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May 25, 2023

Todd Shaw, Chair
City of Austin Planning Commission

Re: Palm District Plan

Dear Mr. Shaw,

Preservation Austin exists to empower Austinites to shape a more inclusive, resilient, and meaningful community culture through preservation. We write to you today to address the draft Palm District Plan, to be discussed at the May 30 meeting of the Planning Commission.

We appreciate the Plan's stated Vision for the district as a "a vibrant historic hub of downtown where the past is honored, culture is celebrated, and the future is shaped" (p. 40), as well as the numerous mentions of preservation in the Desired Outcomes for the Plan. We also appreciate the recommendations for placemaking efforts to tell the stories of the displaced Black and Mexican American communities that historically defined the district.

While we agree that the historic and cultural resources that remain in the district should be a priority for the Palm District, we are concerned that few specifics have been outlined in the draft that would achieve this outcome. Below are our recommendations for potential improvements to the Plan that would strengthen its stated goal of preserving and promoting the district's physical cultural resources and architecture (p. 50).

- **Identify existing historic and cultural resources.** The Plan makes mention of several historic and cultural districts in the Palm District including the Red River Cultural District and Sixth Street National Register District; however, a more detailed understanding of the remaining historic and cultural resources, including those designated and eligible for designation, should be presented in the Plan to fully understand how these resources can best be integrated into the proposed Scenarios.
- **Identify and recommend potential City of Austin Landmarks and Historic Districts.** At present, historic zoning is the best tool available for protecting Austin's historic and cultural resources from demolition and redevelopment. Council demonstrated its commitment to proactively protecting one of our most important places by initiating and ultimately designating the Broken Spoke as a City of Austin Landmark this May. The Plan should prioritize specific recommendations for Council to proactively designate City of Austin Landmarks and Historic Districts within the Palm District, including the Sixth Street National Register District.
- **Recommend financial, programmatic, and regulatory tools to protect historic and cultural resources.** The Palm District contains the most intensive zoning categories available for land in



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Austin. The need for financial and regulatory tools to meaningfully protect the few historic and cultural resources that remain is imperative. Without these tools, we will see the Palm District's limited historic inventory continue to diminish precipitously as its replaced by lucrative development opportunities. Echoing the sentiments shared by the [Red River Cultural District](#), we would like to see recommendations for budgetary commitments for Plan implementation, as well as recommendations for tools such as transfers-of-development-rights, relaxed permissions for site development, tax incentives, design standards, and zoning protections that support preservation in the district.

- **Integration of existing and ongoing preservation planning efforts.** The 2012 Downtown Austin Plan identifies a number of goals and recommendations to preserve and enhance the unique historical and cultural heritage of Downtown, many of which still have not been acted on. At present, the development of an Equity-Based Historic Preservation Plan is underway to replace Austin's 1981 Preservation Plan. More meaningful integration of the Palm District Plan with these and other preservation planning efforts would build on the work of existing efforts and strengthen the Plan's preservation potential.

We believe that with meaningful improvements, the Palm District Plan can deliver positive preservation outcomes for this important downtown district. Thank you for your consideration of this item, and for your service to the community.

Sincerely,

Linda Y. Jackson, President