

REZONING: CONDITIONAL REZONING - SOUTHGATE APARTMENTS (P21-62-CZD)

CITY OF HENDERSONVILLE - COMMUNITY DEVELOPMENT STAFF REPORT

PROJECT SUMMARY	2
EXISTING ZONING & LAND USE	3
SITE IMAGES.....	4
SITE IMAGES.....	5
SITE IMAGES.....	6
SITE IMAGES.....	7
SITE IMAGES.....	8
SITE IMAGES.....	9
REZONING HISTORY –.....	10
FUTURE LAND USE	11
REZONING ANALYSIS – COMPREHENSIVE PLAN CONSISTENCY (ARTICLE 11-4)	12
REZONING ANALYSIS – COMPREHENSIVE PLAN CONSISTENCY (ARTICLE 11-4)	14
REZONING ANALYSIS – GENERAL REZONING STANDARDS (ARTICLE 11-4)	15
DRAFT COMPREHENSIVE PLAN CONSISTENCY AND REZONING REASONABLENESS STATEMENT	16
STAFF SITE PLAN REVIEW – SUMMARY COMMENTS	17



PROJECT SUMMARY

- Project Name & Case #:
 - Southgate Apartments
 - P21-62-CZD
- Applicant & Property Owner:
 - David Royster III, Capitol Funds, Inc. [Owner/Developer]
 - Suzanne Godsey, Sitework Studios {Applicant}
- Property Address:
 - N/A [Behind Fresh Market / between Israel St and S. Main St]
- Project Acreage:
 - 3.63 Acres
- Parcel Identification (PIN):
 - 9568-75-5382
- Current Parcel Zoning:
 - C-2 Secondary Business
- Requested Zoning:
 - CMU-CZD (Central Mixed Use - Conditional Zoning District)
- Future Land Use Designation:
 - High Intensity Neighborhood
 - Natural Resource / Agricultural
- Neighborhood Compatibility Meeting:
 - October 21, 2021
 - October 29, 2021



SITE VICINITY MAP

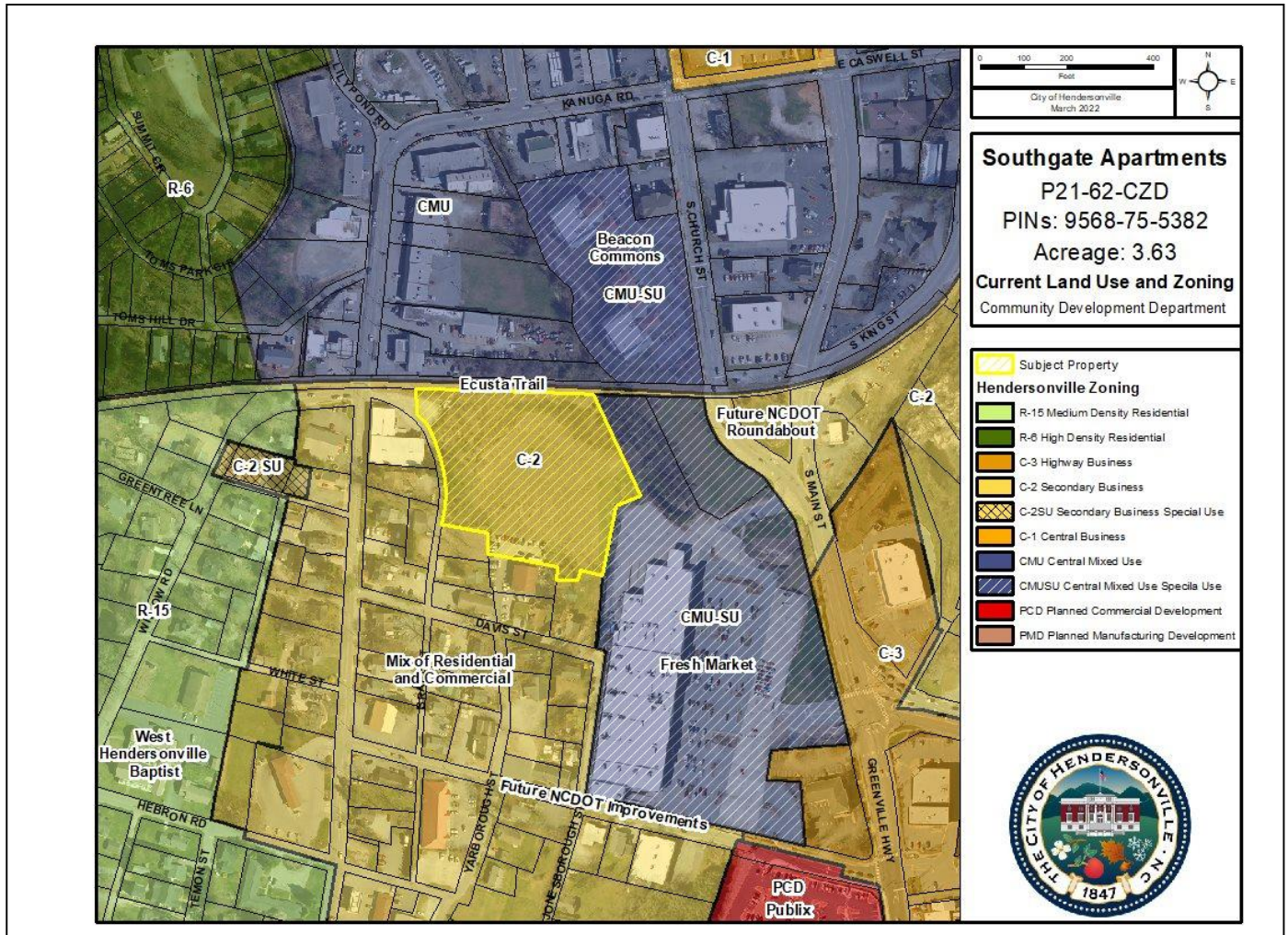
The City of Hendersonville is in receipt of an application for a Conditional Zoning District from Suzanne Godsey of Sitework Studios, applicant and David W. Royster, III of Capitol Funds, Inc., property owner. The applicants are requesting to rezone the subject property (PIN 9568-75-5382) from C-2, Secondary Business to CMU-CZD, for the construction of a 60' tall, 70-unit apartment building on approximately 3.63 acres. The Central Mixed Use district does not have a density cap.

