

COVINGTON MUNICIPAL - REGIONAL PLANNING COMMISSION MEETING

July 2, 2024

12:00 PM NOON

**LOWER-LEVEL CONFERENCE ROOM
AT CITY HALL**



**AGENDA FOR THE MEETING OF THE
COVINGTON MUNICIPAL-REGIONAL PLANNING COMMISSION
July 2, 2024
12:00 PM**

- I. CALL TO ORDER – ESTABLISHMENT OF A QUORUM**
- II. OPEN FOR PUBLIC COMMENT**
- III. APPROVAL OF THE PREVIOUS MINUTES**
- IV. NEW BUSINESS**
 - A. Election of a Planning Commission Secretary**
 - B. Baskin Reality, LLC Rezoning Request**
 - C. Covington Court Square Town Homes – Final Major Subdivision Plat**
 - D. Covington Court Square Town Homes – Site Plan**
 - E. Oak Row Subdivision – Minor Subdivision**
 - E. Oak Rowe Apartments – Phase 1 - Site Plan**
 - F. Taylor - Old Memphis Road Minor Subdivision**
- V. OLD BUSINESS**
- VI. OTHER BUSINESS**
- VII. ADJOURNMENT**

Next Meeting: August 6, 2024

The Covington Municipal-Regional Planning Commission met on June 4, 2024, at 12:00 p.m. with the following members present: Chairman Joe Auger, Vice Chairman Sammy Beasley, Secretary Alice Fisher, Commissioners: Sue Rose, C.H. Sullivan, Annette Johnson, Louise McBride and Benton Lindsey. Also present were Planner Will Radford, Building Official Lessie Fisher, Code Technician Phyllis Mayfield, Fire Inspector Rusty Thigpen, Donald M. "Skip" Baskin, and Ali Spoon.

The meeting was called to order by Joe Auger.

Motion was made by Alice Fisher and seconded by C.H. Sullivan that the minutes of the preceding meeting be approved. Motion passed.

Rezoning request was submitted by Baskin Realty for property located at 962 Highway 51 N/ 128 Industrial Road, map 025K group B parcel 016.01 to be rezoned to B-2 along the west side of the property and the east side of the property to remain as currently zoned M-1.

C.H. Sullivan made a motion to approve, Sammy Beasley seconded the motion. Motion passed.

Lessie Fisher reported on the following, a conceptual site plan for Oak Rowe apartments had been received; that an Annexation request by Gary Taylor & Ceres Land Management and Consulting, LLC had been received; and that work had begun on a text amendment for a planned residential district to be considered for adoption.

Reported that a Text Amendment to adopt a Planned Residential District Regulations was being worked on.

C.H. Sullivan made a motion, seconded by Alice Fisher, to adjourn the meeting. There being no further business, the meeting was adjourned at 12:40 p.m.



RADFORD PLANNING SOLUTIONS

LOCAL PLANNERS. LOCAL SOLUTIONS.

P.O. BOX 112 | Huntingdon, TN 38344 | 731.234.7798 | RadfordPlanning@gmail.com

MEMORANDUM

TO: The Covington Municipal-Regional Planning Commission
FROM: Will Radford, AICP
DATE: May 2, 2024
SUBJECT: Staff Recommendations for the May meeting of the Municipal-Regional Planning Commission.

B. Baskin Reality, LLC Rezoning Request

Background

A rezoning request has been submitted on behalf of Baskin Reality, LLC to rezone 32.67 (approximate) acres of property on Tennessee Avenue from R-2 (Medium Density Residential) District and M-1 (Industrial Park) District to B-2 (Highway Business) District. The property can be further identified as a portion of Parcels 5.02 and 5.28 on Tipton County Tax Map 025. The property appears to be located in a Zone AE flood hazard area according to 47167C0160F, effective on 12/19/2006.

Analysis

The property is located north of the intersection of Simonton Street and Tennessee Avenue. Simonton Street and Tennessee Avenue are "Collector Streets" according to the Covington Major Road Plan.

The property currently has nearby access to U.S. Highway 51 south, a Major Arterial Street. This property is located near a major retail center of the City of Covington and would be conducive to commercial development.

