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Dear Planning Commissioners:

I am writing to respectfully urge you to refine the proposed changes to the middle housing (MH) standards.

These standards have now been in place for over a year, and I fully support making target adjustments informed by what we have learned so far. Well-crafted standards that engender quality and context-sensitive development are critical to building public confidence in middle housing and sustaining long-term support—support that may one day enable us to expand MH options beyond the (rather arbitrary!) boundaries of the TDR.

That said, it is critical that any revisions remain narrowly tailored and focused on addressing specific, demonstrated issues. By its nature, middle housing is already complex and challenging to develop under existing building and zoning requirements. Frequent or broad changes create additional uncertainty and barriers, ultimately discouraging the very types of development we seek to encourage. I also urge caution against crafting policy responses to the conduct of individual developers. Standards should be rooted in broad applicability and sound planning principles, not isolated cases. We should always lead with: what problem are we trying to solve?

Many of the proposed revisions are, in my view, reasonable and appropriate. For example, clarifying that MH standards cannot be combined with the underlying base zone standards is a prudent correction and consistent with the original intent of the ordinance. Allowing applicants to selectively apply the most favorable aspects of two distinct sets of standards introduces inconsistencies and creates opportunities for projects to circumvent core requirements—undermining the integrity of the ordinance.

Other proposed changes are more modest in impact but nonetheless merit careful consideration. For instance, prohibiting middle housing on flag lots or parcels lacking direct street frontage is unlikely to significantly affect overall MH production. However, this approach does raise a question of consistency. If single-family homes are permitted on flag lots, it is worth examining why middle housing—which is intended to mirror single-family homes in both scale and impact—should be treated differently. While I do not object to this specific restriction, I believe it's important to acknowledge and reflect on the broader implications for how we regulate and perceive middle housing.

Perhaps the most consequential proposed revision involves the modification of the original dimensional standards for lot width. Specifically, the proposal eliminates Section 4.6.G.1.a.i, which allows Planning staff to grant an administrative variance of up to 20% in the minimum required lot width. This provision was a key component of the original ordinance, intended to provide flexibility while maintaining compatibility with the surrounding neighborhood context.

In practice, eliminating the administrative variance for lot width would make the standards more restrictive and reduce the number of lots in the TDR that could accommodate middle housing. The table below illustrates how minimum lot width requirements for various middle housing types (with alley access) would change if the proposed revisions were adopted:

Middle Housing Type	Permitted Minimum Required Lot Width (by-right)	Permitted Minimum Required Lot Width (w/ staff approval)	<b>PROPOSED</b> Minimum Required Lot Width
Duplex (Side-by-Side)	45	36-45	40
Duplex (Stacked)	45	36-45	40
Triplex	45	36-45	40
Fourplex	45	36-45	40
Townhouse (small)	18	14.4-18	18
Townhouse (large)	18	14.4-18	18
Multiplex	70	56-70	70

As shown in the table, the proposed change would be especially impactful for the multiplex housing type, which already has the largest minimum lot width requirement of any middle housing form. Under the current standards, a multiplex can be approved on a 56-foot-wide lot with staff approval. Under the proposed changes, however, a minimum of 70 feet would be required.

While I am concerned about the prospect of eliminating much-needed flexibility in the code, the administrative variance process is flawed. There are no clear criteria for planning staff to reference when determining whether a lot width variance should be granted. This ambiguity can understandably create confusion and lead applicants to believe they are automatically entitled to approval. Moreover, when staff decisions related to administrative variances are appealed, there's no established standard for an appellate body—whether it be the planning commission or the design review board—to use in evaluating whether planning staff's decision was appropriate. I assume these concerns helped shape planning staff's recommendation to eliminate this provision altogether.

**Given these shortcomings, I support eliminating the administrative variance for lot width but only if the base minimum lot widths listed in Table 4-4 are reduced to preserve the flexibility the variance process was designed to provide.** Staff has already recommended reducing the minimum required lot width for duplexes, triplexes, and fourplexes. Similar reductions should be applied to townhouses and multiplexes as well. The following table provides a comparison of the existing lot width requirements, staff's proposed revisions, and my recommended adjustments:

Middle Housing Type	Lot width <i>with</i> alley (min. ft.)			Lot width <i>without</i> alley (min. ft.)		
	Existing	Staff Recommendation	Suggested	Existing	Staff Recommendation	Suggested
Duplex (Side-by-Side)	45	40	40	50	45	45
Duplex (Stacked)	45	40	40	50	45	45
Triplex	45	40	40	50	45	45
Fourplex	45	40	40	50	45	45
Townhouse (small)	18	18	16	25	25	20
Townhouse (large)	18	18	16	25	25	20
Multiplex	70	70	60	80	80	70

Adjusting the lot width for all middle housing types would ensure the standards do not become more restrictive.

In sum, I fully support making targeted changes to the middle housing standards. As previously noted, strong standards ensure high-quality development and elicit community support for these much-needed housing types.

While the middle housing ordinance garnered significant political attention when first adopted, it is important to note that actual development has remained relatively limited. With only a few exceptions, the current standards have worked as intended—providing a framework for modest, incremental growth that broadens housing choice.

At a time when housing is in such short supply, it is my hope that our efforts continue to focus on expanding both the types of homes being built and the areas in which they are permitted. To that end, I encourage the consideration of additional amendments to further support and incentivize middle housing, including:

- **Eliminating Table 4-3** and permitting the full range of middle housing types in all zoning districts (within the TDR) so long as they comply with the dimensional standards provided in Table 4-4.
- **Eliminating Section 4.6.B.2.b**, which prohibits three-story triplexes except for on lots with frontage on arterial roads.
- **Eliminating parking requirements** for all middle housing types, regardless of proximity to public transit.

Middle housing plays a critical role in creating a more diverse, affordable, and resilient housing market. As we look ahead, the goal should not be to narrow the path for these housing types, but to widen it—ensuring that more families have access to the kinds of homes that meet their needs in walkable, well-connected neighborhoods.

We need more middle housing—not less.

As always, thank you for consideration and your service to our community.

Sincerely,  
Hancen Sale