

[EXTERNAL MAIL]ZAJ-23-1 - Giffit Hill Road / Ari Goldschneider

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To: Leia LaPlace <leia.laplace@dpnr.vi.gov>

Good day Ms. LaPlace,

My comments on the proposed rezoning for the parcel on Giffit Hill Road, St John, are below.

DEFECTS IN THE PUBLIC NOTICE AND DOCUMENTS

The public notice stated that the purpose of the rezoning was to allow for operation of a "boarding house." This was corrected during the public hearing and the purpose was restated to be for a "Guesthouse" however this should have been corrected prior to the public hearing.

The drawings submitted by the applicant and distributed by DPNR prior to the hearing showed features which the applicant stated are not actually part of the proposal. These included a restaurant trailer in the front of the property, an owners apartment trailer on the property, and a different parking configuration than was shown on the drawings. The drawings did not include any details on the proposed size or location of septic systems. As such, the documents available for public review did not reflect what was actually being proposed.

PARKING

The zoning code states that "one off-street parking space shall be provided for each ... transient guest room or separate residential accommodation ... in any district." The proposed use for 72 separate residential accommodations will require 72 parking spaces, not only by code but by practical considerations. The units are intended to be for "workforce housing" and the jobs of these tenants will not all be within walking distance of Giffit Hill Road. The applicant stated that he does not intend to provide parking for each of the residential accommodations, however this is not allowed under the zoning code and would require a variance.

The Applicant has said that he does not intend to pave the parking areas. The code requires that "Any off-street parking area for more than five vehicles or for any use in the TABLE OF PERMITTED USES ... shall be surfaced with a properly bound pavement so as to provide a durable and dustless surface." An unpaved parking lot for 72 vehicles will generate a tremendous amount of dust. If the applicant does not intend to pave the parking areas then this would require a variance.

WATER

At an average of 1-1/2 persons per unit (per code) and average water usage of 50 gallons per person per day (standard low usage), the 72 proposed units will consume 5,400 gallons per day. This will generate over 5,000 gallons per day of waste water and require, on average, one water truck delivery per day. The effluent from the septic system will need to disperse 5,000 gallons of water every day which, with Type 3 soils, will require a leach field of 25,000 square feet, or 0.57 acre at 0.2 gallons per square foot per day. Between the footprint of the structures and the required parking and access there is insufficient open space to accommodate this amount of waste water. This is one of many reasons why R-4 density should only be allowed in places where public sewer systems are available.

PEDESTRIAN TRAFFIC ON GIFFIT HILL ROAD

The road shoulder between the site and the closest public transportation at Centerline Road is not safe for pedestrians. I have driven that road numerous times and there are blind turns, and many places where the shoulder is narrow or non-existent, forcing pedestrians into the