The area for rezoning is mostly developed and has the existing infrastructure (utilities) to support commercial development.

The following policies are found in the **2030 Municipal-Regional Land Use and Transportation Plan** for Commercial Development:

1. All commercial developments shall be designed in compliance with appropriate site development standards.
2. **Commercial development shall be approved in only those areas where infrastructure is available to support such development.**
3. All commercial and private service developments shall be required to provide an adequate number of paved off-street parking spaces.
4. **To the extent feasible, landscaping or other screening shall be provided between commercial and residential land uses.**
5. Sidewalks shall be installed by the developer as commercial uses develop along arterial and collector-status street.

The Covington Future Land Use and Transportation Plan Future Land Use Map has the area dedicated as "Light Industrial".

Consideration for the potential impact of commercial zoning to these properties should be considered.

Recommendation

Staff recommends in favor of the rezoning request.

C. Covington Court Square Town Homes – Final Major Subdivision Plat

Background

A major subdivision plat has been submitted to create 9 lots/Townhouse sites from a .53 acre (29,193 square feet) parent tract at the intersection of East Washington Avenue, South Tipton Street, and South Maple Street. The property can be further described as Parcel 6.00 on Tipton County Tax Map 041 C, Group E. The property is zoned R-P (Residential Professional) District. The property doesn't appear to be located in a federally identified flood hazard district.

Analysis

The Lots do not meet the standard lot sizes for single family residential homes in the R-P district (6,000 square feet) but the developers are asking approval for Townhome lots where future property owners own the area within the walls of the unit and no surrounding land/yard with the property.

The Covington Zoning Ordinance defines Townhouses as single-family units:

Townhouse: A row of multi-story **single family** dwelling units, separated from one another by a continuous fire resistant vertical wall without opening from basement to floor.

Section 11-602 **Design Standards for Multi-Family Residential Development** provides the following language as guidance for the Planning Commission for this type of development:

Front, side and rear building yard areas shall be provided extending from the building envelope. In the instance of individually conveyed units including condominiums, townhouses and other zero-lot-line type developments, along common party walls where applicable, the side and/or rear yard requirements contained herein may be conceded by recommendation of the Planning Commission and certification by the Board of Zoning Appeals.

The subdivision plat and construction plans are subject to third party engineer review in regard to drainage and access. This review is still ongoing.

Recommendation

Staff is withholding a recommendation at this time. The Planning Commission should consider site suitability and access. Approval should be withheld until approved by third party engineering review.

D. Covington Court Square Town Homes – Site Plan

Background

A site plan has been submitted to create 9 Townhouse Units at the intersection of East Washington Avenue, South Tipton Street, and South Maple Street. The property can be described as Parcel 6.00 on Tipton County Tax Map 041 C, Group E. The property is zoned R-P (Residential Professional) District. The property doesn't appear to be located in a federally identified flood hazard district.

Analysis

The site plan is showing a 15-foot front setback which does not meet the requirements for the R-P District (25 feet) but is seeking an exception per the following standard:

11-1002. Yards. *The front yard requirements of this Ordinance for dwellings shall not apply to any lot where the average depth of existing front yards on the developed lots located within one hundred (100) feet on each side of such lot is less than the minimum required front yard depth. In such cases, the front yard may be less than required but not less than the average of the existing depth for front yards on developed lots within one hundred (100) feet. In residential districts, however, the front yard shall in no case be less than fifteen (15) feet.*

The site meets the side (10 feet) and rear (20 feet) setbacks of the R-P District.

The site plan is subject to third party engineer review in regard to drainage and access. This review is still ongoing.

The site plan is subject to review by the Covington Fire Department in regard to access and fire protection. This includes a variance request by the developer to allow for one access instead of two. The Fire Department has concluded that one access for this site is sufficient.

Recommendation

Staff is withholding a recommendation at this time. The Planning Commission should consider site suitability and access. Approval should be withheld until approved by third party engineering review.

E. Oak Row Subdivision – Minor Subdivision

Background

A minor subdivision plat has been submitted Oak Rowe 2023 LP and Rosedale Development LLC to create two lots from a 16.77-acre parent tract. The properties can be further identified as Parcels 6.00 and 6.09 on Tipton County Tax Map 050. The property is zoned R-3 (High Density Residential) District. The property does not appear to be located in a federally identified flood hazard area.

