

Cheryl, Please see below my Concerns and thoughts about the proposed plan. Sorry they are a day late.

Three Concerns

1. The plan introduces risk and possible instability to Knoxville's pre automobile neighborhoods that have struggled for the past half Century to fight the impacts of the auto, the interstates and suburban flight. All the identified neighborhoods have made great progress in this battle under the current set of rules. The single biggest risk is that single family houses will be converted/subdivided into more units as was done in the early and middle part of the 20th Century . A great amount of the preservation and rehabilitation work that has been done these last 50 years to stabilize these old neighborhoods has been accomplished by returning these buildings to their original use as single family homes. This slow process under the current rules has led to communities that are now quite livable and desirable to both owner occupants, renters and investors. To further elaborate on the issue, the conversion option has the potential to lure absentee landlords into this market. It is interesting to note that the New York Times ran an article on September 16th of this year documenting the major increase of institutional investors buying single family houses for rentals. According to the article 17% of all home sales in Charolette in 2022 were by investors, with 21% in Atlanta and 11% in Nashville. This action will bring instability to the affected communities.
2. It is a public policy plan that places the burden of solving a city-wide problem on only part of its citizens. A policy plan to make the densest parts of town denser while leaving things alone in the suburban ring, the least dense part of town, seems wrong. The city has offered three main reasons for making this policy choice. I find those arguments to be less than compelling.
 - a. Argument 1 ; The old neighborhoods already have some of these housing types, so it is a good place to put more of it. It is true the old neighborhoods have more of these type units, and nobody is asking that that they be removed. They help bring balance and diversity to our communities. The cities RN1 and EN neighborhoods do not have these structures and if we are being asked to accept the burden for the good of the community so should they. As the old saying goes. What is good for the goose is good for the gander.
 - b. Argument 2; The consultant told us to do it. That is only partially accurate. The Optico planning document on page 56 clearly states "The following analysis focuses on the four zones (RN-2,RN-3, RN-4 and RN-5)selected by the City for this

Study.” Clearly the City made the first decision to restrict the Missing Middle concept to the older more dense neighborhoods. Their input, as always, guided the consultant’s recommendations. The City has made the policy choice to pursue this course of action.

- c. Argument 3; These type units are best suited for more walkable neighborhoods. According to the study one of the goals of Missing Middle types is to achieve more density to support more neighborhood amenities. Many of the old neighborhoods already have the sufficient density and walkable amenities but most folks still use their cars routinely to access those properties. Along these same lines, the study identifies some areas outside the 640 loop that could be transformed into more walkable areas. The city proposal does not touch that concept. The walkability argument is thin at best.
3. The process appears to have been top down from the beginning. Here are just a few questions on that topic.
 - a. What if any community input was taken before Optico was hired to do the initial study of the “ Missing Middle”?
 - b. Why was this option for solving Knoxville’s housing problems pushed to the top of the administration’s agenda instead of a focus on Transit Oriented Development along the corridors which has a much better chance of producing housing in sufficient numbers to handle the problem?
 - c. What role has the East Tennessee Realtors Association played in this process besides funding 1/3rd of the cost of the original study?

Even with these concerns I could support the concept if it only applied to vacant lots and would not lead to the subdivision of existing older and historic properties.

Sincerely

Bob Whetsel

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