purpose of the Act [*See Tenn. Code Ann. § 54-17-104*, a copy of which is attached hereto as Exhibit A] and (2) the letter received from the Tennessee Department of Transportation ("TDO") that exempts the Development from the Act.² A copy of TDO's letter is attached hereto as Exhibit B.

Furthermore, directly across Pellissippi Parkway/I-140 is the Northshore Town Center Development. As you may recall, the apartment complex currently under construction appeared before this Commission on multiple occasions before eventually being approved. The Act was also raised as an issue because some of the apartment units exceed the Act's 35 feet restriction.

¹ Parcel ID No. 154 CE 009 & 154 09902

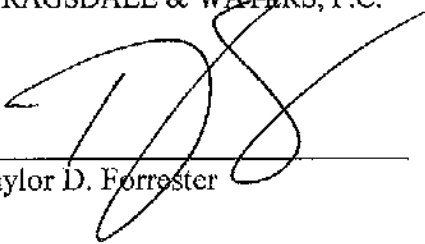
² MPC Professional Staff instructed Prime Senior Living to obtain an exemption letter from TDO for the Development on the Property.

Precluding the proposed Development distorts the true purpose and objective of the Act when considering one side of Interstate I-40 is able to build in excess of 35 feet, but the other is restricted to under 35 feet.

We appreciate your consideration and hope that you will support our request.

Respectfully yours,

LONG, RAGSDALE & WATERS, P.C.

By: 
Taylor D. Forrester

Enclosures

cc: Joel Locker (via email)
Tom Brechko (via email)