Analysis

The parcels were created without an approved subdivision plat by the Covington Planning Commission.

Parcel 6.09 is currently landlocked and requires the shown 50-foot access easement for future access. The easement is mislabeled as “shared access” which should be labeled as an “access easement for Tract 2”

Recommendation

Staff recommends approval of the plat provided the access easement label is corrected.

F. Oak Rowe Apartments – Phase 1 – Site Plan

Background

A site plan has been submitted Oak Rowe 2023 LP to construct 48 residential apartments at the end of Meadowview Cove. The property can be further identified as Parcel 6.09 on Tipton County Tax Map 050. The property is zoned R-3 (High Density Residential) District. The property does not appear to be located in a federally identified flood hazard area.

Analysis

The site plan meets the parking requirements for Multi-Family Residential. (2.5 spaces per unit)

The site plan meets the setback requirements for the R-3 district and the perimeter yard requirements for multi-family developments.

Multi-Family Developments require two access points per Covington’s Municipal Zoning Ordinance. This site does not meet this standard, and the developers have presented a letter seeking a waiver of this requirement.

Staff is requesting a traffic study to determine the impact 48 units (96 units total after Phase 2) will have on existing streets.

The site plan is subject to third party engineer review in regard to drainage and access. This review is still ongoing.

The site plan is subject to review by the Covington Fire Department in regard to access and fire protection.

Recommendation

Staff is withholding a recommendation at this time. Staff is reviewing access and traffic impact. Approval should be withheld until approved by third party engineering review and the Covington Fire Department.

G. Taylor - Old Memphis Road Minor Subdivision

Background

A minor subdivision plat has been submitted on behalf of Lisa and James Taylor and Norris Curtis to resubdivide three lots and create an access easement to the remaining property. The properties can be further described as parcels 11.00, 11.13, and 11.14 on Tipton County Tax Map 068. The property is zoned FAR (Forestry, Agricultural, Residential) District. The property does not appear to be located in a federally identified flood hazard area.

Background

The lots do not meet the minimum lot requirements of the FAR district (1 acre) and are asking the Planning Commission for a variance on these lot sizes.

The Covington Regional Subdivision Regulations state the following regarding variances:

I. Variances

Where the subdivider can show that a provision of these standards would cause unnecessary hardship if strictly adhered to, and where, because of topographical or other conditions peculiar to the site, in the opinion of the Planning Commission, a departure may be made without destroying the intent of such provisions, the Planning Commission may authorize a variance. Any variance thus authorized is to be stated in the minutes of the Planning Commission with the reasons on which the departure was justified set forth in writing.

Staff notes that these lots previously dedicated .21 acres of Right of Way on a previous subdivision. The addition of this area would put both lots above the minimum lot requirement.

Recommendation

Staff recommends approval of the variance and the plat due to the previous right of way dedication. Staff notes that this area was originally part of these lots. Right of Way on existing streets should not be used to justify a variance for lot size requirements unless the right of way can be proven to have once been a part of the lot.

MEMORANDUM FOR RECORD

TO: Covington Municipal-Regional Planning Commission.

RE: Performance Bonds and Letters of Credit

The following is a list of performance bonds and letters of credit held by the Covington Municipal-Regional Planning Commission. Sixty (60) days before the expiration date, the Department of Code Compliance staff, will request the developer to renew the financial instrument. If the performance bond or letter is not renewed within two weeks of notice then staff will recommend that the Covington Municipal-Regional Planning Commission "call the bond "or submit a draft on the letter of credit.

