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The Austin Apartment Association was founded in 1964 and is composed of more than 1,000 diverse businesses that own, manage and service nearly 200,000 rental homes in the Greater Austin Area and is committed to providing quality housing and wholesome living environments for all Texans.

The need for a new land development code for the City of Austin is almost universally acknowledged by the land development community, city officials, housing advocates and urban planning experts. The current code is conflicting and cumbersome and its associated development approval process is notoriously long. We fully support efforts taken to develop a new and innovative development code that aims to replace Austin's complicated web of development regulations and vastly improve the development approval process.

Upon review of Division 23-3E-1: Citywide Affordable Housing Density Bonus Program the AAA offers the following general comments:

- 23-3E-1030 (B): clearly indicate that participation in the Housing Choice Voucher Program is voluntary but that the vouchers will be valid for the affordable units created through a density bonus programs.
  - It is difficult to analyze the Citywide Affordable Housing Density Bonus Program absent the full release of all document components such as the missing Bonus unit calculation formula example as part of Table 23-3E-1040 (A).
  - Waivers on setbacks, impervious cover and parking requirements may be needed to ensure that the affordable units added as part of the bonus program will have the desired unit type mix and number of bedrooms in medium multiplex building types.
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- In 23-3E-1050 allow off-site affordable units to be added to a new development or inserted in an existing structure that is located beyond the one mile limit if the units are located along the same corridor.

The Austin Apartment Association will remain engaged in the CodeNEXT approval process, and we respectfully reserve our right to provide additional comments on this topic and others throughout the process.

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