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Atlanta GA 30328
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May 14, 2020

Chuck Warbington, PE
City Manager
City of Lawrenceville
70 South Clayton Street | PO Box 2200
Lawrenceville GA 30046

RE: RZC2020-00012 & SUP2020-00027

Enclosed with this letter are the Recommended Conditions we received from you on 05/05/20.

Thank you for the opportunity to respond to these revised Staff Recommendations for the Rezoning Application number RZC2020-00012 and Special Use Permit number SUP2020-00027. Please see our responses to your comments below:

RZC2020-00012

- 1.B. Based on a recent intermittent stream determination made by Corblu Ecology Group from a 05/08/20 field visit, a 75' stream buffer is now a project requirement along the southern property line of the subject site. Therefore, item 1.A. shall be revised as such:

"The maximum number of units shall be 156."

- 1.C.iii. Due to the reduced unit count for the project, the recalculated minimum Loading Parking Space requirements is now (9) nine in lieu of (10) ten. We request that item 1.C.iii. be revised as such:

"Loading requirements shall be 9 min."

SUP2020-00027

We agree with the condition relative to SUP 202000027 except as to the following:

- 1.2. Based on a recent intermittent stream determination made by Corblu Ecology Group from a 05/08/20 field visit, a 75' stream buffer is now a project requirement along the southern property line of the subject site. Therefore, item 1.A. shall be revised as such:

"The maximum number of units shall be 156."

- 1.3 We cannot put maximum limits upon unit mix based on income. We have checked with counsel and such a provision violates the Fair Housing Act. The same is true as to limitations on bedroom numbers since they are tied to rent and could end up discriminating against families with children

We are, however, willing to commit no more than 25% of the units in the proposed development that are serviced by the Lawrenceville Housing Authority.

In addition, please note the following current project assumptions:

- 25% market rate unit types included
- 15% 3-bedroom unit types included
- No 4-bedroom unit types included

2.A.3 As you are aware, we are seeking an allocation of 9% tax credits from the Georgia Department of Community Affairs (DCA) through the upcoming 2020 funding round. This is a very competitive statewide process and our application will be ranked against competing applications throughout all of Georgia.

The mandate of "above market finishes" resulting in "excessive costs" in the eyes of DCA could result in a Threshold failure for our application, thus denying our financing request and rendering this project financially infeasible.

As stated in the **2020 Qualified Allocation Plan – Threshold section, Item XXVII. OPTIMAL UTILIZATION OR RESOURCES (p. 42):**

"DCA is required to take any actions necessary or convenient to ensure the complete, effective, efficient, and lawful allocation and utilization of the Housing Tax Credit Program. It will not select projects that will result in a waste of DCA resources."

Our current portfolio of approximately 1,500 affordable housing units throughout the Southeast do not possess stainless steel appliances or stone countertops yet perform at less than 3% vacancy annually.

We request that item 2.A.3 be deleted.

Sincerely

A handwritten signature in blue ink, appearing to read 'B. Barr', with a stylized flourish at the end.

Brendan Barr
Managing Partner

CC: Lejla Prjlaca, Lawrenceville Housing Authority
Kathy Zickert, Smith Gambrell and Russell

**PLANNING AND DEVELOPMENT DEPARTMENT
RECOMMENDED CONDITIONS**

RZC2020-00012:

Approval as OI (Office Institutional District) for an apartment development, subject to the following enumerated conditions:

