AIA Austin - LDC Comments

Neighborhood Core

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Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase viability of preservation incentive tool by increasing impervious cover.	Add 5% increase in impervious cover for those using the preservation incentive in R2B.	Preservation should be priority in this zone, followed by Duplex, then Single Family. The proposed increase in FAR for Duplexes in R2B could incentivize Duplexes over preservation of existing homes. An increase in IC for preservation units would make it the most attractive option in this zone.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase viability of preservation incentive tool by not requiring technical restrictions.	Provide direction to staff to ensure Technical Criteria Manuals do not add cumbersome requirements or additional costs to the preservation incentive process.	TCMs are unknown at this point and could require items that make this cost prohibitive.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase viability of preservation incentive tool by not requiring cumbersome processes.	Exempt developments using preservation incentive from any Site Plan requirements beyond single family requirements, including Site Plan Lite.	Added design and permit costs will disincentivize preservation.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing addition of habitable space.	Revise Section (c) Adding Habitable Space to be based on square footage area, not % of value of structure.	Current % of value requirement would allow little to no additional square footage. \$100K structure would only allow \$20K addition. This would be little more than a closet. City Council direction to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure. Remodeling or adding units should be very simple, so it is much easier to preserve an existing structure and than to tear down and replace it with another larger structure	Per City Council direction, remodeling or adding units should be very simple, so it is much easier to preserve an existing home than to tear down and replace it with another larger structure
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by reducing parking requirement.	Eliminate parking requirements for preservation units in all Residential House-Scale zones.	Some older homes don't have driveways or curb cuts and adding (3) parking spaces on these lots could be cost prohibitive. Remove barriers to preservation.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Add language to clarify (2) ADUs can be added as part of preservation incentive to achieve total of (3) units.	To incentivize preservation, the code should allow any combination of housing types to achieve (3) total units.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Allow (2) curb cuts for projects using preservation incentive if a curb cut already exists on site.	Allows flexibility to design around existing site encumbrances including heritage trees. If an existing curb cut does exist, allow it to remain and allow a new one for additional units	
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Allow existing Duplex to qualify for the preservation incentive and clarify if one or both units must be preserved.	Allows flexibility to meet preservation incentive. Preservation should extend to all building types, not just detached single family.	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Clarify code language to allow an internal ADU to be added to the preserved structure.	Allows flexibility to meet preservation incentive. Preservation should extend to all building types, not just detached single family	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Allow a new unit to be added on top of preserved unit and allow an attic be converted to an ADU.	Allows flexibility to meet preservation incentive. Allow flexibility to achieve preservation and density	Imagine Austin calls for guidelines to support preservation. City Council also directed to create Preservation incentives City-wide, so that an additional unit, beyond what would otherwise be allowed, is allowed with the preservation of an existing structure.
AIA Austin	Preservation Incentive	23-3C	3050(D)	10	Increase attractiveness of preservation incentive tool by allowing design flexibility.	Allow attics and basements to be converted to habitable area without counting against a cap on new habitable area added to a qualifying preserved structure.	Allows flexibility to achieve preservation incentive.	Attic and basement area is exempted from FAR and does not impact the look or character of a preserved structure from the public realm.

