

Subject: Concerns Regarding the North Trail Development Proposal

To: Members of the Zoning and Platting Commission, Alison Alter, and Ashley Fisher

From: 2222 CONA

Subject: Opposition to Case SPC-2023-0357C – North Trail Office Park Development

Building Data Table:

Building	Gross Floor Area (GFA), square feet	Proposed Use	Building Height	Foundation Type	Finished Floor Elevation (FFE)
A	112,848	(see below)	28-feet	Concrete Podium	635.5
	112,848	Professional Offices	(2-stories above & 1-story below ground)		
	150,454	Parking Garage	(4-levels below ground)		
Total GFA:	263,313	(for AFD purposes)			
Total GFA:	112,848	(for AW & PARD purposes)			

BUILDING SUMMARY

The North Trail Office Park development, as proposed, raises significant concerns regarding environmental impact, infrastructure strain, and community well-being. While the applicant asserts compliance with regulatory standards, the following issues highlight why this project should not proceed as currently designed:

1. Environmental Risks – Bull Creek

- **Proximity to Bull Creek:** The development site is directly adjacent to Bull Creek, a critical water feature and floodplain (Zone AE per FEMA). Although the plan claims no development within the floodplain, construction activities and increased impervious cover could disrupt natural water flow, increase runoff, and jeopardize the creek's ecological balance.
- **Biofiltration and Detention Issues:** The proposed partial biofiltration system and detention pond rely on assumptions that may not fully mitigate runoff or long-term pollution risks. Inadequate maintenance of these systems could result in sedimentation, water quality degradation, and downstream flooding, which would harm the sensitive Bull Creek watershed.
- **Increased Runoff Potential:** Post-development for the underground parking and office the runoff characteristics indicate a significant shift in site hydrology. Even with mitigation measures, the increased impervious cover poses risks of erosion, sediment transport, and habitat destruction.

2. Environmental Risks - Bluff Instability and Setback Issues

- **Erosion Risks:** Construction activities near the bluff—particularly grading, excavation, and stormwater outflow—could exacerbate erosion and destabilize the bluff. The use of a flow-spreading wall may help diffuse stormwater but does not address the potential for

subsurface water movement that could undermine the bluff's stability over time. The bluff CEF, under Austin's Environmental Criteria Manual (ECM), may require additional protections. These features appear to be inadequately addressed in the site plan.

- **Slope Conditions:** Nearly half the site consists of slopes greater than 15%, and the bluff itself represents an area of extreme sensitivity. Development on and around such steep terrain increases the risk of structural instability, sediment transport, and bluff failure, especially during heavy rainfall.
 - **Downstream Impacts:** Any destabilization of the bluff could lead to sediment deposition into Bull Creek, adversely affecting water quality, aquatic habitats, and the surrounding watershed.
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3. Traffic and Connectivity Concerns

- **Increased Traffic on Loop 360:** The projected 1,439 daily trips from the proposed office development will exacerbate congestion on Loop 360, a corridor already strained by high traffic volumes. The Traffic Impact Analysis lacks robust solutions to prevent further delays or address safety concerns at the proposed driveway.
 - **Lack of Connectivity:** Due to topographical constraints, the development fails to provide meaningful pedestrian or vehicular connectivity with adjacent properties. This shortcoming reduces opportunities for shared infrastructure and sustainable transportation options.
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4. Inadequate Infrastructure

- **Septic System Risks:** The waiver to use an on-site septic system instead of connecting to public wastewater infrastructure raises red flags. Septic systems near sensitive water features like Bull Creek increase risks of nutrient loading and contamination. The long-term viability of this system is questionable given the site's topography.
 - **Stormwater Drainage Concerns:** The drainage plan relies heavily on a flow-spreading wall and natural vegetation for erosion control. However, this approach is unproven under the site's specific conditions and may fail during extreme weather events.
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5. Community Impacts

