

**Broadway Corridor Task Force
ReCode Comments & Requests for Submission**

Draft 2 Text, Draft 1 Map
20 September 2018

OVERARCHING COMMENTS:

In general, the Broadway Corridor Task Force (BCTF) supports the ‘vision versus past’ theory – and though past pattern of development may be used to identify the best future use, we agree that the vision for that area as identified in City adopted plans and policies should be used as the initial guide for recommending a zoning designation. It seems the first map draft mostly follows the current zoning map, instead of fixing re-zoning issues that occurred in the 1960s. We would request the next Map draft follow more closely to the Sector Plan, and many comments below follow this request.

In terms of the Broadway Corridor, we would like to see development that follows the pre-1960s model (when the corridor was developed), with more urban-type codes that establish edges along the corridor as opposed to the current code’s suburban deep-setback, parking in front model. Many of these comments below are centered on this vision, and our hope that ReCode will allow the corridor to be developed with a mixed-use, higher density model.

These comments are centered on Commercial zones that serve the Broadway Corridor, however at times we may make recommendations that affect residential pocket zones.

COMMENTS OF SUPPORT:

We support:

- The allowance of mixed-use (residential over commercial/office) along the Broadway Corridor.
- Build-To-Zones along Broadway in order to encourage a more ‘urban edge’ along the corridor, as well as force parking to be located at the side, or more preferably the rear of buildings.
- Current landscape buffering requirements between commercial and residential properties.
- Commercial Design Standards (especially in relation to the Broadway Corridor)
- CN designation for properties along E Woodland, across from Physician’s Regional Medical Center. (904 E Woodland; 1034 E Woodland)
- Reduced parking requirements for pedestrian-oriented zones (however request additional reductions, see below)

GENERAL COMMENTS:

Parking Requirements related to Transit and/or Transit Oriented Development

In addition to current parking requirement reductions as associated with C-N and certain C-G zones, we would ask MPC and Recode to consider a parking reduction for developments within a certain distance to a public transportation stop/center (IE the Broadway Shopping Center) to encourage more Transit-Oriented and Mixed-Use Development.

GENERAL COMMENTS: (cont.)

Office Space Inconsistent Setbacks, Change to C-G-2

Office zoning along Broadway (and other urban corridors) should have minimum front, side, and rear setbacks that match adjacent Commercial parcels. C-N, and C-G-1, 2 and 3 all allow no minimum front setback or 0' - which would create strange conditions along corridor where one parcel may be Commercial and an adjacent one Office. This would not allow for a consistent 'urban edge' along the street, where one building may have a 0' setback, and then the adjacent building is required to step back 15' just because it is Office zoning.

In looking further into the differences between Office and C-G-2 zoning, we see no reason why Office zoning is necessary along Broadway, and even noticed some non-compliance with proposed Office Zoning (for example, Independent Living facilities zoned Office that does not allow this use). Therefore, we request all currently proposed Office zoning along Broadway be zoned as C-G-2. In general, the BCTF questions whether an Office zone is a redundant zone to the new OP zone, since Offices are a compliant use within the C-G zones.

If for some reason this change is not possible, we suggest an Office Zone subsidiary for urban corridors (such as O-2 or O-Urban) that has no minimum front setback, to allow for office zoning adjacent to C-N or C-G parcels to have the same setback, as well as allow no minimum interior side setback to allow for zero-lot lines when adjacent to Commercial zoning. We also request that the build-to zone match any neighboring property – in Broadway's case, generally C-G-2 – therefore a 0' to 10' build-to-zone. Potential allowances could/should be made for existing churches and historic residences that have been converted to office functions - however this may need to require historic overlays.