There is one 4-story building proposed with a total of 81,897 Sq Ft (Gross Floor Area). The stated use of the site is residential, multi-family.

The site is currently vacant and contains approximately 1.44 Acres of 100-year floodplain (40%). The site features a cluster of mature trees alongside Israel St – most of which are proposed to be removed and the area will be replanted. The site had previously been occupied for outdoor storage.

This project required a conditional rezoning due to the scale of the proposed development exceeding 50,000 Sq Ft and more than 50 units.

EXISTING ZONING & LAND USE



City of Hendersonville Current Zoning

The subject parcel is within a C-2 zoning district that stretches to the south and west, extending from the west side of Kanuga Rd to the rear property boundaries of two large shopping center developments which front S. Main St. This pocket of C-2 suggests this area has been designated for residential and non-residential redevelopment. The area is currently defined by an older mix of single-family residential and small commercial uses.

To the north of the subject property, the CMU zoning runs along the future home of the Ecusta Rail Trail as it creates a perimeter around the Central Business District (C-1). The site is proposed to have access to the Ecusta Trail and is within a half mile walk of downtown.

To the east, the subject property fronts the Wash Creek floodplain and the parcel containing the Fresh Market Shopping Center (which fronts S. Main St at the intersection of Spartanburg Hwy and Greenville Hwy). The site is in close proximity to the range of uses concentrated around this intersection.

SITE IMAGES



View at western site entrance facing Kanuga Rd at Israel St



View along Israel St facing south

SITE IMAGES



View across site facing north



View across site facing west

SITE IMAGES



View of Wash Creek facing north



Existing shopping center entrance / proposed driveway to site

SITE IMAGES



View of delivery truck preparing to back in to loading dock at shopping center utilizing proposed driveway to subject property

