

LETTER OF INTENT

Emory Johns Creek Hospital (EJCH) is an existing hospital and medical office building facility located at 6325 Hospital Parkway. EJCH has been in operation at this location for well over ten years and is the premier health care provider in the City of Johns Creek. When the hospital buildings were approved by the Fulton County Board of Commissioners in 2004, the zoning conditions restricted the height to six stories and no more than 100 feet. However, when approval for a helicopter pad was granted in 2006, a description of the existing hospital of 110 beds was included within the zoning conditions. We do not believe that descriptive reference to 110 beds was intended to provide a cap on the number of beds EJCH could have, but the reference nonetheless exists, and thus EJCH is seeking to remove that reference to 110 beds. Importantly, the total gross floor area of 672,963 sf contained in the zoning conditions will remain unchanged. Indeed, the conversion of authorized medical office space to bed space will result in a decrease in traffic. The recognition that hospital beds generate less traffic than medical office space is reflected in the Johns Creek zoning ordinance, which requires one parking space per 250 sf for medical offices versus only one space per four beds plus one per three employees for hospitals. Kimley-Horn has prepared a trip generation analysis that shows the change from medical office space to hospital beds produces a reduction in vehicle trips of 1,880 per day. These reductions are throughout both AM and PM peak hours. In general, medical office space produces approximately 4.5 times more daily trips than hospital beds. Therefore, the decrease in traffic resulting from the decrease in medical office space indicates the removal of the 110-bed condition is in actuality a "downzoning."

As noted above, the square footage of the approved hospital and medical office space will remain unchanged at 672,963 sf. The hours and manner of operation will remain unchanged as a 24/7/365 facility. The building heights will remain within the six-story and 100-foot cap. No additional variances from the zoning ordinance are being sought.

In 2017 Johns Creek ranked # 3 on the USA Today list of "50 best cities to live in." Johns Creek's estimated 2018 population is 84,350 per the US Census Bureau, and it is the ninth largest city in Georgia. The population has increased from 18,116 in 1990 to 59,889 in 2000 to 76,626 in 2010. As Johns Creek continues to grow, the demand for hospital beds will continue to grow. EJCH has just filed a Certificate of Need with the Georgia Department of Community Health to increase the number of beds from 110 to 150. It is respectfully submitted that a local government zoning condition limiting the number of hospital beds in a hospital is preempted by State law and regulation. Therefore, we would respectfully request that the existing 110-bed reference from the 2006 zoning approval by the Fulton County Board of Commissioners be removed. This will allow EJCH to expand its number of hospital beds to reflect the demands of the growth of Johns Creek.

EJCH recognizes the important role it plays in the overall attractiveness of Johns Creek as a destination city. EJCH appreciates the opportunity and privilege of being the premier health care provider in one of the premier cities in the United States. We appreciate the City's consideration of this application.

RZ 18-005

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City of Johns Creek
Community Development