AIA Austin - LDC Comments

Transition Zone

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Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Preservation Incentive	23-3C	3050 (D)	10	Increase viability of preservation incentive tool by increasing impervious cover.	Add 5% increase in impervious cover for those using the preservation incentive in R4 zones.	Preservation incentive looks more attractive on large lots, but many of the urban core older homes are on small lots. The baseline of (4) units in this zone doesn't make preservation very attractive. Need more impervious cover to incentivize preservation. More than (2) units above the ground level requires a second egress stair per City of Austin amendments to the IBC. This, along with trash, recycling, and compost bin storage eats up space and therefore more IC is needed to make it work on typical small lots in the urban core.	Preservation incentives City-wide, so that an
AIA Austin	Front Yard Planting	23-3D	3040	4	Reduce Front Yard Landscaping Requirements.	Calibrate front yard tree requirements to align with lot size.	There is physically not enough space to plant this many trees after subtracting out driveways, sidewalks, etc. A typical small lot would have to provide (1) large tree and (3) small trees in a front yard with 15' setback.	There is nothing in Council direction or Imagine Austin that directed staff to create these burdensor requirements.
AIA Austin	Front Yard Planting	23-3D	3040	4	Revise Front Yard Landscaping Requirements to conform with utility requirements.	Revise Front Yard tree requirements to allow Austin Energy compatible trees.	Lots with overhead lines will be in noncompliance due to Austin Energy's conflicting requirements. Working through conflicts between code and AE requirements create delays and add cost.	There is nothing in Council direction or Imagine Austin that directed staff to create these burdensor requirements.
AIA Austin	Townhouse Use	23-3C	3130(A)	32	Need AHBP FAR Bonus for Townhouses.	Add 0.6 FAR bonus for projects opting into the AHBP.	Currently, Townhouse Use receives no bonus for opting into AHBP.	Opportunity for affordable bonuses should be take wherever possible.
AIA Austin	R4 Zoning	23-3C	3130(A)	32	Increase entitlements to allow for (4) units on small lots.	Increase impervious cover on small lots in this zone.	Added IC will help achieve intended yield. It will be very hard to achieve (4) units on small lots mapped R4 without additional impervious cover.	Per City Council direction, the draft code should encourage Townhomes. Simply allowing the use is not encouragement.
AIA Austin	Cottage Court Use	23-3D	1160(A)	19	Courtyard area can be prohibitive on small lots using Cottage Court-3.	Revise Table 23-3D-1160(A) to eliminate total area and only provide area per unit.	A total area is not needed if there is an area requirement per unit. Excessive area requirement will leave Cottage Court Use under utilized.	Per City Council direction, the draft code should encourage Cottage Courts. Requiring too much op space will discourage their use.
