

As members of the south Knoxville community and the South Waterfront Advisory and Advocacy Group (SWAAG) we request that you postpone this item to allow the community more time to work with the developers on community concerns.

The South Waterfront form-based zoning code and associated Vision Plan (VP) are the results of a collaboration between the City and the community. This robust public process included the work of the South Waterfront Oversight Committee, which comprised members from the community, business, south waterfront land owners, academia, and other stakeholders.

It's vital to the community that the design priorities defined by the code and VP are upheld on all projects but especially on sites as prominent as this one. This may be the single most important site in the South Waterfront. A project of this size in such a strategic location serves as precedent for the future development of other nearby sites, and it serves as infrastructure for the use of the site over the next generation. It is important to build for our community today, but also for the community we want for the future.

The developers, CR-Endeavors, have shown willingness to work with the community. They conducted two well-attended open houses. Following those meetings, SWAAG and the developers, along with representatives from the City of Knoxville, attended a working meeting to address concerns raised.

Following that meeting, the developers submitted a revised proposal, which is the one you are asked to approve. We acknowledge and are grateful to CR-Endeavors for incorporating changes that mitigated some of our concerns, particularly with respect to massing. However, substantial concerns have still not been addressed.

In addition, the City report on this project includes the statement that "The development team has also committed to enhancing public access and connectivity, including a pedestrian linkage to Kern's Food Hall." While we would welcome such connectivity, it will require commitment from and coordination with the City. It is not included in the present proposal, and there is no guarantee it will be built. Therefore, potential pedestrian linkages outside of this property should not be considered in your review of this application.

The proposal deviates from the South Waterfront form-based code in multiple large ways. That is the reason that it is before you for a Level III Alternative Compliance review. Level III projects, while not required to conform with a strict interpretation of the code, are still expected to "comply with the intent of the applicable Form District and Plan" (Knoxville Zoning code 7.0.2.G.1). The plan referred to here is the South Waterfront Vision Plan.

Furthermore, the South Waterfront zoning ordinance lists criteria the Planning Commission is to use to evaluate the plan (Knoxville Zoning Ordinance 7.0.2.G.8). That criteria begins with "consistency with the applicable adopted plan;" i.e., the Vision Plan.

The main objectives of the Vision Plan, as embodied in the code, are a mixed-use, human-scaled, gridded, urban form (rather than suburban super-blocks), pedestrian friendliness, and being part of the connective tissue of the community. The proposal before you fails to achieve those objectives. We have identified three priorities that need to be addressed, as well as some suggestions for moving closer to those goals.

**Priority 1: Create navigability to and through the site for the public.** This is implicit in many of the requirements of the form-based code and aligns with the guiding principles of the Vision Plan.

The existing Kerbela site is almost twice the size allowed by code. This is an existing condition and is not the fault of the seller or the developer; however, we expect appropriate provisions to be incorporated into the design of the almost 6-acre site that meet the spirit of the code and VP. That means creating public access through the site consistent with the code requirement for block sizes of no more than 1400'. The lot size and block size requirements are intended to implement the VP objective of a human-scale, gridded urban plan. What is proposed here is a superblock. That is not pedestrian friendly and it isolates itself from the community rather than integrating itself into the community.

In contrast, consider One Riverwalk, which sits across Blount Avenue from this proposed project. It meets the intent of the code. It fits into the urban grid by providing a public plaza between its two buildings, allowing pedestrian traffic between Blount Avenue and the Riverwalk. Similarly, although outside the South Waterfront, One Tree Pass at Summit Hill and Gay is also a model of this kind of development. It creates an engaging urban pedestrian experience by including a pedestrian connection through the development between W. Vine Ave. and W. Summit Hill Dr.

Proposed Solution: Allow public access to and through the site from the proposed public east-west walking path along the bluff above Sevier Avenue to the proposed plaza (from the western edge of the private pool area to the far west end of the building where the currently proposed "public plaza" is indicated). This would expand public access to views and gathering areas.

Public access through the site is essential. Consider fully separating each apartment volume and incorporating an exterior public access pedestrian path between the buildings. Alternatively, consider dividing the enclosed, conditioned space within the lobby area so that a public access indoor pedestrian street, atrium, arcade, or galleria is created between the buildings. In any case, provide a welcoming and engaging pedestrian connection from Sevier Avenue via the "ghost stairs" to the public path to Mimosa Avenue through the Kerbela site.

**Priority 2: Create a safe, engaging urban pedestrian experience.**

The code implements the VP objectives of pedestrian friendliness by requiring small setbacks from the street, sidewalks, 70% transparency on the ground floor, and surface parking lots to the side or rear of the building. This proposal has a very large setback from Sevier Avenue, which is understandable given the topography. But it also has a very large setback from Mimosa, where the building entrance is

located. It includes a surface lot between the building and Mimosa. It lacks enough transparency at ground level, with too many blank walls, as is noted in the City report. This is particularly problematic along Dawson Street.

The South Waterfront was intended to be mixed-use. We would like to see that mixed use implemented with something like ground floor commercial that engages pedestrians. We understand that traditional ground floor commercial space may not be economically viable for this location at this time; however, it is important to the community to create infrastructure that supports growth in the future while keeping our streetscapes safe and engaging for the average pedestrian. We have significant concerns that the corners of Dawson and Sevier and Dawson and Mimosa will be dark, uninspired, and potentially unsafe pedestrian corridors if they are allowed to only include faceless garage facades without better lit and more engaging uses.

Proposed Solution: At these corners and along Dawson, create a combination of small-scale ground floor retail (coffee shop, pharmacy, etc.), apartment-support program (bike shop, tool rental, etc.) well-lit landscaped areas and/or art installations, mini-plazas for use by the public, or other public amenities. This could also help facilitate future development of the land between Sevier and Council Place. As an example, consider the slender, small commercial on the side of the Market Square Parking Garage at the corner of Walnut and Union. That enlivens that corner in a way that a few more parking spaces and a blank wall couldn't accomplish.

Also, consider making landscape nodes along the proposed public pedestrian trail along the top of the bluff that provide room for pop-up market tents, food vendor carts, etc.

In any case, provide ceiling heights, ADA entrances, and facade glass on all ground floor facades such that they are compatible with future commercial use.

**Priority 3: Traffic management.** It is our understanding that a traffic study would be required by any development proposing to introduce 200+ new residential units on a single site. Given that the proposed main entrance is off Mimosa, which has a direct connection with a major thoroughfare (Chapman Hwy) and that other access points of the site abut a single family residential neighborhood and a popular church with parking capacity issues, the traffic study will be an essential component to inform how to manage cars on and near this site.

As a final point, the proposal fails to contain a cross-section for Dawson Street. The code specifies that Dawson Street should have the same cross-section as Mimosa.

We appreciate the work that has been done to revise the project to date, and we look forward to seeing future revisions that meet the intent of the code and VP. We intend to support this development when it becomes clear that the design is integrated with the community rather than isolating itself from its community.

Once again, we ask you for a postponement so that we can continue to work with CR-Endeavors on a plan that aligns with the objectives of the Vision Plan and the intent of the form-based code.

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Tommy Smith, Island Home Park resident and former First District City Council Member

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