

Commentary on Codenext draft, 6/13/17  
By Travis G. Young, AIA

To Whom It May Concern:

I am a registered architect in the State of Texas, and have spent the last 20 years designing residential additions, remodels and new builds within the City of Austin core. I have worked extensively in established neighborhoods within the City, with a focus on the Brentwood and Crestview Neighborhoods. I currently reside in the Brentwood Neighborhood.

I have reviewed the Codenext draft with an eye to establishing its consistency and or contrast with existing code entitlements. I have done this by testing past and current residential design projects that have been approved under current zoning regulations, against the new code requirements. This testing has focused on the Brentwood Neighborhood where I have completed over two-dozen residential projects including many ADU's and Duplexes.

I have included in this commentary, site plan examples of these test projects for reference.

As a long term resident of Austin, I would like to see the Codenext process and new code further the goals of the Imagine Austin Comprehensive Plan, and to allow for further development of the urban core with an eye to establish more variety of housing types and sizes, and increase density within reason, in established neighborhoods with a focus on the "edges" of these neighborhoods along the Core Transit Corridors established in Imagine Austin.

General Commentary on the new Code:

1. For the projects I have tested, none of them comply with current code restrictions. That means that they will all be "non-complying" structures if the code is adopted as is.
2. The Code does not allow more density of development than current code restrictions, either through increased impervious cover, or increased building size through height, or stories. In fact the new draft code restricts the size of buildings, the building envelope and the height of buildings to a greater extent than existing zoning throughout the Brentwood Neighborhood.
3. Given the existing subdivision layout of Brentwood, narrow, deeper lots, with no alleyways, the new code draft creates several problems that need to be addressed.
4. The new Code does reduce parking requirements overall. This will result in more parking on the streets, but also less parking in front yards due to parking placement requirements.

5. The new Code reduces building height and allowable stories, with SF-3-NP allowing 32' and 2.5 stories, now being T3N.DS allowing 28' measured to the topmost structural element, and 2 stories.

Brentwood specific zoning changes:

The vast majority of SF-3-NP lots in Brentwood have been changed to T3N.DS in the new Code. Some in Southern Brentwood have been changed to T4N.IS.

It should be noted that the ADU option is not allowed with multiple building forms and therefore cannot be combined with Cottage Court or Multiplex building forms. It is apparently allowed with other residential building types, including duplex. What needs to be clarified is if the development of 3 or more living units on a residential lot will require a commercial site plan approval as is currently necessary.

In terms of edge development, the new Code reduces building height and stories along many of the current corridors, but allows more potential uses within those corridors.

Transect T3N.DS recommendations:

1. Remove the 20' rear yard setback for all accessory structures and change it to be 10' per current code, even without an alleyway. The 20' setback is not a good use of the lot because the Brentwood neighborhood has narrow and deep lots without alleys. Trees and other impacts make pushing the accessory building more toward the street less desirable.
2. Increase the building height to 2.5 stories, which is in keeping with the existing code. The building height limit should be 32' if the new code is accurate in measuring to the top most part of a building. This will represent a reduction in building height, as it is currently measured to the average of pitches. However, it won't be as drastic as the 28' currently proposed.
3. Allow the development of the stacked and back/front duplex building forms in this transect zone. They currently are allowed, and restricting these forms is unwarranted.
4. Allow the development of 3 living units on a residential tract without commercial zoning site plan review. This will allow residential review to look at the cottage court and the duplex w/ ADU building options within the residential zoning review department, without the added fees, timelines, cost and complexity required in the commercial development process.
5. Increase the size of the building envelope to be more in keeping with the .4 FAR allowable entitlements of the existing SF-3 zoning. The proposed zoning restricts building envelopes so that the overall developable size of the structures is reduced.

6. Allow for flexibility in regards to building envelope when attempting to preserve protected and heritage trees on a site.

#### Conclusions:

The draft code should not create so many non-conforming conditions when adopted. If we look at the Brentwood Neighborhood specifically, the new form based code ignores the fact that we in Brentwood have no alleys, and prescribes a building form that is not related to, or consistent with the established development pattern.

#### Attachments:

1408 Justin Lane ADU, would be considered non-conforming due to rear yard setback. This project was completed in 2016. Site plan and picture included.

1415 Justin Lane ADU, would be considered non-conforming due to depth of ADU structure which was done to preserve heritage trees on the site. This project was completed in 2008. Site plan and picture included.

1414 Dwyce, wide narrow lot that shows the impact of the rear yard setback on a proposed ADU, wasting valuable yard and the composition of outdoor space in relation to the existing house. Site plan included, project currently in design phase.

