



Similar Use Determination

Daniel A. Sanders

Knox County Only

Name of Applicant:				
Date Filed: Application Accepted by: W. Warner				
	Date: File Number:6-A-25-OB			
PROPERTY INFORMATION	PROPERTY OWNER/OPTION HOLDER			
Address: 2306 Maryville Pike General Location: East of Maryville Pike North of Berry Road	PLEASE PRINT Name: CW Trust c/o Daniel A. Sanders, Esq. Company:			
Tract Size: 28.5 acres No. of Units: Zoning District: Industrial Existing Land Use: Agricultural	Address: 900 Volunteer Landing, Suite 200 City: Knoxville State: TN Zip: 37915 Telephone: (865) 316-9626 Fax: E-mail:			
Planning Sector: South County Sector Plan Proposed Land Use Classification: BP	APPLICATION CORRESPONDENCE All correspondence relating to this application should be sent to:			
Growth Policy Plan Designation: UG Census Tract: 35.01 Traffic Zone: Parcel ID Number(s): 135CD002 Jurisdiction: ☑ County Commission 9 District	PLEASE PRINT Same as above Name: Company: Address: City: State: Zip: Telephone:			
USE REQUESTED RV Campground	Fax: E-mail: APPLICATION AUTHORIZATION			
ATTACH AS A SEPARATE DOCUMENT: A detailed description of the proposed specific use. Including: number of employees, hours of operation, products made or sold, services performed, special equipment used. A statement indicating how the various permitted uses listed in the zoning regulations are similar in nature, operations, and character to the proposed use in this application and how they would be compatible. Floor/site plan factors. Details regarding limitations (such as maximum floor area or site area) on building and site development for the following: office areas, warehousing areas, manufacturing areas, showroom/retail areas.	I hereby certify that I am the authorized applicant, representing ALL property owners involved in this request or holders of option on same, whose signatures are included on the back of this form. Signature: PLEASE PRINT Daniel A. Sanders, Esq. Name: Company: Lowe Yeager & Brown 900 Volunteer Landing, Suite 200 Address: City: Knoxville State: TN Zip: 37915 Telephone: (865) 316-9626 E-mail:			

SIGNATURES OF ALL PROPERTY OWNERS INVOLVED OR HOLDERS OF OPTION ON SAME MUST BE LISTED BELOW:						
Please Sign in Black Ink:	(If more space is required attach additional sheet.)		***************************************			
Name	Address • City • State • Zip	Owner	Option			
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LOWE YEAGER & BROWN PLLC 920 VOLUNTEER LANDING LN STE 200 KNOXVILLE, TN 37915 TELEPHONE: (865) 521-6527 TELECOPIER: (865) 637-0540 www.lyb.law

> Direct: (865) 316-9626 Email: das@lyb.law

April 28, 2025

Knoxville-Knox County Planning Commission 400 W. Main Street, Suite 403 Knoxville, Tennessee 37902

Re: Application for Similar Use Determination

RV Campground 2306 Maryville Pike

Dear Planning Commissioners:

On behalf of CW Trust, I am pleased to submit this letter in support of our application to establish an RV campground and educational facility within the Industrial (I) Zone. We believe this proposed use aligns well with the nature, operations, and character of other permitted industrial uses, and respectfully request your consideration and approval.

Description of the Property

The 28.5-acre site is located at 2306 Maryville Pike, in Knox County (outside of the City of Knoxville). A zoning map of the property is attached as Exhibit A. Approximately 19 acres are zoned Industrial, and the remaining 9.5 acres are zoned Agricultural.

The property is bordered on the north by the CSX Railroad, on the west by private property, on the south by Berry Road and Mount Olive Cemetery, and on the east by the Knoxville & Alcoa Line and private property. The former Mayo Seed Factory sits in the southeastern corner of the tract.

Description of the Proposed Use

The applicant seeks to create an RV campground featuring 25 sites initially, with an additional 25 sites to be developed in the future. In conjunction with the campground, the applicant seeks to develop an agricultural education facility. The campground will be located entirely within the Industrial Zone while the agricultural and educational uses will utilize the whole property. The applicant believes these uses will compliment each other and result in a profitable use of an otherwise underutilized property.