1. To restrict the use of the property as follows:
 - A. Multifamily apartment buildings and its associated accessory use structures.
 - B. The maximum number of units shall be ~~233~~ **202**.
 - C. **The following variances shall be granted:**
 - i. **Maximum height of structures shall be 45'**
 - ii. **Parking ratio shall be 1.6 per dwelling unit min.**
 - iii. **Loading requirements shall be 10 min.**
2. To satisfy the following site development considerations:
 - ~~A. The property shall be developed in general accordance with the submitted site plan, dated February 6, 2020, with changes necessary to meet conditions of zoning, requirements of the Zoning Ordinance and/or Development Regulations, and other minor adjustments as may be approved by the Director of Planning and Development.~~
 - B. Provide a 50-foot wide natural undisturbed buffer along the eastern property line, immediately adjacent to the Acadia Woods single-family subdivision. The buffer shall be enhanced where sparsely vegetated. Final landscaping shall be subject to review and approval of the Director of the Planning and Development Department.
 - C. Provide a 10-foot landscape strip along the eastern right-of-way of Grayson Highway, and the southern right-of-way of Applewood Drive. Final landscaping design shall be subject to review and approval of the Director of the Planning and Development Department.
 - ~~D. The apartment buildings shall meet the RM-12 architectural standards set forth in the Zoning Ordinance. Final elevations shall be subject to the review and approval of the Director of Planning and Development Department.~~
 - E. Ground Signage shall be limited to a maximum height of 6 feet and shall be setback from the right-of-way a minimum of 10 feet. Maximum Sign Display Area shall not exceed 32 square feet.
 - F. The front, side and rear facades of associated accessory use structures shall be finished with a minimum of 50 percent brick on each elevation.
 - G. All grassed areas shall be sodded.
 - ~~H. Underground utilities shall be provided throughout the development.~~

- I. ~~All The electric~~ utilities internal to the development ~~shall must~~ be placed underground.
- J. The developer shall provide a bus shelter along Grayson **Highway as well as access from the development to the bus shelter subject to the review and approval of GCDOT and GDOT.**
- K. **Exterior site lighting shall be provided and shall be contained in cut-off type luminaries and shall be directed in towards the property so as not to shine directly into adjacent properties or right of ways**
- L. **Dumpsters shall be screened by solid masonry walls matching the building, with an opaque metal gate enclosure.**
- M. **Detention ponds shall include a six foot tall black vinyl coated chainlink fence and landscaping so as to be screened from view of adjacent property or rights of way.**
- N. **Access shall be provided to the development by Applewood Drive and subject to the review and approval of City Engineer.**

PLANNING AND DEVELOPMENT DEPARTMENT RECOMMENDED CONDITIONS

SUP2020-00027:

Approval of Special Use for an apartment development ~~at 24 units per acre~~, subject to the following enumerated conditions:

1. To restrict the use of the property as follows:
 1. Multifamily apartment buildings and its associated accessory use structures.
 2. The maximum number of units shall be ~~233~~ **202**.
 3. **The units shall meet the following:**
 - i. **Lawrenceville Housing Authority Managed Units – 25% max.**
 - ii. **Units leased at market rent – 25% min.**
 - iii. **3 bedroom – 10% Max**
 - iv. **4 bedrooms are prohibited**
2. To satisfy the following site development considerations:
 - A. The property shall be developed in general accordance with the ~~submitted~~ site plan **presented at the May 20,2020 Council Meeting, dated February 6, 2020**, with changes necessary to meet conditions of zoning, requirements of the Zoning Ordinance and/or Development Regulations, and other minor adjustments as may be approved by the Director of Planning and Development.
 1. The apartment buildings shall meet the RM-12 architectural standards set forth in the Zoning Ordinance **with the exceptions outlined herein. All**

elevations of all structures shall have majority exterior treatments of brick or stacked stone on each elevation. The remainder of the elevation may be the same or of fiber cement shake or siding or architectural metal. Building elevations shall be submitted for review and approval by the Director of Planning and Development prior to the issuance of a development permit.

2. Buildings shall be constructed with internal double loaded corridors (no breezeways).
3. Interior unit features include stainless steel appliances, stone countertops, and washer and dryer.
4. The development shall be a gated community, with automated car access at all entrances/exits. The access gate system is required to be properly maintained and functional at all times, with any required repairs to be made in a timely manner. Fencing along public Right of way shall be wrought iron style type fencing with masonry columns spaced 25 feet.
5. Development shall include amenities for residents including active common spaces that include a splash pad, playground, community garden, grilling and picnic areas. Design and location of the amenities shall be subject to the review and approval by the Director of Planning and Development.
6. The leasing facility shall include a community room sized large enough for after school classes for tutoring.

~~B. The front, side and rear facades of associated accessory use structures shall be finished with a minimum of 50 percent brick on each elevation.~~

~~D. All grassed areas shall be sodded.~~

~~E. Underground utilities shall be provided throughout the development.~~

~~F. The electric utilities internal to the development must be placed underground.~~