

Dear City Council, Planning Staff, & Fellow Citizens:

I strongly support this proposal as one tool in a toolbox for fixing our housing crisis, building the city's tax base, and creating human-scale walkable environments. Yet, this proposal is not enough to actually realize the former, nor is it enough to realize much missing middle housing. A typical 50' wide lot does not qualify for a quadplex. That is a problem. There are quadplexes and even 6-plexes on lots with 50' of frontage that are well-integrated and beloved Knoxville building stock (some of which were even used on marketing materials for this proposal). Let's allow those! Triplexes and quadplexes won't actually get built under this proposal at any reasonable scale. Another key item here is the cost of building. Any more than two dwelling units triggers the commercial building code, sprinklering, and requires full engineering design and the approvals process of a commercial building (civil, mechanical, electrical, etc. engineering). While not always prohibitive, this makes triplexes one of the hardest typologies to build (nearly everywhere) because they trigger these requirements, but only have the scale of 3 units worth of income to offset these costs. Thus, they are bespoke. If we want anything besides duplexes out of this proposal, we MUST allow quadplexes in 50' lots. Requiring 55' for a quadplex just means they aren't going to get built. What a shame if all this work goes into this proposal and we see maybe 10 - 15 new quadplexes built over the next 10 years. With a 55' wide lot minimum, that is probably the best-case scenario. Quadplexes will fit in better in traditional neighborhoods as they are inherently symmetrical by way of having an even number of units. Triplexes certainly can be designed to fit in, but quadplexes and 6-plexes make so much more sense to promote. Also, the FHA offers low money down loans for quadplexes if the developer is willing to live in one of the units for a period of time. Wouldn't you rather have a landlord that lives upstairs in the same type of unit you live in than some wealthy out-of-town investor who doesn't know their tenants' names and who hired a faceless property management company that has to have 5 people authorize a simple repair? Quadplexes can create those aforementioned conditions of a tight-knit community. Even if you don't want to live in a quadplex, shouldn't other people be able to choose to? Someone can build a quadplex with an FHA loan for the same money down as a traditional 20% downpayment on a single-family house if they live in it. It's approximately 1/4 the down payment and 4 times the cost - a 1 for 1. Isn't that cool? We can have more middle-class landlords. Let's make this legal again!

I support the idea that a test run of this might yield some benefits AND the idea that this proposal is fundamentally good for nearly all, if not all, of the city. The TDR might be a good place to start, but this should be expanded within a year to include most of the city. For now, RN-1 SHOULD be included in this proposal, because RN-1 represents a large amount of lots and there is no reason that RN-1 should be an exclusionary zone. In addition, all MMH typologies should be allowed in all zones. Apartments are not a scourge on society. Quite the opposite! They are where a college student, a temporary nurse, a single person, a small family, and large and financially struggling family, a traveling lineman, a person with mobility challenges, a person who wants to age-in-place with other people nearby all may want to live. These people matter too. These people are our neighbors, and they deserve to live in a housing market that is free to meet their needs (demand) with a supply of housing that is adequate in amenity and attainable in price.

As someone who designs housing and often grapples with residential versus commercial code requirements, I can see clearly that conversions are going to be infeasible, due to cost, the far majority of the time. Conversion of a single-family to a duplex is possibly feasible if the single-family being converted needs to be gutted anyway. Conversion of a single-family to a triplex or quadplex is functionally never going to be feasible due to the various fire-rating and sprinkler requirements.

More protections for demolition wouldn't hurt necessarily, but as a practical matter, property values are so high that it just doesn't make economic sense to demolish much of anything right now. We may need more protections for demolition in H, IH, and NC overlays, but that should be done outside of this proposal and in the overlay requirements.

Please pass this reform. Please expand it. Please keep working for more zoning reforms. Please investigate creative incentives for rent-stabilized housing. We need all of this and we needed it yesterday. This is a great start! Thanks to everyone involved in this effort!

- An Appreciative Citizen