

## Planning Commission Work Group Comments on Built Environment Prescription Paper

1. Overall, we commend city staff and consultants for adopting the Prescription Paper (PP) approach. It's a useful starting point for launching the new Land Development Code (LDC). Generally, the initial PP identifies many key values that are important to Austinites when addressing growth in our community. We offer the following constructive suggestions.
2. Given how much work has been done and money spent on CodeNext to date, we see no reason future PPs can't be more specific. For example, to improve transparency, each individual PP prescription needs to:
  - (i) cite the existing LDC provisions affected; and
  - (ii) state whether the existing LDC provision is being kept as is, is being made more or less stringent, or is being deleted.

The initial PP lacks specific citations to some existing ordinances, such as SOS, Protected and Heritage Trees, Hill Country Roadway, etc. Moreover, the initial PP refers generically to "tools" without elaborating on what those tools are. Finally, comments such as "retain something similar to" (Compatibility), "as opportunities grow" (Redevelopment), "protection of "significant trees" are too vague and need more specificity in future PPs.

Trust and transparency go hand in hand. If staff and consultants will provide greater specificity in future PPs, it will create transparency in a way that builds trust between stakeholders, boards and commissions, and city staff and consultants.

3. We understand staff will not revise the PPs based on public comment before the draft LDC is released in 2017. Before that draft LDC is released, staff should publish summaries of the comments they received on the PPs and indicate how those comments will be reflected in the initial draft.

Publishing a response to comments on the PPs before releasing the initial draft of the new LDC will increase transparency and build trust between stakeholders, boards and commissions, and city staff and consultants.

4. Many task forces or workgroups that studied specific areas are generically mentioned in the PP. Future PPs should provide links to their reports or recommendations.
5. Demolition of modest housing in Austin's older neighborhoods to make way for larger, more expensive homes is occurring at a frightening pace. The LDC rewrite should not facilitate this. Imagine Austin states that more density will be encouraged along corridors and in centers, but that redevelopment will not occur in other areas. These older neighborhoods are where Imagine Austin says redevelopment won't occur. The new LDC must

not relax site development standards in these neighborhoods and should provide tools that require new housing and changes to reflect local development. Doing otherwise harms affordability by allowing expensive new SF housing stock to supplant, existing, modestly priced SF housing stock.

6. Parking and connectivity standards need to be much more flexible and context sensitive. There need to be multiple standards that allow for adaptation among different neighborhoods. Connectivity and reduced parking standards for redevelopment adjacent to existing SF neighborhoods should be mitigated by other protections for those neighborhoods
7. The initial PP recognizes the well-known inadequacy of the stormwater utility system in the central city, which was built before there were government standards to ensure development didn't cause flooding. Redevelopment must be required to improve the drainage situation in the central city, but the degree to which it must be improved should factor in whether the higher cost of redevelopment in the central city incentivises sprawl.
8. Compatibility is referred to as a "simplistic reliance on height". There are many other issues other than height addressed in current compatibility standards. Abandonment of height could easily result in an equally "simplistic reliance" on other factors. Efforts to provide compatibility through landscaping may have merit, but landscaping alone depends on maintenance and season as to its effectiveness and can't be relied upon to provide compatibility.