5705 Adams, larger lot in south Brentwood, development showing how new medium sized multiplex option as allowed under proposed T4N.IS will only allow 4,320 s.f. (although in 4 living units) versus 5,178 s.f. under current SF-3-NP .4 FAR calculation. This example does not take advantage of the lot size, and the lot is too narrow to allow cottage court building form. There are two site plans provided, one showing possible build area with a maxed side by side duplex, with ADU, as well as the single Medium Multiplex option. The added cost of a commercial site plan will also make the multiplex option less desirable from a development point of view.



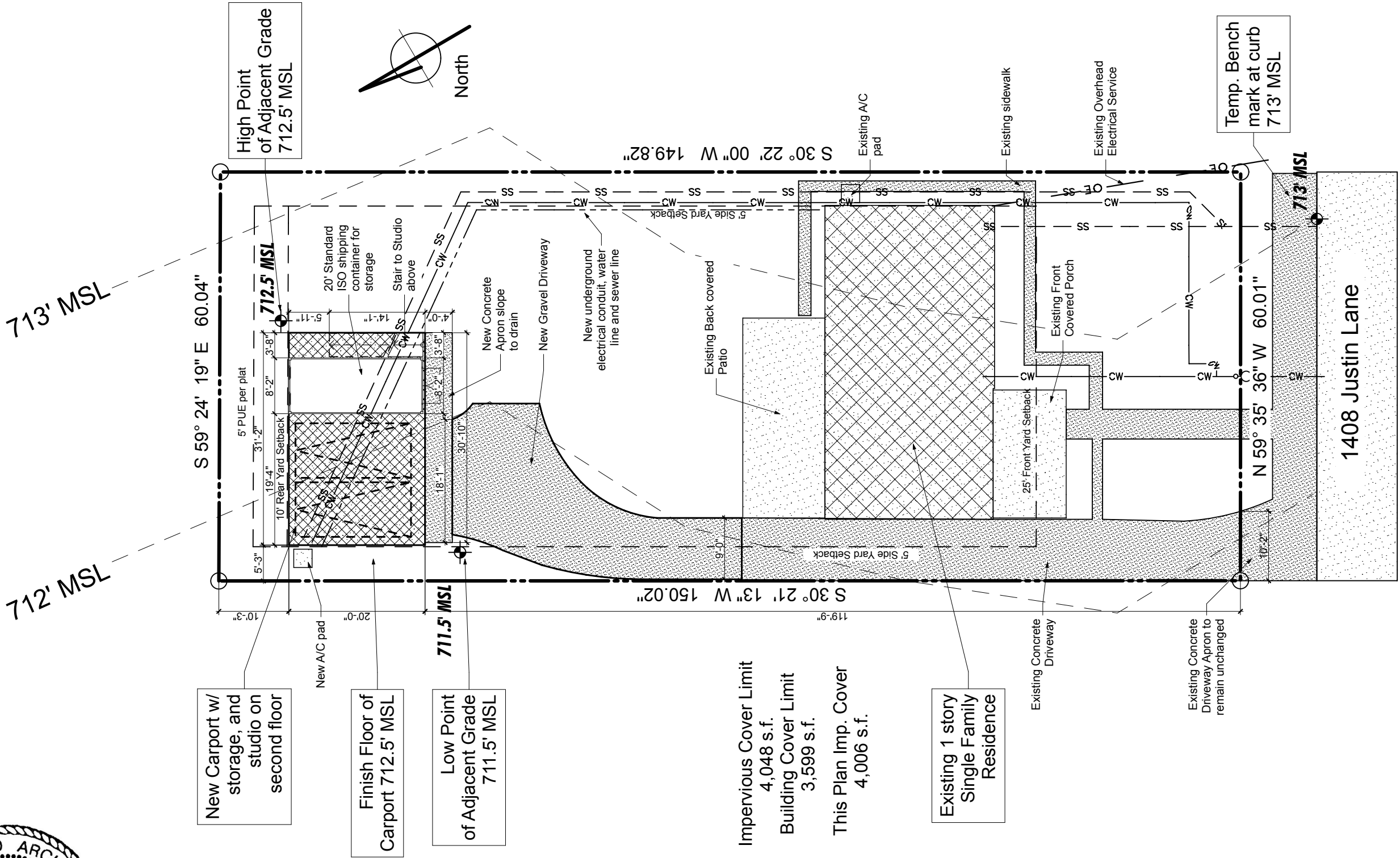
For Permit Review  
5/12/15

1408 Justin Lane  
Austin, Tx. 78757

Site Plan  
A1 of 8

1

1/16" = 1'-0"









A: 9,000.00 sq ft