<u>Developer</u>	<u>Renewal Date</u>	<u>Notice Date</u>	<u>Expiration Date</u>
Deena, LLC 80 Deena Cove Covington, TN 38019	August 3, 2023 Irrevocable Letter of Credit \$17,000.00	July 23, 2024	September 3, 2024
Barry J. & Melody K. Diggs 247 Holly Grove Road Covington, TN 38019	August 29, 2023 Irrevocable Letter of Credit \$100,000.00	August 19, 2024	September 30, 2024



Engineering | Planning | Surveying

July 2, 2024

Miss Lessie Fisher
Director of Code Compliance
200 West Washington Ave.
Covington, TN 38019

**RE: COVINGTON COURT SQUARE
VARIANCE REQUEST**

On behalf of Renaissance Development, we wish to address a few items outlined in the City Engineer Review dated June 11, 2024, pertaining to Covington Court Square. We are formally providing clarification and justification for a variance request regarding the following aspects:

1. Two Way Access

The Multi-Family Design Guidelines stipulate the necessity for two drive entrances for multifamily communities. Multi Family communities are typically understood to be high density residential communities on larger tracts of land with public and private street networks and private amenities. These communities can include dozens to hundreds of units. A minimum of two points of access are certainly needed for emergency vehicles to access such communities. However, The Covington Court Square property uniquely benefits from access from three existing streets. We're also providing an 18' wide entrance from Maple Street for rear fire access. This was discussed and agreed to by the Fire Department in a meeting on June 18, 2024.

In addition, with nine units on 0.53 acres, the traffic generated from such a small footprint does not warrant a second drive entrance. This residential site could be compared to a small commercial site with one entrance.

Considering the given points, we would like to request one drive entrance rather than two since a single drive entrance suffices to meet emergency access without compromising safety or functionality.



June 18, 2024

Oak Rowe 2023, LP
1723-B University Avenue, Suite 116
Oxford, Mississippi 38655
662-202-8226 | stewart.rutledge@rosedalecorporation.com

City of Covington, TN
Attention: Will Radford – City Planner
200 W. Washington Ave.
Covington, TN 38019

Regarding: Ingress/egress waiver

Will:

Thank you so much for your guidance, help, and support as we work to bring "Oak Rowe" to Covington. As Covington is part of "Blue Oval City," we are excited to bring much needed high quality housing to your growing community.

Our meeting with you and so many of the other City officials on June 6 was very productive, and we are excited to work in your community. During that meeting, we discussed ingress and egress matters, primarily with the fire department officials, but also from a City perspective. We are very appreciative of the City's consideration and accommodation for us considering the specifics of this site, and, as requested, please accept this letter as our formal request and justification for the development having one point of ingress and egress.

Our request to utilize a single point of ingress and egress is completely case-specific, does not create precedent for any other site, and the request is based on at least the following six factors:

1. **Hardship.** The site location and presence of surrounding development make adding an additional ingress and egress difficult if not impossible at this point and, thus, create this hardship.
2. **No Inappropriate Purpose.** The hardship in obtaining additional access is not due in any way to the developer (us) failing to take any action or to us seeking to achieve some financial purpose. That is, but for the physical configuration of the site, we would absolutely desire and seek an additional ingress and egress point.

3. **Sprinklers.** All of our buildings will be sprinklered with fire suppression systems, and the International Fire Code at Section 503.1.1 and the National Fire Protection Association ("NFPA") Code at 18.2.3.2.1.2 state that when buildings are equipped with sprinklers, it is appropriate to utilize these systems as an alternative to ingress and egress requirements.
4. **Fire Department Approval.** The fire department approved our single access configuration, and we have coordinated with them to modify our site over and above standard ordinances to ensure that the fire department is fully satisfied with their access to the site, turn radiuses, and any other needs they may have. We did this at our cost, and we are happy to do so.
5. **Traffic Analysis.** Preliminary traffic analyses show that the relatively small number of units in this development are easily served by a single point of ingress and egress, and our traffic activity falls well below TDOT standards for further traffic mitigation or study.
6. **Second Phase Commitment.** At our June 6 meeting, it was clearly stated, and we agreed that, although we are now building only forty-eight units, if we desire to do an additional phase, we should fully expect to be required to provide a second point of ingress and egress.

Please see below and attached a brief explanation of the above points.

1. **Hardship**

Please see below an aerial of our overall property. Oak Rowe will only be developed on the northernmost portion of this parcel, but, as you can see, there are no other options for access. Further, prior dense development adjacent to our property has created this unavoidable hardship preventing us from gaining additional access at this time.