Affected Office Properties Along Broadway (and Woodland):

815 N Broadway; 215 Bearden Place (current use noncompliant as office); 901 N Broadway; 949 N Broadway; 826 N Broadway; 830 N Broadway; 834 N Broadway; 1207 N Broadway; 1216 N Broadway; 1303 N Broadway; 1323 N Broadway; 2909 N Broadway; 3101 N Broadway; 3111 N Broadway; 3127 N Broadway; 818 E Woodland; 1306 N Broadway; 2921 N Broadway

Institutional Zoning

Currently institutional zoning does not have a 'build-to' requirement, and requires a 20' front and corner/side setback. This creates a similar condition to the above-mentioned Office zoning setbacks. For institutional parcels within an urban area or along an urban core (such as N Broadway) we request an institutional zone that has no front setback, but a 'build-to' requirement that would force new construction to align with the building face of adjacent C-G or Office properties. This would also force parking to occur behind or to the side of a building, as opposed to in front of it.

Additionally, the Task Force has reservations related to the allowance of Homeless Shelters on Institutional-Zoned parcels. Due to the nuances related to N Broadway with relation to the Homeless, we request that Institutional Properties along N Broadway (especially the current Physician's Regional property) prohibit homeless shelters.

GENERAL COMMENTS: (cont.)

Height Restrictions & Step-Back Requirements

We believe maximum building height should be less related to zone (as in O, C-G, C-H), but where a parcel is located on the map, IE distance from downtown. In general, we would recommend that the maximum building height remain taller (or unlimited) downtown, and then step down outward from downtown accordingly.

We recommend adding a height restriction to CG-3, perhaps 85' with review process if requesting over 85' and 130' maximum with review. The gap between C-G-2's 70' maximum height and C-G-3's unlimited maximum height seems too extreme. An intermediate is necessary, while limiting the unlimited height restriction to DK zones seems more appropriate.

We request C-G-2 (or anything above 4-5 stories, or an appropriate height) to have a 'step-back' requirement, similar to the Cumberland District and DK Zoning – whereas any floors above a certain height are required to step back. This will avoid the 'tunneling affect' along the corridor, and is similar to what larger cities like New York City enacted.

I-MU Design Standards

I-MU should require Commercial Design Standards when redeveloped as mixed-use properties. Not allowing such standards would create a loop-hole for I-MU properties developed as mixed use as opposed to CG or DK zones.

We recommend landscape screening requirements for commercial and/or office zones where the rear of the property abut a residential district. We recommend requiring infill commercial to align with existing building frontage/datum established by existing urban (pre-1950s) development.

Parking Requirements related to C-G-2 and C-G-3

Currently proposed is parking requirement reductions for pedestrian-oriented zones, which we agree with. However currently there is a 10% parking reduction for C-G-2, and a 20% parking reduction for G-G-3. We have requested and agreed with current proposals for C-G-2 along N Broadway namely due to the reduced height restraint – which is more in-keeping with a pedestrian oriented zone as opposed to unlimited (or taller) height restraints. If anything, these taller buildings will require more parking to serve their uses adequately, so it seems the reduction percentages are backwards – in that C-G-2 should allow a higher reduction than C-G-3, or it not at least the same.

Therefore, we request C-G-2 allows for a 20% parking reduction to be equal to C-G-3. If this is not possible, we would request a separate C-G-3 subsidiary zone that maintains the higher parking reduction, while creating a lower height restriction.

Homeless Shelters within C-G Zones

We request the removal of Homeless shelters from the C-G zones, believing that their allowance within C-G and C-R zones is sufficient, if not more appropriate\