AIA Austin	Cottage Court Use	23-3D	1160(A)	19	Allow unclustered parking in Cottage Courts.	Revise text to allow unclustered parking in Cottage Court Use.	Design flexibility is needed to work around site constraints like heritage trees and grading. Clustered parking requirement could prevent Cottage Court on lots with any site features.	Per City Council direction, the draft code should encourage Cottage Courts. Requiring too many prescriptive design standards will discourage their use.
AIA Austin	RM1 Building Height	23-3C	4060(D)	12	Increase height in this zone to allow buildings to achieve desired density.	Revise allowable height to be 45' base and 55' with AHBP.	This zone is mapped behind corridor lots that will allow 90' buildings. A 40' height limit behind 90' is not an appropriate transition between scales. 40' is also lower than the 45' allowed in R4 with the AHBP height bonus.	Per City Council direction, the draft code should me housing goals for affordable housing. The allowed number of affordable units can not be achieved on typical urban sites without additional height.
AIA Austin	Townhouse Use	23-3C	4050	7	Allow two lots to be combined for Townhouse Use without having to aggregate them.	Add simple process to allow (2) lots to be combined for Townhouse Use.	This will allow Townhouse to be utilized much more. Aggregation is time consuming and expensive and will be cost prohibitive.	Per City Council direction, the draft code should encourage Townhomes. Simply allowing the use is not encouragement.
AIA Austin	Density	23-3C	4060(A)	12	Allow density to scale with lot size.	Revise and calibrate Table 4060(A) to allow units per acre.	This zone is mapped over lots with a wide range of sizes, some of which are currently zoned SF-5 or SF-6. Capping large lots at (10) units a loss compared to SF-5 and SF-6 zones in the current code.	Per City Council direction, the draft code should me housing goals for affordable housing. The amount affordable units on a site should be correlated with size in order to achieve the most affordable units w can.
AIA Austin	RM Zoning Site Development	23-3C	4050	7	Clarify site plan development requirements for these sites with multiple units	Add text to exempt RM1 zoned developments from full site plan development requirements	It is unclear what site plan development requirements will be enforced in RM1 zones. Site Plan Development standards will make or break this success of this zone. If these standards are overly burdensome then many will choose not to opt in.	Per City Council direction, the draft code should me housing goals for affordable housing. These developments can not achieve affordability if they have overly complicated site development requirements. This increases design costs, permitti costs, and construction costs.
AIA Austin	Open Space	23-3D	4020(B)	1	Reduce barriers for Missing Middle housing.	Consider lowering or exempting R4 & RM1 zones from 5% Open Space requirement.	On small urban core lots, this open space requirement will have a big effect on yield.	Per City Council direction, the draft code should encourage missing middle housing. The more site requirements required by code, the more it will be discouraged

