

**MEMPHIS AND SHELBY COUNTY OFFICE OF PLANNING AND DEVELOPMENT
ADDENDUM TO STAFF REPORT #22**

CASE NUMBER: S.U.P. 07-225

L.U.C.B. MEETING: January 10, 2008
(Redacted 1/29/2008)

LOCATION:

Northwest and southwest corners of National Street, and Faxon Avenue

OWNER:

Highland Heights Baptist Church

APPLICANT:

Collegiate School of Memphis, Inc.

REQUEST:

Private school (7-12)

AREA:

4.9 acres

EXISTING LAND USE & ZONING:

Church campus in the Duplex Residential (R-D) Zoning District

SURROUNDING USES AND ZONING:

North: Duplexes in the R-D District with frontage on the north side of Tutwiler Avenue and a commercial use in the Local Commercial (C-L) District in the northwest corner of Tutwiler and National Street.

East: Across National Street, retail and auto repair businesses, a parking lot and a US Postal Service station in the Local Commercial (C-L) and General Office (O-G) Districts.

South: Retail and motor vehicle repair businesses with access from Summer Avenue in the Highway Commercial (C-H) District

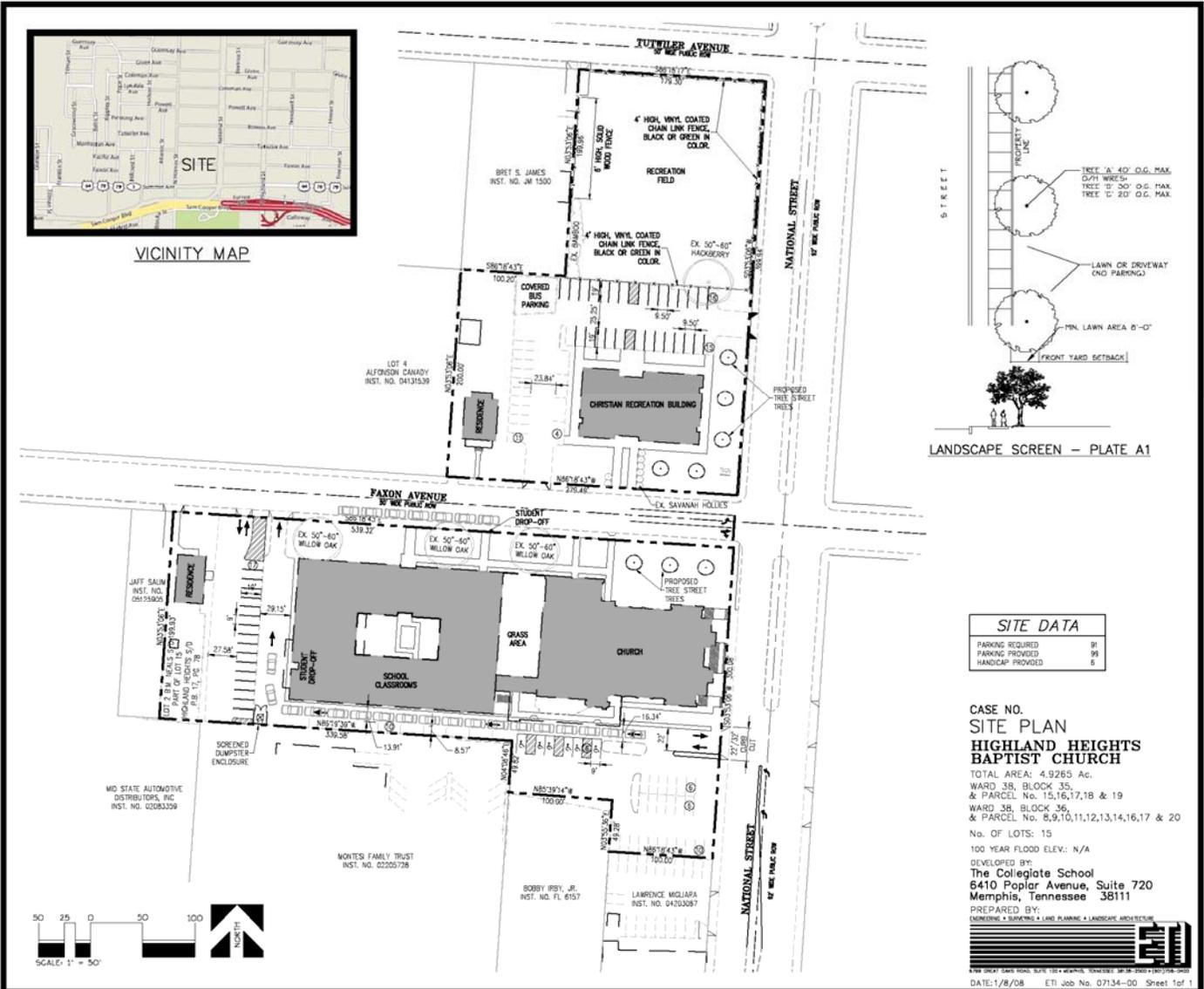
West: Single family residences and duplexes in the R-D District, with frontage on Faxon and Tutwiler Avenue