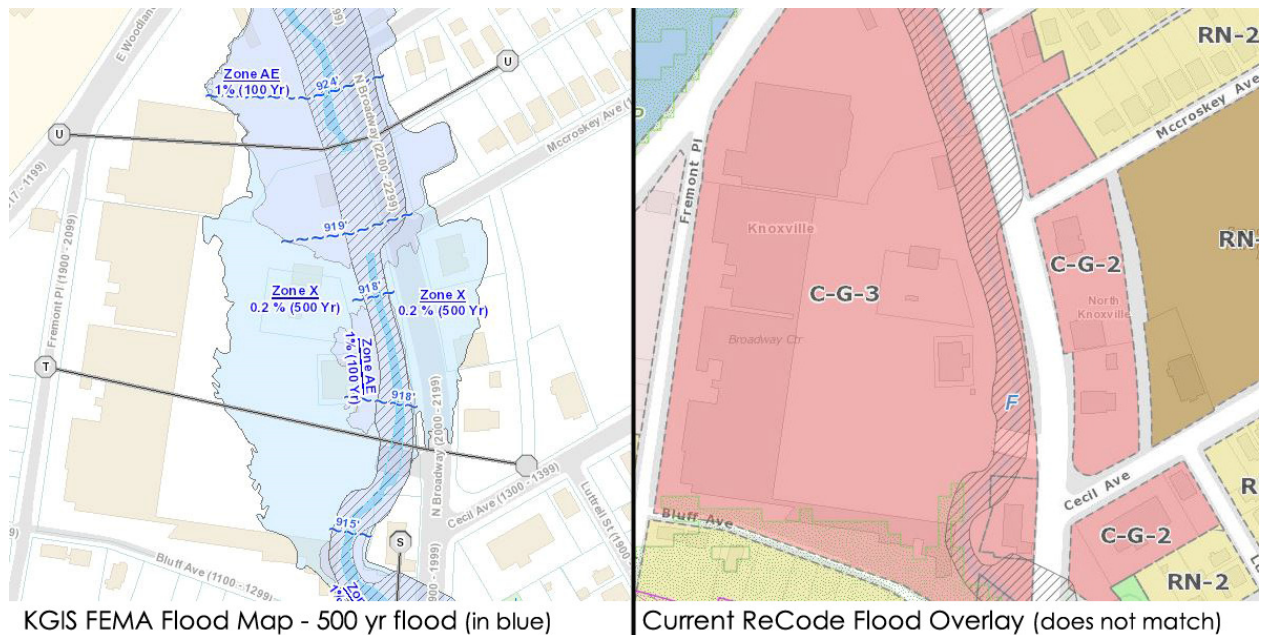
GENERAL COMMENTS: (cont.)

Floodway Overlay Zoning

The current 'Floodway Overlay Zoning District' is noted as being "established to meet the needs of the streams to carry floodwaters of a 500-year frequency flood," however the map overlay district does not reflect the 500-year flood plain. We ask that you update your map to show the accurate 500-yr flood overlay (see below) to allow current and future property owners an accurate representation of where they will be able to construct new buildings and/or renovate existing structures that may be within the 500-year floodplain.

Because a large portion of properties along the Broadway Corridor are within the 500-year floodplain, we ask the MPC, ReCode, and the City of Knoxville to create and/or utilize any possible zoning or administrative tools to allow for redevelopment within the flood zone, or at least more effectively communicate to property owners the restrictions they are faced with.

As a result of potential miscommunication between the City, FEMA, and property owners, many are easily confused regarding current regulations, since their properties may have been constructed before the 500-yr floodplains (and therefore current restrictions) were established.



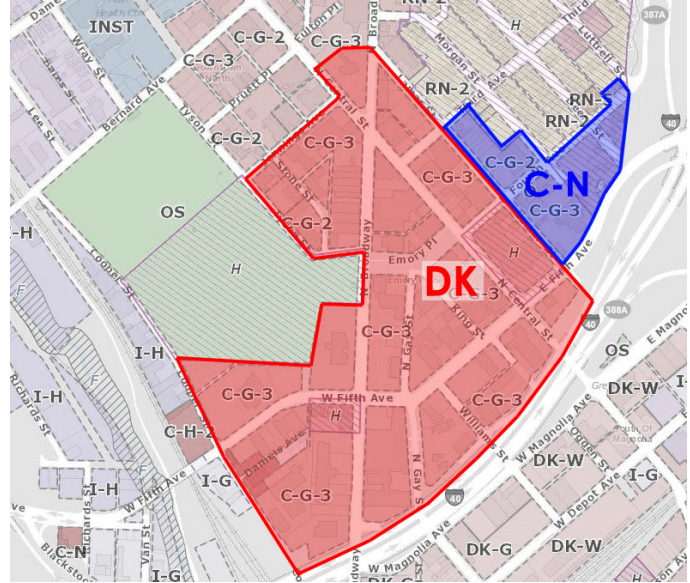
PARCEL AND/OR ZONE SPECIFIC COMMENTS:

(Ordered from South to North (working out of Downtown, travelling North along Broadway))

DK Zoning North of I-40, C-N Zoning Between Lamar & Moran St – 4th & Gill Periphery

We recommend DK zoning north of I-40 to the intersection of Central and N Broadway, allowing downtown expansion North of I-40, and reducing the number/allowance of surface parking lots. We believe this expansion of downtown has already taken place, and that DK zoning is more appropriate than the currently proposed C-G-3. We believe DK-H, DK-B, or a hybrid of the two is appropriate.