2. No Inappropriate Purpose

The hardship described above is unavoidable, and it was not created in any way by our actions. That is important to distinguish because it is an important consideration that if a developer "self-creates" a hardship or does so for financial gain, then that hardship is not persuasive as a reason for an accommodation. We can confirm that we have worked diligent to minimize this hardship, and, but for it, we would absolutely pursue other options.

3. Sprinklers

Possibly the most important factor in making our single access configuration acceptable is that our buildings will be sprinklered, and the International Fire Code at Section 503.1.1 and the National Fire Protection Association ("NFPA") Code at 18.2.3.2.1.2 state that when buildings are equipped with sprinklers, it is appropriate to utilize these systems as an alternative to ingress and egress requirements.

It is standard and common to use sprinklers to address access issues, and we are doing so at an estimated additional cost of \$150,000. This further proves that we only seek this accommodation as a last resort, but, by sprinklering the buildings, we will meet international standards for safety.

For further explanation on this, please see attached a letter from the Project Engineer further elaborating this justification.

4. Fire Department Approval

We are very pleased that the Covington Fire Department recognized the benefit of using sprinklers to address this issue, and, at the June 6 meeting, they agreed to permit our current configuration based on this fact. But, further, we discussed then and have continued discussions with the fire department to ensure that our roads are built over and above your ordinances in terms of width, turn radii, and other factors, to ensure that the fire department is completely comfortable with our configuration. This adds expense to our development, but, again, that is a cost we have to bear in light of this difficult site.

5. Traffic Analysis

We hired a traffic engineer to perform a traffic analysis of our proposed development, and, notably, the engineer's analysis found, "The proposed development's projected trip generation is quite a bit under the TDOT threshold. The additional generated peak hour trips do not create a significant influx of new traffic within the area. If at some point in the future there is a reason for concern or if additional development occurs, it might warrant further analysis depending on the situation." As such, in addition to addressing fire concerns, the relatively small number of units we are creating does not create the need for additional access or traffic mitigation at this time.

This traffic analysis is attached here, and it explains the above further and also confirms that, at this time, no further study is needed.

6. Second Phase Commitment

It was stated loud and clear that, although this development is relatively small on a large piece of land, if we do desire to build further on this parcel or the parent or adjacent parcels, we will almost certainly be required to find additional access. We heard and acknowledge this, and we appreciate this accommodation.

Sincerely,

Stewart Rutledge

Enclosures

Project Engineer Letter



4530 Annalee Way
Knoxville, TN 37921
865-692-9809 Phone and Fax
wscottwill@comcast.net

Consulting, Civil Engineering, Land
Surveying

June 3, 2024

City of Covington Board of Zoning Appeals

Attn: Lessie Fisher

Director of Code Compliance
200 West Washington Ave.
Covington, TN 38019
901-476-7191 ext 1046

RE: Request for Variance from Access Requirement Under Covington, TN Zoning Ordinance for Oak Rowe Apartments,

Dear Board of Zoning Appeals,

On behalf of my client and the property owner, Oak Rowe 2023, LP, we are writing to formally request a variance from the current access requirements stipulated under Covington, Tennessee's municipal zoning ordinance. This request is grounded in the specific provisions and technical justifications that align with both local regulations and internationally recognized codes.

Background and Ordinance Specification:

According to Covington Municipal Zoning Ordinance Section 11-602, Design Standards for Multi-family residential development – Access control, the proposed Oak Rowe Apartments development is required to have a "minimum of two (2) access points". This provision typically aims to help ensure access to the site in case of an emergency.

Request for Variance:

We are requesting a variance to reduce this requirement to one access point based on the installation of an advanced automatic sprinkler system for the apartment units throughout the property, in accordance with the International Fire Code (IFC) and the National Fire Protection Association (NFPA) standards and using a loop road system.

Technical Justification:

1. International Fire Code (IFC) and NFPA Standards:

The International Fire Code (IFC) Section 503 and the National Fire Protection Association (NFPA) 1, Fire Code, provide provisions where the installation of an automatic sprinkler system can justify modifications to the requirements for fire department access roads (ingress/egress).

Specifically, IFC Section 503.1.1 and NFPA 1 Section 18.2.3.2.1.2 state that when buildings are equipped with an approved automatic sprinkler system, exceptions to the required fire apparatus access roads may be considered.