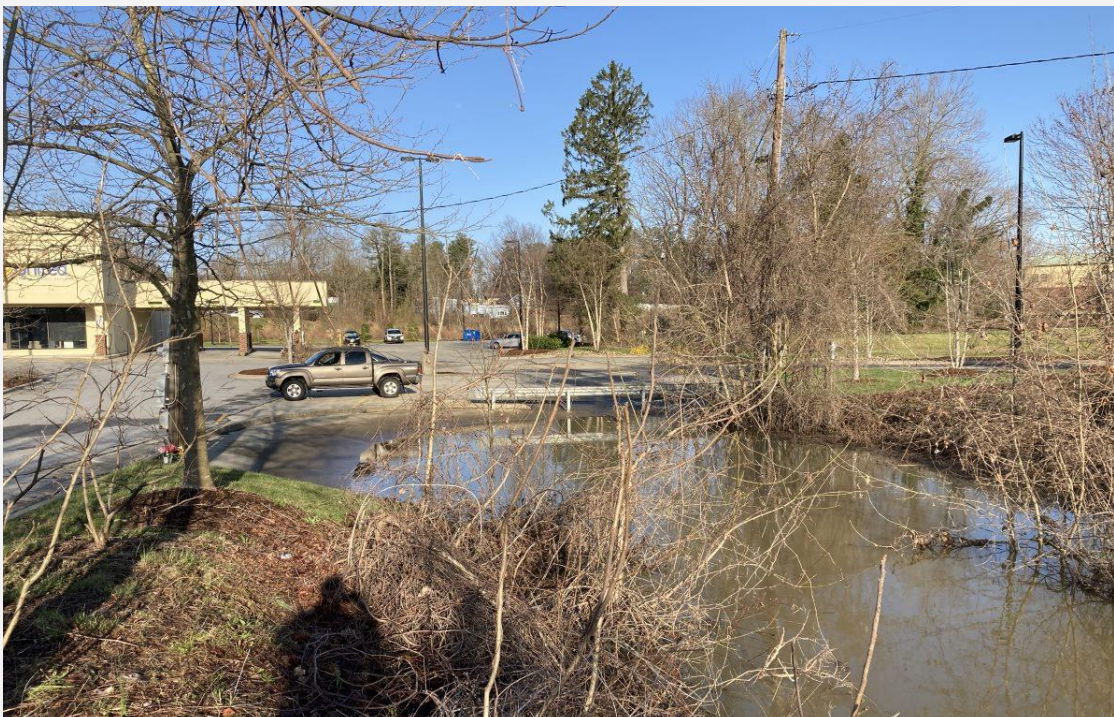


View of future Ecusta Trail along northern boundary of site

SITE IMAGES



Confluence of Mud Creek and Wash Creek after heavy rain



Looking towards site at Wash Creek culvert / bridge crossing

SITE IMAGES

Wash Creek culvert on confluence side



Wash Creek culvert at site – debris collected after heavy rain



REZONING HISTORY –

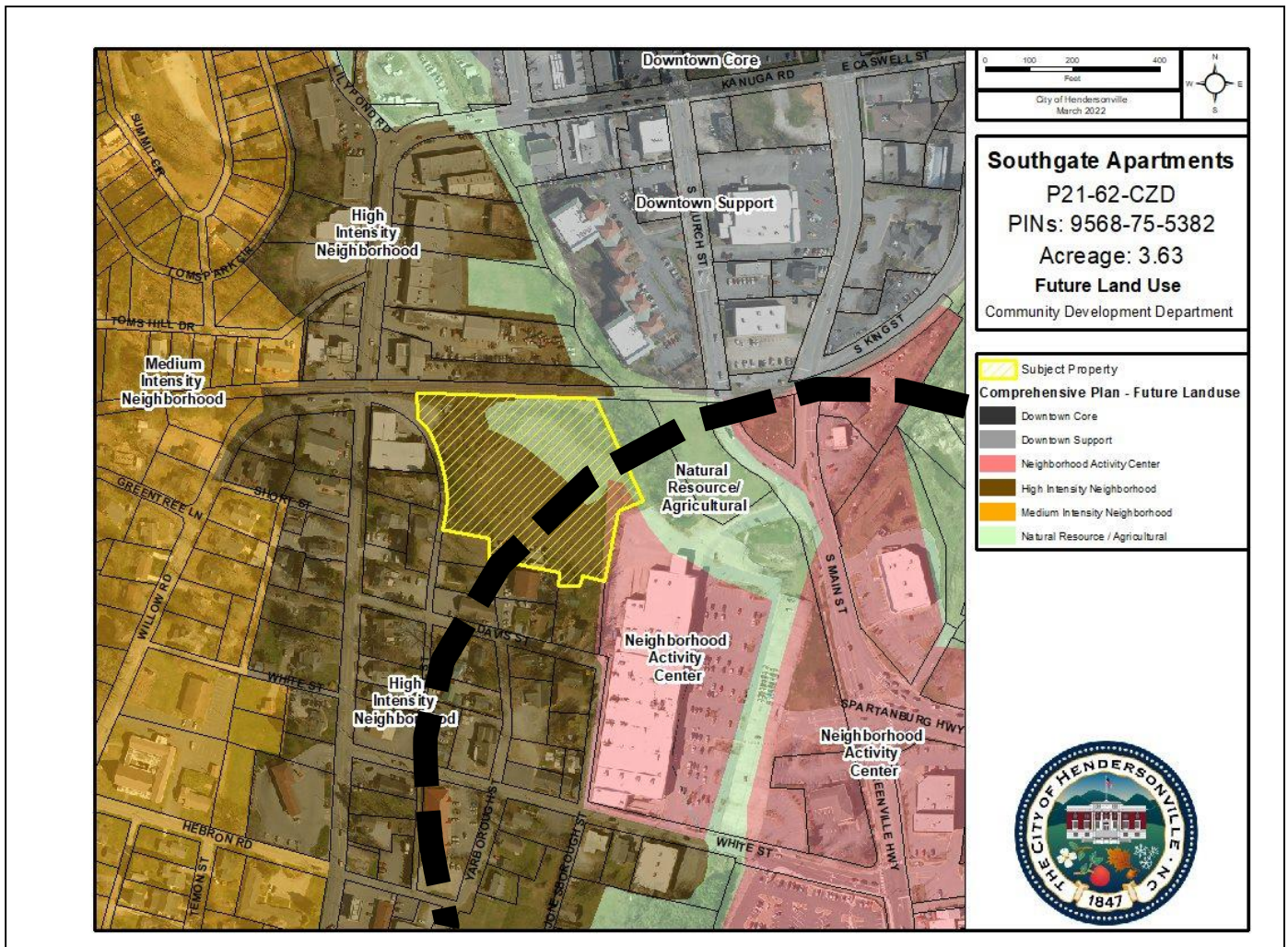
Prior Zoning	Summary of Prior Petition	Status
Unknown		

