TCG Residential, LLC Individual Permit Alternatives Analysis

Need and Purpose:

The proposed residential development is needed to serve the rapidly growing area surrounding the community of Conroe, Texas. This project is unique in that it will create a community with a density that is higher than single-family housing, but that is less than multi-family housing. The Applicant proposes to construct single-level detached cottages, single-level duplexes, two-story quadraplexes, and community amenities onsite. Demographics in Conroe indicate that there is a need for this type of community, which targets residents ages 50 and older.

Specifically, the development needs to be in an area with similar land use in surrounding areas and proximity and easy access to major thoroughfares. It must be located adjacent to Phase 1 of the overall residential development. Access to the development would be accomplished via Phase 1 of the development which has direct access to Highway 336. The Applicant is proposing to develop Phase 2 of the proposed TCG Residential, LLC.

Alternatives:

<u>Preferred Alternative</u>: The Preferred Alternative consists of a 28.4-acre undeveloped tract of land located northeast of the intersection of Sargent Ed Holcomb Boulevard South and Highway 336 in Conroe, Montgomery County, Texas. The Preferred Alternative site is currently owned by the Applicant and is adjacent to Phase 1 of the overall residential development. Access to the Preferred Alternative site would be accomplished via Phase 1 of the development which has direct access to Highway 336. Developing residential facilities on the Preferred Alternative site would meet the need and purpose of the project and would result in impacts to Waters of the U.S.

<u>No Action Alternative</u>: Though the no action alternative would avoid all impacts to Waters of the U.S., it would not meet the need and purpose of the proposed project. Therefore, the no action alternative is not practicable. If the Applicant did not develop this property, other developers would likely attempt to develop this site, as there is a high demand for residential facilities within the southwest area of Conroe, Texas.

Offsite Alternatives: The Applicant is interested in the City of Conroe because of a demonstrated need for specific residential development. A search within the vicinity of the City of Conroe for other properties was conducted before deciding on this location. Based on the multiple facets of the overall proposed project (phased residential development), the Applicant searched for a site that met the following criteria:

- 1. The site had to be in the southwest area of Conroe, Texas which contains areas with similar land use (residential, light commercial) and demands residential facilities;
- 2. The site had to be already owned by the Applicant or adjacent to land owned by the Applicant;
- 3. The overall site acreage had to be adjacent to or have easy access to a major thoroughfare as this would serve as the major access point for the residential development project; however, not an interstate;
- 4. The overall site had to measure between 25 and 40 acres in size to allow for the appropriate amount of development to be practicable;
- 5. The specific Phase 2 residential site had to be located adjacent to the Phase 1 residential site. This is required to allow for access coming from Highway 336 and to allow for an onsite presence of the management company as opposed to offsite;
- 6. The site had to be on land which is predominately undeveloped, or if some development is on the land, it must be of compatible land use (residential);
- 7. The site had to meet the minimum separation requirements to other existing developments of similar nature; and
- 8. The site had to be able to easily connect to existing or proposed utility lines (gas, electric, water).

At the time the Applicant purchased the property, the Preferred Alternative was the only known property within the City of Conroe that met these criteria. There were limited properties available in the southwest portion of Conroe at the time of property purchase; however, multiple other offsite alternatives were evaluated. The locations of the Offsite Alternatives are attached for reference.

Table 1, below, is a summary of the selection criteria used to select the preferred alternative.

Table 1: Offsite Alternative comparison matrix.

