

North Shoal Creek Neighborhood Association (NSCNA)
PO Box 66443
Austin, Texas 78766

February 11, 2015

Re: Case # C14-2014-0157 (8528-8600 Burnet Road/8647 Rockwood lane, Crump-Gordon properties)
Contact: Sherri Sirwaitis, 512-974-3057

Dear Ms. Sirwaitis:

This letter is to reiterate the North Shoal Creek Neighborhood Association's objection to this proposed rezoning. Our previous letter, dated December 5, 2014, was written prior to the issuance of the Zoning Change Review Sheet on December 9, 2014. This letter addresses several points made in the review sheet that we believe to be incorrect, overly general, or misleading. **We disagree with staff's recommendation to approve this zoning change request, and we urge City Council members not to approve it.**

Points of disagreement:

On page 1, the "Department Comments" section recommends approval because "this tract of land fronts onto Burnet Road, an arterial roadway and a designated Core Transit Corridor." Attachment A (a map of Austin's Core Transit Corridors, updated 5/13/2013) shows that Burnet's Core Transit Corridor status ends at Anderson Lane. **This section of Burnet is not designated a Core Transit Corridor.**

This same section states "MF-6 zoning is consistent with the adjacent uses" and references the Rockwood Apartments to the west. The Rockwood Apartments is zoned MF-4. There are 13 multifamily complexes in North Shoal Creek, none of which are zoned MF-5 or MF-6. **In our view, MF-3 or MF-4 zoning would be consistent with our neighborhood's character; MF-5 and MF-6 is not.** (Attachment B illustrates the disparity between densities in North Shoal Creek and the 107.5 units/acre density of this proposed project.)

Furthermore, we know of no evidence in either *Imagine Austin* or the Wooten/Crestview neighborhood plan that supports staff's conclusion that MF-6 is consistent with existing multifamily zoning in North Shoal Creek. To the contrary, *Imagine Austin* describes regional centers as "places where the greatest density of people and jobs and the tallest buildings in the region will be located." Under *Imagine Austin*, the preferred location for MF-6 zoning would be in or near the Transit Oriented Development in the North Burnet/Gateway regional center, not in a medium/moderate density neighborhood like North Shoal Creek.

The "Basis for Recommendation" section on page 4 draws several conclusions that are not supported by specifics. In addition, the reasons given as substantiating MF-6 zoning at the Burnet/Rockwood site are so general as to qualify almost any Central Austin site near a roadway with bus service as potential MF-6 sites.

Here, for example, are some specifics relating to transportation infrastructure at this location which paint a realistic but less than rosy picture. As the applicant says, there is a bus stop very near the site. It's for Route 3, the "old" bus service. Since the addition of MetroRapid Route 803, Route 3 runs every 30-40 minutes. The stop for the MetroRapid bus, which runs every 12-15 minutes, is about a fourth mile away. Which site would be better for high density zoning: next to the 30-40 minute bus stop or the 12-15 minute one?

Also, according to the *Austin Mobility North Lamar/Burnet Corridor Program* report, this section of Burnet lacks adequate sidewalks and pedestrian crossings and has too many entrance/exit driveways for pedestrian safety.

This section also calls being "adjacent to the central business district or a major institutional or employment center" as a qualifier for MF-6 zoning. This site isn't adjacent to the CBD nor is it near a major institutional or employment center.

It also refers to "an area for which the high density multifamily use is desired" as a qualifier for MF-6 zoning. Does this mean that if a developer says he/she desires MF-6 zoning, it's a done deal—he/she gets it? This is a Catch 22 phrase that makes everywhere a potential candidate for MF-6 zoning, neighborhood planning and Imagine Austin be damned. In this case, we fear that MF-6 zoning is desired for this site by the applicant and City staff, while most people living near the site do not, and we don't understand why the desires of neighborhood residents aren't considered along with the desires of the other stakeholders.

This section also invokes promoting "consistency and orderly planning." As explained on page 1 of this letter, a density level of 107.5 units/acre is not consistent with our neighborhood's medium/moderate level of density. If "orderly planning" is desired, it can be obtained by delaying a decision on this rezoning request until after the long-delayed but still pending Burnet Corridor Plan is completed.

Finally, this section concludes MF-6 zoning will provide a "mixture of housing opportunities in this area of the city" and "is consistent with the goals of the Imagine Austin Comprehensive Plan as it is located on Burnet Road, a designated Activity Corridor." Planning doesn't consist of putting a building anywhere it can be built. Planning means placing buildings in preferred locations, based on the principles of the overall plan. Based on the Imagine Austin Comprehensive Plan, this building should be in the North Burnet/Gateway Regional Center north of Highway 183, not at the intersection of Burnet and Rockwood Lane.

We urge you to reject the recommendation of this flawed zoning review and vote no to this rezoning request. We thank you for your consideration of our position.

Best regards,

Attachment B: Densities

3: Density of proposed
project: 107.5 units/acre

A: Austin's density 2013: 4.42 persons/acre*

B: North Shoal Creek's density: 5.3 persons/acre**

C: Austin's highest density neighborhood: West University
at 35 persons/acre**

*Source: worldpopulationstatistics.com

**Source: Population and Housing, Table 1, Neighborhood Reporting
Area, Census 2010 Data

1: MF-3 density limit: 36 units/acre

2: MF-4 density limit: 54 units/acre

3: Density of proposed MF-6 zoning at 8528-8600 Burnet:
107.5 units/acre (MF-6 zoning allows unlimited density)