The specific previous zoning for this currently vacant parcel is unknown but we do know that the site had previously been used for minimal outdoor storage and appears to have been cleared prior to 1951.

A portion of an unimproved Right-of-Way which ran through this property (Yarborough St) was closed in 2016 (shown below).



FUTURE LAND USE



City of Hendersonville Future Land Use Map

The subject property is designated as High Intensity Neighborhood. This High Intensity Neighborhood area runs along either side of Kanuga Rd from Lilly Pond Rd to Hebron Rd. The subject property also contains a Natural Resource / Agricultural designation for the area of the property within the 100 yr floodplain / floodway. Finally, the parcel is partially within an Activity Node centered around the intersection of S. Main St, Spartanburg Hwy and Greenville Hwy. Adjacent to the property and centered within the activity node is a Neighborhood Activity Center designation. The Downtown Support designation begins to the northeast of the subject property, across Wash Creek.

COMPREHENSIVE PLAN CONSISTENCY

Future Land Use

Goal LU-7 - High Intensity Neighborhood: Encourage low-maintenance, high density housing that supports Neighborhood and Regional Activity Centers and downtown and provides a transition between commercial and single-family development. Promote walkable neighborhood design that creates attractive and functional roadway corridors and multi-family residential neighborhoods [consistent]

Strategy LU-7.1. Locations:

- Existing or planned high-density housing neighborhoods (greater than eight units per acre) [CONSISTENT]
- Priority infill development areas where high-density development is desirable and/or expected, including: [CONSISTENT]
 - Boulevard and Major Thoroughfare corridors near Neighborhood Activity Centers [CONSISTENT]
 - Neighborhoods near Downtown, excluding historic neighborhoods [consistent]

Strategy LU-7.2. Primary recommended land uses:

- Multi-family residential [CONSISTENT]

Strategy LU-7.4. Development guidelines:

- Eight or more units per gross acre [CONSISTENT]
- Placement of higher-intensity uses (e.g. office or higher-density residential) close to Boulevards and Major Thoroughfares, and/or adjacent to Neighborhood and Regional Activity Centers [CONSISTENT]
- At least 60% open space in new residential developments greater than three acres [INCONSISTENT]
- Architectural guidelines to encourage compatibility between different land uses (e.g. similarities in building height, massing, roof pitch, and rhythm of windows and façade detailing) [CONSISTENT]
- Encouragement of walkable neighborhood design, as described under Goal PH-3 in Chapter 2 [LIMITED CONSISTENCY]

Goal LU-4 - Natural Resource/Agricultural Areas: Create an interconnected network of green infrastructure that preserves environmentally sensitive areas, protects water resources through low-impact stormwater management, provides floodwater storage, provides community open space and recreational opportunities, and preserves agricultural resources.

Strategy LU-4.1. Locations:

- The FEMA 100-year Floodplain

Strategy LU-4.2. Primary recommended land uses:

- Open space [CONSISTENT]
- Recreational amenities [CONSISTENT]
- Low-impact stormwater management facilities [CONSISTENT]
- Flood storage [CONSISTENT]

Strategy LU-4.4. Development guidelines:

- Preservation and restoration of natural hydrology [INCONSISTENT] Parking & grading is proposed to occur within the existing floodplain.
- Encouragement of Low-Impact Development principles [CONSISTENT]
- Development of non-motorized pathways [CONSISTENT]
- Residential uses limited to one unit per gross acre or less with at least 60% open space [CONSISTENT]

