

The ordinances governing planned developments state (section 16.7) that they "should ONLY be applied to further those applications that provide compensating amenities and benefits to the City AND neighborhood." (emphases mine).

The MOST important component of the neighborhood to consider is the surrounding neighborhood - those neighbors directly impacted by the proposed development. This proposal does NOT benefit the surrounding neighborhood and is therefore disqualified from the zoning exemptions requested under Planned Development.

The current "Historic Giffin Square" proposal will NEGATIVELY impact both property values and quality of life for people in the surrounding neighborhood, for the following reasons:

- 1) the scale is too large,
- 2) it effectively eliminates the positives Giffin School brings to the neighborhood, and
- 3) the type of use is inappropriate for the location.

If preserving the historic school building is a +1 for the neighborhood, the combined effects of problems 1-3 above are at least a -10. That is, whatever good this development might bring to the neighborhood is vastly diminished by the negative impacts it will have.

Before describing below the various ways this large apartment complex will negatively affect our neighborhood, I want to first state clearly to the Planning Commission that the development will irrevocably alter the character of our neighborhood to such an extent that many nearby neighbors (my family included) will in effect be driven from the homes we love and the properties we have invested our time, energy, and money into.

Who stands to benefit from this development?

- 1) The developers (none of which live in the area) and whichever outside property management company they decide to use. These people and companies stand to maximally benefit by turning the property into as large a commercial enterprise as possible.
- 2) Future rent-assisted apartment residents, none of which (likely) live in the neighborhood currently. These people would benefit just as much and probably even more from new rent-assisted apartments constructed in a more appropriate location.

Who will suffer excessive adverse impacts?

The people who currently live in the surrounding neighborhood; the closer they live to Giffin School, the more adverse the impact.

It is patently unfair to waive zoning restrictions for the benefit of individuals outside the neighborhood when it so greatly harms those already living there. If the developers wish to develop the property in lawful accordance with its current zoning, then so be it. But if they wish to be excepted from certain zoning ordinances, it must not be to the great detriment of the surrounding neighborhood. We are depending on the Planning Commission to prevent this great travesty of a development plan so that our local historic gem will be available for a use that benefits the surrounding neighborhood, or at the very least has minimal adverse impacts. We love having Giffin School in our neighborhood and we want it to remain an asset and focal point. The neighborhood would likely support (and in some cases even celebrate) use of the school for a senior living/care facility (as originally planned), condos, a boutique hotel, office space, some commercial endeavors (e.g., bike shop, brewery/restaurant), a private school or educational facility, or most any other impact-minimizing use.

The proposal claims that the development will add vitality to the neighborhood as a welcome addition (pg. 7). Quite the opposite. It will suck the vitality out of the neighborhood. Ours is a quiet neighborhood, and no one wishing to live in a quiet neighborhood wants to live next to a large, busy apartment complex. This is NOT a welcome addition—just ask those living here. Find one nearby resident in favor of the development, if you can, and I will show you 99 who vehemently oppose it.

Giffin School is completely embedded in our quiet neighborhood (mostly RN-2). It sits atop a hill which slopes steeply on the north and east sides (see Figure 3 in the Giffin Square proposal) down to Baker's Creek and unnamed spring-fed creek. The steep slopes are heavily forested, and the forest on the east slope is at least 100 years old (as evidenced by aerial photos dating back to 1935 on the KGIS Maps website). Due to its position atop a hill, the school property is visible to about 88 houses in the surrounding neighborhood. For the vast majority of these (approx. 83%), views of the school are from the north or east; for half the year when the leaves are off the trees, residents of these properties see the historic school building through (or in a few cases above) the trees of the forest, and during the other half of the year their views of the property are of a beautiful green forest. This background information is important for understanding some of the negative impacts the proposed development will have on the neighborhood.

1) The scale of the development is too large. It a) requires the destruction of most of the century-old forest, b) increases population density to such an extent that the surrounding area will cease to be a quiet neighborhood due to accordant increases in noise and activity, and c) would overwhelm existing infrastructure.