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Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Ground Floor Height	23-3C	6000		Match ground floor height of VMU standards in Subchapter E from current code.	Table 23-3C-60#0(D) Height; (3) Primary Building, Ground Floor: Change Floor-to-Bottom of Structure Height from 18' (min.) to 12' (min.).	as a minimum requirement. This could prevent a fifth	12' clear height matches today's regulations. Projects will exceed this downtown and in developments where the market demands more generous ceiling heights. It would increase construction costs and make it difficult to provide dwelling units at the ground floor under a ~20' podium on the non-primary street.
AIA Austin	Parkland Dedication	23-4B	1010		Exempt sites in IA Corridors and Centers from on-site parkland dedication.	Add exemption in 23-4B-1010(B)(2); exempt all properties fronting an IA Corridor or within an IA Center from dedication of on-site parkland. Allow fee-in-lieu automatically.	Modeling of the 15% Urban Core Cap on-site parkland results in significant loss in residential units, even moreso if a development opts in to the AHBP, or it would have eliminated an entire office building from one yield scenario.	Council Policy Direction 2.2.b requires prioritization of non-zoning regulations to allow more housing in centers and corridors. The uncertainty of on-site vs. fee-in-lieu and the potential loss from on-site parkland is low-hanging fruit for prioritization. Busy urban corridors are also not suitable for high-quality parks.
AIA Austin	Active Frontage	23-3C	6050		Clarify percentage of frontage that needs to be pedestrian oriented uses (POU).	Revise 23-3C-6050(E) to require POU at 75% of net building frontage.	As written, it's unclear if 100% of the primary frontage has to be POU or if one small residential lobby would comply. Needs clarification.	75% POU matches today's regulations in Subchapter E. Allowing lobbies serving upper floor uses to satisfy requirements is a good addition.
AIA Austin	Green Stormwater	23-4D	6030		Exempt sites in IA Corridors and Centers from requiring GSI for all water quality measures.	Add provision in 23-4D-6030(E) for properties fronting an IA Corridor or within an IA Center to treat water quality with other controls, e.g sed/fill ponds.	Testing revealed incentives to remove existing trees and pave intentionally to reach the 90% IC threshold to avoid doing GSI, which would've taken up much more site area. This is a perverse incentive and counter to many goals.	Council Policy Direction 2.2.b requires prioritization of non-zoning regulations to allow more housing in centers and corridors. Several policy directions relate to preserving trees, reducing IC, etc.
AIA Austin	Parking Maximums	23-3C	6040		Increase parking maximums to allow developments to provide parking at current market-demanded ratios.	Increase maximums in 23-3C-6040(B) to 1.75 times the minimum across the board.	Testing the 1.25 maximum was not workable on corridor projects outside of the downtown area where developments are currently providing approx. 1.5 spaces/unit and 4 spaces/1,000rsf of office.	This could be a deal-killer or an artificial limit on development yield in the locations we want most development to occur. Parking maximums to prevent extreme over-building are reasonable, but they need to allow current market-demanded parking to be provided until reliable, effective mass transit lowers this demand and maximums can be recalibrated.
AIA Austin	Active Frontage	23-3C	6050		Clarify Alternate Active Frontage requirements.	Clarify if active private frontage is limited to 20' in width or 50% of the building frontage. 23-3C-6050(C)(2)(a) and Figure 23-3C-6050(1) conflict. Recommend allowing 50% of the building frontage.	The 20' maximum width may be an error, meant to be maximum 20' depth as shown in the figure.	Necessary technical clarification.
AIA Austin	Density Cap	23-3C	6080		Eliminate unnecessary and redundant density cap.	Table 23-3C-6080(A) change Multifamily Base Standard from 54du/ac to N/R.		With FAR, height, setback, and other development regulations in effect, the du/ac tool is redundant and shouldn't limite residential yield in this intense zone. The 30' height bonus is attractive enough to incentivize AHBP without capping and bonusing du/ac.

