

## EXHIBIT "A"

2022-3096-ZC

A certain parcel of land, lying and situated in Section 22, Township 8 South, Range 14 East, Greensburg Land District, Saint Tammany Parish, Louisiana and being more fully described as follows.

From the Quarter Section corner common to Sections 22 & 23, Township 8 South, Range 14 East, Greensburg Land District, Saint Tammany Parish, Louisiana run North 00 Degrees 08 Minutes 00 Seconds East a distance of 256.00 feet to a point; Thence run North 89 Degrees 06 Minutes 30 Seconds West a distance of 684.00 feet to point on the westerly right of way line of Broom Road; Thence run along said westerly right of way line of Broom Road North 00 Degrees 08 Minutes 00 Seconds East a distance of 185.99 feet to a point and the **Point of Beginning**.

From the **Point of Beginning** run North 00 Degrees 08 Minutes 00 Seconds East a distance of 70.01 feet to a point; Thence leaving said westerly right of way line of Broom Road run South 89 Degrees 06 Minutes 30 Seconds East a distance of 155.57 feet to a point; Thence run South 00 Degrees 08 Minutes 00 Seconds West a distance of 70.01 feet to a point; Thence run North 89 Degrees 06 Minutes 30 Seconds West a distance of 155.57 feet and back to the **Point of Beginning**.

Said parcel contains **0.250 acres of land more or less**, lying and situated in Section 22, Township 8 South, Range 14 East, Greensburg Land District, Saint Tammany Parish, Louisiana.

Note: This description is based upon a survey by Ivan M. Borgen dated 8/14/80 and has not been field verified by this firm.

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HOWARD R. FUSSELL  
(1937-2015)

Appeal #3

February 2, 2023

VIA EMAIL

St. Tammany Parish Council

Re: February 2, 2023 Appeal Hearing for Case #2022-3096-ZC  
Request for Zoning Change to Add MHO to A-4  
Property of Cinthia Juarez Diaz on Broom Road off La. Hwy. 11  
Our File S-21,646

Dear Honorable Councilpersons:

Our Firm represents Cinthia Juarez Diaz, the owner of the above referenced property, which seeks the addition of MHO zoning in the above referenced case on your docket for appeal hearing on February 2, 2023.

At the St. Tammany Parish Zoning Commission Meeting on January 3, 2023, with 3 Commissioners absent and/or resigned, there was a deadlock (4 to 4) vote as to the request for the additional MHO zoning.

In this regard, please note the following facts:

1. The ZONING STAFF REPORT does not include any negative comments and/or recommendations with regard to the MHO request, and furthermore, emphasizes:
  - a) There are some large sections of MHO Manufactured Housing Overlay in close proximity to the east and the south of the subject site, approved through the Comprehensive Rezoning (Council Ordinance No. 09-2087); and
  - b) The site's current A-4 Single-Family Residential Zoning District designation allows for a density of 4 units per acre; however, the applicant's request is to be able to place a single mobile home on site in addition to the existing stick-built home.
2. The closest structure to subject property is a manufactured home located to the north well over 100 feet north of the proposed trailer site.

3. The nearest stick-built home to subject property (owned by Iris Lemus), who lives across Broom Road from the mobile home located to the north of subject property, has confirmed that she has "no problem" with this request. Furthermore, no one else living in the area, spoke in opposition at the January 6 Zoning Commission Meeting, except Barbara Broom, who lives in the mobile home directly north of subject property.

\* Please see the attached Vicinity Map depicting Subject Property, and please note that:

- a) Only the northwesterly 0.25 acres (of the 2.0 acre tract) will be zoned with MHO.
- b) The trailer (14 feet wide by 70 feet long) will be situated 30 feet from the front (Broom Road) and 25 feet from the northern boundary, being more than 125 feet from the trailer owned and occupied by Ms. Barbara Broom.
- c) An 8 foot solid privacy fence (90 feet long) will be constructed along the northern boundary of the MHO parcel a sufficient distance to reasonably screen the trailer from easy view by Ms. Barbara Broom and her Family.

**We respectfully request that the St. Tammany Parish Council override the St. Tammany Parish Zoning Commission's denial (created by the deadlock vote) and thereby approve the request for MHO for subject property.**

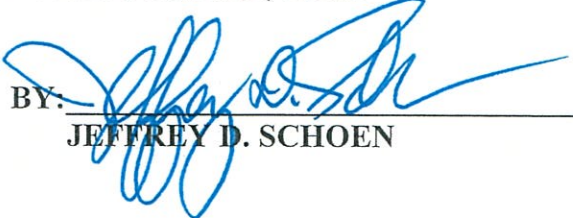
After you have had a chance to review, please let me know if you care to further discuss.

