ASLA Austin | *submitted to* CodeNEXT

Land Development Code Diagnosis
Comments
6.30.14

Chapter 1. Introduction & Executive Summary

ASLA Austin comments on the **Land Development Code Diagnosis** Public Draft: May 5, 2014 are focused on those elements that impact and shape the Topic Group of Integrating Nature and the City from **Imagine Austin**.

- **1.1 Listening to the Community Report**
  While ASLA did not participate during the primary time period of the report, we appreciated the opportunity to have a Listening and Understanding session along with other Environmental Community leaders on 6.12.14. We reviewed the concern that Sustainability and Austin's regional ecology are not yet being fully integrated into the CodeNEXT process. Possible solutions were discussed such as a CodeTALK on Sustainability in fall 2014 and greater collaboration between Opticos and the city Office of Sustainability and the Green Infrastructure Regulatory Team (GIRT).
  We *support* these solutions and remain willing to facilitate discussions on Integrating Nature in the City into Compact and Connected throughout the CodeNEXT process.

- **1.2 History and Current Structure of the LDC**
  We *support* the current ordinances that reinforce Nature and the City such as:
  - -1986 Comprehensive Watershed Ordinance; Parkland Dedication Ordinance
  - -1993 Save Our Springs Ordinance
  - -2010 Heritage Trees
  - -2011 Open Space
  - -2013 Watershed Protection Ordinance; Downtown Density Bonus Ordinance – Open Space, Green Roofs, On-site Plazas; Urban Farms

Chapter 2. Policy Planning and Framework

- **2.1 Imagine Austin**
  We *support* the priority programs of Integrate Nature into the City and Sustainably manage water, energy, and other environmental resources (p.16) and the creation of "harmonious transitions" between land uses through the use of green infrastructure (p.19).

- **2.2 Neighborhood Plans**
  We *support* the Common Themes Across Neighborhood Plans such as:

  Natural Resources, Environment, and Open Space
  - Protect and Enhance Creeks and Open Spaces
  - Preserve and Enhance Parks
  - Create Additional Public/Green Spaces
  - Enhancing Drainage and Green Infrastructure
  - Improving Environmental Quality
  - Reducing Pollution

  Transportation, Parking, Streets
  - Complete Streets
  - Transit
  - Connectivity
  - Streetscape

- **2.3 Other Small Area Plans**
  We *support* the Open Space Typologies found in the Airport Boulevard Corridor Form Based Code Initiative.   .

Chapter 3. Content Specific Findings

Of the 10 Key Findings the CodeNEXT Land Development Code Diagnosis report, ASLA Austin comments are focused on the following: Ineffective Base Zoning Districts, Complicated "Opt-in, Opt-out" System, Auto-centric Code, LDC Not Always in Line with Imagine Austin, Incomplete and Complicated Administration and Procedures.

- **3.1 Ineffective Base Zoning Districts**
  Compatibility Standards

  We recommend that green infrastructure be embedded in the zoning code for transitions between zones.

- **3.3 Complicated "Opt-In, Opt-Out" System**
  Competing Incentives – Many of the incentives to improve our urban ecology such as the Downtown Density Bonus Open Space, Green Roofs, and On-site Plazas as well as the private Open Space Ordinance have been a reflection of community values of Integrating Nature into the City.

  We recommend that the above incentives be strengthened in the next code.

- **3.5 Auto-Centric Code**
  Creating Dense but Auto-Dependent Places
  We *agree* with the statement that "Buildings that have provided less parking or only require smaller parking structures are more flexible and are more easily designed to protect existing trees, provide on-site stormwater management and be compatible with adjacent development."

- **3.6 LDC Not Always in Line with Imagine Austin**
  ASLA Austin comments are focused on the following: Priority Programs 1, 2, 4, 7, and 8.

  Priority Program 1: Invest in a Compact and Connected Austin
  We *support* increased connectivity with Transit, Bicycle, and Pedestrian Infrastructure.

  Priority Program 2: Sustainably Manage Our Water Resources
  We *support* Water Conservation Landscape and Irrigation Techniques.

  Priority Program 4: Use Green Infrastructure to Protect Environmentally Sensitive Areas and Integrate Nature into the City
  We *agree* with the position that green infrastructure can protect environmentally sensitive areas and integrate nature into the city (p. 67). Research has demonstrated that the landscape can be shaped and managed to contribute to water conservation and purification, air quality improvement, heat island effect mitigation, carbon sequestration, and biodiversity.
  From this recognition, we *disagree* with the opinion alluded to in the draft that environmental regulations may hinder development. To the contrary, it is the protection of our environment that supports our quality of life. Beyond the provision of ecosystem services, nature in the city provides recreational opportunities, reduces stress, and is a source of beauty. In this light, we also believe that nature must play a bigger role than just that of infrastructure in the City of Austin.
  We *support* Protecting, Preserving and Enhancing the Urban Forest within the new proposed transition zones.

  We recommend drawing on the knowledge of the Office of Sustainability and Green Infrastructure Regulatory Team (GIRT) to expand the use of green infrastructure and open space in the new code, with special attention to proposed transition zones.

  Priority Program 7: Create a Healthy, Austin Program
  We *support* a Healthy Austin Program with emphasis on creating places where people can easily walk, bike, play, and find healthy food options and healthcare.

  Priority Program 8: Revise Austin's Development Regulations and Processes to Promote a Compact and Connected City
  We *support* placing the same emphasis on Integrating Nature into the City as on Compact and Connected with the new code.

Chapter 5. Administration and Procedures Findings

- **5.2 Incomplete and Complicated Administration and Procedures**
  We *agree* with the finding of Inconsistent Interpretation and Review.
  We *agree* with the finding that there is Missing or Incomplete Code Administration Information. Purpose and applicability statements are important components of any code, but are especially important in codes that support the protection and health of our regional ecology.