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June 5, 2017

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Mayor and Council of the City of Austin
301 W. 2nd Street
Austin, Texas 78701

RE: CodeNEXT Feedback

Honorable Mayor, Mayor Pro Tem, and Council,

The Downtown Austin Neighborhood Association welcomes the CodeNEXT effort. We recognize the current zoning restrictions governing Downtown Austin are outdated, and that the whole Land Development Code needs an overhaul. We're hopeful that the CodeNEXT process will result in a Land Development Code that is far better aligned with the goals of the Imagine Austin Comprehensive Plan and promotes a compact and connected city.

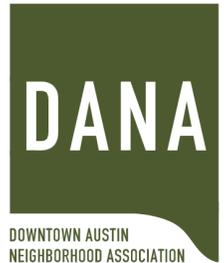
To that end, we offer the following initial suggestions for changes we'd like to see in the current draft of the new Land Development Code.

1. Refine the T6 regulations to make them workable.

The intent section of the draft zoning code (section 23-4A-2010) states that the city is divided into "walkable urban transect zones and drivable suburban non-transect zones." Oddly, the draft places downtown – the most walkable part of the city -- in the category of drivable suburban non-transect zones.

We understand the rationale offered for using non-transect zones downtown. Significant planning has already been done for most parts of downtown, and the draft regulations for the most urban transect zones – T6 Urban and T6 Urban Core – are not well aligned with either the current built environment or current plans. But the appropriate solution, we believe, is not to give up on using transect zones downtown, but rather to revise the T6 regulations so that they can be used downtown. Other areas, such as West Campus, the South Central Waterfront, and the Domain could also benefit from properly tailored T6 regulations.

Absent significant changes to T6, the intent section (section 23-4A-2010) should be revised to clarify that non-transect zones are also being applied in walkable areas that have previously been through extensive planning processes. Additionally, other code provisions referring to transect zones should be revised to extend to downtown zones. For example, section 23-6B-2020 provides for streamlined approval of small residential projects in a transect zone in an urban watershed. Downtown zones would benefit from this provision as well.



2. Codify and expand upon progress already made in parking regulations.

Austin and other cities across the country have been rethinking parking requirements in recent years. CodeNEXT presents an important opportunity to continue that progress. For the downtown area at least, the current draft should be revised in the following respects:

- *Eliminate parking requirements.* Surprisingly, the current draft code reinstates parking requirements in areas of downtown where they have previously been eliminated. Table 23-4D-4050.C, “Parking Standards for Commercial Zones,” includes parking requirements for all commercial non-transect zones, including DC (Downtown Core) and CC (Commercial Core). We trust that this is an unintended error, and we suggest that it be corrected by providing an exemption for DC and CC zones in Table 23-4E-3060.A, which lists various parking adjustments. Exemptions should also be provided for the University Neighborhood Overlay and South Central Waterfront areas.
- *Require unbundling of parking.* The University Neighborhood Overlay (UNO) has always required that parking spaces be unbundled (i.e., leased separately) from residential units. This requirement, which is carried forward for UNO in section 23-4D-7110(E)(1)(f), should be extended to DC and CC zones, and to the South Central Waterfront area.
- *Extend parking caps.* Current regulations cap the amount of parking that may be provided in CBD and DMU zones, but allow for additional parking if it is structured. (§ 25-6-591(B)(3), (C)). We believe parking caps are warranted, and could be useful for comparable policy purposes; for example, parking could be allowed in excess of the caps if all parking is underground.

3. Ease undue geometric constraints.

Recent work by the Austin Chapter of the American Institute of Architects (AIA) has indicated that the setback requirements and other constraints imposed by the draft code would present serious challenges for the development of many downtown sites. The code should allow abundant and diverse housing and commercial structures downtown, especially in areas of opportunity unencumbered by view corridors.

4. Treat MLK as a boulevard.

West Martin Luther King Jr. Boulevard is an important corridor, and a gateway to the University of Texas, Museum District, Capitol Complex, and Medical District. It is also the boundary between the West Campus and Downtown sections of Austin’s primary CodeNEXT Activity Center. Accordingly, on properties east of Vance Circle / Robbins Place, applicable regulations should allow urban-scale, mixed-use buildings, such as those envisioned for T5 transect areas, and should promote or require pedestrian-oriented frontages facing MLK, to create a cohesive, pedestrian-friendly environment.

5. Embrace the South Central Waterfront.

The code text and mapping should fully reflect the South Central Waterfront Vision Framework Plan, which the Council adopted last year.

We appreciate the opportunity to provide this input, and look forward to continuing involvement as the new code and mapping take shape.

Respectfully,

Board of Directors of The Downtown Austin Neighborhood Association -

Cc: Greg.Guernsey@austintexas.gov