Thank you for your consideration of this matter.

With best regards,

Very truly yours,

**JONES FUSSELL, L.L.P.**

BY:   
**JEFFREY D. SCHOEN**

JDS:swg  
Enclosure

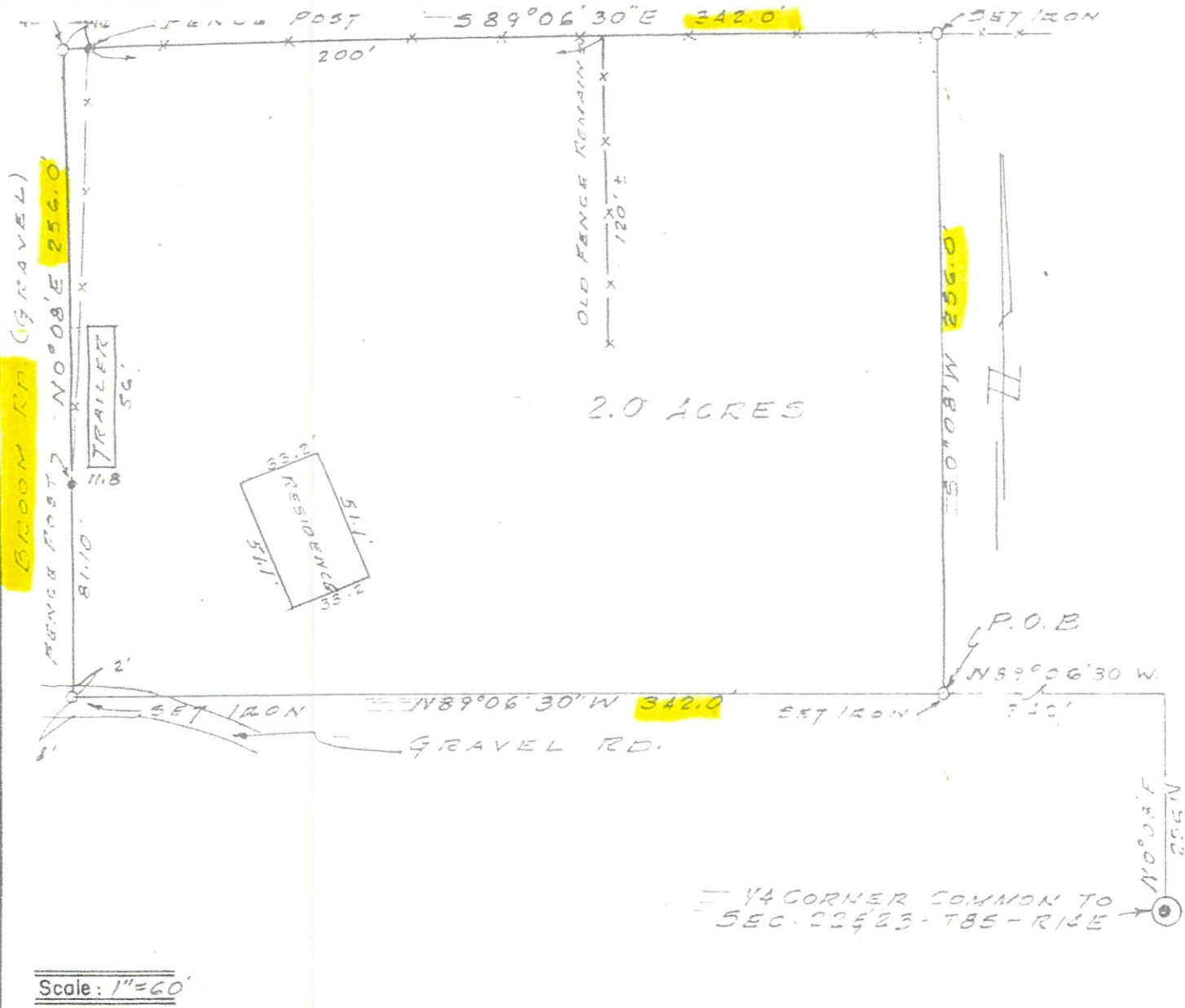
cc: Cinthia Juarez Diaz







2022-3096-ZC



Survey Map

of

A CERTAIN PARCEL OF LAND SITUATED IN SEC. 22, T85-R1E

in

St. Tammany Parish, Louisiana

for

DAUNETTE L. WILLIS



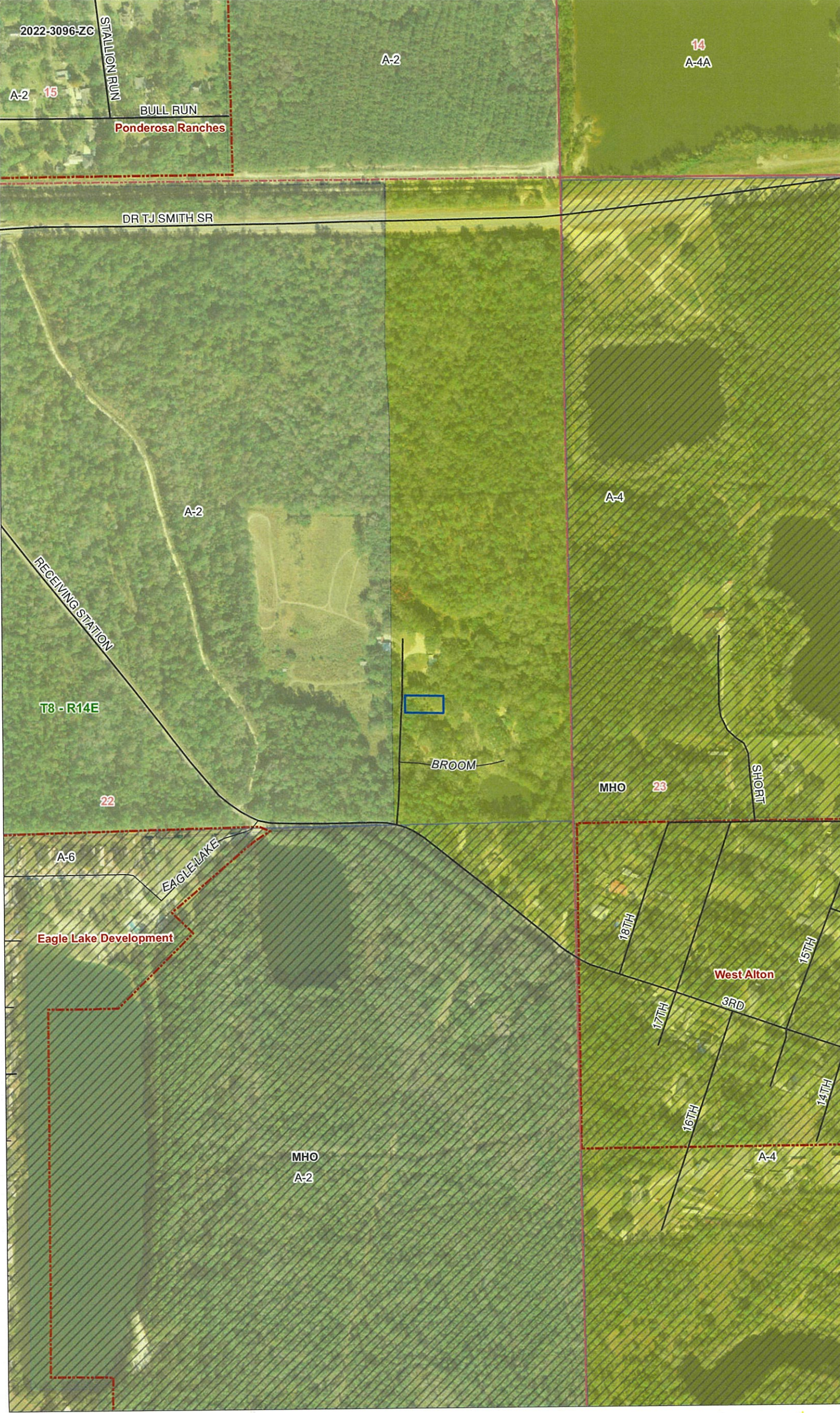
Survey Number: 24719  
Date: AUG. 14, 1980  
Revision:

This Survey is Certified  
True and Correct by

Ivan M. Borgen  
No. 686

DRAWN BY: I.M.C. CHK'D BY: L.S.







ADMINISTRATIVE COMMENTS



ZONING STAFF REPORT  
2022-3096-ZC

MICHAEL B. COOPER  
PARISH PRESIDENT

PLANNING & DEVELOPMENT  
Ross Liner  
Director

985-898-2529      21454 Koop Drive, Suite 1B, Mandeville, LA 70471      stpgov.org/planning