OFFICE OF PLANNING AND DEVELOPMENT RECOMMENDATION

Hold Approval, with Conditions

CONCLUSIONS

1. *OPD staff is disposed to recommend approval of this location for the proposed school if certain compatibility concerns can be appropriately analyzed and dealt with.*
- ~~2. *Unresolved concerns at this point are the enrollment ceiling, the traffic impact (a study is under review by City Engineering), the intensity of the proposed outdoor recreation use and landscaping details. OPD concerns have been addressed by a landscaping plan and amendments to the outline plan conditions*~~
- ~~3. *The traffic issues and the intensity should be resolved prior to a decision by the Land Use Control Board. Applicant has set an upper limit on enrollment of 450 students.*~~



SITE PLAN SHOWING LANDSCAPING DETAILS

DRAFT OF SITE PLAN CONDITIONS
COLLEGIATE SCHOOL AT HIGHLAND HEIGHTS BAPTIST CHURCH CAMPUS
S.U.P. 07-225

As Recommended by OPD Staff
January 10, 2008

A Special Use Permit is hereby authorized, subject to the following conditions, for the operation of a School for Grades 7 -12 on the property on Highland Heights Baptist Church, 675 National Street, subject to the following conditions and in accordance with the approved site plan.

1. Enrollment at this school shall be limited to 450 students.

2. The site plan shall identify the all activity areas used by the school including any recreational field and the proposed utilized of the various buildings on the site.
3. Any additional building constructed that will involve utilization by the school shall be subject to the review and approval by the Land Use Control Board, with customary notification and the right of appeal to the City Council by either proponents or opponents.
4. Provide a paved and curbed pick-up/discharge area that does not cause children to walk between parked cars or across traffic aisles. Locate the pick-up/discharge areas as far as possible from the entrances as practical to maximize on-site queue space for vehicles between the right-of-way and the pick-up/discharge point. A conforming design shall be indicated in the site plan.
5. **Within Area A, P** Provide continuous, one-way, on-site traffic patterns that will provide for exits by forward motion without any on-site backing of vehicles. A conforming design shall be indicated in the site plan.
6. All private drives/rear service drives shall be constructed to meet pavement requirements of the Subdivision Regulations, applicable City Standards, and provide a minimum width of twenty-two feet (22').
7. Dedicate a 30 foot property line radius at the intersections of Faxon/National and National Tutwiler,
8. The proposed median modification in National Street shall include a 100 foot stack lane with the appropriate transition. [Note: This construction shall be at the developer's expense.]
9. Install and maintain landscaping along the National Street and Tutwiler Avenue frontages, and supplementally as needed along the Faxon Avenue frontages so as to establish streetscape plantings in conformance with Plate A-1, A-2, A-3, A-3, A-4 or A-5 as specified in Chapter 32 of the Zoning Ordinance.

10. Install and maintain screening along the eastern property lines in conformance with Plate B-1, B-3 or B-4, as specified in Chapter 32 of the Zoning Ordinance, **with due consideration for the planned use of properties at 3337 Faxon and 3364 Faxon.** Screening around the property at 3364 Faxon will be based on the planned use of that property as specified in the site plan.
11. **The designated outdoor recreational area shall be screened with a four-foot (4') high black vinyl-coated chain link fence.** A higher level of screening shall be provided around any proposed outdoor recreational area. Site plan designations and landscaping details satisfactory to the Office of Planning and Development shall be incorporated, subject to review and approval by the Land Use Control Board if finalized after approval by the Memphis City Council.
12. A detailed landscape plan will be required prior to final approval of the site plan
13. Equivalent alternatives may be approved for the landscaping specified in these conditions subject to the review and approval of the Office of Planning and Development.
14. On-site parking shall be provided in accordance with Chapter 28 of the Zoning Ordinance.
15. On premise signage shall be permitted in accordance with the regulations for the R-D District.
16. Any refuse containers shall be completely screened so as not to be visible from the public roads and driveways, subject to the approval of the Office of Planning and Development.
17. Any existing sewer and drainage easements shall remain clear of landscaping, and plant species shall be selected to avoid conflict with overhead wires.
18. Any existing nonconforming curb cuts shall be modified to meet current City Standards or closed with curb, gutter and sidewalk. All curb cuts are subject to the review and approval of the City Engineer with respect to design, number and location.
19. Provide any on-site drainage facilities required by the Subdivision Regulations, including on-site detention if necessary, subject to the approval of the City Engineer. Also provide any data necessary for the City Engineer to determine what facilities are required.
20. The City Engineering may establish additional requirements with respect to issues relating to street improvements, circulation, school hours and enrollment levels, pending a staff review of based on traffic and enrollment data provided by the applicant.

