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Knox County Planning Commission Re: 1-SC-23-C and 1-B-23-DP

Dear Members of the Commission.

I am unable to attend the hearing regarding the above-referenced matters, but I did want to share my comments and concerns regarding the currently proposed development. My family and I have lived at 8333 Lake Village Circle, a property directly bordering the proposed development, for 14 years. We have enjoyed the wooded lot directly behind our house and while I know that development of the property cannot be stopped, I do have concerns about the current proposal.

My main concern is with the proposed density of the development - 12 rental homes on 4 acres. While the property is in the Rural Area Growth plan, which allows property use otherwise allowed by applicable zoning, that many residences on that small a piece of property seems inconsistent with the Knoxville-Knox County General Plan Development Policies.

Specifically, Policy 9.2 "[e]ncourage[s] development practices that respect and fit the natural landscape, minimizing the loss of trees, woodlands, and wildlife habitat." Clearcutting this forested area in an attempt to put 12 homes on 4 acres is inconsistent with this policy and a therefore a lower density should be required obey the Commission if this development is approved. At minimum, Policy 9.2 should require the developer to leave all trees and vegetation in place in the required 35' peripheral setback areas.

In addition, Policy 9.3 seeks to "[e]nsure that the context of new development, including scale and compatibility, does not impact existing neighborhoods and communities." The density suggested by the developer is simply out-of-line with the

residential density of the adjacent single family homes and neighborhood. It is therefore inconsistent with Policy 9.3 and should be modified by the Commission. This policy should also require the developer to provide assurances, and an explanation, as to steps being taken to ensure that the development does not cause future subsidence issues for the homes at the top of the hill.

Also of concern, with regard to housing density is the fact that majority of the planned development falls under the Hillside Protection Overlay. The Staff's slope analysis for this property shows that of the 4.05 total acres planned for development, only 1.07 acres is 'non-hillside.'

CATEGORY	ACRES	RECOMMENDED DISTURBANCE BUDGET (Percent)	DISTURBANCE AREA (Acres)
Total Area of Site	4.05		
Non-Hillside	1.07	N/A	
0-15% Slope	0.83	100%	0.83
15-25% Slope	1.51	50%	0.75
25-40% Slope	0.64	20%	0.13
Greater than 40% Slope	0.01	10%	0.001
Ridgetops			
Hillside Protection (HP) Area	2.98	Recommended disturbance budget within HP Area (acres)	1.7
		Percent of HP Area	0.6

Importantly, a total of <u>2.16 acres</u> of the planned development, or approximately <u>53%</u> of the development, is a slope of 15% or greater. A total of .65 acres, or 15% of the proposed development, is a slope of 25% or greater.

Significantly, the Commission's Hillside Protection Overlay (https://knoxplanning.org/plans/land-use?city=HP) indicates that "[o]pen space, recreation land or very low density housing (one dwelling unit per two acres) is recommended for slopes exceeding 25 percent." Further, "[f]or slopes of 15 to 25 percent, housing densities should not exceed 2 dus/ac)." The proposed density of 2.93 du/ac for this development would therefore appear to violate the density standards in the Hillside Protection Overlay.

Finally, the proposed development is on Greenwell Road, a curving, narrow, two-lane road with no shoulder on either side. In addition, in multiple places the road drops off several feet directly into a small stream. In recent years more than one car has run off of the road into the stream.



Due to the limitations of this road, additional developments along Greenwell, including the present one, should be carefully considered, if not constrained, until the County takes action to improve the road. At minimum, an actual traffic study should be conducted before this development should be approved. The materials available online do not appear to reflect that a traffic impact study was requested or performed for this development and that is a major oversight given the realities of Greenwell Road.

Development of new residential properties is important and beneficial for Knox County. While development of this property will undoubtedly proceed in some manner, the current proposal should be denied until an actual traffic impact study is performed. If approved without such a study, the Commission should only allow this development to proceed at a lower density, in keeping with the County's General Development Policies and Hillside Protection Overlay policy. Further, if approved, the Commission should require the developer to leave all trees and vegetation in the 35' peripheral setback and in all undisturbed areas of the development.

I appreciate the opportunity to provide my comments to the Commission and thank you for your consideration of same.

Sincerely,

Joshua Wolfe