Additionally, we request parcels between Lamar Street, Morgan Street, and 5th Avenue (currently proposed C-G) be zoned C-N to keep various existing historic single family or multi-family residences in-tact, and serve as a buffer between the DK zone and 4th & Gill neighborhood.

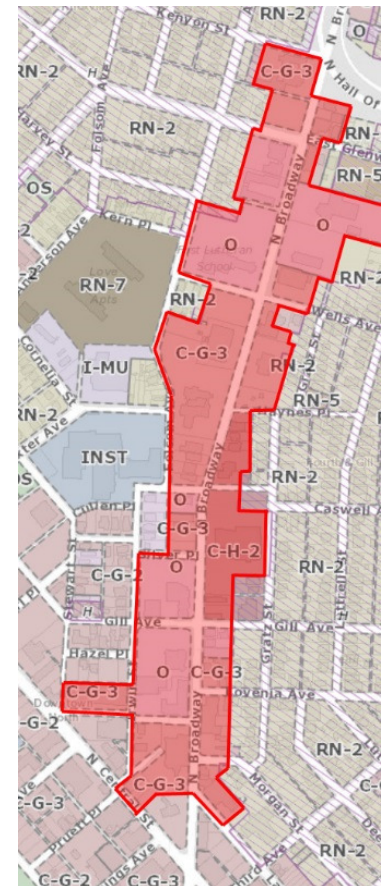


C-G-2 Zoning; Broadway between Central and Hall of Fame

Though we support and recommend DK zoning north of I-40 to the intersection of Central and N Broadway, we see this intersection as a transition point with regards to height and density. Currently all of these properties are proposed as C-G-3, however we believe the unlimited height restraint (even if reduced to 85') is too tall for this transitional section of corridor, which begins to be bound by residential parcels moving north from the intersection of Central and N Broadway.

We therefore recommend all parcels currently proposed as C-G-3 for this section of Broadway be reclassified as C-G-2, for the reduced height restraint (70') as well as the smaller build-to zone. This also matches in scale and follows precedent to the currently proposed C-G-2 zoning along N Central.

See Diagram at Right >



701 Cooper Street

We do not see C-H-2 an appropriate zone for this parcel, and request this parcel be appropriately zoned C-G-2 to remain consistent with surrounding properties.

621; 622; 625; 628; 629 Luttrell

(Residential related comments, affected by commercial proposal)

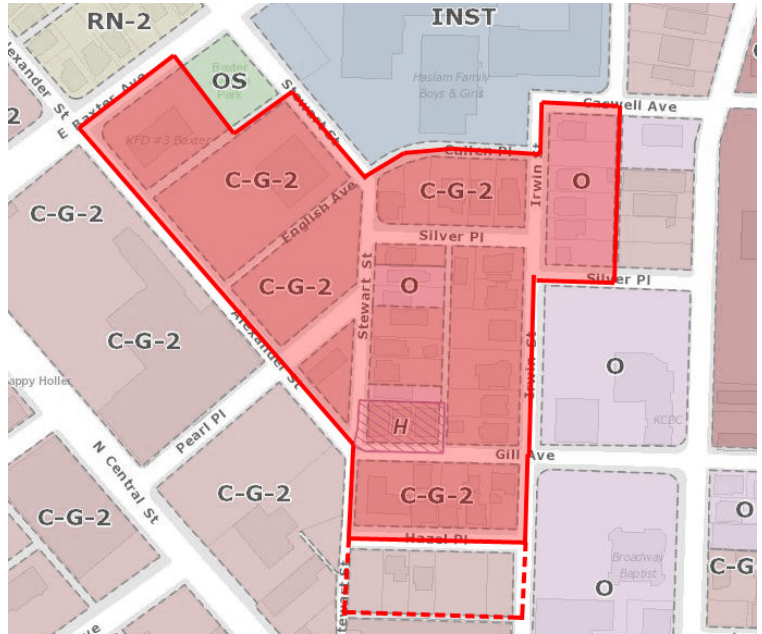
These properties on the corner of Luttrell and 3rd are currently proposed as C-G-2, yet are all historic single family residences. These properties should be zoned RN-2.