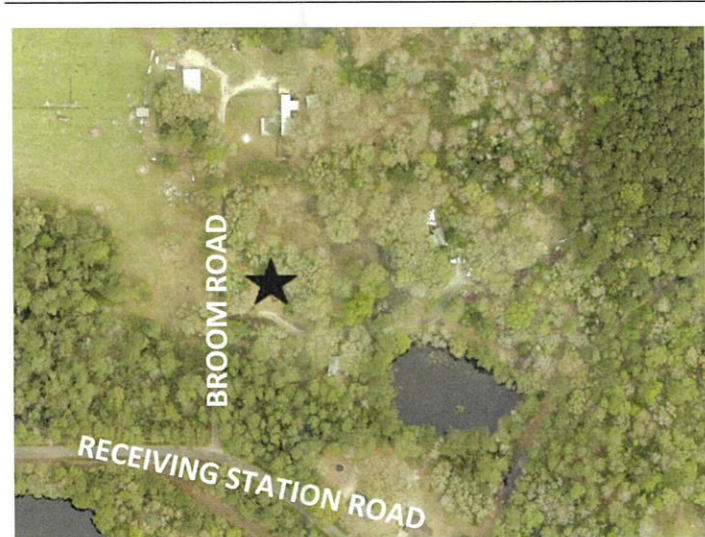
**Location:** Parcel located on the east side of Broom Road, north of Receiving Station Road, Slidell; S22, T8S, R14E; Ward 9, District 9      **Council District:** 9

**Owner:** Cinthia Juarez Diaz      **Posted:** December 15, 2022

**Applicant:** Marina Stevens      **Commission Hearing:** January 3, 2023

**Size:** .250 As Amended      **Prior Determination:** Postponed until January 3, 2022 – December 6, 2022

**Determination:** Denied



**Current Zoning**

A-4 Single Family Residential District

**Requested Zoning**

A-4 Single Family Residential District

MHO Mobile Home Overlay District

**Future Land Use**

Rural & Agricultural

**Flood Zone**

Effective Flood Zone A10

**Critical Drainage:**

Yes

*Findings*

1. The petitioner is requesting to change the zoning classification from A-4 Single Family Residential District to A-4 Single Family Residential District and MHO Manufactured Housing Overlay. The site is located on the east Side of Broom Road, north of Receiving Station Road; Slidell.

*Zoning History*

Table 1: Zoning history of Subject Lot(s)

Ordinance	Prior Classification	Amended Classification
87-001A	Unknown	SA Suburban Agriculture
09-2020	SA Suburban Agriculture	A-4 Single Family Residential District – Comprehensive Rezoning

2. The 2-acre parcel is currently developed with a stick-built home.

*Compatibility or Suitability with Adjacent Area*

3. Table 2: Surrounding Land Use and Zoning

Direction	Surrounding Use	Surrounding Zoning Classification
North	Residential	A-4 Single-Family Residential District
South	Undeveloped	A-4 Single Family Residential District
East	Undeveloped	A-4 Single-Family Residential District
West	Undeveloped & Residential	A-2 Suburban District

4. There are some large sections of MHO Manufactured Housing Overlay in close proximity to the the east and the south of the subject site, approved through the Comprehensive Rezoning (Council Ordinance No. 09-2087). This area includes developments/subdivisions such as Alton, West Alton, Eagle Lake Development, Belle Gardens, Morgan, W Addition to Morgan, and Browns Village Annex, all of which are zoned residential with MHO Manufactured Housing Overlay.
5. The site's current A-4 Single-Family Residential Zoning District designation allows for a density of 4 units per acre; however, the applicant's request is to be able to place a single mobile home on site in addition to the existing stick-built home.



ADMINISTRATIVE COMMENTS



ZONING STAFF REPORT  
2022-3096-ZC

MICHAEL B. COOPER  
PARISH PRESIDENT

PLANNING & DEVELOPMENT  
Ross Liner  
Director

Consistency with New Directions 2040

**Rural-Agriculture:** areas that include mostly very low intensity uses in non-urbanized areas, such as agriculture, horse farms, timberlands, ranches, and very large single-family lots typically larger than three acres. No large traffic generators or noisy or pollution causing uses are located in Rural and Agricultural areas. Low-capacity country roads—typically two-lanes—serve these areas. Septic systems and wells are typical. The Parish’s abundant rural areas provide ample space for low-intensity uses, offering residents privacy and access to the outdoors. The countryside also fosters a number of commercial activities, such as production farms, horse boarding, and lumber harvesting. The Rural and Agricultural category includes these commercial uses, as well as small rural-serving businesses such as small groceries, gas stations, restaurants, and auto repair shops. St. Tammany’s countryside supports a growing tourism industry, whose businesses in this area include bed and breakfasts, retreat centers, nature tours, and “u-pick” farms.

- 1. The proposed zoning change is consistent with the following goals, policies, and strategies of the Comprehensive Plan:
  - i. Goal 1.3: The character of existing residential areas, expansive rural landscapes, and sensitive ecological areas will be preserved.
  - ii. Goal 1.8: A variety of safe, affordable, and attractive housing types will meet the needs of our diverse community.

