



Dori Caron <dori.caron@knoxplanning.org>

[MPC Comment] KCDP PAC Comment Submission on ReCode Knoxville Draft 3 Map and Draft 4 Text

KCDP Progressives <KCDPProgressives@outlook.com>
Reply-To: kcdpprogressives@outlook.com
To: "commission@knoxmpc.org" <commission@knoxmpc.org>

Fri, Jan 4, 2019 at 4:51 PM

Honorable Knoxville-Knox County Planning Commissioners,

On behalf of the Knox County Democratic Party (KCDP) Progressive Action Committee (PAC), we would like to submit the attached comments on ReCode Knoxville Map Draft 3 and ReCode Text Draft 4.

We would especially like to point out our recommendation that the Planning staff seek out more lots to designate as RN-3 or RN-4, focusing on lots within a quarter-mile of core and local bus route stops that have no structures and/or that have non-historic structures that were built more recently, for example since 1980. This will help ensure the ReCode map provides more opportunities for development of affordable housing while balancing the other varied interests of the residents of our city.

Below is the list of PAC members that ratified this comment submission:

- Emily Gregg - KCDP Chair & TNDP Executive Committee Member
- Allie Cohn - PAC Co-Chair & KCDP Secretary and Executive Committee Member
- Michael Davis - PAC Co-Chair & KCDP Executive Committee Member
- Sylvia Woods - PAC Steering Team Member, KCDP Executive Committee Member & Tennessee Democratic Party Executive Committee Member
- LaKenya Middlebrook - PAC Steering Team Member
- Elizabeth Rowland - PAC Steering Team Member
- Moira Connelly - PAC Steering Team Member
- Matt Sterling - PAC Member

Please let us know if you or your team members have any questions on our submission.

Thank you,

Elizabeth Rowland

Progressive Action Committee
Knox County Democratic Party
311 Morgan St. Knoxville, TN
Like us on Facebook or subscribe to our newsletter

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This message was directed to commission@knoxmpc.org

 **PAC Recode Comments Round 5 FINAL.pdf**
293K



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.



Dori Caron <dori.caron@knoxplanning.org>

[MPC Comment] Community Forum- Re: Request for Postponement of Agenda Item 5, 11-A-8-OA

larrys55 via Commission <commission@knoxplanning.org>

Fri, Jan 4, 2019 at 4:52 PM

Reply-To: larrys55@aol.com

To: LarryS55@aol.com, commission@knoxplanning.org, gerald.green@knoxplanning.org, recode@knoxplanning.org

Cc: Mayor@knoxvilletn.gov, pahrens@knoxvilletn.gov, fsaunders@knoxvilletn.gov, swelch@knoxvilletn.gov, aroberto@knoxvilletn.gov, ssinghperez@knoxvilletn.gov, Irider@knoxvilletn.gov, mcampen@knoxvilletn.gov, gmckenzie@knoxvilletn.gov, gwallace@knoxvilletn.gov, marshallstair@knoxvilletn.gov

To: Knoxville-Knox County Planning Commissioners, Gerald Green, Recode Knoxville

From: Community Forum, Larry Silverstein, Chairperson

Re: Request for Postponement of **Agenda Item 5, 11-A-8-OA**

Date: January 4, 2019

Community Forum requests that Agenda Item 5, 11-A-18-OA, Consideration of the Comprehensive Update of the City of Knoxville Zoning Ordinance, be postponed from the January 10, 2019, meeting of the Planning Commission to the February 14, 2019, meeting.

Recode Draft 4, 287 pages long, was first made available online on December 17, 2018. Hard copies were not available until December 27, 2018. Citizens were given only eighteen days until January 4, 2019, to comment on Draft 4. The eighteen days included two major holidays when people travel and celebrate with family, friends, and community.

Planning Commissioners and the public have not had adequate time to review Draft 4 which contains a large number of modifications, additions, and deletions from Draft 3. The only public workshop held since Draft 4's release, was yesterday, January 3, 2019, for the Stakeholder Advisory Committee. Many of those attending the meeting, including members of the public, were seeing Draft 4 for the first time at the meeting. There was some discussion about some of the changes in Draft 4.

Community Forum is not submitting comments to Draft 4 by the January 4, 2019, deadline because it has been impossible for us to prepare comprehensive and thoughtful comments in 18 days. We have been reviewing Draft 4 since it became available and have been working on our written response. It will be submitted as soon as our review is completed.

To be clear, we have previously submitted comments on 55 topics and met every comment deadline for Drafts 1, 2, and 3. However, an 18-day review period is just not reasonable. We recognized the difficulty of our task immediately when the deadline was announced, and immediately sent a letter on December 19, 2018, to City Council, Mayor Rogero, Peter Ahrens and Gerald Green requesting the January 4, 2019, deadline be extended until February 1 or February 15, which would be after the Community Design Center's February 1 workshop. That workshop with architects and developers is likely to produce many comments and suggested revisions to Draft 4. We did not get any response to our letter regarding extending the deadline. It was announced yesterday at the workshop that the deadline would not be extended for comments to be considered in Draft 5.