2. Enhanced Fire Safety:

The installation of the automatic sprinkler system significantly enhances the fire safety measures of the building, ensuring that any fire incident can be promptly controlled and extinguished before it escalates. This system is designed to activate automatically in response to a fire, providing immediate suppression and reducing the need for extensive firefighter intervention.

3. Firefighting Efficiency:

The advanced sprinkler system reduces the risk and severity of potential fires, thereby mitigating the necessity for multiple ingress/egress points. Firefighters can operate more efficiently within the building, as the system controls the fire spread and maintains safer conditions for both occupants and emergency responders.

4. Code Compliance and Precedents:

The variance is consistent with provisions allowed under the aforementioned international codes, demonstrating that local modifications in fire access requirements are permissible with enhanced safety systems in place. Numerous jurisdictions have granted similar variances where automatic sprinkler systems are installed, recognizing their effectiveness in ensuring occupant safety and reducing the demand on firefighting resources.

5. Other considerations:

Other typical options to enhance access to a site include looping the internal road system or widening the roads to minimize the chances that an entire road could be blocked during an emergency event. A loop road has been used in this case.

We respectfully ask that you consider our request.

Sincerely,

A handwritten signature in cursive script that reads "Scott Williams". The signature is written in dark ink and is positioned above the typed name.

Scott Williams, P.E.

Traffic Analysis



WILLIAMS ENGINEERING CONSULTANTS, INC.

Professional Engineers | Professional Land Surveyors

June 5, 2024

Oak Rowe
Attention: Stewart Rutledge
1723-B University Avenue, Suite 116
Oxford, MS 38655

Re: "Oak Rowe"
Proposed Traffic Evaluation

Mr. Rutledge:

This is a summary letter detailing the potential traffic impact of your proposed development, "Oak Rowe," to be located in the City of Covington, Tennessee (Tipton County).

Project Overview

The purpose of this letter is define what the proposed project encompasses, as well as, its potential and typical guidelines for this type of development.

Existing Conditions

The proposed project site (Figure 1) is located is southern Covington, Tennessee approximately 1.90 miles southwest of the city square. The proposed site is adjacent to existing multiplex housing developments along the west and south side. Roadways in the vicinity of the project site include U.S. Highway 51, Mueller Brass Road, Old Brighten Road and Meadowview Cove.

U.S. Highway 51 is a 4-lane open ditch regional north/south Principal Arterial with a speed limit of 55 mph. Mueller Brass Road (also known as TN Highway 59) is a 2-lane open ditch Principal Arterial with a speed limit of 45 mph. Old Brighten Road and Meadowview Cove are both 2-lane open ditch local roadways adjacent to the proposed project site. The speed limit on Old Brighten Road is 30 mph while Meadowview Cove is 15 mph.

Proposed Development

The proposed Oak Rowe development will consist of 48 townhome-style apartment units located in Covington, Tennessee. Based on information provided by the Developer, the site plan includes 46 standard 3-bedroom units and 2 ADA-accessible 3-bedroom units, for a total of 65,896 heated square feet. A 1,590 square foot community building is also proposed. Vehicle access to the site will be provided at the northwest corner of the project site by extending Meadowview Cove.

Proposed Site Generated Traffic

The trip generation potential of the proposed development was calculated using information provided in the Institute of Transportation Engineers (ITE) *Trip Generation*, 9th Edition, 2012. This publication includes studies and reports regarding specific categories of developments. Statistical traffic generation rates are derived from these studies to help provide guidance in determining the traffic potential of a specific type of development. There are several different traffic generators available for different residential land use types. It was determined that the best fit for this development will utilize the generation rates for Apartments/Multifamily Housing (Land Use Code 220) per dwelling unit. Apartment/Multifamily housing includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have one or two levels (floors). These traffic generation rates were used to develop the average total daily trips generated within a 24-hour period, as well as, the AM and PM Peak hour generated trips entering and exiting the proposed development. The generation rates used are shown in Table 1.