(1a): the forest. The proposal states (pg. 8) that the development will benefit the community in the form of preservation of existing environmental features and protection of steep slopes. Nothing could be farther from the truth! The most prominent and most important environmental feature of the site is the 100(+)-year-old forest growing on the steep slopes surrounding the school. These slopes are slated for new buildings and parking lots (compare Figs. 2 and 6 in the proposal). Mature forests valued by the neighborhood will be sacrificed for new construction and asphalt! Large trees close to the new buildings will need to be cut down to protect from treefall. Slopes below the new construction will probably be graded, knocking down additional trees for grading purposes and suffocating others by overlaying their roots with thick layers of clay. Preservation indeed! The reason reforestation is included in the proposal is because the land will be denuded of its existing forest. It will take 30-40 years before the reforestation saplings mature into large trees. This does NOT benefit the existing neighborhood in any way.

The forest surrounding Giffin School is part of a greenspace that stretches from Mary James Park to the railroad next to Island Home Ave. and the Tennessee River, much of which is owned by the City of Knoxville or KUB. As such it serves as a wildlife corridor and habitat for a wide variety of flora and fauna, and it is a fixture of our neighborhood that contributes greatly to the neighborhood's character. Greenspace is an asset for South Knoxville, and its destruction should not be taken lightly. The developers ask for special zoning exemptions in order to destroy this forested greenspace; I ask for special consideration of the fact that this was PUBLIC greenspace for nearly 100 years. Yes it is now private property, but generations of children played in that forest and generations of South Haven residents have enjoyed the beauty and proximity to nature provided by those prominent forested hillsides. Why should special permission be granted to the developers to destroy what was long a public benefit to the community?

Replacing the forested slopes with multiple 3-story apartment buildings that dominate the hillsides and tower over the creeks below will CERTAINLY negatively affect the value of properties near the school with prominent views of the hillsides (i.e., many properties on South Haven, McClung, Davis, Beech, and Lenland). Who in their right mind could argue otherwise? People value natural beauty; people who choose to live in quiet neighborhoods away from urban environments ESPECIALLY desire natural landscapes over high-density urban ones. This proposed development will drastically reduce the number of people interested in buying and living in the properties near the school hillsides, and it will greatly diminish the prices offered by those people willing to tolerate views of—and proximity to—a large apartment complex.

If the developers wish us to believe that many trees will remain despite plans that depict the exact opposite, let them survey the existing forest and provide estimates as to what percentage of mature trees (e.g., > 1 ft diameter-at-breast-height [dbh]) and large, old trees (e.g., > 2 ft dbh) they expect to remain. Vague promises to save as many trees as possible are not good enough.

(1b): population density. Rough calculations suggest that the population density of the proposed apartment complex will be about 600% greater than the average density of the surrounding neighborhood, and as much as 1,100% greater than the neighborhood immediately north and east of the property, which is the portion of the neighborhood that will abut the newly constructed apartment buildings.

The developers ask for an exception to the RN-2 population density limitations, pointing out that their proposal will yield not quite twice the density permitted by RN-2. However, average lot sizes in the surrounding neighborhood are far greater than the minimums permitted under RN-2, and focusing on minimum lot areas can give the FALSE IMPRESSION that population densities at the Giffin Square apartments will not be that much greater than the surrounding neighborhood. Population densities at Giffin Square will be DRASTICALLY GREATER than in the surrounding neighborhood.

People living in those apartments will live their lives, just like current residents of the neighborhood do. Hundreds of people living their lives produces a lot of noise, light, traffic, and activity. It's natural and unavoidable. The problem is that all that noise/activity/etc. will be concentrated in a single location, rather than spread out over dozens and dozens of acres of RN-2 neighborhood. Anyone living near the Giffin apartment complex will effectively no longer live in an RN-2 neighborhood, and that represents a stark and drastic negative impact to the quality of life of current residents. Who would claim that their quality of life improved by replacing the sounds of the birds and the breeze in the trees by an order of magnitude increase in noise pollution from a busy apartment complex?

