Dear City Council,

I have been in ongoing conversation with many neighborhood representatives from inner-city neighborhoods such as Parkridge, 4th & Gill, Old North, Belle Morris, Oakwood Lincoln Park, Edgewood, and Fairmont/Emoriland. I don’t want to inappropriately speak on their behalf, however many of us are concerned that KAT/KTA’s push for RN-4 zoning in our neighborhoods that do not have the protection of a Historic Overlay (or at least a general protection of the Infill Overlay district) and it’s allowance of Multi-Family and Townhouse developments will give developers or landlords the incentive to either knock down unprotected historically significant buildings and single-family homes to build more profitable multi-family developments, or once again split up historic single family homes into multiple apartments as was done in the 1950’s up until the recent renaissance of all of our neighborhoods.

Though Knoxville-Knox County Planning and the ReCode team have taken heed to our concerns, I/we find it unacceptable and grossly inappropriate for a public entity such as KAT/KTA to be lobbying their agenda for increased multi-family zoning within 1/4-mile of all of their bus stops against the wishes of the neighborhoods it serves, all in order to fix a ridership problem that residential zoning (and the neighborhoods) did not create. How is it ethical for a public entity to make a resolution and/or push an agenda for something that is supposed to be public process? How is this different from a public agency backing and promoting a specific political candidate?

Even if their lobbying were acceptable (say, that this was not KAT’s agenda, but another entity) their statements and requests are incorrect and contradictory. KAT/KTA is spreading misinformation that "The current Recode proposal reduces the diversity of housing types within many close-in neighborhoods with good transit service, changing from its current zoning that allows multi-family, duplexes, triplexes, four-plexes, to only single family (with duplexes allowed as a special use)." Specifically, this is not true for many neighborhoods and many areas that their "1/4-mile rule" covers - including my own neighborhood of Belle Morris. Thankfully our single-family and duplex-allowed zoning is staying very much the same as it is now, so therefore a resolution requesting "the option for mid-level housing opportunities (duplexes, triplexes, bungalow courts, for example) within 1/4 mile of the major corridors" would change my current zoning all for the illusion that it will make "high quality transit to succeed in Knoxville." Also, what their resolution fails to portray is that the ‘orange’ RN zoning they have been requesting allows for apartment building as well – development types which could incentivize demolition of historic homes.

I did not ask KAT/KTA to push for my home and neighborhood to be rezoned multi-family in order to fix their organizational and operational woes. Even if there were higher density housing in Belle Morris and even if it increased ridership, these riders would have to be riding downtown in order for a bus pass to actually make sense. Don’t get me wrong - I am in support of public transit. I have looked into this because when I purchased my house it was a selling point to be within 150ft of a stop on Bus Line 23 and within 1/2 mile of a stop on Bus Line 21. But since I work on Sutherland
Ave I would have to ride downtown and then switch buses, which would take about 45 minutes. This is just not realistic when I can make the drive in 10 minutes. **Re-zoning is not going to fix KAT’s ridership problem, however retooling its cross-town linkages might.**

Additionally, **ReCode is not a "if you zone it, development (or riders) will come" phenomena.** If KAT (or the City - who’s letterhead sits atop their resolution) wants to see Transit Oriented Development and quality multi-family redevelopment along its corridors, then it needs to create other incentives such as TIF or PILOT zones for developments being built within under-performing shopping centers, underutilized industrial sites, or empty parcels of land - “not” by rezoning our established historic neighborhoods. The Office of Redevelopment could also focus on projects that would be a catalyst for future development along these corridors. Another idea would be extending credits to developments that offered reduced rent to public employees or teachers who could easily take a KAT bus to work.

In summary,

- **I am concerned that KAT/KTA’s "1/4-mile rule" will incentivize developers/landlords to split up historic single family homes that are not protected by a H-1 overlay into duplexes or multi-family homes.**
  - Historic neighborhoods are still recovering from serious harm done by landlords chopping up historic homes into multiple apartments.
  - Additionally, KAT/KTA conveniently omitted Bus Line 10 that runs through Sequoia Hills from their diagrams pushing the "1/4-mile rule."
- **If KAT wants to increase ridership, KAT should focus on re-tooling its cross-town linkages to fit a "hub" model, connecting residential areas to jobs-- not by trying to "remake" the City around its existing (unpopular) bus lines.**
  - Align bus lines to connect residences to workplaces and businesses, and people will make use of the bus.
  - We don’t even have a bus line to the local airport.
- **If popular destinations are not being served, why is "zoning" KAT’s solution to increasing ridership? In Parkridge, served by two bus lines, only 8.2 percent of residents use the bus, according to American Community Survey data.**
- **Ridership is clearly driven by the destinations and efficiency of bus lines, not density of housing in the corridors.**
- **Please stop looking to "zoning" as a way to increase KAT ridership and look at re-tooling the routes instead, or create other incentives such as expanded TIF or PILOT zones along our urban corridors to promote Transit Oriented Development.**

I am, however, in support of passing ReCode (without implementing the KAT/KTA’s 1/4-mile rule) as soon as possible in order to stop the epidemic of inappropriate suburban-type commercial development along our urban corridors. No, ReCode has not yet been perfected and it may take some time to iron out all of the details, however the longer we wait the more unfitting development our corridors and neighborhoods will see.