**MEMPHIS AND SHELBY COUNTY OFFICE OF PLANNING AND DEVELOPMENT
STAFF REPORT #22**

CASE NUMBER: S.U.P. 07-225

L.U.C.B. MEETING: January 10, 2008
(Redacted 1/8/2008)

LOCATION: Northwest and southwest corners of National Street,
and Faxon Avenue

OWNER: Highland Heights Baptist Church

APPLICANT: Collegiate School of Memphis, Inc.

REQUEST: Private school (7-12)

AREA: 4.9 acres

EXISTING LAND USE & ZONING: Church campus in the Duplex Residential (R-D) Zoning
District

SURROUNDING USES AND ZONING:

North: Duplexes in the R-D District with frontage on the north side of Tutwiler Avenue and a commercial use in the Local Commercial (C-L) District in the northwest corner of Tutwiler and National Street.

East: Across National Street, retail and auto repair businesses, a parking lot and a US Postal Service station in the Local Commercial (C-L) and General Office (O-G) Districts.

South: Retail and motor vehicle repair businesses with access from Summer Avenue in the Highway Commercial (C-H) District

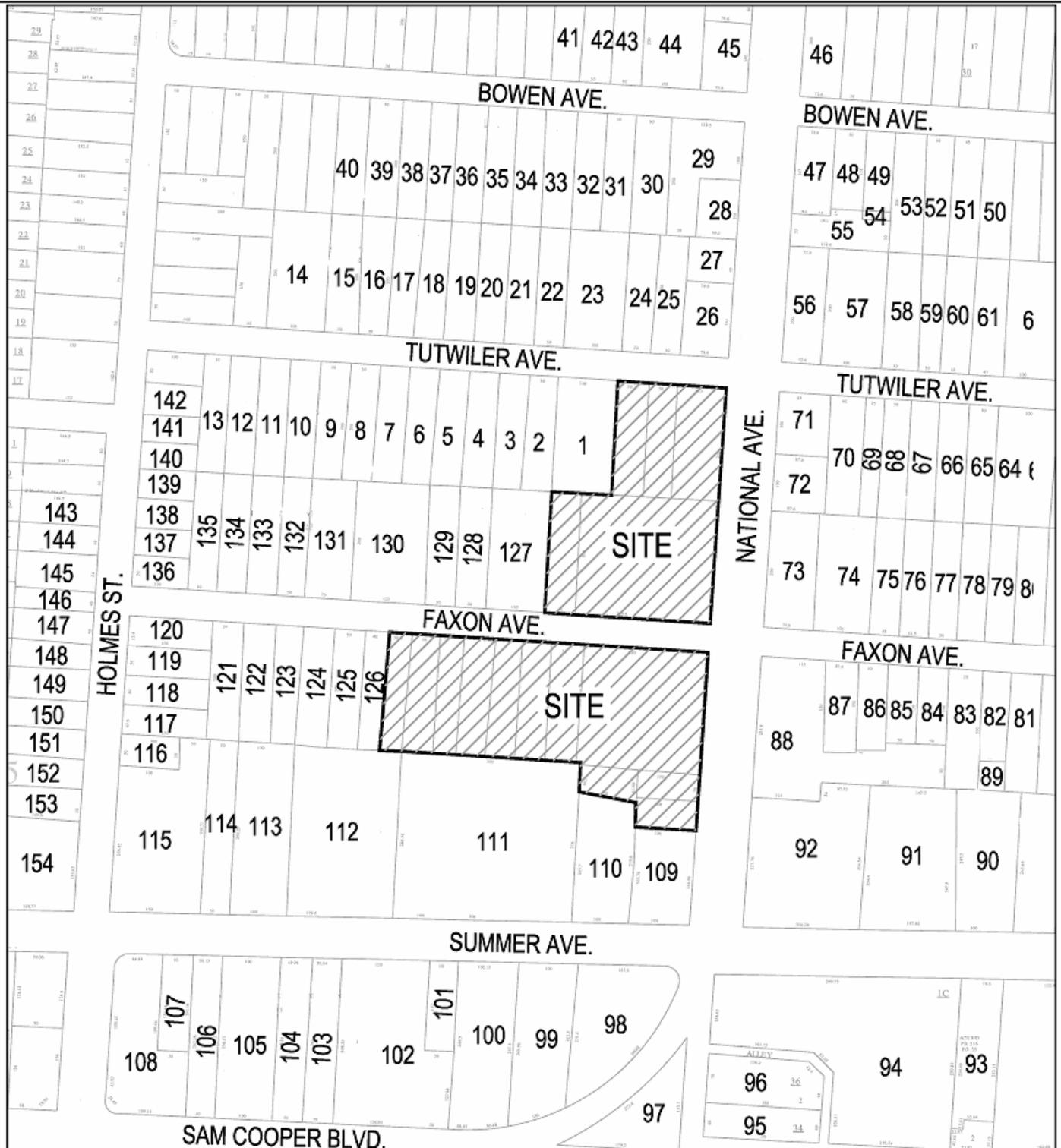
West: Single family residences and duplexes in the R-D District, with frontage on Faxon and Tutwiler Avenue