Each campsite will include water, sewer, and electrical hookups, plus access to restrooms, showers, and laundry facilities. Campsites will be available to the public for overnight stays. Guests may also participate in educational programs focused on sustainable agriculture, including livestock management and vegetable cultivation. This combination of short-term stays and on-site

agricultural education is designed to be comparable in its intensity and operational requirements with the uses already permitted in the Industrial Zone.

Employees and Staffing

Four full-time employees plus three part-time helpers will oversee and maintain the operation. Positions include a Property Manager/Maintenance role, an Animal Husbandry Specialist, and a Horticulturist. With a total workforce of fewer than ten individuals, this staffing model is similar in scale to many light industrial or specialized contracting operations.

Hours of Operation

The facility will generally operate from 9:00 AM to 5:00 PM year-round, with earlier hours for essential farm tasks such as feeding livestock. This schedule is comparable to typical industrial or commercial shifts and ensures no late-night disruptions to adjacent properties.

Amenities and Services

In addition to core RV services, the facility will offer shower and laundry areas, and plans to host occasional farmers market—style sale days for produce like eggs, garlic, and vegetables. A night security system, including automated gates and camera surveillance, will be in place to protect both guests and property—again reflecting typical security measures found in industrial settings.

Equipment and Infrastructure

The property will include automated security gates, a camera system, and a maintenance vehicle for grounds upkeep. Vehicle traffic primarily consists of trucks hauling RVs and personal cars. To encourage safe circulation, the applicant will post speed limit signs and install gravel speed humps. No off-road or side-by-side recreational vehicles will be permitted.

Traffic, Noise, and Impact

The traffic generated by 25–50 RV sites is modest in comparison to other permitted uses within the Industrial Zone. Based on the ITE Trip Generation Manual (10th Edition), the Campground / Recreational Vehicle Park (ITE 416) generates approximately:

- 0.48 trips per acre (daily average)
- 0.98 trips per acre during peak periods

By comparison, other permitted uses generate significantly more traffic:

ITE Code	Use Type	PM Peak Trips per 1,000 sq. ft. GFA
030	Truck Terminal	1.97
110	General Light Industrial	4.96
140	Manufacturing	3.93

ITE Code	Use Type	PM Peak Trips per 1,000 sq. ft. GFA
150	Warehousing	1.74
720	Medical-Dental Office	34.80
912	Drive-In Bank	100.03
851	Convenience Market	762.28

Even at full build-out with 50 sites, the proposed campground would generate less daily and peak-hour traffic than virtually every other major permitted use in the Industrial Zone. It is far below the volume associated with high-traffic commercial uses such as banks or convenience markets, and well within the tolerances of infrastructure designed for industrial traffic, including truck terminals and distribution centers.

Additionally, the applicant has incorporated design-based traffic control measures, such as internal speed controls and restrictions on recreational vehicles, to mitigate noise and congestion.

Future Expansion

The applicant intends to add up to 25 more sites in the future. Because the existing infrastructure (utilities, security, internal roads) can accommodate this expansion, the incremental impact on traffic, noise, and operations will remain within the Industrial Zone's tolerances.

Comparison to Permitted Industrial Uses

We respectfully suggest that the proposed RV campground and educational facility is a "use of the same general character" under the zoning ordinance. Similar to light industrial or warehousing operations, our focus on short-term, vehicle-oriented stays (including temporary lodging for industrial workers) and a controlled on-site workforce aligns with the intent and intensity of the Industrial (I) Zone. Additionally, the infrastructure needed—security measures, vehicle circulation, utility connections—parallels that of many light manufacturing or warehouse facilities.

Floor/Site Plan Factors

The proposed campground will have an office located in an existing building on the property. The existing building is located within the Industrial Zone. The building is depicted on the zoning map attached to this letter. The floor area of the existing building will not change.

Conclusion

In light of these points, we believe the RV campground's operational profile meets or falls below the impact thresholds typical of other permitted uses in the Industrial Zone. We appreciate your thoughtful review of our application. Should you need any further information or clarification, please feel free to contact me at [Phone Number or Email]. We look forward to working with the Planning Commission on this project.

Thank you for your time and consideration.

Very truly yours,

Daniel A. Sanders

cc:

Enclosures: Zoning Map