GENERAL COMMENTS: (cont.)

Gill Ave West of Broadway

(Residential related comments, however affected by current commercial zoning proposal)

Not only is this area inconsistent with the sector/one-year plan, but the recommended zone does not permit the current use - which is mainly single family residential, and this neighborhood has been residential since the area was developed in the early 1900s. In fact, more of this area was residential until the 1960s and the current code. Our recommendation is that this area is rezoned RN-2 or C-N in order to avoid noncompliance and allow continued revitalization of these single family homes. If you refer to the One Year/Sector Plan, this residential pocket neighborhood connects up to Old North along Stewart Avenue. We request RN or C-N zoning to extend along Stewart Street and Alexander Street in order to connect this residential area to another neighborhood.



Gill Ave West of Broadway

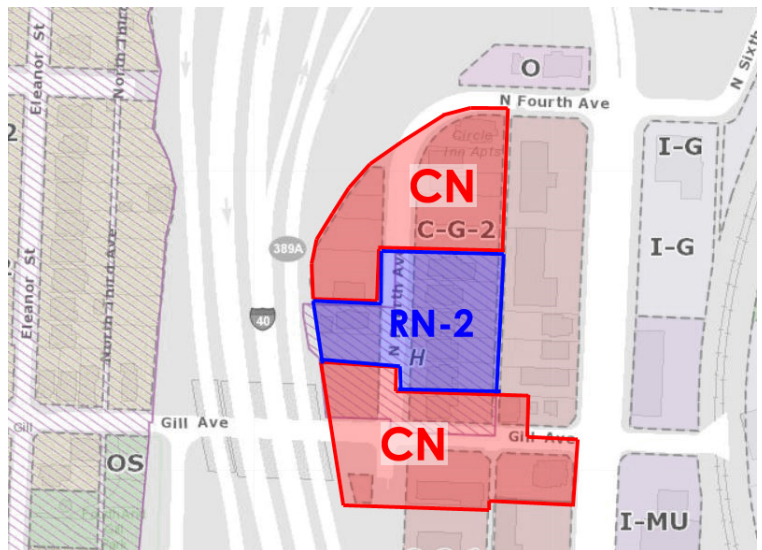
915; 911 Gratz

(Residential related comments, however affected by current commercial zoning proposal)

These residential properties on Gratz Street (abutting Broadway parcels) are historic and should not be rezoned to C-H-2. These parcels are also under a Historic Overlay, therefore we recommend these parcels to be zoned RN-2.

4th & Gill Ave – CN and RN-2

There are a number of restored single family residences in the small pocket neighborhood at 4th and Gill Avenues. To keep this important neighborhood intact, we request RN-2 zoning for single family residences, and CN zoning for commercial and/or converted properties. We request Gill Avenue to require CN zoning eastward to Hall of Fame Boulevard, in order to keep buildings in-scale with the single family homes.



GENERAL COMMENTS: (cont.)