- **Compatibility Issues:** While the development meets technical compatibility standards, its scale and expected traffic impacts pose a burden to nearby residential areas. Increased vehicle flow on Loop 360 and potential spillover onto Lakewood Drive will degrade the quality of life for surrounding neighborhoods.
 - **Construction Disturbances:** The project's location on steep slopes with significant topographic changes will require extensive excavation and grading. This process risks creating noise, dust, and runoff that could affect adjacent properties and Bull Creek.
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6. Compliance Gaps and Overreach

- **Impervious Cover and Slope Management:** Although the development adheres to technical impervious cover limits for slopes, nearly half the property consists of slopes greater than 15%. Intensive development on these slopes contradicts the spirit of the Lake Austin Watershed Ordinance, which seeks to preserve the area's natural character. Per the Lake Austin Watershed Ordinance (841213-L), the project proposes impervious cover

that adheres to technical requirements for slope categories (e.g., 50% for <15% slopes), but cumulative impacts on sensitive areas like Bull Creek and the bluff are inadequately addressed.

- **Public Infrastructure Coordination:** Coordination with TXDOT for driveway alignment and road improvements remains incomplete. Without finalized agreements, the project introduces significant uncertainties about its broader traffic and safety impacts.

Conclusion

This proposal prioritizes commercial development over environmental stewardship and community preservation. While the applicant may meet baseline regulatory requirements, the cumulative risks—environmental degradation, traffic congestion, and inadequate infrastructure—far outweigh the benefits of this project.

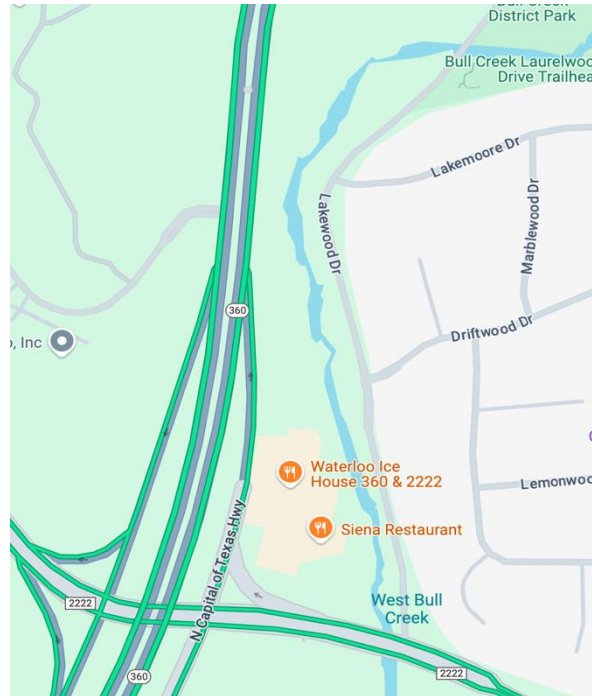
Requested Action

We urge the Zoning and Platting Commission to **deny this application** or, at a minimum, require significant revisions to:

1. Send this to the Environmental Commission for review prior to making a decision.
2. Reduce impervious cover and scale of the development.
3. Mandate connection to public wastewater infrastructure.
4. Strengthen environmental safeguards to protect Bull Creek and mitigate runoff risks.
5. Require enhanced traffic solutions to minimize congestion and improve safety on Loop 360.
6. Requested Actions Regarding the Bluff and Bull Creek
 1. Independent Geotechnical Analysis: Conduct a detailed assessment of the bluff's stability under the proposed development conditions, including grading, runoff, and altered drainage patterns.
 2. Erosion and Sediment Control Plan: Mandate enhanced measures to prevent sediment transport into Bull Creek and ensure the bluff's stability during and after construction.
 3. Limit Impervious Cover Near the Bluff: Restrict any additional impervious surfaces near the bluff.

The Bull Creek watershed and the surrounding community deserve thoughtful, sustainable development—not a rushed project that prioritizes short-term gains over long-term resilience.

Google maps shows how close the proposed development is to Bull Creek (it is proposed to be built at the end of the Waterloo Ice House strip center).



Below are photos of the bluff and property

