

*These comments have been updated since initial submission to reflect more accurate data.*

While I support this proposal as a step in the right direction, it is unlikely to result in a significant amount of new middle housing construction in Knoxville. Here is why:

1. According to Knoxville-Knox County Planning, 78.8% of applicable vacant lots in TDR can support at least a duplex, although this percentage includes RN-1 properties (51 in TDR) which do not support middle housing in the proposed amendments.
2. Triplexes are generally regarded by developers as infeasible to build because they are required to have sprinkler systems (unlike duplexes and single family, which use a different building code). Most developers are not going to accept switching building codes unless they can get more than one additional unit out of the deal. So whether triplexes are permitted by this proposal is essentially irrelevant, unless the city pursues an exemption from the IBC for triplexes or allows the three units to be constructed as separate structures (such as is proposed in Bentley Marlow's ordinance amendment regarding detached multi-family).
3. Data which would be particularly pertinent but is unclear from the documentation provided by Planning is how many lots can support at least a fourplex. One statement says 123 properties can accommodate a fourplex, which, if accurate, is only 6% of applicable vacant lots. This would mean that the only meaningful contribution of this application is for duplex development.
4. From the 1970s until 2020, duplexes were permitted by right in Heart of Knoxville neighborhoods (yes, ReCode down-zoned our neighborhoods), and very, very few duplexes were built during that huge span of time. Why would we expect this type to be built in abundance now? It may have only just now made the news, but Knoxville had a need for affordable housing solutions well before ReCode squashed duplex rights in 2020. Merely "allowing" these types will not incentivize their development because zoning is only one of many barriers.
5. Some examples of additional barriers to development: land title issues, construction costs, financing costs and accessibility, appraisal issues for uncommon housing types, land development costs, zoning overlay requirements, land owners who intend to hold, consolidate, or have unrealistic value expectations for their properties, etc.
6. Regarding the demolition of existing, historic or otherwise contributing houses to build more densely: though this is a risk, it is unlikely to occur very often. The cost to demolish an existing single family home is \$20-30k. With current construction costs and other feasibility hurdles for middle density as well as the cost to acquire a house in this market and demand for historic homes, there are very few scenarios where demolishing an existing, contributing house in a historic neighborhood will make investment sense. If and when demolition does happen, it is likely only to occur where a house is condemned and/or likely to be demolished anyway, whether for four units or one.
7. Subdivision of existing larger homes into multiple units is even less likely than demolition. Considering how invasive modern building code requirements are for firewalls and sprinklers, conversion of historic homes would be completely impractical in nearly every case.

For those who are skeptical of middle housing and prefer to severely limit its development, this proposal should not worry you, and **I encourage you to approve it on the basis that it will be a very low-risk experiment** in appeasing middle housing proponents. However, for those who support middle housing and want to encourage its development, this proposal does little to further that goal.

Those of you who are unfamiliar with the TDR map should take a look at it. It's a very weird shape and doesn't include noteworthy swathes of applicably-zoned downtown-adjacent lots. Although I can see some logic behind a walkable "test" area and can see why TDR would have the greatest political favor for middle housing, the specific map boundaries seem wholly arbitrary. There are plenty of walkable, urban areas outside the TDR well before you reach suburbia.

In conclusion, while I **support** this proposal merely as a step in the right direction, I think it is relatively inconsequential legislation which will result in few additional housing units than would otherwise be built without its adoption.

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