

April 15, 2008

Mr. Jay Reddy  
Chair, Codes and Ordinances Sub-Committee  
Planning Commission  
City of Austin



Re: Agenda Item B. 3., 4/15/08 Codes and Ordinances Sub-Committee Proposed  
Revisions to *Chapter 25-2 Zoning, Land Development Code Subchapter F:  
Residential Design and Compatibility Standards*

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Dear Mr. Reddy:

The Austin Chapter of the American Institute of Architects welcomes the opportunity for public dialogue and input regarding proposed changes to the *Residential Design and Compatibility Standards*. The AIA encourages its members to actively participate in the community, and to apply one's professional knowledge, skill and experience to engage in civic life. AIA Austin also embraces this policy, and works through its members – professional architects and design leaders – to advocate for responsible design that results in beautiful, healthy, sustainable places that reflect society's diverse cultures and needs. Recognizing that revised regulatory requirements have a profound impact on the nature and form of this design, we have engaged in an internal analysis of the proposed revisions.

Over the last two months, the Residential Committee of AIA Austin has facilitated discussions regarding the proposed revisions to the *Residential Design and Compatibility Standards*, and has explored other issues architects and designers are experiencing with the implementation, interpretation and enforcement of the ordinance. The Residential Committee is composed of practitioners – architects, designers, and homebuilders – with special expertise in residential building types. The Residential Committee has identified five items on which they offer additional comments for your consideration, and one item on which they offer recommended ordinance language, at the request of City staff.

We recognize and appreciate the considerable effort to analyze and propose revisions to the current ordinance that has been put forth by the Residential Development Regulation Task Force, including the work of AIA Austin's delegate to that body. The commentary from the AIA Austin practitioner group is intended to complement this effort. We hope these comments can be considered in the context of contemplating revisions to the *Residential Design and Compatibility Standards*, as the Codes and Ordinances Sub-Committee prepares its recommendations to the Planning Commission and Council.

Thank you for your service to our city.

Very truly yours,

Rudy Delgado, AIA  
President, AIA Austin

cc: Codes and Ordinances Sub-Committee members  
AIA Austin Executive Committee members  
Dora Anguiano  
Jessica King  
file

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**AIAA Comment Regarding Task Force Recommendation 10 – Side wall articulation - 15’ wall height measurement (Section 2.7)**

In addition to the recommendations made by the Task Force, we suggest consideration of an alternative or additional method for wall height measurement on steeply sloping lots. This would make this change consistent with current requirements of determining the Side Setback Plane or ‘tenting requirement’ as determined by Section 2.6.A. The following language describes this suggestion:

*For purposes of this subsection (Section 2.7) the 15 feet height measurement will be measured from the highest point of natural grade in each 40’ portion of the lot as determined by Setback Planes (Section 2.6) to the top of the wall plate (needs a definition). For purposes of this subsection a wall with a height of less than 10’-1” would be exempted from sidewall articulation regardless of the slope of lot, and a wall of greater than 15’ would be required to have sidewall articulation regardless of the slope of the lot.*

**AIAA Comment Regarding Task Force Recommendation 13 – Parking area – Gross Floor Area (Section 3.3.1.C)**

There may be unintended consequences to the Task Force recommendation for this item, which may impact the economic viability of more moderately priced duplexes. The following language might be considered, as a way to mitigate this unintended consequence:

*An applicant can only receive one 200 square foot exemption **per primary dwelling unit** for attached parking under Section 3.3.1.C.2. Further under the subsection 3.3.1. A maximum exemption of up to 650 s.f. can be utilized per site if the 650 s.f. is utilized to meet the minimum parking requirement.*

**AIAA Comment Regarding Task Force Recommendation 18 - Below Grade (Basement) Exemption (Section 3.3.2 B)**

An unintended consequence of the proposed change may be the elimination of habitable basement spaces, and proposed revision may not properly restrict the abuse of the basement exemption. The following language might be considered, to mitigate this:

- 1.) Below grade portions must be achieved below natural grade; and*
- 2.) The exempted habitable space below grade must have at least 60 percent of the building’s perimeter wall area surrounded by natural grade.*

**AIAA Comment Regarding Task Force Recommendation 21 - Gross Floor Area (Section 3.3)**

An unintended consequence of the proposed elimination of the FAR exemption for enclosed spaces below 6’ is that this may be overly restrictive, and generally discourage the use of things like habitable attic spaces. Habitable attic spaces can effectively serve to reduce overall building mass, which is a goal of the *Residential Design and Compatibility Standards*. Under the proposed revision, the FAR area will now include unfinished, but enclosed spaces, even for things like mechanical equipment. It may be preferable to use a height lower than 6’, and to also prohibit the use of “furr downs” to artificially reduce the height.

The following language might be considered, to mitigate this:

*Section 25-1-21 (43) GROSS FLOOR AREA means the total enclosed area of all floors in a building with a clear height of more than five feet, measured to the outside surface of the exterior walls.*

#### **AIAA Comment Regarding Task Force Recommendation 28 - Duplex Chart 5.3**

Duplexes are a useful building type to maintain affordability, density, and sustainability in communities. The proposed revision may limit design options that are compatible with the character and scale of traditional neighborhoods. While the intent of the suggested revision is apparently to limit incompatible infill development in traditional neighborhoods, the language put forth would also drastically limit the available design tools for bringing forth compatible duplex development. (See attached Duplex Variation diagrams.) We also recognize that this may well be a complex issue to resolve, requiring further thought and dialogue to do so. If AIA Austin can be helpful in that process, we would be happy to participate.

#### **AIAA Comment Regarding Horizontal Articulation (Input as requested by COA Residential Review Staff)**

The Task Force was not able to address this issue in the course of their review of the *Residential Design and Compatibility Standards*. The City of Austin Residential Review staff desired an additional design tool to use in providing compliance with the Side Wall Articulation provisions of Paragraph 2.7. In response to a staff request, we offer the following proposed language to be added to Paragraph 2.7. Side Wall Articulation:

*For lengths of sidewall 50' or less in length and with a wall height of 15' or less, the sidewall articulation requirement may be satisfied by the second floor being set back from the first floor so that the second floor wall is 9' or greater from the side property line.*

## DUPLEX VARIATIONS