Table 1

LAND USE	INTENSITY		DAILY TRIPS	AM PEAK			PM PEAK		
	QTY	UNITS		TOTAL	IN	OUT	TOTAL	IN	OUT
PROJECTED SITE TRAFFIC									
Apartments	48	Dwelling Units	48	24	5	19	30	20	10
TOTAL			48	24	5	19	30	20	10
Average Generation Rates:									
Apartments/Multifamily Housing {ITE 220}				In	Out				
Daily Traffic Generation T=6.65 * Dwelling Units									
AM Peak Hour Generation T=0.51 * Dwelling Units				20%	80%				
PM Peak Hour Generation T=0.62 * Dwelling Units				65%	35%				
Source : ITE Trip Generation, 9th Edition, 2012									

As shown in Table 1, the proposed development is projected to generate approximately 319 vehicle trips per weekday, with 24 trips (5 entering, 19 exiting) occurring during the AM peak hour and 30 trips (20 entering, 10 exiting) during the PM peak.

Industry standards and best practices are used to conduct detailed traffic impact analyses for developments that meet or exceed certain trip generation thresholds. These thresholds are typically established by state or local agencies to ensure that the potential impacts of larger projects on the surrounding roadway network are adequately evaluated and mitigated. However, for developments that generate traffic volumes below these triggering thresholds, the preparation of a comprehensive traffic impact study is typically not warranted, as the associated impacts are unlikely to be significant enough to require off-site improvements, safety concerns or mitigation measures. While the City of Covington does not currently have codified trip generation thresholds that mandate the preparation of traffic impact studies, it is appropriate to refer to guidelines published by the Tennessee Department of Transportation (TDOT) and industry organizations such as the Institute of Transportation Engineers (ITE). See Table 2 of an excerpt from the TDOT Traffic Impact Studies Manual. These widely-accepted standards provide a rational basis for determining the need for and scope of traffic analyses based on the expected number of new trips generated during the critical peak hours.

Table 2-Traffic Studies Minimum Threshold Levels

Traffic Study		Minimum Thresholds	Typical Study Area
Level	Type		
1	Traffic Access	50 to 99 new peak hour trips <u>or</u> 250 to 499 new daily trips, whichever is greater	All site access intersections to existing adjacent public roads and the existing adjacent public roads to the first control point* from all site access intersections.
2	Traffic Impact	100 to 249 new peak hour trips <u>or</u> 500 to 2,999 new daily trips, whichever is greater	All site access intersections to existing adjacent public roads, existing major public roads, and study intersections (signalized and unsignalized) within 1/4 mile of all site access intersections
3	Traffic Impact	250 to 399 new peak hour trips <u>or</u> 3 000 to 5,999 new daily trips, whichever is greater	All site access intersections to existing adjacent public roads, existing major public roads, and study intersections (signalized and unsignalized) within 1/2 mile of all site access intersections
4	Traffic Impact	≥400 new peak hour trips <u>or</u> ≥6 000 new daily trips, whichever is greater	All site access intersections to existing adjacent public roads, existing major public roads, and study intersections (signalized and unsignalized) within 3/4 mile of all site access intersections

Source: Traffic Impact Studies, TDOT, 2023

Conclusion

The traffic generated trips are low and typically well under what would be required to facilitate a detailed Traffic Impact Study. The Tennessee Department of Transportation (TDOT) doesn't get into Traffic Impact Study Requirements until 100 to 249 new peak hour trips or 500 to 2,999 new daily trips. This is typically the bare minimum threshold to warrant a study or unless there are special circumstances which might be of concern. The proposed development's projected trip generation is quite a bit under the TDOT threshold. The additional generated peak hour trips do not create a significant influx of new traffic within the area. If at some point in the future there is a reason for concern or if additional development occurs, it might warrant further analysis depending on the situation.