OFFICE OF PLANNING AND DEVELOPMENT RECOMMENDATION

Hold

CONCLUSIONS

- 1. OPD staff is disposed to recommend approval of this location for the proposed school if certain compatibility concerns can be appropriately analyzed and dealt with.*
- 2. Unresolved concerns at this point are the enrollment ceiling, the traffic impact (a study is under review by City Engineering), the intensity of the proposed outdoor recreation use and landscaping details.*
- 3. The traffic issues and the intensity should be resolved prior to a decision by the Land Use Control Board.*



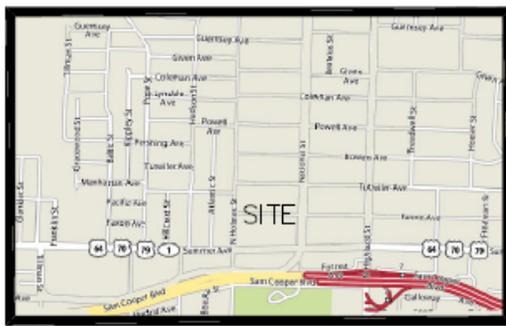
VICINITY MAP
LOCATION OF SUBJECT PROPERTY
(Drawing by ETI Corporation)



Figure 2: Overhead View of Vicinity



Figure 3: Overhead view of subject property



VICINITY MAP

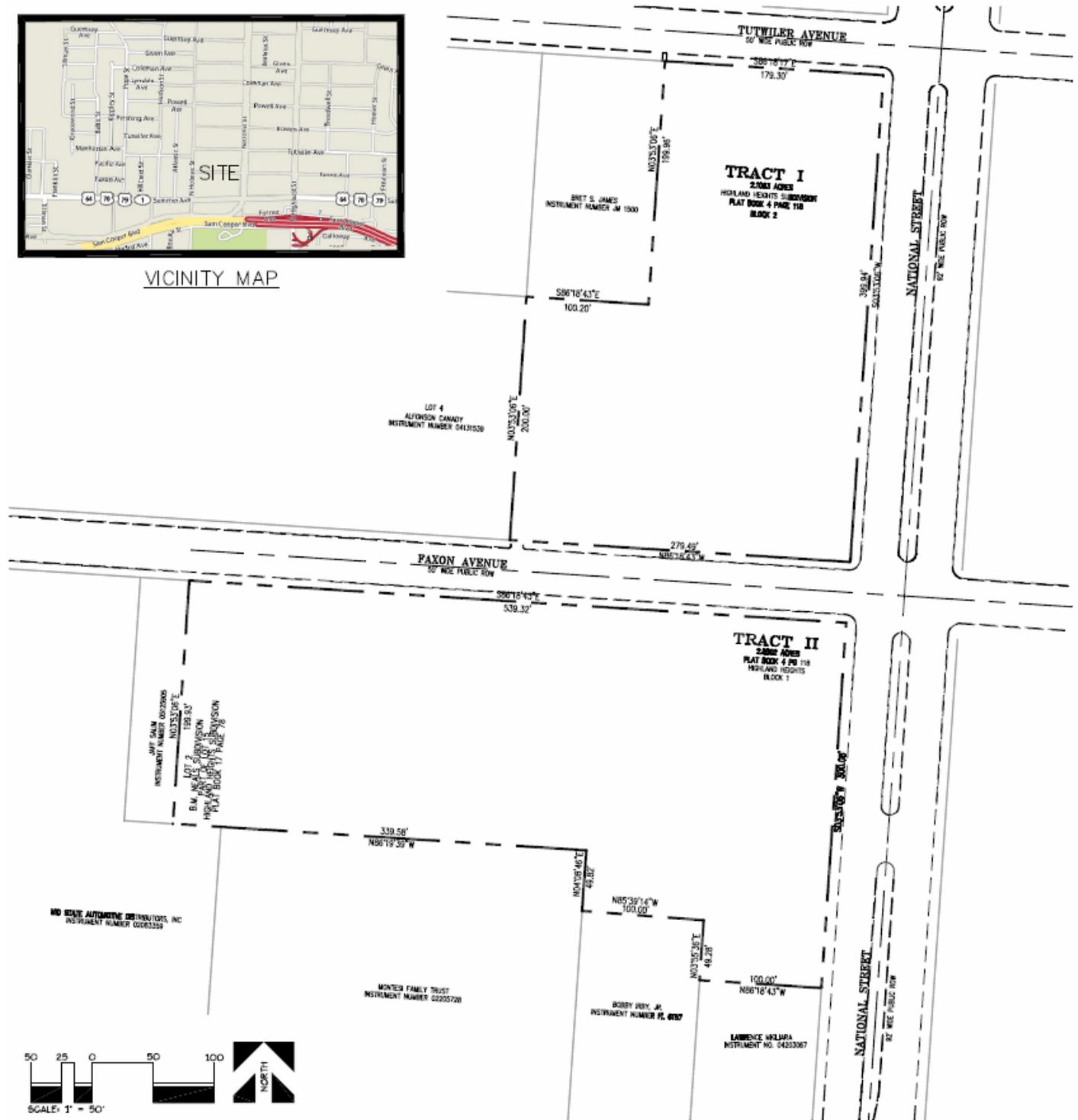


Figure 4: Plot Plan – Detail for Subject Property
Drawing by ETI Corporation



Figure 6: View of Highland Heights Baptist Church property looking northward on National Street



Figure 7: The principal structure has a lengthy frontage along the south side of Faxon Avenue. This view is looking eastward toward the intersection with National Street.



Figure 8: South of the principal building are church-owned parking lots, including this lot (on the left), apparently shared with the business at the corner of National St. and Summer Ave.



Figure 9: Site includes this church-owned residence at 3337 Faxon, west of principal building and a parking lot. Building is not shown in site plan.



Figure 10: This church-owned single-family residence at 3364 Faxon as shown in the site plan would provide a buffer for residences farther west on Faxon.



Figure 11: The church's recreation building occupies frontage along the north side of Faxon Avenue at the northwest corner of intersection with National Street.



Figure 12 At the north end of the site plan's Tract I, a grassy field borders the residence at 3365 Tutwiler Avenue.



Figure 13: These commercial uses and a parking lot occupy the east side of National Street north of Faxon; south of Faxon is the Highland Heights Station for the US Postal Service.

STAFF ANALYSIS

Site Characteristics

The subject property consists of two irregularly shaped tracts of land totaling roughly 4.9 acres which comprise the campus of the Highland Heights Baptist Church. Parcel I is a 2.1 acre tract on the east side of National Street between Tutwiler Avenue and Faxon Avenue. It also includes the adjoining single-family residence at 3364 Faxon. It is currently occupied by a recreation building, surface parking lot, and a small shelter structure used for parking church busses. Parcel II is on the south side of Faxon Avenue, bordered on the south by businesses with frontage on and access to Summer Avenue. It is occupied by the principal structure where Sunday services are conducted and by additional surface parking areas. Parcel II also includes an adjoining single-family residence at 3337 Faxon.

The site has 1½ blocks of frontage on National Street --- 700 feet, not including an intervening right of way. National Street is a major collector street, which provides a direct connection between Summer Avenue and Jackson Avenue on a route that connects with the heart of the Raleigh community. National has diminished in importance since the nearby interchange at Highland providing improved access from Sam Cooper Boulevard (the aborted route for Interstate Highway 40). Highland Street received the major road designation even though National, which is parallel, has a more direct connection to Jackson Avenue (TN Highway 14) and the Raleigh community.