Broadway, Between Gill Ave and Haynes Place

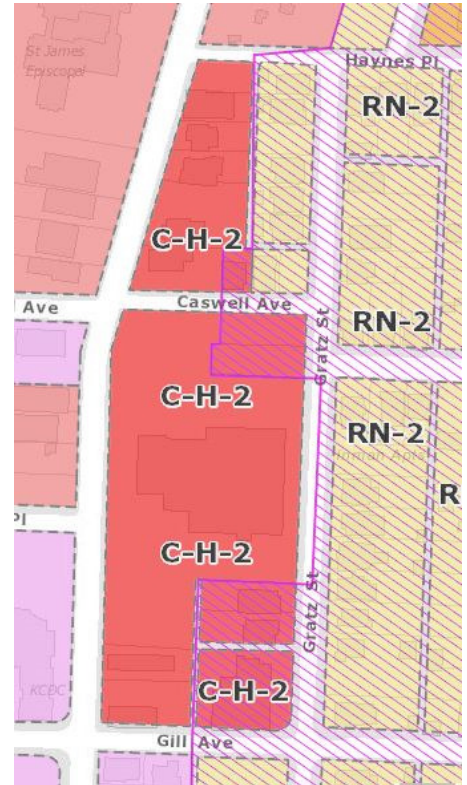
To remain consistent with neighboring properties (and our recommendations for zoning in this area) we recommend zoning these parcels C-G-2.

The extent of C-H-2 zoning in this area is inconsistent with the sector and one-year plan, which describes this area as a Multi-Use Urban Corridor. C-H-2 is of an auto-oriented character and doesn't make sense in the middle of an urban multi-use sector of a pedestrian nature, with single-family residences within walking distance. It appears C-H-2 was based upon the large parcel that is currently Broadway Carpets (930 N Broadway), however this parcel was developed after the 1960s and has setbacks and a lot size that is not in character/scale with the surrounding neighborhood.

The rest of these properties have a non-compliant minimum lot area (less than 10,000 sf) if zoned as C-H-2, which would not work with or support a minimum 20' setback. This largely applies to the properties between Caswell and Haynes.

Related Properties:

900 N Broadway; 904 N Broadway; 930 N Broadway (Broadway Carpets); 1002 N Broadway; 1006 N Broadway; 1016 N Broadway; 1020 N Broadway; 1024 N Broadway; 1026 N Broadway



315 Gill Ave

In relation to the comment related to inappropriate C-H-2 zoning on Broadway between Gill Ave and Haynes Place, this parcel should not be zoned C-H-2, which is also inconsistent with the sector plan. Considering this property's historic zoning overlay, and direct relation to a revitalized neighborhood with single family residences across the street and on both sides, we request C-N zoning for this parcel. C-N would keep the parcel in-scale and of a pedestrian-oriented nature appropriate for the character of 4th & Gill.

Broadway Shopping Center

We support the current zoning; however, the 'unlimited' height restriction seemed a bit ominous. This should be taken care of in our general 'height restriction' comment. We foresee mixed-use development along the property edge (adjacent to First Creek) and support a 'build-to' requirement for these parcels.

This property is located at the most heavily used transit stop in the city (second to only the transit hub). We support/suggest reduced parking requirements for properties located adjacent to a public transportation stop, to encourage more mixed-use and transit-oriented-development.

This property is also within the 500-year floodplain - we ask the MPC, ReCode, and the City of Knoxville to create and/or utilize any possible zoning or administrative tools to allow for redevelopment within the flood zone

GENERAL COMMENTS: (cont.)

Physicians Regional Medical Center

See general Institutional comment above. Considering the potential Civic use of this site, we request that MPC studies how the amount of surface parking may be regulated, if not prohibited on extra-large parcels when adjacent to single family residence zones.

Commercial Properties along E Woodland

We support the C-N designation for properties along E Woodland, across from Physician's Regional Medical Center. **Related Properties:** 904 E Woodland; 1034 E Woodland

E Woodland Ave - 111, 233, 241, 0

(not within BCTF boundary, but affects residential pockets which serve the corridor)

We request this property, along with adjacent properties (111, 233, 241 & 0 E Woodland) to be zoned C-N considering their location along a predominantly residential corridor (especially considering adjacent properties). CN would be a more appropriate 'buffer zone' that would encourage pedestrian and neighborhood centered development that could serve adjacent vibrant Old North Knoxville and Oakwood Lincoln Park neighborhoods. Reduced parking requirements would also be appropriate given the amount of residences in the vicinity that would encourage clientele to walk or bike ride. Additionally, the current C-G-2 allows for 70' building height, which is inappropriate directly adjacent to residential properties on both sides.

