

FOUNTAIN CITY TOWN HALL, INC.
PO Box 18001, Knoxville, TN,37928-8001
November 10, 2015

Agenda Item #6, 11-A-15-OA, Craft Industries

Dear Metropolitan Planning Commissioners:

The Board of Fountain City Town Hall respectfully requests postponement of the "Craft Industries" amendment to the Knoxville Zoning Ordinance.

The proposed amendment introduces a variety of manufacturing activities into the commercial zoning districts that line almost every arterial and collector in Knoxville. Citizens deserve sufficient time to consider and discuss an amendment that has the potential of widespread impact on our community.

The amendment was first available for review on Friday, November 6, 2015. Clearly that is insufficient time for the public to give thoughtful consideration to this significant amendment. Notice of the proposed amendment is not included on the list of "Proposed Zoning Ordinance Changes" on MPC's website.

Several concerns have been identified in our initial review of the amendment:

Definition of "Craft industry":

The definition appears to allow unspecified manufacturing operations as a Use-on-Review in C-3, C-4, C-5, C-6, C-7, zoning districts, and as a Permitted Use in the I-2 zoning district. The activities are **not limited** to the production of edible products. We assume "Craft industries" would include such activities as the manufacture of glass, iron works, woodwork, leather production, etc.

The variety of raw materials, industrial processes and products produced creates the potential for a broad range of possible impacts depending on the specific industry. For this reason, we believe the amendment requires further study and public discussion.

The definition of "Craft industry" seems insufficient. The only actual limitation placed on "Craft industries" in the definition appears to be size of the "**establishment**" (Check definition. "Building" is more appropriate than "establishment"); 15-thousand square feet in Commercial zones (more than 1/3 acre), and 20-thousand square feet (almost ½ acre), in Industrial zones.

The first sentence of the definition, "***A type of small industry wherein goods and products are produced, created, and/or manufactured by artisans and/or those skilled in a particular trade***" is very vague. It pretty much says anyone producing anything qualifies as a "Craft industry." For instance, almost everything can be termed "goods and products." And, there is no mention of any credentials or certifications that must be obtained in order to be recognized as "artisans and/or those skilled in a particular trade" and thus qualify to operate under "Craft industry."

Performance Standards:

Effective performance standards are essential in order to avoid conflicts between incompatible uses. Establishing, monitoring and enforcing performance standards is a complex and costly undertaking.

However, it seems reasonable to expect that a basic core of performance standards be adopted for all “Craft industries” and that the Use on Review process provide the opportunity for additional, site-specific conditions.

The existing performance standards in the zoning ordinance, **Article V, Section 1, Performance standards:** appear to apply **only** to the South Waterfront Form Based Zone, I-1, I-2, I-3, I-4 and BP-1. The C-6 General Commercial Park District (**Article IV, 2.2.9, Sec. G**), specifies that C-6 districts must meet the performance standards in **Article V, Sec. 1**. The language for C-3 and therefore, C-4, is far less clear. Mention of **Article V, Section 1, Performance standards**, appears to relate only to Permitted Uses, not Uses Permitted on Review.

More importantly, we are not certain that the performance standards in **Article V, Section 1**, even if applied to all Commercial zones, are adequate for manufacturing/industrial uses operating in Commercial districts lining our arterials and collectors. The **Article V, Section 1, Performance standards**, were established for Industrial districts which, unlike Commercial districts, generally are not located in close proximity to offices, schools, churches, daycare centers, and residents.

Other Zoning Districts:

“Craft breweries, distilleries and wineries” are allowed as Uses Permitted on Review in many zoning districts such as C-2, PC-1, etc. Why were “Craft industries” not included in those districts?

Thank you for considering our request for postponement.

Yours truly,

Charlotte Davis, Carlene Malone, Co-Chairs, Fountain City Town Hall Land Use Committee