



Recommendations for **ReCode Map Draft 3 and ReCode Text Draft 4**

Comment Submission to ReCode Knoxville **By Knox County Democratic Party Progressive Action Committee**

January 4, 2019

The Knox County Democratic Party Progressive Action Committee (PAC) believes that the ReCode Knoxville Draft 4 Text is getting closer to an acceptable compromise document that balances the diverse interests of Knoxvillians; however, we still believe that a significant amount more of RN-3 and RN-4 needs to be added to the Draft 3 ReCode Map in order to facilitate the development of “missing middle” affordable housing in Knoxville.

Examples of Successful Compromise in the Draft 4 Text

Though we have not had time to review thoroughly all the changes due to the short timeframe over the holidays of this most recent comment period, we have found several positive changes made to the draft ReCode text, such as decreases to minimum lot sizes for duplexes in some zones, allowance of vinyl as a primary building material on multifamily developments in some zones, the addition of housing diversity in the purpose section, and the addition of a section on reasonable accommodation in accordance with the Americans with Disabilities Act.

In the case of some changes, such as with the allowance of vinyl for use as a primary surface finish material on any façade in RN-4 and RN-5, we wish the Knoxville-Knox County Planning staff had gone further, by allowing vinyl in RN-3 and RN-6 and above as well. However, we recognize that some of these changes are the result of compromise, and we believe they strike an acceptable balance between the divergent views of Knoxvillians.

Another example of such an acceptable compromise is the addition of the requirement that a single-family dwelling with an accessory dwelling unit (ADU) must have one of the units occupied by the owner of the property. PAC would prefer no “owner occupied” requirement; however, if that compromise is necessary to make ADUs more palatable to certain

neighborhoods, then we can accept that compromise. We still do hope that Planning staff will consider implementing our suggested changes to minimize required ADU setbacks and ease the limits to gross floor area required for ADUs to make ADU construction more feasible in neighborhoods with smaller lots (see PAC's comments on the ReCode Text Draft 2 for very detailed recommendations on these points).

Lot Size Compromise in RN-3 Not Worth It

One example of compromise that PAC believes does *not* strike the right balance is the increase of the minimum lot size for duplexes in RN-3. While we greatly appreciate the decrease in minimum lot size for duplexes in RN-2 and RN-5, we believe that the minimum lot size for duplex development in RN-3 should be no more than 7,500 square feet. We understand that the increase in the RN-3 duplex lot size minimum to 10,000 square feet was made as a compromise for one specific neighborhood; however, we do not believe it is worth it to downgrade the value of RN-3 for the whole city just to accommodate the request of one neighborhood. We would rather see that neighborhood zoned RN-2 (with special use duplex lot size minimum remaining at 7,500 square feet) while maintaining the minimum lot size for RN-3 duplexes at 7,500 square feet.

Still Need More Orange Multifamily Zoning on the Map

The PAC was very disappointed that no significant amount of orange multifamily zoning was added back in the Draft 3 Map, and in fact, it may be that overall the amount of orange multifamily zoning declined. That is unacceptable and will prove detrimental to the ability for affordable "missing middle" housing to be developed in Knoxville in the future.

We urge the Planning staff to find more properties across the city to be zoned RN-3 or RN-4. In our past comments, we recommended adding more "orange" within a quarter-mile of Knoxville Area Transit (KAT) core and local bus route stops. We still stand behind that recommendation; however, we understand that there has been pushback on that idea from some communities due to perceived risk of tear downs of historic structures. At a minimum, PAC suggests finding lots within that quarter-mile range that have no structures, and zoning those lots RN-3 or RN-4. Another possibility would be to designate as RN-3 or RN-4 lots in that quarter-mile range that have non-historic structures that were built more recently, for example since 1980.

Due to the short timeline for submitting this round of comments, PAC did not have time to identify such properties in order to submit specific lot suggestions by the comment submission deadline. However, in the coming weeks, PAC will work to identify such properties and will follow up with subsequent comments on the draft map. We hope that Planning staff will also seek to identify such properties so that we can ensure the ReCode map provides more opportunities for development of affordable housing while balancing the other varied interests of the residents of our city.

For questions on this comment submission, please contact kcdpprogressives@outlook.com.