3009 N Broadway

This C-G-1 parcel along Broadway and the one west of it on Atlantic Avenue does not currently require commercial design standards, yet it surrounded by properties that do. We request this parcel to be zoned C-G-2 to remain consistent with all other properties along Broadway, as well as to require design standards related to this property.

1320 Raleigh; 0 Grace; 0 Raleigh

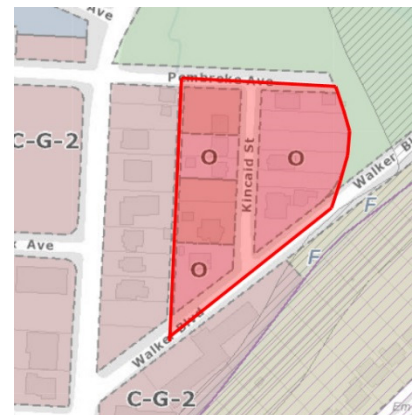
(Residential related comments, however affected by current commercial zoning proposal)

We believe the appropriate location to transition from Broadway's Commercial zoning to Raleigh Ave's RN-2 zoning is the Alley west of Broadway and west of First Creek. Therefore, we request these parcels to be zoned RN-2 to remain in-keeping with the current single family use, as well as the surrounding neighborhood.

Kincaid Street R-N Zoning (as opposed to O or C-G)

(Residential related comments, however affected by current commercial zoning proposal)

The recommended zone does not permit the current use - which is single family residential, and this neighborhood has been residential since the area was developed in the early 1900s. In fact, more of this area was residential until the 1960s and the current code. Our recommendation is that this area is rezoned RN-2 or C-N in order to avoid noncompliance and allow continued revitalization of these single family homes.

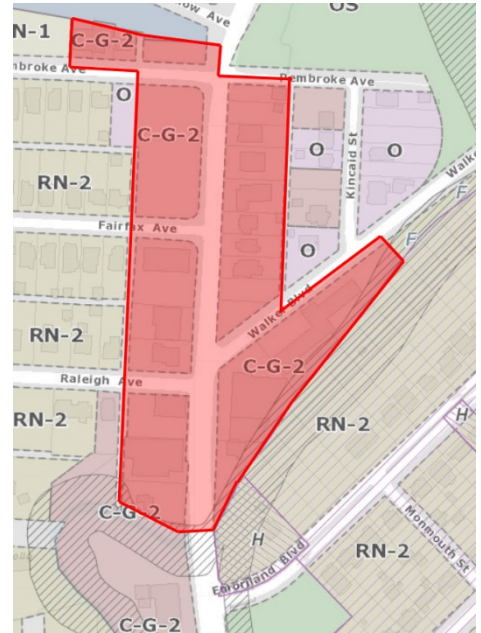


GENERAL COMMENTS: (cont.)

C-N (or other scale-appropriate) zoning; Broadway between Emoriland and Pembroke

The scale of buildings along Broadway between Emoriland Boulevard and Pembroke Ave reduces to small-scale commercial and converted historic residential. In order to keep the scale and nature of these properties intact, as well as transition to the directly adjacent single family residential neighborhoods, we request MPC and ReCode to study a C-N zoning for this portion of Broadway. We see this pocket of Broadway as having great potential for a walkable, pedestrian oriented shopping district similar the 12 South neighborhood of Nashville, and believe C-N zoning would be more appropriate than C-N-2 with a 70' maximum height allowance.

If C-N zoning is not possible, we request a C-N-2 zone that has a reduced maximum height requirement more in-keeping with the scale of this area of Broadway (40').



Northgate Plaza

We request that this parcel and all parcels within the 'Northgate Shopping Center' vicinity that are adjacent to N Broadway (or at the corner of Mineral Spring Ave) be zoned C-G-2, so that a 'build-to' requirement can ensure future development along the street edge, with parking in the rear.