AIA Austin - LDC Comments

Regional Center

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Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Parking Maximums	23-3C	5040		Increase parking maximums to allow developments to provide parking at current market-demanded ratios.	Increase maximums in 23-3C-6040(B) to 1.75 times the minimum across the board.	Testing the 1.25 maximum was not workable on corridor projects outside of the downtown area where developments are currently providing approx. 1.5 spaces/unit and 4 spaces/1,000rsf of office.	This could be a deal-killer or an artificial limit on development yield in the locations we want most development to occur. Parking maximums to prevent extreme over-building are reasonable, but they need to allow current market-demanded parking to be provided until reliable, effective mass transit lowers this demand and maximums can be recalibrated.
AIA Austin	Active Frontage	23-3C	6050		Clarify Alternate Active Frontage requirements.	Clarify if active private frontage is limited to 20' in width or 50% of the building frontage. 23-3C-6050(C)(2)(a) and Figure 23-3C-6050(1) conflict. Recommend allowing 50% of the building frontage.	The 20' maximum width may be an error, meant to be maximum 20' depth as shown in the figure.	Necessary technical clarification.
AIA Austin	Green Stormwater	23-4D	6030		Exempt sites in IA Corridors and Centers from requiring GSI for all water quality measures.	Add provision in 23-4D-6030(E) for properties fronting an IA Corridor or within an IA Center to treat water quality with other controls, e.g sed/fill ponds.	Testing revealed incentives to remove existing trees and pave intentionally to reach the 90% IC threshold to avoid doing GSI, which would've taken up much more site area. This is a perverse incentive and counter to many goals.	Council Policy Direction 2.2.b requires prioritization of non-zoning regulations to allow more housing in centers and corridors. Several policy directions relate to preserving trees, reducing IC, etc.
AIA Austin	Parkland Dedication	23-4B	1010		Exempt sites in IA Corridors and Centers from on-site parkland dedication.	Add exemption in 23-4B-1010(B)(2); exempt all properties fronting an IA Corridor or within an IA Center from dedication of on-site parkland. Allow fee-in-lieu automatically.	Modeling of the 15% Urban Core Cap on-site parkland results in significant loss in residential units, even moreso if a development opts in to the AHBP, or it would have eliminated an entire office building from one yield scenario.	Council Policy Direction 2.2.b requires prioritization of non-zoning regulations to allow more housing in centers and corridors. The uncertainty of on-site vs. fee-in-lieu and the potential loss from on-site parkland is low-hanging fruit for prioritization. Busy urban corridors are also not suitable for high-quality parks.
AIA Austin	Building Height	23-3C	5100		Use consistent overall building heights across zones.	Table 23-3C-5070(D)(1) change overall max. building height from 60' (min.) to 65' (min.).	The 5' increase in height would not be perceivable from the ground level but would allow flexibility in achieving a fifth floor of residential units for projects on sloping lots.	This height aligns with MS3 and promotes consistency and flexibility for developments in Centers and Corridors.
AIA Austin	Density Cap	23-3C	5100		Eliminate unnecessary and redundant density cap.	Table 23-3C-5100(A) change Multifamily Base Standard from 48du/ac to N/R.	The reduction from current code is inappropriate for a high-intensity mixed-use zone. AlA testing shows it makes the AHBP more attractive, but could also tip the scale in favor of more commercial development.	Council Policy Direction 2.1.g stipulates downzoning should generally not occur. With FAR, height, setback, and other development regulations in effect, the du/ac tool is redundant and shouldn't limite residential yield in this intense zone.
AIA Austin	Mapping	23-3C	7060	9	Clarify UC85 zones	Add UC85 development requirements to code text section	UC85 zone is shown on proposed zoning map, but there are no regulations listed in code text	Technical Fix
AIA Austin	Reclaimed Water	23-9D	1030	2	Exempt small projects from reclaimed water requirements	Exempt projects less than 1 acre from reclaimed water requirement	Forcing a development to connect to reclaimed water is cost prohibitive and forcing it go 250 feet off site to connect to it is arbitrary. This requirement will kill many small projects that can not absorb this cost plus the cost to bring the water into the building and use it. This will require redundant building plumbing systems, which is very expensive. This is a huge shift in policy and needs to be eased into. This requirement, along with site detention changes, will kill many small developments	
AIA Austin	Allowed Use	23-3C	5100	32	Clarify if multiple Uses are utilized if FAR is combined	Add language explaining which Uses can be combined and how to total their combined FAR. This should apply to FAR for AHBP as well	It is unclear how to develop on one lot with multiple uses	Technical Fix