The subject property has 539 feet of frontage on the south side of Faxon Avenue and 280 feet on the north side. The Tutwiler frontage is even less. Faxon and Tutwiler are local streets in these blocks connecting Holmes Street with National Street and beyond. There is no traffic control on National to assist through traffic on Faxon or Tutwiler.

Proposed Development

The proposed development is definitely a work in progress and will be described as originally presented in the application. The proposal is to utilize the existing church facilities to house a new school. According to the engineering firm, "The Collegiate School of Memphis, a private school for inner-city students will use the classroom facilities and the recreation building." As originally specified, these facilities would be remodeled to provide 14 classrooms for grades 7 through 9 and 14 classrooms for grades 10 through 12. At this level, total enrollment could well be in the range of 700 - 900 students although no specific figure is given in the data submitted with the application. The field at the north end of Parcel I would be used for recreation.

The Vicinity and the Neighborhood

The subject property is in a transitional area adjoining one of the nodes of the Highland Heights neighborhood commercial area which extends along Summer Avenue from Holmes Street eastward to the four corners of the intersection at Highland. (Of course this is just one of many commercial concentrations along Summer Avenue.) In addition to the commercial uses along Highland, the post office opposite the subject property on National and the fire station on National south of Summer increase the perceived intensity of activity. This large church site, permitted in the R-D District, provides a buffer between this commercial concentration at the predominantly single-family residential areas to its north and east.

Planning Issues

A school serving children and youth in grades 7-12 is allowable in the R-D District, subject to a unique set of conditions tailored to the site, a detailed site plan and the approval of the Memphis City Council in the form of a special use permit. Unlike certain other special uses, the zoning ordinance specifies no particular standards for school use other than the general standards that apply to all special use permits.¹

Unresolved concerns at this point are the enrollment ceiling, the traffic impact (a study is under review by City Engineering), the intensity of the proposed outdoor recreation use and landscaping details. The last of these may be subject to deferral until a later stage in the design / approval process. The traffic issues and the intensity should be resolved prior to a decision by the Land Use Control Board. Site plan conditions have been drafted to permit flexibility in the landscaping design/review process, and (if the Land Use Control Board were determined to act immediately) flexibility in the design of any unresolved issues relating to traffic.