<p>Land Use & Development</p>	<p>Growth Management: Designated as a “Priority Infill Area” (Map 8.3a) - Areas that are considered a high priority for the City to encourage infill development on remaining vacant lots and redevelopment of underutilized or underdeveloped properties [CONSISTENT]</p> <p>Goal LU-1. Encourage infill development that utilizes existing infrastructure in order to maximize public investment and revitalize existing neighborhoods. Strategy LU-1.1. Encourage infill development and redevelopment in areas planned for high-intensity development, as indicated by the “Priority Infill Areas” on Map 8.3a. [CONSISTENT] <u>Infill development:</u> Development that takes place within existing neighborhoods, making maximum use of the existing infrastructure instead of building on previously undeveloped land. -Centers for Disease Control and Prevention, Healthy Places Terminology Examples of opportunities for infill development include: • Scattered vacant lots • Underutilized commercial properties</p>
<p>Population & Housing</p>	<p>Strategy PH-1.1 – Promote compatible infill development</p> <p>Strategy PH-2.2 – Encourage provision of affordable housing units in new developments.</p> <p>Strategy PH-3.2 - Encourage mixed land use patterns that place residents within walking distance of services.</p>
<p>Natural & Environmental Resources</p>	<p>Goal NR-1 - Preserve environmentally sensitive areas in order to protect life and property from natural hazards, protect water resources, and preserve natural habitat. Strategy NR-1.1. - Discourage and reduce development of structures and impervious surfaces within the FEMA Floodway and 100-Year Floodplain. Strategy NR-1.2. Protect land adjacent to streams in order to protect water quality, reduce erosion, and protect wildlife habitat. Strategy NR-1.3. Encourage restoration of natural habitat and drainage patterns in developed areas.</p> <p>Goal NR-2 - Provide a variety of quality open space, distributed equitably throughout Hendersonville, that can be used for recreational opportunities and aesthetic enhancements Strategy NR-2.1. Encourage clustered development that preserves open space while allowing a return on investment. Clustering homes on smaller lots, or clustering commercial development in multi-story buildings, preserves open space without sacrificing housing units or leasable floor area. Zoning regulations can encourage such development by avoiding minimum lot area standards and promoting flexibility in design Strategy NR-2.3 – Promote preservation of woodlands. Mature trees and wooded areas are significant community-defining natural features that contribute to Hendersonville’s identity. Trees provide several additional community benefits, as described in Figure 3.3.c. Strategy NR-2.4. Promote the location and design of open space areas within developments so that they contribute to and link individual homes to the City’s green infrastructure network.</p>

COMPREHENSIVE PLAN CONSISTENCY	
Cultural & Historic Resources	There are no Goals, Strategies, or Actions that are directly applicable to this petition.
Community Facilities	<i>Strategy CF-3.1. Balance investment in new park space and amenities with anticipated maintenance resources.</i>
	<i>Strategy CF-6.1. Encourage community open-space or play areas in new or redeveloped residential neighborhoods.</i>
	<i>Strategy CF-7.2. Preserve and expand the public greenway system as a means of connecting neighborhoods to parks and increasing recreational amenities and open space.</i>
Water Resources	The proposed project would be serviced by City Water and Sewer.
	<i>Strategy WR-2.3. Enable and encourage Low-Impact Development practices in stormwater management. Low Impact Design (LID) is an innovative approach to stormwater management that mimics natural hydrological processes and focuses on both the quality and quantity of stormwater.</i>
Transportation & Circulation	The project is located on a Major Thoroughfare (S. Main St) according to Map 7.3a.
	<i>Strategy TC-1.1. Encourage mixed-use, pedestrian-friendly development that reduces the need to drive between land uses.</i>
	<i>Strategy TC-1.2. Identify and prioritize needed pedestrian connections within the community.</i>
	<i>Strategy TC-1.4. Encourage pedestrian connections between dead end streets and adjacent neighborhoods.</i>
	<i>Strategy TC-2.2. Preserve and expand the public greenway system as a core component of the bicycle and pedestrian transportation system.</i>
	<i>Strategy TC-2.4. Encourage bicycle parking facilities at key destinations. Providing secure parking facilities for bicycles is an important component in creating a convenient bicycling infrastructure and promoting bicycle usage</i>
	<i>Strategy TC-3.1. Continue to develop and require a <u>connected</u> street grid.</i>
	<i>Goal TC-5. Enhance key gateways to the community in order to present a positive first impression and increase civic pride.</i> <i>Strategy TC-5.2. Enhance key entrances within the City</i>

