

Comments on Knox County Unified Development Ordinance (UDO)

Thank you for the opportunity to submit comments regarding the development of Knox County's Unified Development Ordinance (UDO).

The UDO represents a once-in-a-generation opportunity to ensure that implementation of Advance Knox aligns with community priorities: conserving rural character, improving infrastructure, and ensuring development is compatible with existing neighborhoods

1. Respect for Rural Character in Urban Growth Areas

The UDO must clearly define what “respecting rural character” means in practice. This includes:

- **Context-Sensitive Development Standards:** Limit building heights, require adequate setbacks, and adopt landscaping requirements to provide visual buffers between new subdivisions and existing rural homes.
- **Tree Preservation & Open Space:** Require tree preservation plans and establish minimum open space requirements for all developments, in line with the Hillside & Ridgeway Protection Plan framework
- **Noise & Light Protections:** Adopt quantitative lighting standards (e.g., Dark Sky model ordinance) and reasonable construction hours. Current allowances permit construction as late as midnight, which is incompatible with rural areas. Construction hours should be limited to 8:30 a.m. – 7:30 p.m. on weekdays and more restrictive on weekends and holidays to preserve residents' ability to enjoy their property.

2. Traffic Impact Analysis (TIA) Reform

Under current rules, a Traffic Impact Analysis is only required for developments of 75 units or more. This unit-based threshold fails to account for road safety and capacity in rural areas.

The UDO should:

- **Tie TIA Requirements to Road Conditions:** Require TIAs based on road geometry, sight distance, and existing traffic counts rather than unit counts alone.
- **Adjust for Rural Road Conditions:** Currently, the sight distance requirement is 10 feet of sight distance times the speed limit, so if the speed limit is 30mph, the sight distance only needs to be 300 ft, but the area's curves, hills, and mph actually driven here (40mph) make standard thresholds insufficient. The ordinance should allow county engineers to require TIAs and additional mitigations (turn lanes, signage, speed reduction measures) whenever road conditions present safety concerns, regardless of development size.
- **Mitigation Before Occupancy:** Require that any traffic improvements identified in the TIA

be installed before issuance of a certificate of occupancy, not deferred until after build-out.

3. Infrastructure and Growth Management

Advance Knox emphasized infrastructure investment as the #1 community priority. The UDO should require:

- **Infrastructure Adequacy Findings:** Before approving rezonings or development plans, confirm that schools, roads, stormwater, and emergency services can support the added growth.
- **Coordination with Capital Improvement Plans:** Tie rezonings and subdivision approvals to funded infrastructure improvements or require developers to contribute proportionally to the needed upgrades.

4. Transparency and Public Participation

The adoption process must be transparent and allow meaningful participation. I support KPCA's recommendation for:

- **Open House Engagement:** Host at least one round of public open houses before the draft UDO proceeds to hearing, allowing residents to engage directly with planners and elected officials in an informal setting.
- **Minimum 60-Day Review Period:** Provide adequate time for citizens, neighborhood groups, and advocacy organizations to review, discuss, and submit comments on the draft ordinance

5. Strengthen Compatibility Standards

UDO should adopt compatibility requirements to prevent new developments from significantly injuring the value or livability of adjacent properties through noise, lights, fumes, vibration, or traffic congestion This should include:

- **Drive-Through & High-Traffic Uses:** Limit these uses to commercial corridors and prohibit them adjacent to residential and agricultural properties.
- **Performance Standards:** Include measurable noise, lighting, and air quality thresholds to protect neighbors from adverse impacts.

6. Conservation Tools and Agricultural Land Protection

Advance Knox calls for creating a conservation toolkit and a large-lot agricultural zone. The UDO should:

- Establish clear incentives for conservation easements and cluster subdivisions that permanently protect open space.
- Require soil assessments to protect prime farmland soils from unnecessary conversion.
- Consider maximum densities of 1 unit per 5 acres or lower in agriculturally designated areas.

In conclusion, the UDO is our chance to align growth management with community priorities and to avoid piecemeal, reactive development approvals. By incorporating noise limits, context-sensitive design, reforming traffic impact requirements, and embedding conservation tools, Knox County can ensure that growth is safe, fiscally responsible, and respectful of rural residents. Thank you for your consideration.