¹ The General Standards of Applicability are as follows:

- A. That the proposed building or use will not have a substantial or undue adverse effect upon adjacent property, the character of the neighborhood, traffic conditions, parking, utility facilities, and other matters affecting the public health, safety, and general welfare;
- B. That the proposed building or use will be constructed, arranged, and operated so as to be compatible with the immediate vicinity and not to interfere with the development and use of adjacent property in accordance with the applicable district regulations;
- C. That the proposed building or use will be served adequately by essential public facilities and services such as highways, streets, parking spaces, drainage structures, refuse disposal, fire protection, water, and sewers; or that the persons or agencies responsible for the establishment of the proposed use will provide adequately for such services;
- D. That the proposed building or use will not result in the destruction, loss or damage of any feature determined by the legislative body to be of significant natural, scenic or historic importance;
- E. That the proposed building or use complies with all additional standards imposed on it by the particular provision of this section authorizing such use.

Analysis

OPD staff is disposed to recommend approval of this location for the proposed school if the above compatibility concerns can be appropriately analyzed and dealt with. A just-completed traffic study paid for by the applicant will provide a proxy for the overall impact on the neighborhood. The immediate impact on adjoining property should be susceptible to reasonable mitigation as landscaping plans are refined.

RECOMMENDATION: *Hold*

**DRAFT OF SITE PLAN CONDITIONS
COLLEGIATE SCHOOL AT HIGHLAND HEIGHTS BAPTIST CHURCH CAMPUS
S.U.P. 07-225**

A Special Use Permit is hereby authorized, subject to the following conditions, for the operation of a School for Grades 7 -12 on the property on Highland Heights Baptist Church, 675 National Street, subject to the following conditions and in accordance with the approved site plan.

1. The site plan shall identify the all activity areas used by the school including any recreational field and the proposed utilized of the various buildings on the site.
2. Any additional building constructed that will involve utilization by the school shall be subject to the review and approval by the Land Use Control Board, with customary notification and the right of appeal to the City Council by either proponents or opponents.
3. Provide a paved and curbed pick-up/discharge area that does not cause children to walk between parked cars or across traffic aisles. Locate the pick-up/discharge areas as far as possible from the entrances as practical to maximize on-site queue space for vehicles between the right-of-way and the pick-up/discharge point. A conforming design shall be indicated in the site plan.
4. Within Area A, provide continuous, one-way, on-site traffic patterns that will provide for exits by forward motion without any on-site backing of vehicles. A conforming design shall be indicated in the site plan.
5. All private drives/rear service drives shall be constructed to meet pavement requirements of the Subdivision Regulations, applicable City Standards, and provide a minimum width of twenty-two feet (22').
6. Dedicate a 30 foot property line radius at the intersections of Faxon/National and National Tutwiler,
7. The proposed median modification in National Street shall include a 100 foot stack lane with

the appropriate transition. [Note: This construction shall be at the developer's expense.]

8. Install and maintain landscaping along the National Street and Tutwiler Avenue frontages, and supplementally as needed along the Faxon Avenue frontages so as to establish streetscape plantings in conformance with Plate A-1, A-2, A-3, A-3, A-4 or A-5 as specified in Chapter 32 of the Zoning Ordinance.
9. Install and maintain screening along the eastern property lines in conformance with Plate B-1, B-3 or B-4, as specified in Chapter 32 of the Zoning Ordinance. Screening around the property at 3364 Faxon will be based on the planned use of that property as specified in the site plan.
10. A higher level of screening shall be provided around any proposed outdoor recreational area. Site plan designations and landscaping details satisfactory to the Office of Planning and Development shall be incorporated, subject to review and approval by the Land Use Control Board if finalized after approval by the Memphis City Council.
11. A detailed landscape plan will be required prior to final approval of the site plan
12. Equivalent alternatives may be approved for the landscaping specified in these conditions subject to the review and approval of the Office of Planning and Development.
13. On-site parking shall be provided in accordance with Chapter 28 of the Zoning Ordinance.
14. On premise signage shall be permitted in accordance with the regulations for the R-D District.
15. Any refuse containers shall be completely screened so as not to be visible from the public roads and driveways, subject to the approval of the Office of Planning and Development.
16. Any existing sewer and drainage easements shall remain clear of landscaping, and plant species shall be selected to avoid conflict with overhead wires.
17. Any existing nonconforming curb cuts shall be modified to meet current City Standards or closed with curb, gutter and sidewalk. All curb cuts are subject to the review and approval of the City Engineer with respect to design, number and location.
18. Provide any on-site drainage facilities required by the Subdivision Regulations, including on-site detention if necessary, subject to the approval of the City Engineer. Also provide any data necessary for the City Engineer to determine what facilities are required.
- 19. The City Engineering may establish additional requirements with respect to issues relating to street improvements, circulation, school hours and enrollment levels, pending a staff review of traffic and enrollment data provided by the applicant.**