AIA Austin - LDC Comments

Downtown

Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Detention				Don't require on-site detention downtown.	Allow all projects with CC, DC, or UC zoning to participate in RSMP automatically.	Atlas 14 may result in undersized existing stormwater infrastructure downtown, requiring upgrading of these lines or on-site detention.	It is understood that the lower 1/3 of watersheds should not detain water. Best practice would be to allow this water to drain directly into the lake as fast as possible.
AIA Austin	Accessible Parking	23-3D	2040		Remove accessible parking requirements from existing buildings in urban areas that don't currently provide parking or have space to add parking.	Add exemption in 23-3D-2040(B) for projects in CC, DC, or UC zones that are changing use or occupancy, or are enlarging an existing structure by up to 50%.	This could have a chilling effect on adaptive reuse or modest enlarging (adding a floor) of older structures in urban areas that were never built with parking and can't physically accommodate new ADA parking.	Maintains flexibility these projects have under currer code.
AIA Austin	TIA Requirements					Exempt projects in CC, DC, and UC zones from TIA requirements; require TDM instead.		
AIA Austin	Parking Maximums	23-3C	7040		Increase parking maximums to allow developments to provide parking at current market-demanded ratios.	Increase maximums in 23-3C-6040(B) and 23-3C-7040 (B) to 1.75 times the minimum across the board; Clarify that projects in Regional Center Zones can provide parking up to the maximums allowed in MS and MU zones.	It's unclear if the Regional Center parking maximum was intended to be limited to the maximum allowed, or minimum required in MS and MU zones.	This could be a deal-killer or an artificial limit on development yield in the locations we want most development to occur. Parking maximums to prever extreme over-building are reasonable, but they nee to allow current market-demanded parking to be provided until reliable, effective mass transit lowers this demand and maximums can be recalibrated.
AIA Austin	Parking Flexibility	23-3C	10080		Allow flexibility to do "up and down" parking garage access for corner sites.	Revise 23-3C-10080(D) to allow (1) curb cut on a Pedestrian Activity Street frontage for corner sites.	If curb cuts are only allowed on non-PAS frontages, they will either be inefficient on the non-PAS frontage or the only curb cut will serve above-grade parking, negatively impacting the public realm downtown.	Below-grade parking should be encouraged for the vibrancy of downtown streets.
AIA Austin	Parking Flexibility	23-3C	10080		Allow flexibility to develop small mid-block sites on our most vibrant downtown streets.	Revise 23-3C-10080(D) to allow (1) curb cut on a Pedestrian Activity Street frontage for mid-block sites if the curb cut is limited to 20' in width and there are no more than (3) curb cuts on the PAS block face.		If curb cuts are denied to the leftover mid-block sites on PAS streets, this could hinder density and activit in our most vibrant downtown streets.
AIA Austin	Active Frontage	23-12A	1030		Reduce active frontage burdens on sites without access to an alley.	Revise definition for Frontage, Net (Measurement) to also subtract width of required AE vaults and fire pump rooms.		Projects will continue to place these required space along alleys where available. This gives fair treatme to sites without alleys that would otherwise have trouble meeting active frontage percentage requirements.
AIA Austin	Glazing Reflectivity	23-3C	10080		Allow attractive building designs with appropriate daylighting of interior spaces.	Remove maximum reflectivity provision in Table 23- 3C-10080(C) Note 2.	It's ambiguous what reflectivity is being regulated (internal, external, or solar). The issue with highly reflective glass in 1980's architecture is not relevant in today's market.	We should encourage an attractive skyline with reasonable external reflectivity, meet sustainability goals with adequate daylighting related to internal reflectivity, and reduce cooling demand with high solar reflectivity.
AIA Austin	Downtown Density Bonus	23-4E	2030		Revise density bonus map legend to match map.	Revise legend in Figure 23-4E-2030(1) to match the "no FAR" zones in the map.		Necessary technical clarification.
AIA Austin	Functional Green	23-3D	3130		Provide requirement for scoring	Add text clarifying requirements for Functional Green scoring	Scoring requirements have been deferred to the Environmental Criteria Manual so they cannot be evaluated so to their effect on development. This could have very big impact on development and it is still not known. They need to be part of code. Scoring levels should vary by size of site and impervious cover	Necessary technical clarification.
AIA Austin	Functional Green	23-3D	3130		Provide more options for Functional Green	Add text allowing more options for downtown sites.	Limitations for downtown include: landscaping within ROW for credit (questionable), green walls (questionable on glazed facades), or green roofs, requiring green roofs as only mechanism for compliance and they are costly and maintenance headaches.	Necessary technical clarification.
AIA Austin	Functional Green	23-3D	3130		Provide more clarification of perceived code conflicts with Functional Green	Add text clarifying conflicts between other code requirements and Functional Green	Possible conflicts include: Active Frontage & Functional Green green wall; Great Street trees & Functional Green trees; Function Green green roofs & solar ready building code requirements; Does landscaping within ROW count towards site compliance (not currently allowed); Conflict with DB Great Streets and Functional Green – Double count? (not currently allowed); Can irrigator be used to irrigate trees/shrubs in ROW? (not currently allowed)	Necessary technical clarification.