Community Forum appreciates the enormity of the Recode project, its importance, complexity and long-term impact on the community. Our members have been participating from the beginning. Recode Draft 4 and Maps Draft 3, affect every piece of property in Knoxville. Every word of the Recode text is important because it is law. It is important to get this right and understand the impact every change from the existing ordinance will have on our properties and our neighborhoods.

While the Recode project maybe two years old, it is important to note that Draft 1 was released in March, 2018, less than one year ago. It has been changed significantly since then. There is no urgency that would require the Planning Commission to act on January 10, 2019, before there has been adequate time for public review and Planning Commissioner review, especially since there are so many significant changes in Draft 4 and anticipated changes to Draft 4.

This deadline is contrived and unwise. Knoxville has a Zoning Ordinance in place. Nothing will be harmed or delayed while awaiting Recode's adoption by the City Council. However, a flawed Recode product will damage our community. Please do not believe that oversights and errors in the Ordinance can easily be fixed without damage to the community.

Due to State law, an error or oversight in Recode may well result in an undesirable outcome, detrimental to the commercial and/or residential neighborhood where it occurs.

For these reasons, we ask that Agenda Item 5, be postponed to the February 14, 2019, meeting.

Thank you for your consideration.

Sincerely,

Larry Silverstein, Chairperson
Community Forum
7808 Sheffield Dr.
Knoxville, TN 37909
693-1256

Larrys55@aol.com

cc: Knoxville City Council
Mayor Rogero
Peter Ahrens

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This message was directed to commission@knoxmpc.org



Community Forum letter to MPC re Recode postponement__ 1-4-19.docx

18K

To: Knoxville-Knox County Planning Commissioners, Gerald Green, Recode Knoxville
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For these reasons, we ask that Agenda Item 5, be postponed to the February 14, 2019, meeting.

Thank you for your consideration.

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Larry Silverstein, Chairperson
Community Forum
7808 Sheffield Dr.
Knoxville, TN 37909
693-1256

Larrys55@aol.com

cc: Knoxville City Council
Mayor Rogero
Peter Ahrens



Dori Caron <dori.caron@knoxplanning.org>

[MPC Comment] Agenda Item 5, 11-A-8-OA

ombroligo via Commission <commission@knoxplanning.org>

Mon, Jan 7, 2019 at 4:20 PM

Reply-To: ombroligo@aol.com

To: commission@knoxplanning.org, gerald.green@knoxplanning.org, recode@knoxplanning.org

Cc: Mayor@knoxvilletn.gov, pahrens@knoxvilletn.gov, fsaunders@knoxvilletn.gov, swelch@knoxvilletn.gov, aroberto@knoxvilletn.gov, ssinghperez@knoxvilletn.gov, Irider@knoxvilletn.gov, mcampen@knoxvilletn.gov, gmckenzie@knoxvilletn.gov, gwallace@knoxvilletn.gov, marshallstair@knoxvilletn.gov

To: Knoxville-Knox County Planning Commissioners, Gerald Green, Recode Knoxville

From: Fountain City Town Hall, Inc, Kelly Ellenberg, Chair

Re: Request for Postponement of **Agenda Item 5, 11-A-8-OA**

Date: January 7, 2019

The board of Ftn. City Town Hall, Inc. agrees with and supports the request of Community Forum regarding Agenda Item 5, 11-A-18-OA- Consideration of the Comprehensive Update of the City of Knoxville Zoning Ordinance. We are asking for a **postponement from the January 10, 2019**, meeting of the Planning Commission to the February 14, 2019, meeting.

The last draft was only available online December 17, 2018, with hard copies available December 27, 2018. During this busy season of the year, it is not practical for neighborhood groups to be able to meet for extensive periods of time to discuss this important document that affects every parcel of property within the city limits. We could not possibly have written comments within the time period allotted, which was January 4, 2019.

We certainly intend to offer comments as soon as possible.

There are many substantive changes from Draft 3 to Draft 4. The time that Commissioners, the Stakeholder Committee, and the public has had for review has not been long enough for a thorough review.

Please don't vote to accept this document in its present form. We must get this right. **Our neighborhoods are in great part what makes Knoxville so special.** It is too far-reaching and too important to adopt and then "hope" we can amend the document in problematic areas to prevent damaging impacts to our neighborhoods and even commercial areas.

Again, we are asking for Agenda item 5 to be postponed until the February 14, 2019 Planning Commission meeting.

Sincerely,

Board, Ftn. City Town Hall, Inc.

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This message was directed to commission@knoxmpc.org

Google Groups

Community Forum- Re: Request for Postponement of Agenda Item 5, 11-A-8-OA

larrys55@aol.com <larrys55@aol.com>

Jan 7, 2019 7:24 AM

Posted in group: **Commission**

To: Knoxville-Knox County Planning Commissioners, Gerald Green, Recode Knoxville
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Date: January 4, 2019

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1/7/2019

Community Forum- Re: Request for Postponement of Agenda Item 5, 11-A-8-OA - Google Groups

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Sincerely,

Larry Silverstein, Chairperson
Community Forum
7808 Sheffield Dr.
Knoxville, TN 37909
693-1256

Larrys55@aol.com

cc: Knoxville City Council
Mayor Rogero
Peter Ahrens