

Chair and members of the Historic Landmark Commission,

My husband and I live in the Heritage Neighborhood. The neighborhood is bordered by Guadalupe, Lamar, 38th and 29th Streets. We live in a landmark that was built in 1930 within a neighborhood that is of similar vintage. We are very concerned about the impact that the revised Land Development Code will have on the historic fabric of residential homes and urge you to recommend significant revisions to the draft.

Prior to 2014, Central and North Austin neighborhoods saw the historic fabric of neighborhoods close to the University of Texas being destroyed by an increasing number of demolitions of older, smaller homes replaced by structures designed only for occupancy by multiple unrelated persons. The new “dorm” like houses and duplexes were typically rented at the time for \$1000 per bedroom resulting in a domino effect as adjacent properties became viable only as high occupancy rentals. Between 2012 and 2014, about 100 homes were demolished and replaced by high occupancy housing. Fortunately, in early 2014, the City Council passed [ORDINANCE NO. 20140320-062](#) to reduce the maximum occupancy to **four unrelated adults in newly construction** within the McMansion boundaries to reduce the financial incentives for tear-downs. The ordinance had an expiration date of March 31, 2016 which allowed the City to evaluate its impact. The new occupancy limit was so successful that in 2016, the City Council passed [ORDINANCE NO. 20160303-007](#) which removed the expiration date and made the occupancy limits permanent.

Section 23-3D-10040 of the draft Land Development Code instead allows up to **six unrelated adults per unit**. So, while a maximum of six unrelated adults were allowed in SF-3 properties prior to 2014, the code change will allow up to 12 in a duplex or home with an ADU. This change – even without any other changes to the Land Development Code – will so drastically change the financial incentives for properties near the University of Texas, that we expect the entire stock of older housing in the Heritage neighborhood to quickly disappear.

Additional changes in the draft Land Development Code will accelerate the demolition of existing housing stock and the accompanying displacement. Perhaps most notable is the preservation incentive, 23-3C-3050 (D), which allows an extra

unit on a property and unlimited FAR, for example three units with 18 unrelated adults in an R2 property. The incentive itself will do nothing to prevent the loss of older structures as only two exterior walls need to be retained to qualify. The increased duplex size of 0.6 FAR and the transition zones which allow 4 to 10 units per property will further increase incentives to remove existing, older housing stock and the historic fabric that makes many older Austin neighborhoods, including the Heritage neighborhood, distinctive.

The Heritage Neighborhood is home to landmarks that are proposed for significant increases in entitlements. For example, the OLD FIRE HOUSE at 3002 Guadalupe is proposed to have MS3 zoning, a category that allows building up to 90' tall. The MANNING-UDDEN-BAILEY HOUSE at 901 W 31st is proposed to have RM1 zoning allowing 6 to 10 units on the property. Similarly, the BROOK HOUSE at 609 W 33rd, the MCCALLUM HOUSE at 613 W 32nd, and the MCCALEB HOUSE at 609 W 32nd are proposed to have R4 zoning allowing 4 to 8 units on the property. As these properties have historic zoning, they should not receive zoning that would encourage redevelopment. The zoning for all Austin landmarks should be carefully reviewed.

Please vote to inform the City Council that the draft Land Development Code encourages demolition and displacement and needs serious revision particularly to occupancy limits, the preservation incentive, and the radical increases in entitlements. As the Council seems ready to pass the revised Land Development Code very quickly, please recommend F25 zoning for all properties that are individual landmarks or within historic districts, both local and national, as well as those that are within the [Ongoing Historic Resources Survey study areas](#). Temporary F25 zoning would allow for more time to determine how a new Land Development Code could increase housing and transportation choices without sacrificing our history and character.

Thank you for promoting historic preservation in Austin.

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