GENERAL REZONING STANDARDS	
Compatibility	Whether and the extent to which the proposed amendment is compatible with existing and proposed uses surrounding the subject property -
	There are a wide range of uses and levels of intensity in the area surrounding the parcel. The property is in immediate proximity to the intersection of Spartanburg Highway and S. Main St. and in close proximity to Downtown. As such high density multi-family residential appears to be compatible as a use. The current C-2 zoning for the parcel permits high intensity uses.
Changed Conditions	Whether and the extent to which there are changed conditions, trends or facts that require an amendment -
	The southern end of Hendersonville has continued to develop as a key commercial node for the City with a wide range of groceries, restaurants, retail shops, services and high density residential. The acquisition, design and construction of the Ecusta Trail will greatly enhance the visibility of and access to this site by non-motorized transportation.
Public Interest	Whether and the extent to which the proposed amendment would result in a logical and orderly development pattern that benefits the surrounding neighborhood, is in the public interest and promotes public health, safety and general welfare -
	The proposed 70 residential units would provide needed additional housing units while making efficient use of land (19.2 Units/Acre) within walking distance to a number of opportunities for employment, shopping, and recreation.
Public Facilities	Whether and the extent to which adequate public facilities and services such as water supply, wastewater treatment, fire and police protection and transportation are available to support the proposed amendment -
	A Water / Sewer Availability Request has been submitted for this project. An extension of public water and sewer is required to serve the proposed project. The development team provided a TIA to identify any needed mitigation based on a recommendation from City staff although the project was under the threshold for triggering a TIA based on projected daily trips.
Effect on Natural Environment	Whether and the extent to which the proposed amendment would result in significantly adverse impacts on the natural environment including but not limited to water, air, noise, storm water management, streams, vegetation, wetlands and wildlife -
	Floodplain Considerations: The proposed development would develop 25% of the subject property's floodplain. The developed portion of the floodplain would be used for parking and driveways and would be filled and covered with impervious surfaces. The developer proposes to offset the proposed fill with a stormwater facility. The 20' Stream Buffer Transition Zone has an existing encroachment of impervious pavement which would be utilized by the proposed development as part of the driveway/access. 17 of 21 mature trees on the site are proposed to be removed (6 evergreens and 11 hardwoods). Portions of the site have a "moderate" ranking for biodiversity.

The petition is found to be **consistent** with the City of Hendersonville 2030 Comprehensive Plan based on the information from the staff analysis and because:

The High Intensity Neighborhood designation calls for Multi-Family Residential as a primary land use and the proposed site plan aligns with a majority of development guidelines listed under LU 7.4.

We find this petition to be reasonable and in the public interest based on the information from the staff analysis and the public hearing, and because:

DRAFT [Rationale for Approval]

- *The petition is located in a Priority Infill Area which recommends redevelopment of underutilized lots*
- *The petition provides infill development utilizing existing infrastructure*
- *The petition provides additional housing in close proximity to downtown and the future Ecusta Trail and in close proximity to goods and services*
- *The petition provides a transition from uses of high intensity to lower intensity uses*
- *The existing C-2 zoning provides a wide range of high intensity commercial uses including car washes, automobile and farm equipment sales, hotels, animal hospitals, service stations, and small-scale manufacturing by right up to 50,000 Sq Ft. The petition for multi-family housing in the CMU District provides greater compatibility with surrounding land uses than other potential by-right developments.*
- *The proposed development provides access from a major thoroughfare*

DRAFT [Rational for Denial]

- *The petition would add an additional 67,225 Sq Ft of buildings, parking lots and streets to a parcel currently utilized for flood storage. This would make 48.7% of the site impervious.*
- *The petition proposes parking and grading of 25% of the site's 100-Year floodplain which exceeds that which is permitted by the City's Zoning Ordinance.*
- *The petition is requesting to add fill to the 100-Year floodplain at a level which exceeds that which is permitted by the City's Zoning Ordinance.*
- *The scale, massing and/or architectural design of the proposed building is not compatible with existing character of the neighborhood between Israel St and Kanuga Rd.*
- *Israel St is a substandard local street which is not designed to accommodate additional traffic.*
- *17 of 21 mature trees on the site will be removed.*

