

FROM THE DESK OF

# DUSTIN W. DURHAM

Knoxville Transportation Authority Commissioner | Renter  
New Urbanist | Bike Advocate | Knoxville Since 2008

**To: Knoxville-Knox County Planning**

**Subject: Ordinance Amendment 8-A-23-OA**

I am writing this letter in support of proposed Amendment 8-A-23-OA to our City codes. Below are details on the various articles and my reasoning as to why I support them.

**Article 2.3:** Adding this language to the definitions helps to specify that multi-family can be built on one lot in a manner that is not attached buildings. Not everyone developing in this manner would want a courtyard cottage or pocket neighborhood design, and this seems to allow more freedom in the layout of a lot. The staff comment about multiple dwellings being allowed on RN-3 and up is a non-comment, as the bulk of our city land is dedicated to RN-1 and RN-2 zones, and this is where we need to be building additional housing so that we do not continue to sprawl out in an environmentally and fiscally irresponsible manner. This is also the primary way to make our bus system work better. It is not rocket science to comprehend that more density is needed for transit to be more effective.

As well, while I congratulate the City for referencing the 2020 book 'Missing Middle Housing', it is error to treat all recommendations in this book as Gospel, such as the recommendation that two single family homes should not exist on one lot. Quite simply, more housing supply is the only way out of this crisis, and even two single family homes on one lot aids in ending that crisis. It is also absurd for the City to reference Article 10.1.A on there not being more than one principle structure allowed on lots in RN-1 and RN-2 zones as, again, this is most of our City land. The existence of this Article should not preclude us from updating definitions of multi-family housing so that in the future Article 10.1.A can also be changed. There are ways to ordain the existence of multiple primary structures on lots in RN-1 and RN-2 in the future, and having this definition in our codes for detached multi-family housing is the first step to get us there. There is nothing sacred or holy about the zones of RN-1 or RN-2, and allowing detached multi-family housing in most of our City is the only way to get ourselves out of this housing crisis that quite literally only exists because of a lack of supply brought forth by these exclusionary zones which only allow single-family homes to be built.

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**Article 4.1:** Again, there is nothing special or sacred about zoning most of our city to only allow a detached single family home to be built. It is, in fact, the reason we lack the supply to meet the demand for housing in this nation. It is an antiquated and irresponsible manner of developing our city. There is nothing less honorable or American about choosing to live under the same roof as another family, or as non-family members. Allowing duplexes by right in RN-1 and RN-2 zones is literally the least we can do in order to begin to tame this housing crisis. The character of our neighborhoods has historically been affordable and mixed income; continuing to allow exclusionary zones like RN-1 and RN-2 is what is truly killing the character of this city. It is insanely regressive and harms us all, and especially the poor, to allow such zoning to continue. We need more housing, and we need it in all zones. As well, adding the specific language about ADUs, even if they are currently allowed in all zones, is another necessary step to spell out clearly in the definition of our zones what we welcome to be built there, and provides another safe guard in writing that will solidify the attempts to preserve the character of our neighborhoods as affordable.

**Article 4.3.A:** I see no logical reason to allow potential worries of stormwater issues to preclude us from allowing more maximum building coverage. There are many ways to mitigate stormwater, some of which include increased tree canopies, green roofing systems, and the construction of complete streets. However, increased maximum building coverage does allow more square footages for new homes and businesses that are desperately needed. Using future possible stormwater issues as an excuse to prevent us from building more homes is not a valid excuse.

**Article 4.3 Table 4-1:** Similar to the above rationale, changing our codes to allow smaller setbacks allows for more square footages to be built. There is no reason to not allow as much additional square footage for homes as possible while in a housing crisis. Aside from utility easements, the average blockface in any district is an arbitrary historic amount and it is not a valid reason to hold to that blockface. Cities are not museums, they are living organisms. Everything, including setbacks and average blockfaces, should be evaluated as a means to attain more housing.