

May 12, 2025  
City of Austin Planning Commission  
301 W. 2nd Street  
Austin, Texas 78701

Re: Design Commission Alternative Draft — Downtown Density Bonus (DDB) Urban Design Standards

Dear Chair and Members of the Planning Commission,

I write as a member of the Design Commission and its Urban Design Guideline Working Group to provide background on the alternative draft of the Downtown Density Bonus (DDB) Urban Design Standards recommended by the Design Commission as an alternative to the Staff-prepared draft. I plan to attend the May 12 meeting and would be happy to answer questions or provide additional clarification.

Over the past several years, the Design Commission has worked to update the Urban Design Guidelines to improve consistency, predictability, and alignment with contemporary urban design best practices. This effort included extensive stakeholder engagement and coordination with relevant City departments. More than a year ago, the Commission submitted a completed draft to Urban Design Division Staff for formatting and public review.

Subsequently, the Commission learned that Staff was preparing revisions to the DDB framework that would eliminate both administrative design review and the public-facing Design Commission review for DDB projects, changes that would significantly alter the role and function of the Design Commission and the Urban Design Guidelines. The Design Commission Urban Design Guideline Working Group met with Staff twice during their expedited drafting process for replacement standards. However, after multiple meetings and comment periods, it became apparent that the Commission's direction would not be substantially reflected in the Staff draft. In response, the Commission prepared its own alternative draft.

Our draft reflects a substantial compromise from the broader urban design outcomes envisioned in the updated Urban Design Guidelines. It focuses narrowly on the most important and impactful standards while emphasizing objectivity, clarity, and ease of administration. The standards were calibrated based on real projects, professional practice, and national experience drafting objective design standards.

Key differences from the Staff draft include:

**Mandatory Standards.** Our draft establishes stronger baseline requirements for pedestrian-oriented design, including driveway limitations and minimum standards for ground-floor transparency and entrances. These are treated as essential requirements for all DDB projects, rather than optional enhancements.

**Enhanced Standards.** Our draft reserves optional standards for true enhancements to the public realm and provides a broader range of compliance options to account for varying project conditions and costs. Rather than relying on a complex point system, the framework is intentionally straightforward and calibrated to ensure meaningful urban design outcomes across all projects.

**Street Hierarchy Definitions.** Our draft defines “primary street” and “side street” specifically for Downtown Austin, rather than relying on Subchapter E’s “principal street” definition, which is oriented primarily toward vehicular corridors. Downtown’s urban structure is instead defined by a network of pedestrian-oriented streets and public spaces, including Congress Avenue, 2nd Street, 6th Street, Rainey Street, Waterloo Greenway, Shoal Creek Trail, and the Butler Trail. Our draft ensures that future development meaningfully engages these important civic and pedestrian environments.

I and other Design Commissioners are increasingly concerned that the urban design standards are being softened primarily due to their perceived cost impact on Downtown Density Bonus projects, without a clear or documented calibration exercise analyzing what those standards actually cost to implement in practice. While cost considerations are real, they should be grounded in evidence rather than assumption, and weighed against the far more significant long-term consequences for the physical form of downtown. Today’s market conditions are temporary and cyclical, but the standards adopted now will shape the quality, vitality, and public realm of downtown for generations. It would be short-sighted to dilute long-term urban design outcomes in response to near-term development pressures especially without a true understanding of their tradeoffs.

The Design Commission shares Staff’s and the Planning Commission’s goal of a vibrant, walkable, and high-quality downtown. We submit this alternative draft in that spirit and respectfully request that the Planning Commission carefully consider it as the basis for the final standards.

Thank you for your consideration.

Respectfully submitted,

Kevin Howard Oliver  
Vice Chair, City of Austin Design Commission