The current flood-zone at the rear of the property seems to be prohibiting investment into the property, and new construction fronting N Broadway (with parking behind) would spur reinvestment in these properties. Ultimately, the BCTF would like to see all parts of these parcels that front Broadway be zoned C-G-2, however we realize a single parcel cannot have split zoning. Therefore, if the MPC and/or ReCode team sees it appropriate, we would support zoning the entire shopping center to C-G-2 or C-G-3. If appropriate, the current out-parcels adjacent to Broadway may be most appropriately zoned C-G-2 (reduced height & reduced build-to zone) and the parcels towards the rear of the property may be zoned C-G-3.

Related Properties Along Broadway:

4224 N Broadway; 4126 N Broadway, 0 Topeka Street, 4426 N Broadway, 2320 Mineral Springs Ave; 4200 N Broadway, 4216 N Broadway, 4454 N Broadway

4206 N Broadway (additionally, this parcel's minimum lot area is noncompliant as C-R-2)

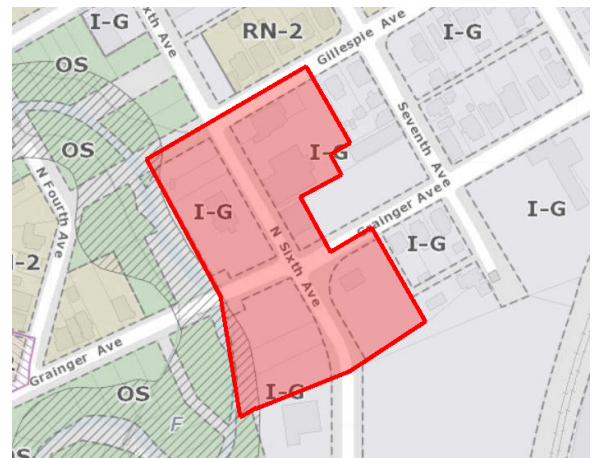
Hall of Fame drive between I-40 and E Fifth, Historic Preservation Drive

All properties along Hall of Fame Drive between I-40 and 'Historic Preservation Drive' downtown should allow Commercial Mixed use, with parking at the side or behind. We request all necessary Industrial zoning along Hall of Fame to be I-MU (to avoid noncompliance), and all Commercial Properties to be zoned CG-2. Office zoning is not necessary, so to keep setbacks consistent, we request all Office zoning be changed to CG-2. If a property does not require Industrial zoning, we request CG-2.

All properties along Hall of Fame Drive should require commercial design standards. Another option is one of the Downtown Zoning tiers. If the City's and MPC's intention is for 'Downtown' or urban development to continue outward towards Magnolia, Hall of Fame drive needs to be a priority for developing more urban commercial mixed-use properties, which would establish Hall of Fame Drive as an urban boulevard as opposed to the current suburban setbacks and industrial nature. Anything that can be done to spur this type of development between I-40 and downtown (we think of this as a major gateway into Knoxville) will promote quality development around the downtown core, and down corridors such as Magnolia and Broadway.

Grainger and Sixth – CN and/or I-MU

We request the zoning of properties at the corner/intersection of Grainger Ave and Sixth Avenue to C-N in order to encourage neighborhood commercial which could serve the neighboring pocket of Old North. This will also encourage residential revitalization down Grainger and east of Sixth Avenue, playing upon the revitalization of Old North and Grainger Avenue, and adding to the city's inner-city single-family housing stock. C-N zoning would also compliment recent development on 6th Avenue (Patricia Nash) as well as proposed neighborhood commercial development along the western portion of Washington Avenue near 6th Avenue in Parkridge.



Additionally, we request that all properties currently zoned I-G along N 6th Avenue (between Cecil and Hall of Fame) be zoned I-MU to allow for future neighborhood redevelopment.

Office within Oakwood Lincoln Park, adjacent to Physicians Regional Medical Center

We request all proposed office zoning within Oakwood Lincoln Park to be rezoned CN to keep future development in-scale with the surrounding historic single family residential neighborhoods. This would also appropriately encourage pedestrian-type commercial tenants that can serve the surrounding neighborhoods, as well as future development at Physician's Regional Medical Center.

If office zoning is absolutely necessary, we request the O-Urban type zone suggested previously in order to require urban setbacks with build-to zones, as well as require parking at the side or rear of a building.

