

October 31, 2017

Re: SHNA comments on Draft CodeNEXT text and zoning map

Dear Mayor Adler, Mayor Pro Tem Tovo, Council, Interim City Manager Hart and Mr. Guernsey:

The Swede Hill Neighborhood Association appreciates the opportunity to provide input on the second draft of the CodeNEXT text and zoning map. We respectfully request that you consider the following concerns and suggestions and take action to ensure that the next iteration of our land development code documents addresses them with meaningful change.

Increased density should be reserved for creation of housing stock with deep and long-term affordability.

Single-family zoned lots in the central city remain slated for an upfront increase in permitted density that will accelerate displacement and demolition trends, most acutely in East Austin. The R3C zone is projected to yield units at an average sales price of \$724,425 and be 100% occupied by high-income households. Our land development code and its application should incentivize preservation rather than redevelopment of existing, more affordable and often historic housing stock, and it should mitigate rather than intensify market pressures that make it so difficult for lower-income residents to remain in and retain ownership of their homes.

We strongly urge you to apply R2C zoning for all SF-3 zoned parcels and exclusively reserve three-unit entitlement zoning for land trust infill lots where all units offer deep and long-term affordable housing that extends land trust homeowners the same zoning petition rights as citizens who own the land beneath their homes.

Additionally, consideration should be given to temporary options for low-income resident-homeowners to convert their single-family structure to two units, one to occupy and one for long-term rental. This entitlement should be means-tested and not run with the land, and there should be mechanisms in place to ensure that homeowners are accountable for its impact on neighbors.

And on a broad note, the zones applied to our corridors—Residential Multi-Unit, Mixed Use and Main Street—offer significant, upfront entitlements, including parking reductions and increases of height and FAR, without securing any housing units at the affordability levels most needed. Please rethink giving away our most effective incentives for free.

Mapping should memorialize equal responsibility for all parts of town to accommodate Austin's growth aspirations within centers and along corridors.

This draft, as the first, is driven by the premise that Austin will capture an unrealistic share of the five-county MSA growth and continues to place an inequitable burden for achieving that aspiration on central city neighborhoods by upzoning their cores while preserving existing zoning in neighborhoods that are similarly proximal to activity corridors and regional/town centers other than the downtown. Most notably, neighborhoods west of Mo-PAC and far north remain zoned for one or two units per lots despite proximity to 360, 620, major shopping areas, Lakeline Station and the Domain.

This inconsistency substantially undercuts Imagine Austin's imperative to grow compact and connected *citywide*. Growth should be focused along all corridors and within all centers, both mapped and the ones overlooked by Imagine Austin, and all neighborhoods and their residents valued and protected in an equitable manner.

Mixed Use and Main Street Zones should be modified and mapped to better promote walkability and livability next to House Scale Zones.

MU1 and Main Street zones mapped in neighborhood cores introduce the potential for drive-throughs, intense retail and medical offices as well as late night operation and bars on lots that currently do not permit these uses. Walkability and livability require a more delicate balance than the Draft 2 map acknowledges, and we do not see a reason to introduce intense uses within neighborhoods that already provide amply for more intense commercial along their corridors.

The schedule for public review and council adoption of the new code and zoning map should be modified to ensure adequate time to produce a code that serves Austin citizens and their comprehensive plan well.

CodeNEXT endeavors to provide Austin tools to effectively manage growth, maintain and/or expand housing access and socio-economic diversity in all parts of the city and promote prosperity, health and auto-independence for all Austin communities. However, the message from land use commissioners, non-profit organizations and a broad spectrum of the general public is that the proposed code and map fall far short of that mission.

Staff and consultants have yet to provide pivotal sections of code and longstanding request for resources. Hundreds of questions remain unanswered or were only recently perfunctorily addressed. To date, there is no publicly available log of comments received, interactive maps, a redlined version of the code (compared with our existing code) or an updated report from the Land Development Code Advisory Group.

Most critically, the Planning Commission recently eschewed the October 31 Draft 2 comment deadline and is considering splitting the text from the map to focus on what our new code should say, first, before rezoning the entire city. That seems like a wise approach to us. Getting this costly and momentous collective decision right is more important than getting it done by an arbitrary deadline.

We ask that you please acknowledge the serious deficits of both the product and the process and set us on a more responsible path for adoption of a code and zoning map that hew to the vision, goals and promise of Imagine Austin.

Sincerely,

Paula Reckson, President, and the Swede Hill Neighborhood Association Board