GENERAL INFORMATION

Coordinates:	35° 09' 02"N, 89° 56' 55"W
Parcel Number:	038036 00009 through -16, -20 and 038035 00015, -18
Street Address:	675 National Street, 38122
Street Frontage:	<u>National Street:</u> 700 ft. on this 4-lane improved major collector street with median and curbside parking (92' ROW). <u>Faxon Avenue:</u> 279 ft. (Tract I) and 539 ft. (Tract II) on this improved local street with median (50' ROW). <u>Tutwiler Avenue:</u> 179 ft. on this improved local street with median (50' ROW).
Planning District:	Jackson (Traditional Neighborhood - Highland Heights)
Census Tract:	13
Voting Precinct:	03802-1
City Council Districts:	5 & 9
Annexation Status:	Annexed in 1928
Zoning Atlas Page:	1735, 1940, 2035
Zoning History:	<i>1931- In 1st Ordinance: 'A' Residential District (single-family, duplex)</i> <i>1955- In 2nd Ordinance: Two Family Dwelling "R-3" District</i> <i>1981 – Converted to Duplex Residential (R-D) District under the current ordinance</i>

DEPARTMENTAL COMMENTS

City Engineer:

1. Standard Subdivision Contract as required in Section 500 of Subdivision Regulations.

Sewers:

2. City sanitary sewers are available at developer's expense.

Roads:

3. Dedicate a 30 foot property line radius at the intersections of Faxon/National and National Tutwiler, #.

4. The proposed median modification in National Street shall be at the developer's expense and shall include a 100 foot stack lane with the appropriate transition

Curb Cuts/Access:

5. The City Engineer shall approve the design, number and location of curb cuts.
6. Any existing nonconforming curb cuts shall be modified to meet current City Standards or closed with curb, gutter and sidewalk.

Drainage:

7. Drainage improvements, including on-site detention, shall be provided under a Standard Subdivision contract in accordance with Subdivision Regulations and the City of Memphis Drainage Design Manual.
8. Drainage data for assessment of on-site detention requirements shall be submitted to and approved by the City Engineer.
9. The developer should be aware of his obligation under 40 CFR 122.26(b)(14) and TCA 69-3-101 et. seq. to submit a Notice of Intent (NOI) to the Tennessee Division of Water Pollution Control to address the discharge of storm water associated with the clearing and grading activity on this site.

Site Plan Notes:

10. An adequate review cannot be made without knowing the maximum number of children at the school.
11. Provide a continuous, one-way, on-site traffic pattern or a paved, circular turn-around that will provide for exit by forward motion without any on-site backing of vehicles.
12. Locate the pick-up/discharge area as far as possible from the entrance as practical to maximize on-site queue space for vehicles between the right-of-way and the pick-up/discharge point.
13. Provide a paved and curbed pick-up/discharge area that does not cause children to walk between parked cars or across traffic aisles.
14. All crossings for children between the north and south buildings shall be located at the corner of Faxon and National. No crossing will be approved mid-block.
15. All proposed curb cuts shall be ADA compliant.
16. All sidewalks adjacent to the site shall be inspected for compliance with ADA requirements and non-compliant walkways will be replaced during the construction phase of this project.

General Notes:

17. The width of all existing off-street sewer easements shall be widened to meet current city standards.
18. All connections to the sewer shall be at manholes only.
19. Required landscaping shall not be placed on sewer or drainage easements.

Memphis Light, Gas and Water:

MLGW has reviewed the referenced application, and has no objection, subject to the following comments:

- If it is necessary for MLGW facilities to be installed, removed or relocated, any work performed by MLGW will be done at the expense of the owner/applicant.
- It is the responsibility of the owner/applicant to identify any utility easements, whether dedicated or prescriptive (electric, gas, water, CATV, telephone, sewer, drainage, etc.), which may encumber the subject property, including underground and overhead facilities.
- **Landscaping prohibited** within any MLGW utility easement. No trees, shrubs or permanent structures will be allowed within any MLGW utility easements.
- It is the responsibility of the owner/applicant to contact **TN-1-CALL @ 1.800.351.1111**, before digging and to determine the location of any underground utilities including electric, gas, water, CATV, telephone, etc
- It is the responsibility of the owner/applicant to submit a detailed plan to MLGW Engineering for the purposes of determining the availability and capacity of existing utility services to serve any proposed or future development(s).
- To determine if system improvements may be required, please contact the appropriate MLGW engineering area:
 - MLGW Engineering - **Residential Development:** 528.4858
 - MLGW Engineering - **Commercial Development:** 367.3343
- The owner/applicant will be responsible for the cost of any utility system improvements necessary to serve the proposed development with electric, gas or water utilities.