Practicability	Factor	Preferred	Offsite	Offsite	Offsite	Offsite	Offsite
•	ractor	Alternative	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Category		Aitemative	(I-45 & League	(I-45 & FM 830)	(FM 1314)	(I-45 and River	(Firetower Rd. &
			Line Road)	(1-43 & 1 101 030)	(11111314)	Plantation Dr.)	Deer Ridge Dr.)
Location	Owned by Applicant	Yes	No	No	No	No	No
200411011	or adjacent to land	Applicant owns	Owned by				
	owned by Applicant	the parcel and	others; located	others; located	others; located	others;	others; located
	within City of	site is within	within City of	within City of	within City of	located	within City of
	Conroe	City of Conroe.	Conroe	Conroe	Conroe	within City of	Conroe
		only or commod.	3011133	3011130	3011133	Conroe	3011133
	Southwest area of	Yes	No	No	No	No	No
	Conroe	Site is near	Site is located				
		Highway 336 in	on north side of	on north side of	on southeast	on south side	on southeast
		southwest area	Conroe.	Conroe, north of	side of Conroe.	of Conroe.	side of Conroe,
		of Conroe.		Offsite			east of Offsite
				Alternative 1			Alternative 3.
	Adjacent to or have	Yes	Yes	No	Yes	No	Yes
	easy access to	Site would	Site would have	Site would only	Site would have	Site would	Site would likely
	major thoroughfare	have access to	access to	have access to	access to FM	only have	have access to
	which is not an	Highway 336	League Line	Interstate 45.	1314.	access to	FM 242.
	interstate	via Phase 1 of	Road.			Interstate 45.	
		the residential					
		development.					
	Adjacent to Phase 1	Yes	No	No	No	No	No
	residential site	Site is adjacent	Site is not				
		to Phase 1	adjacent to				
		residential site.	Phase 1				
			residential site.	residential site.	residential site.	residential	residential site.
						site.	
Size of Site	Between 25 and 40	Yes	Yes	Yes	Yes	Yes	Yes
	acres in size	Site is 28.4	Site is 39.30	Site is 30 acres	Site is 39.97	Site is 37.50	Site is 31.33
		acres in size.	acres in size.	in size.	acres in size.	acres in size.	acres in size.
Land Use	Predominantly	Yes	Yes	Yes	Yes	No	Yes
	undeveloped land	Site is	Site is	Site is	Site is	Site is	Site is
	or partially	undeveloped	undeveloped	undeveloped	undeveloped	partially	undeveloped
	developed with	land.	land.	land.	land.	developed;	land.
	compatible land use					however,	
						with	
						incompatible	
						land use.	
Logistics	Minimum	Yes	Yes	Yes	Yes	Yes	Yes
				1 147 111	1 14/		Mould be
	separation	Would be	Would be	Would be	Would be	Would be	Would be
	separation requirements to	Would be located far	located far	located far	located far	located far	located far
	separation requirements to other existing	Would be located far enough from	located far enough from				
	separation requirements to other existing developments of	Would be located far enough from other similar	located far enough from other similar				
	separation requirements to other existing	Would be located far enough from	located far enough from				

Availa	able Utilities	Yes	Yes	Yes	No	Yes	No
		The site has	The site has	The site has	It does not	The site has	It does not
		access to utilities.	access to utilities.	access to utilities.	appear that the site has access to utilities.	access to utilities.	appear that the site has access to utilities.

Justification for the Preferred Alternative

There are several critical items which led to the selection of the Preferred Alternative. The justification for Applicant's preferred site is provided below:

- 1. The site had to be located within the southeast area of Conroe, Texas and needed to be located on land either owned by the Applicant or adjacent to land owned by the Applicant. It also needed to be located adjacent to the Phase 1 residential site. The site also had to be adjacent to or have easy access to a major thoroughfare which is not an interstate for safe ingress and egress from the site. Easy access to nearby businesses, retail markets, residential developments, hospitals, and additional thoroughfares are critical to a project's success. With access to Highway 336 via Phase 1 of the development, this requirement is met
- 2. The site had to be between 25 and 40 acres in size. This site is 28.4 acres in size; therefore, this requirement is met.
- 3. The site had to be located to meet the minimum separation requirements to other existing developments of similar nature. This site has the appropriate separation distances from other similar developments; therefore, this requirement is met.
- 4. The site had to have reasonable access to utilities. Due to the adjacent Phase 1 residential site and access to Highway 336, this site would have direct access to the necessary utilities of water, gas, and electricity; therefore, this requirement is met.
- 5. Other Considerations this site is also the Preferred Alternative because of the immediate adjacency to the Phase 1 residential development. This location will significantly improve the management of this project based on adjacency to Phase 1. Also, Methodist Hospital and Children's Hospital opened proximate to the site recently. These hospitals are in addition to St. Luke's and Memorial Hermann which are also within a half a mile of this site. The proximity to hospitals expedites critical care for the residents of the project in the area.

The other alternatives evaluated did not meet the requirements for the project; therefore, they are not preferred.

Onsite Alternative: The preferred onsite alternative will cover 28.4 acres in size and will consist of a community with a density that is higher than single-family housing, but that is less than multi-family housing. The Applicant proposes to construct single-level detached cottages, single-level duplexes, two-story quadraplexes, and community amenities onsite targeting residents ages 50 and older. Approximately 5.5 acres of shrub/scrub wetlands and approximately 12.7 acres of emergent wetlands would be impacted as a result of developing the preferred alternative.

The Applicant considered and evaluated other onsite design alternatives which may have impacted fewer Waters of the U.S.; however, they were found to not be feasible based on the development needs of the project.

The preferred alternative is the least environmentally damaging practicable alternative because it meets the siting criteria and the project purpose and need, while proposing the minimum necessary impacts to Waters of the U.S. necessary to complete the project.