PROPOSED REQUEST DETAILS

- The site plan accompanying this petition contains the following provisions:
 - 70-Unit Apartment Development on 3.63 Acres (Density = 19.3 Units/Acre)
 - 1 – 4-story building (60' Height)
 - 81,897 Sq Ft of Gross Floor Area
 - Development in 100-Year Floodplain
- Requested Uses:
 - Residential, Multi-Family
- Developer Conditions:
 - Developer Proposed Concessions:
 - Provide additional 44 Trees and 78 Shrubs
 - Developer Proposed Conditions:
 - Request Fee-in-lieu of sidewalks along Israel St
 - Request to eliminate the required 12'x40' loading zone space due to floodplain constraints
 - Several modification requests from the Flood Standards of the Zoning Ordinance are necessary for this project due to its unique boundary configuration, existing slope, extent of floodplain on the parcel and conflicts in providing handicap accessibility to the buildings that area required to be raised 2' above base flood elevation while also required to keep all parking allowed in the floodplain at the existing grade (4'+/- grade differential) and where no fill is allowed. The specific modifications will be listed on final plans for recordation and approval. Requested modifications are as follows:
 - Sec. 17-2-2 b) - Request to fill 4' within the floodplain for 5,000 Sq Ft area of parking. This is necessary to ensure ADA connections between the building which has a fixed finished floor elevation due to requirement to be 2' above Base Flood Elevation and the parking lot in front of the building. To compensate for the fill, we will have an in-ground SCM (cell/pond) that will remove fill from the floodplain equal to the fill needed to raise the parking lot.
 - Sec. 17-2-2 c) - We are proposing two entrances for the project, both involve drive aisle that will be located and filling within the floodplain. These entrances need to be located as shown due to the narrowness of the remaining area outside of the floodplain, where the building and parking designs are fixed. The two-entrance layout provides needed fire access, and encourages connectivity to both the shopping center and the Kanuga Rd commercial area. Furthermore these entrances are proposed to be parallel to the stream/floodplain as much as possible while still providing adequate access connections.
 - Sec. 17-2-2 d) - We are looking to develop approximately 25% of the floodplain area contained within the parcel as currently

platted. This is necessary due to the narrowness of the remaining developable area outside of the floodplain. There is a large floodway area around Wash Creek that could potentially be added to the site acreage, dropping the percentage of on-site floodplain area that will be impacted. This would be done per recombination and would be a logistical exercise that would not improve the design. Also note that the existing site is not an undeveloped, pristine, property. Even though it hasn't had a previous building on it, the site has been a construction staging area for decades, and the grade has been changed and most of the parcel has been cleared or disturbed multiple times over the years.

OUTSTANDING ISSUES & PROPOSED CONDITIONS:

COMMUNITY DEVELOPMENT

Site Plan Comments

- The site plan accompanying this petition meets the standards established by the Zoning Ordinance for Central Mixed Use (5-19) and Site Plan Review (7-3) with the following exceptions:
 - Pervious concrete proposed for sidewalk in Stream Buffer Transition Area.
 - Sidewalk from site to Israel St not provided
- Staff identified an alternative to the amount of development proposed in the floodplain and advocated that a portion of the parking for the site be located under the 1st floor of the building. The developer did not agree to this change to the project due to cost.

Proposed City-Initiated Conditions:

- Eliminate gates per Sec 18-6-4.6 of the Zoning Code - Applicants are encouraged to design streets so that they interconnect with adjacent properties.
- Developer to install trail connection from Ecusta Trail to shopping center and dedicate to the City.
- Construct approximately 200' of sidewalk along the east side of Israel St from Site Entrance to existing sidewalk on Kanuga Rd in lieu-of-sidewalks along the entire frontage of Israel St. Sufficient ROW exist adjacent to the site.

CITY ENGINEER

Site Plan Comments

- Show easement for existing sanitary sewer. No tree planting within sewer easement. [resolved]
- Storm outfall is shown exiting at existing sewer - adjust so there is no washout. [resolved]
- Shift fence outside of sewer easement [resolved]

Proposed City-Initiated Conditions:

- None

WATER / SEWER

Site Plan Comments:

- None

Proposed City-Initiated Conditions:

- None

FIRE MARSHAL

Site Plan Comments

- Reduce size of landscaped/entrance island at Israel St access to ensure fire access.

Proposed City-Initiated Conditions:

- None

STORMWATER ADMINISTRATOR

Site Plan Comments

- The culvert at the confluence of Wash Creek/Mud Creek is undersized. That culvert is by far the smallest diameter culvert on the whole reach of Mud Creek from Laurel Park to the confluence. Every other crossing is either a bridge, double or triple box culvert w/ 6'x4' boxes, and the culvert at Fresh Market is a single 72" round pipe, 30% of which is filled w/ sediment. The current stream crossing on Wash Creek at the eastern entrance to the development is not designed to convey the 25-year storm event without overtopping (NCDOT Standards require all minor roads/local road stream crossings to be able to convey the 25-year event). Based on past storm events this entrance is likely to be inundated at least twice a year, limiting the development to 1 entrance onto Israel St. Additionally, climate models for this region show a high likelihood of increasing frequency of severe rainfall and overall increased precipitation, which would lead to more situations in which Southgate residents are being isolated by flood conditions. While this development is not responsible for causing flooding in this area, it will contribute to the peak flow in Wash Creek upstream of the culvert, further increasing the possibility of the eastern entrance becoming inaccessible during severe rain events. The applicant is also requesting a conditional approval of placing additional fill in the immediate vicinity of the culvert, which will decrease the flood storage area above the culvert and potentially cause more frequent inundation of this crossing. The applicant's proposal to "maintain" the culvert under the condition that it does not require additional permitting does nothing to address the current limitations of the culverts performance.