The negative effects of sharp increases in noise and light pollution will be exacerbated by the location of the school and the removal of its forest. At least on the east side, the creek valley below the school acts as natural amphitheater such that when the leaves are off the trees, a normal-volume conversation held behind the school can be heard by people across the valley as they stand on the back porches of their South Haven Rd homes. From Mary James Park down the valley to Baker Creek, every car door shutting, kid playing, and dog barking can be heard by South Haven residents in their back yards. When the leaves are on the trees, this sound-carrying capacity is greatly reduced. The combination of increased noise levels and the removal of the sound-buffering forest will dramatically affect neighbors' ability to enjoy any peace and quiet in their yards. At night, nearby neighbors will no longer have the darkness and peacefulness of a forest behind their homes, but rather a towering array of scores of lights—three

floors of lighted windows across multiple apartment buildings, lights on walkways and parking lots, lights from the headlights of people going to and from the apartments, et cetera. These are undeniable quality of life reductions for current residents of the neighborhood.

(1c): infrastructure. The roads leading to the school entrance are ill-suited for the traffic volume that will accompany hundreds of new residents. Roads will need to be widened and at least one intersection will need to be altered (Lenland at South Haven). Many current residents will be forced to sacrifice part of their already small front yards to accommodate the widening of roads and the installation of sidewalks. Whether road widening could be avoided for some other use types is a question I cannot answer, but I suspect that it would not have been necessary for an assisted living facility or another use type with expected low additional traffic volumes. Residents will be especially angry if they are forced to give up part of their yards for a large apartment complex that nobody in the neighborhood asked for or wants.

There is a very good chance that parking will be an issue, given the number of units and bedrooms planned for the development. There are 176 parking spaces in Figure 6 of the proposal, which appears (laudably) to be greater than the minimum required by zoning ordinances. Whether that number will be sufficient depends upon variables that are currently unknown. How many two-car families will be living there? How many families will have teenage children with their own cars? How many guests will be visiting in the evenings? How many spaces will be available if nonresidents come in to use the clubhouse? Will the inclusion of dumpster sites and a retention pond—currently not included in the Figure 6 schematic—reduce the current number of planned parking spaces?

There is very little street parking on the streets surrounding Giffin School. Furthermore, when cars are parked on the sides of these streets, passage is restricted due to the narrowness of the streets and the absence of shoulders to park on. If traffic spills over from the apartment complex into the surrounding areas, it will negatively impact current residents as they may no longer have readily available street parking near their homes for guests or additional parking needs. Their driveways may also get blocked on occasion, and the difficulty of safely navigating around many parked cars on narrow roads will make driving in their neighborhood more dangerous.

There is a good chance that the sewer system will not be able to handle the additional load of hundreds of new residents concentrated into a small area. The sewer system along the creek below the school already leaks into the creek and people's yards during times of heavy rain, and there is still an unfixed sewage leakage problem that is traveling underground from near the school into the creek below. For this latter problem, KUB is at present simply routing this free-flowing sewage directly into another sewage pipe, but that patch is unlikely to be sufficient in times of heavy rainfall. If we already have sewage flow problems, is it not reasonable to expect far greater problems from a high-density development that will bring in hundreds of additional residents?

2) The proposed development effectively eliminates visibility of the historic structure from most of the surrounding landscape, thus negating most of the positive effects preservation of the school could have on properties in the surrounding area. For

The proposal emphasizes that the construction of new apartment buildings will have low impact on street frontage (pg. 8), but it fails to acknowledge that Giffin School is primarily exposed to the neighborhood on its northern, eastern, and southeastern sides due to its location atop a hill. These are precisely the areas where three-story apartment buildings are sited in the proposal, which will block

views of the historic school from the vast majority of the surrounding neighborhood and effectively ELIMINATE this historic structure from the visual landscape. As mentioned above, over 80% of the houses with a view of the school are directionally situated from the north to southeast of the school. These are properties on Lenland, Rugby, Marshall, Dexter, South Haven, Hansard, Newton, McClung, and Davis streets (about 73 houses by my count). The proposed development would generate minimal visual barriers only for houses sharing the hilltop with the school—those on Beech St. (about 15 residences).

