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March 9, 2022

VIA EMAIL

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

RE: Agenda Item 13, File No. 3-B-22-RZ
704 Irwin Drive

Dear Planning Commission:

I have been retained by the homeowners surrounding the 704 Irwin Drive proposed rezoning. Pardon my brevity, but I have only recently been retained to represent the homeowners and the organizational aspects of the representation find me in a position of addressing Commission on this Agenda Item #13 only one day prior to the Commission meeting.

This property is comprised of 53.97 acres, but more than 3/4ths of that total acreage is within the Hillside and Ridgetop Protection Area. Importantly, this steep sloped property is nothing but rocks and shale and nothing should (or can) be built on that property. Environmental constraints on the property make PR zoning preferable as it provides an opportunity to concentrate development on the non-hillside portion. However, concentrated residential density of 3.5 du/ac along Irwin Drive is out of character with the adjacent properties, especially those on the north and west of the property. Those lots on the same side of Irwin Drive as the proposed property are of very low density, comprised of one acre or more lots with only one residence on each lot. Staff's recommendation of one du/ac is even high to align this property more closely with the intent of the existing and surrounding RA (Low Density Residential) zoning and the residential character along Irwin Drive.

The applicant's property is almost entirely forested. Clearing and grading the entire parcel for residential development will have an adverse impact on the environment and the

surrounding area, particularly Beaver Creek, which is classified as an impaired waterway. This impaired classification is due in part to tree loss within the watershed. Clear cutting the property at issue would exacerbate the impairment of the waterway with added sedimentation and silting.

PR zoning is compatible with the existing LDR (Low Density Residential) land use classification for the North County Sector Plan and is not in conflict with any adopted plans. Consequently, the density of one du/ac would be appropriate for the developable property on this site; approximately 15 acres. The remaining property should not be considered developable and the applicant should not receive a windfall of density for land that is not developable. Any density larger than 1 du/ac would be injurious to not only the residential character of the neighborhood, but also the property itself.

Respectfully,

HODGES, DOUGHTY & CARSON



Wayne A. Kline
Attorney for Homeowners Surrounding
Applicant's Proposed 704 Irwin Drive Property

WAK:kjc

cc: Mary and Gary Grant