OPD-Regional Services: This application was reviewed by the MPO staff/Department of Regional Services on January 3, 2007. The MPO staff has determined that the proposed actions as submitted in this application will have no affect on the MPO Long Range Transportation Plan, Transportation Improvement Program, or any other plan, document, program or initiative of this department/organization.

OPD-Plans Development: No comments

City/County Health Department

1. If any monitoring wells were installed as part of an environmental site

assessment they must be filled as outlined in Section 6 of the Shelby County Well Construction Code.

2. Since this is a Special Use Permit that could require the demolition of a structure or structures at this site the developer will need to fill out the attached questionnaire before any demolition begins at the site.
3. If a Demolition Permit will be required after filling out the questionnaire then the owner, developer, or contractor must contact the Asbestos Branch in the Air Pollution Control Section at (901) 544-7349 in order to secure the appropriate permit.

Pollution Control: No objections.

Environmental Sanitation: No objections.

AT&T/Bell South: No comments

City Board of Education: No comments received

Construction Code Enforcement: No comments received

City Fire Division: No comments received

Memphis Area Transit Authority (MATA): No comments received

Neighborhood Associations:

Binghampton/Lester Community Org. No comments received

Faxon Ave Neighborhood Watch No comments received

Grahamwood NA No comments received

Northeast NA No comments received



Dickinson & Bennett, Inc. ETI CORPORATION
ENGINEERING • SURVEYING • LAND PLANNING • LANDSCAPE ARCHITECTURE

PRINCIPALS

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November 28, 2007

Ms. Mary Baker, Deputy Director
Land Use Controls
Office of Planning & Development
125 N. Main Street
Memphis, Tennessee 38103

Re: **Collegiate School**
ETI Project No.: **07134-10**

Dear Mary:

Enclosed is an application for a special use permit for a school, grades seven through twelve. The property is located on the north and south corners of Faxon Avenue west of National Street. The southern portion of the property is the Highland Heights Baptist Church. The church sanctuary is located on National Street and behind the sanctuary is an attached building of classrooms and administrative offices. On the northern corner is a recreational building owned and operated by the church. Farther north is a vacant field that will be used as a recreational field for the school. The field extends to Tutwiler Avenue.

Two single-family homes owned by the church are located on the property. One is on the south side of Faxon Avenue adjacent to the church and the other on the north side of Faxon adjacent to the recreational building.

The Collegiate School of Memphis, a private school for inner-city students, will use the classroom facilities and the recreational building. There will be very minor improvements to the property except for interior building renovation. Handicapped parking spaces south of the building have been relocated; the curb cut to National Street has been relocated and the median slightly modified; curbing has been added near the new curb cut on National Street; and, parking space stripping has been added west of the church building and north of the recreational building.

There are 102 parking spaces provided on the site. Based upon the Zoning Ordinance parking requirements for 14 classrooms for grades 7 through 9 (28 spaces required) and 14 classrooms for grades 10 through 12 (70 spaces required) there are 98 parking spaces required for the school. Four spaces are provided for church administration personnel during the school hours of operation.

Most of the students will be brought to the school by automobile. The entrance will be from National Street and there is 450 feet of stacking space on the south side of the church building and a portion of the west side of the church to accommodate over 22 vehicles at any one time. The existing curb cut on National Street does not align with the median opening in National Street. A new curb cut is proposed just north of the existing curb opening to align with the existing median. A small corner of the median in National Street will be removed to provide the necessary alignment. The existing curb cut will be closed with curb and gutter.

The proposed school is an excellent use of the church facilities during non-church operations. National Street is a major thoroughfare with average daily traffic volumes from the Metropolitan Planning Organization as follows:

Year 2004 -- 10,106

Year 2005 -- 8,060 (Actual Count)

Year 2006 -- 8,067

Year 2007 -- 8,200

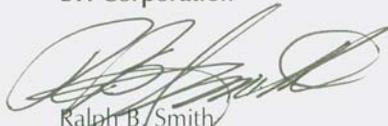
The four-lane divided major roadway can accommodate approximately 20,000 vehicles per day at a level of service C. The amount of traffic on National Street has decreased since 2004.

Commercial uses are located south of the property along Summer Avenue. East of the property across National Street is a post office, a parking lot and commercial uses. Faxon Avenue is a residential street although the church owns the two homes adjacent to the church facilities. The proposed school is compatible with the surrounding land uses.

We respectfully request your favorable recommendation to the Land Use Control Board and Memphis City Council. Please contact me if there is any additional information, or clarifications that we can provide to you.

Sincerely,

ETI Corporation



Ralph B. Smith
Principal

RBS:js

Enclosure

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