To: Gerald Green and Amy Brooks  
From: Belinda Woodiel-Brill, Director of Communications and Service Development, Knoxville Area Transit  
Date: September 14, 2018  
Re: Recode – a transit perspective

Thanks so much for all of your hard work in updating Knoxville’s zoning code. This is an enormous undertaking, with many competing interests and complex ideas and diverse implications, but it’s a task that is definitely needed.

As I see on the Recode website, one objective of the project will be to:

**Promote and balance our mobility options**

Travel by bus, car, bicycle and walking must all be accommodated in an urban community like Knoxville. The desire to increase connections between neighborhoods and destinations, by all modes of travel, continues to grow.

Based on my initial examination of the rezoning proposal and planning background, I would like to comment on the potential outcome of this objective.

**Corridors and Residential Zoning**

The most fundamental indicator of successful and efficient transit is density. While cities do not desire higher densities in all locations, the zoning code provides an opportunity to increase densities along major transit corridors, or in particular nodes along those corridors. I applaud the commercial zoning which “promotes mixed use development in a pedestrian-oriented environment” - this is a key to good transit as well as good quality of life. However, I am concerned about the replacement of R-2 zoning with RN-1 or RN-2 zoning just outside of those commercial corridors. The area around Magnolia Avenue presents a good example of this change:

The ‘transitional’ density – the difference between a single-family neighborhood and a commercial corridor – has been replaced with single-family. These areas along corridors provide excellent opportunities to create additional housing options, as well as provide better densities for transit in walking distance of the main corridor. Opportunities in this zone do not necessarily have to be huge apartments – rather, 4-8 unit housing developments – a transition zone between commercial and single family - would provide opportunities that wouldn’t exist otherwise for different housing demographics.

The Tennessee Housing Development Agency reports that 53% of Knoxville residents rent their housing. Examples with this demographic include 1) graduate students with children – they cannot afford a single family home, but perhaps they have a small child and don’t want to live right on the corridor, but want access to good
transit and other services; or a senior who doesn’t want a lawn to look after, but would like to stay active, use transit, etc.

This also would help with providing more affordable housing options in the neighborhood and along the corridor. Often on-street corridor housing is expensive to rent, so offering another, middle-ground transitional option is a key to good planning and successful cities, and it provides an affordable option for many whose neighborhoods become more popular and subject to higher rental or housing costs.

Providing this type of transitional, higher (but not highest) density zoning between commercial and single-family zoning also meets the Plan ET goal of Housing Choices: “Provide expanded housing options that respond to changing demographics such as an aging population and a rising generation of millennials less inclined to want large houses on large lots.”

I strongly recommend that consideration be given to restoring those higher density opportunities – transitional densities if you will – between commercial corridors and single-family zoning. Included in that, and in some cases within RN1 and RN2 zones, should be standards for such small scale multi-family dwelling types of housing developments that can be clearly understood by adjacent neighborhoods and potential developers in those areas.

Commercial nodes
Intense mixed use development may not work along entire corridors, but there are opportunities where nodes can be enhanced to encourage higher densities, mixed use, and walkable communities. One example might be at Washington Pike and Whittle Springs:

Again, opportunities for higher densities in this node have been replaced with RN2 zoning. I used to live near this intersection, and the bones are here to make this node a neighborhood gathering spot – perhaps a corner restaurant or small neighborhood stores. Transit can provide neighborhood connections to this node, but this node would not be successful with only single-family residential surrounding it. Better put, commercial nodes such as this have a much higher chance of success with higher surrounding densities.
KAT Service Area
The image to the right shows a slice of the KAT system, and the grey area represents the ¼-mile distance to KAT bus stops. As you can see, ¼-mile covers a good deal of area, and provides opportunities for great transit service within the city. To grow efficient transit service, I would encourage opportunities for higher densities within these ¼-mile areas, in particular along major corridors, or in nodes along major corridors.

Discouraging density in non-transit accessible areas
While I understand this zoning exists because the property is already developed, this is an example of workforce, higher density housing being located in an area that is impossible to serve by current types of transit services. As you can see, Cassell Ridge Apartments is located on a narrow, dead-end street far from major corridors. There are no sidewalks, there are hills, and there is no way to provide efficient transit service.

By offering fewer opportunities for higher densities along corridors, we risk creating additional situations such as this.

To Summarize (Sorry, I can be long-winded):
- I’m not convinced that adding residential along commercial corridors, then removing higher density residential opportunities from neighborhoods such as Lincoln Park, Five Points and others would expand housing options. In fact, I think this current zoning proposal might reduce opportunities – in particular for renters and those needing workforce housing – those likely to use transit.
- For transit to be successful, higher densities should be possible not only directly along major corridors, but within ¼ mile of those corridors, or even ½ mile, if sidewalks exist.
- I would recommend adding in standards for small scale multi-dwelling housing developments that would help to clarify opportunities for development, and to make clear to neighborhoods what might be possible, and what would not be possible. I would think these could even be considered for inclusion in RN1 and RN2 zones (or create an appropriate zone to incorporate these within the urban core neighborhoods). If designed properly, I am hopeful these would not disrupt our beautiful traditional neighborhoods.

One final comment from a personal perspective: Additional Dwelling Units (ADU)
As someone who lived in a ‘granny flat’ in a great neighborhood during graduate school, I cannot emphasize the benefits of this type of housing enough, and strongly encourage its expansion. Many - from aging parents who desire independence, to graduate students like I was - greatly benefit from such quiet neighborhood situations in close proximity to transit or family. The homeowner benefits as well, with additional eyes on their home, and a caretaker when on vacation. Plus, this continues to add densities in a very unobtrusive way – in particular for individuals inclined to using transit – while also expanding housing options.

Ok, I think that’s it!
Again, I so appreciate the opportunity to comment. Thank you for working so hard to help us all understand a complicated concept. Please let me know if you have any questions.