

The South Waterfront Advisory & Advocacy Group has reviewed the recent resubmission of the project proposed for the Kerbela site and has the following observations and recommendation.

Planning commission postponed the project to allow for further revisions based on communication with community stakeholders. The new submission (dated 5/26/26) was offered for ARC review without any follow up communication with the SWAAG or, to our knowledge, any other community organizations.

None of the items of concern identified by SWAAG and discussed at the Planning Commission meeting are addressed in the resubmission. This design does not meet the intent of the vision plan, which is to create an engaging, public urban experience. The current proposal isolates itself from the community rather than integrates itself into the community. The prohibition in the code of gated communities is to prevent this kind of development.

The comments offered by CRE with regard to lot coverage and ground floor transparency are not relevant. SWAAG has not objected to proposed lot coverage, lot size, or building footprint. We are focused on the issues that most make this design incompatible with the intent of the code – especially with the 400' block size requirement. The intent of that requirement was specifically to create a pedestrian friendly urban grid. Superblocks like this almost six acre site need to allow public access through them to satisfy this intent.

The assertion by CRE that a north-south public access through the site is “not practical” illustrates that the use and development they envision is not compatible with the adopted SW form-based code. Removing the gate and fence, ramping the public pedestrian path to the large plaza elevation, and allowing public access through the lower lobby area would solve the site access problem.

CRE's assertion that the slope is too steep for this public access is flawed because it uses the slope from Mimosa to Sevier. SWAAG has never asked for that access. We have been clear about asking for pedestrian access through the site from Mimosa to the proposed public path along the top of the bluff. Their renderings make it clear that this is possible; they propose resident access along this corridor. If it's practical for residents, it's practical for the public. This is something CRE elects not to do, not something they are unable to do.

The recommendation to design the ground floor to accommodate future retail as was done at One River Walk is not incorporated into this resubmission. We must plan for the future and create building stock that accommodates the highest and best use of our urban sites even if the current market cannot support a retail use at this time. Taller ceiling heights and exterior ADA access to multiple locations on the ground floor should be provided at a minimum.

While we understand that a traffic study would typically come later in a development process, due to lessons learned on Blount Avenue, it is imperative that the traffic study for this area is performed prior to a decision by the Planning Commission. Sevier and Mimosa are primary thoroughfares into and out of the south waterfront community. Ignoring the implications of excessive traffic on these streets will profoundly affect the day-to-day experience of residents and visitors. This is harder to fix later and should be understood during the design phase so appropriate solutions can be incorporated.

We reluctantly recommend denial of this submission because of the lack of further communication with the community and the refusal to adapt the building design in any way to make it compatible with the urban context required by the SW form-based code. This proposal does not have the best interest of this community at heart and CRE's "product" appears to be incompatible with the intent of our adopted plan and code.

The right developer with the right project will be able to develop this site in a way that integrates into and enhances the community for its customers and the public. This is not an unreasonable goal, and it can be accomplished by aligning with the intent of the SWF form-based code and vision plan.

We are attaching our previous comments and suggested solutions for reference as none of them are addressed in this new submission.