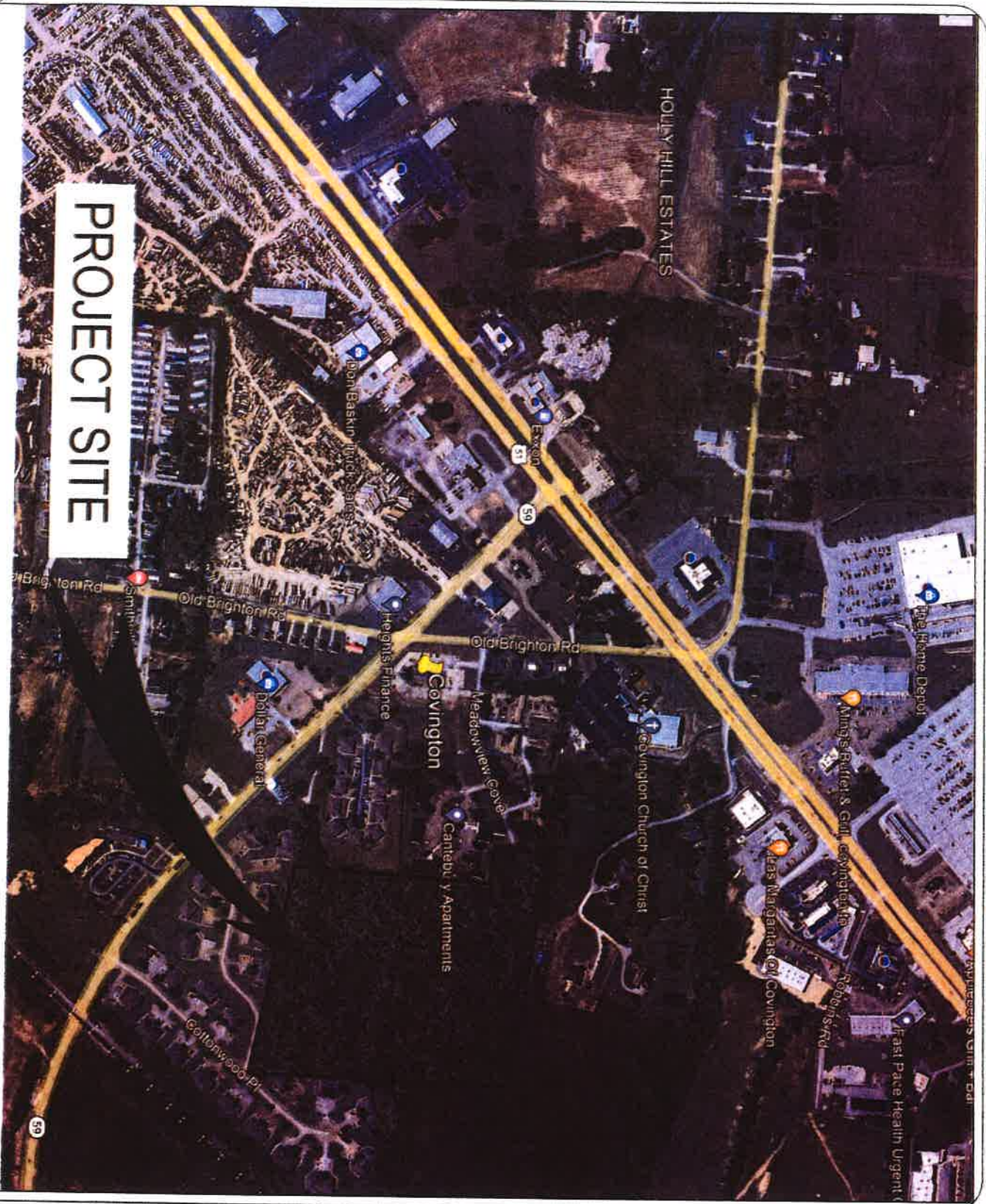
At this time I do not think that a in-depth Traffic Impact Study is needed for the 48 Unit Proposed Development. Please contact our office should you have any questions or need additional information.

Sincerely,

Jimmy Catt Jr., P.E./P.L.S.
Consulting Engineer



PROJECT SITE



OAK ROWE
COVINGTON, TN
TIPTON COUNTY, TN



WILLIAMS ENGINEERING CONSULTANTS, INC.
Professional Engineers | Professional Land Surveyors

720 NORTH LAMAR BOULEVARD, SUITE A
P.O. BOX 1197 OXFORD, MISSISSIPPI 38655
662.238.9475

Scale: NTS
Date: May 2024
File:
Proj. No.:
Drawn By: JEC
Checked By: JEC
Sheet Title: Figure
Sheet No.: 1