

Oct 27, 2021

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Brown County Indiana
Board of Zoning Appeals (BZA), Planning Commission

Subject: Request for Special Exception, Proposed 185 Site Luxury RV Park

Dear BZA Board,

Based on a review of the County Comprehensive Plan, the submitted project documents, and comments from citizens posted on two Brown County Specific Facebook pages – Brown County Matters and Brown County Chatter (see enclosures), *I do not believe* this project as described in the submitted documents, is in alignment with the County Comprehensive Plan and in the best interests of the county.

Regarding the Facebook comments, I provided a copy (enclosures) in PDF files to allow for a quick review. The original posts as well as reactions can be easily viewed on the respective Facebook group pages.

This 185 Site RV Park supports more tourism. A vision for more tourism is not specifically addressed in the County Comprehensive Plan. When is more tourism too much for the infrastructure (including roads) and acceptable by county residents? Andy Rogers recognized the importance of maintaining a balance.

His vision was to accommodate tourism and not destroy the culture and “soul” of the county:

- *“People say, ‘Well, we can’t change.’ But we can change and still retain some of the flavor of Brown County. We need people to live here. I’m in the tourist business but we don’t want to turn this town over to the tourists. You can go to Gatlinburg if you want to see what happens to a town that turns it all over to business. It’s not a town anymore—it’s a shopping center.”*
- *“We don’t need to be slick and highly commercial. We need to be more country. **Country is what we sell.... We need to maintain that. Once you destroy that, it won’t come back.”***

The County Comprehensive Plan (14 pages) represents the “Voice” of the residents. Although it meets the minimum requirements by the state, it is too short and vague. This allows for “flexibility” where arguments for or against a project can be equally valid. The plan does not provide the level of specificity that should be needed to make the best decision regarding the proposed 185 Site RV park. The plan does not specifically mention support for a project of this scope to be located on land that is used for agriculture and homes.

Specific Comments – Alignment with the Comprehensive Plan:

1. The 185 Site RV Park is not in alignment with the Count Comprehensive Plan (CCP). The plan mission statement identifies the following: *“To provide guidance on decision making regarding*

*Brown County land use, public service and zoning **that enhances the quality of life for the residents** based on the county's **natural beauty and rural atmosphere**."*

- How does this project enhance the quality of life for "residents"? Why would a 185 site RV (mobile home) Park be considered an enhancement to the "natural beauty and rural atmosphere"?
- Enclosures 1 and 2 identify the comments from residents sharing their "Voice" regarding the project. Those that are opposed or have concerns provide more detail regarding their position than the individuals that just commented that they were in favor of the project.

2. Plan -Introduction. *"There is a special need to understand that planning should identify and encourage those land uses **that have been positive over time, especially those that contribute to the distinctive character of this "special place" called Brown County.** Planning can guard against rapid change and growth that are incompatible with existing infrastructure and the county's "quality of life vision."*

- There is no history or evidence of how an RV Park of this size has had a positive influence in the county.
- How does a 185 Site RV Park add to the distinctive character of this "*special place called Brown County*" or "*quality of life vision*"? This project supports tourism, e.g., more visitors – NOT residents.
- There has been no evidence submitted, nor is it stated in the Comprehensive Plans, that that an increase in the number and size of RV parks are recognized as a desired outcome.
- Brown County State Park does support camping to include RV Parks, Camping Trailers and Tent Camping. Covid has increased the demand for sites that may be addressed in the future by the Park. Over 50% of the land in Brown County is owned by the state, feds, or non-profit conservation organizations. Land Use for agriculture, residents and appropriate development that serves ALL residents are included in goals in the Comprehensive Plan.

3. Traffic and Safety

- Brown County's two-lane roads adds a constraint to increases in more visitors. Hard Truth Hills and the Music Center now contribute to more year-round tourism which adds more congestion to our roads.
- The location of the proposed 185 Site RV Park is in close proximity to the intersection of old 46, Highway 46 and the North Gate Entrance to Brown County State Park. This intersection has been known to be among the most congested (and accident prone) in the county at times. The State has refused to put in a stop light. And, if they did put in a light, this would add to the back-up traffic on 46 creating more frustration and adding increased travel time for residents.

Indiana Citizen's Planner's Guide. Part 2 Board of Zoning Appeals Basics by KK Gerhart-Fritz, AICP, identifies "Developmental Standards Variance Criteria per IC 36-7-4-918.5". Specifically:

1. The approval will not be injurious to the public health, safety, morals, and general welfare of the community.

- As stated above, the project is incompatible with the intent and goals expressed in the County Comprehensive Plan and the "Voice" of the residents.
- Facebook comments from county specific Facebook groups (see enclosures) do identify residents' concerns and opposition to this project. The public sentiment as well as the comprehensive plan, would likely support affordable housing for residents in this area.
- The location of the proposed park does add to traffic congestion and risks to safety. The State may not approve a request for a traffic light and even if they did, this would add to traffic backups and impatient drivers that tend to create condition that may lead to more accidents.

2. The use and value of the area adjacent to the property included in the variance will not be affected in a substantially adverse.

- Adding a commercial property in an area consisting of agriculture and homes does have an adverse impact on the "**natural beauty and rural atmosphere**" as well as morale, that is intended to be protected by the Comprehensive Plan. Further, it sets a bad precedent.

3. The strict application of the terms of the zoning ordinance will result in practical difficulties in the use of the property.

- "Practical difficulty" is adding to the congestion on Old 46 and 46 across from the North Gate to the State Park which will be the main ingress and regress routes. Traffic on old 46 will also be impeded. Luxury RV's heading west on old 46 to Nashville would certainly add to the traffic congestion.

In conclusion, in addition to this planning guidance, the County Comprehensive Plan represents the "voice" of residents regarding their support for changes. The Facebook comments (see enclosures) provide a strong indication that a 185 Site RV Park is not acceptable.

Respectively,

Tim J. Clark

Enclosures

- (1) RV Park – Comments posted at the Facebook Group – Brown County Matters
- (2) RV Park – Comments posted at the Facebook Group – Brown County Chatter