AIA Austin - LDC Comments General

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Submitter	Description	Ch. / Sec.	Division	Page	Intent	Suggested Text	Notes	Justification
AIA Austin	Parking Reductions	23-3D	2050		Clarify terms where 100% parking reductions are available.	Use consistent language of Center, Corridor, and Transit Corridor to align with ASMP and capitalize all instances throughout the code.	Terms are inconsistently used, not always capitalized.	Necessary technical clarification.
AIA Austin	Parking Reductions	23-3D	2050		Clarify conditions where 100% parking reductions are available.	Allow sites within 1/4 mile of a Center to qualify for 100% parking reduction. Allow sites with any sidewalk system connected to the Corridor to qualify for 100% parking reduction even if it's not fully ADA compliant under current standards.	Central neighborhoods in close proximity to transit on the corridors have old sidewalk systems, but aren't fully ADA compliant under current standards. They shouldn't be penalized for the age of the sidewalk.	This would allow transition zones to take full advantage of parking reductions, make Missing Middle housing more viable, and add more transit supportive density.
AIA Austin	Bike Parking	23-3D	2070		Calibrate amount of publically available bike parking.	Add provision in 23-3D-2070(B)(1) for Multifamily uses to only require 10% of required bike parking be publically available; Reduce requirement to 25% of required bike parking to be publically available for non-residential uses.	50% public bike parking for residential uses is too high. Residential bike parking is primarily used by residents that live in the building. 50% public bike parking for non-residential uses is too burdensome, especially if the ratio remains 1 per 1,000gsf.	This allows more flexibility for locating bike parking in buildings where ground floor space should be prioritized for more active and attractive uses. AIA testing showed inability to meet POU ratios in MS and downtown zones due to public bike parking amount and location requirements.
AIA Austin	Bike Parking	23-3D	2070		Calibrate location requirements for publicly available bike parking.	Increase distance from principal entrance in 23-3D- 2070(B)(1) from 50" to 100"; Define what portion of the bike parking needs to be within the required distance to allow the entrance to the bike parking facility or the closest bike parking space to satisfy requirements; Define "not obscured from public view" to allow clear wayfinding signage to satisfy requirements.		This allows more flexibility for locating bike parking in buildings where ground floor space should be prioritized for more active and attractive uses.
AIA Austin	Bike Parking	23-3D	2070		Calibrate bike parking ratios for non-residential uses.	Reduce non-residential bike parking in Table 23-3D-2070(A) from 1 per 1,000gsf to 1 per 2,000gsf.	AIA testing showed this ratio to be much higher than today's code and difficult to accommodate, especially for the public bike parking portion.	This ratio is an improvement over today's regulations and will still encourage mode shift, but is more appropriately calibrated to the use.
AIA Austin	Parking Reductions	23-3D	2080		Don't require parking for newly converted structured parking to other uses.	Add provision in 23-3D-2080(E) to exempt future uses of convertible parking from off-street parking requirements.	Parking should not be required for converted parking space.	Necessary technical clarification.
AIA Austin	Accessible Parking	23-3D	2040		Remove unnecessary and redundant language from accessible parking requirements.	Remove subsection 23-3D-2040(A) and similar language from other subsections that is redundant to accessibility requirements in the adopted Building Code.	Redundancy between LDC and Building Code language.	Necessary technical clarification.
AIA Austin	Accessible Parking	23-3D	2040		Remove accessible parking requirements from Missing Middle housing.	Add minimum unit threshold to 23-3D-2040(B) in addition to the 6,000sf to exempt projects up to 10 units.	Missing Middle projects already face many impediments and are disproportionately impacted by parking requirements.	Missing Middle housing and transit supportive density is a state goal in many of Council's policy directions.
AIA Austin	Parking Reductions	23-3D	2020		Exempt Preservation Bonus units from parking requirements.	Add exception in 23-3D-2020(D) to exempt projects utilizing the Preservation Bonus in residential zones.	Preservation Bonus projects that add a Duplex use would be required (2) parking spaces, but if (2) ADU's are added, no parking is required.	Parking requirements should be the same regardless of the form the housing takes.
AIA Austin	Parking Reductions	23-3D	2020		Reduce parking requirements for bar/nightclubs to disincentivize drunk driving.	Remove provision 23-3D-2020(C)(1).	There is no justification for encouraging drunk driving.	There is no justification for encouraging drunk driving.
AIA Austin	Definitions	23-12A	1030		Clarify accessibility requirements for new sidewalks.	Remove term "ADA-compliant" from definition.	Many lots with sloped streets adjacent to the property are not able to provide fully-compliant ADA sidewalks due to feasibility issues. Allow existing Building Code and TAS requirements to govern this item.	Necessary technical clarification.