Proposed City-Initiated Conditions:

- Developer shall evaluate the current performance of the culvert and at a minimum increase the capacity of the crossing to convey the peak discharge from a 25-year storm event.

FLOODPLAIN ADMINISTRATOR

Site Plan Comments

- Sufficient separate from seasonal high-water table needed for proposed Stormwater Control Measure.
- Due to the proposed development in the floodplain and the requested developer proposed conditions, staff requested that a preliminary flood study be provided. The conclusion of the Preliminary Flood Study Memo is as follows:
 - Andrew Bick, PE, CFM - *Based on our preliminary analyses, the proposed grading appears to be feasible in terms of not causing adverse flooding impacts. A floodplain development permit application to the City would need to include hydraulic modeling of the final site plan and a detailed summary report. These preliminary analyses can serve as the basis of this final study*

Proposed City-Initiated Conditions:

- Provide information related to seasonal high-water table.
- Response to Developer Proposed Condition: Provide flood study/engineering analysis prior to Final Site Plan approval to determine impact of proposed development to subject property and properties upstream and mitigate / revise site plan as needed. No impact / increased flood hazard on existing or proposed structures shall be permitted.
- Provide flood study/engineering analysis for all work done within floodway.

PUBLIC WORKS

Site Plan Comments

- Additional information on delivery truck scheduled needed [see below]

Proposed City-Initiated Conditions:

- None

NCDOT

Site Plan Comments

- None

Proposed City-Initiated Conditions:

- None

TRANSPORTATION CONSULTANT

The proposed development is anticipated to generate 465 Daily Trips, 29 AM peak hour trips, and 37 PM peak hour trips per the ITE Trip Generation Manual, 10th Edition. This falls below the City's Threshold for triggering a TIA (Section 6-18). A TIA was recommended, but not required for this development. The City's Transportation Consultant (Jonathan Guy, Kimley-Horn) provided the following feedback on the TIA submitted by the development team:

- ***Based on a technical review of the revised TIA report as submitted, several elements of the report and analysis do not address comments provided by Kimley-Horn on February 10, 2022. These unaddressed comments are***

summarized in the bulleted list below, with the relative impact on the analysis results and recommendations noted in brackets [Planning Staff has provided the bullet points from the TIA Review Memo which have a rating of Moderate Impact and High Impact as noted in the brackets]:

- A turn lane warrant analysis was not conducted for the existing unsignalized intersections of Kanuga Road with Israel Street and NC 225 (S Main Street) with S Church Street/Fresh Market Shops Driveway. A turn lane warrant analysis should be completed at these locations or justification for their exclusion should be provided in the TIA report text. [**Moderate Impact**]
 - Consider revising the site plan or otherwise including improvements to Israel Street between the proposed site access point and Kanuga Road to address sight distance deficiencies and provide additional pavement width for two-way traffic. [**Moderate Impact**]
- **The following additional comments are offered based on a review of the revised TIA against NCDOT and City of Hendersonville guidelines and should be addressed as appropriate:**
- In Figure 11 and Figure 12, it is not clear how 2040 No-Build and 2040 Build traffic volumes were derived. NCDOT Traffic Breakouts should be provided as an attachment to the TIA, and a separate trip distribution figure should be developed in the context of the 2040 roadway network. [**Moderate Impact**]
 - NCDOT Congestion Management's Capacity Analysis Guidelines specify that a TIP Design Year Analysis, when applicable, should be conducted for all study intersections. The 2040 NoBuild and 2040 Build analyses should be revised to include all study intersections or justification for their exclusion should otherwise be provided. [**Moderate Impact**]

In addition to the requested technical revisions to the report, recommendations related to addressing conflicts with delivery trucks entering the entrance area of the site have been provided to the applicant. The delivery schedule for Southgate is as follows:

- PetSmart (large trucks): Deliveries 2X/week, Mon. and Fri. between 7am-1pm
- Fresh Market (smaller trucks): Deliveries daily Mon-Sat between 6am-3pm

Proposed City-Initiated Conditions:

- Revise TIA accordingly
- Revise site plan to accommodate recommended Alternative for entrance / loading dock access.