In addition to the residential properties that would lose Giffin School from the visual landscape, the school would be lost from the visual landscape of the non-resident public. For about half the year when leaves are off the trees, the Giffin School is visible from Mary James Park to the southeast and from the main thoroughfare roads through the area: South Haven Rd to the east. Under the proposed development, the general public would predominantly see only new three-story apartment buildings in the direction of Giffin School. Unless they were informed otherwise, they might not ever suspect that a historic structure sits atop that highly-developed hill. The low impact on street frontage touted by the development plan would likely be appreciated only by the few residents living or commuting on Beech Street. Low impact on street frontage is good—I do not wish to portray it as inconsequential—, but the high visual impact to the rest of the neighborhood and the general public cannot be ignored.

It needs to be noted that the site selection diagrams of Figure 7 in the proposal appear to give a false impression of the true visual impact of the new apartment buildings. The slopes of at least the east-west transects are in reality much steeper than shown in Fig. 7 (consider the topography on Figure 3). The proposed three-story apartment buildings will tower over the creeks below, which is not the impression given by the sketches (?) of Figure 7. Before this proposal is considered for a planned development, the developers should be required to produce accurately scaled figures and art renditions of the proposed new construction so that the Planning Commission and the public can get an accurate impression of the views the surrounding neighborhood will be subjected to.

3) Given the Planned Use objectives of benefiting the neighborhood and not causing excessive adverse impact on neighboring properties, a large rent-assisted apartment complex is an inappropriate use of Giffin School and its surrounding greenspace. Large apartment complexes, rent-assisted or not, are large commercial enterprises that are far more appropriately suited to commercial corridors, or at most at the peripheries of established neighborhoods. Giffin School is fully embedded in a neighborhood dating back to the 1920's-1940's. No use that exceeds the impact of a school should be allowed to take its place (under Planned Development) without the express buy-in and support of the surrounding neighborhood. The proposed planned development DOES NOT have the support of the surrounding neighborhood because the negative impacts it will have are excessive and plainly obvious.

Beyond the inappropriate siting of a large apartment complex within a quiet neighborhood, there is additional, valid concern about the rent-assisted nature of the apartments and the higher crime rates that are sometimes associated with such rent-assisted or workforce housing, especially as it relates to the acceptance of Section 8 housing candidates. Brand new rent-assisted apartment complexes in the area (Southside Flats Apts., Young High Flats Apts.) already appear to be suffering from drug-related crime issues, although I still have to run the numbers to verify whether crime rates there vary from those in our neighborhood.

But even if the Giffin Square apartments bring absolutely no additional crime into our area, as we would all hope, the very fact that they are rent-assisted, section-8 accepting apartments will reduce the

property values of at least the surrounding properties. This is simply a fact that everyone understands, whether one agrees with the principles behind it or not. Most people are less willing to live next to rent-assisted apartments than standard apartments, all else equal, and that affects what they are willing to pay for properties near rent-assisted apartment complexes.

It is thus unavoidable that rent-assisted apartments will negatively affect property values in the surrounding area, whether quality of life is also affected or not, as such they are an inappropriate use of the school property. The greater the scale of the apartment complex, the more severe the negative impacts to surrounding property values.

As far as I can tell, there is no precedent in our area for turning a historic structure in the midst of a quiet neighborhood into rent-assisted housing. Old schools have successfully been turned into senior living facilities (South High), condos (Brownlow, Park Place), office space (Perkins Place), and non-profit uses and senior housing (Flenniken). Flenniken is probably the closest to what is proposed for Giffin School, but Flenniken is situated on the edge of a commercial corridor and run by a non-profit organization to help transition people out of homelessness. New apartment buildings constructed on former Flenniken schoolgrounds are restricted to seniors. No such restriction is currently in place for the Giffin Square development.

A true, like-to-like comparison is the only comparison relevant to impacts expected from the Giffin Square proposal. That means the comparison must involve a) a historic structure like a school that is b) completely embedded in an existing quiet neighborhood and c) turned into rent-assisted apartments. Comparisons not incorporating all three of the elements above are not relevant.

In summary, I ask the Planning Commission to reject this proposed planned development. It would be better for the school to remain vacant and empty until a development beneficial to the neighborhood (or at least not grossly negative in impact) is proposed. No use is far better for the neighborhood than a bad use.