

I have been a resident homeowner in Austin since 1967; I am an officer of my neighborhood association, and I have actively followed and/or been involved in the Austin Tomorrow Plan, Imagine Austin and CodeNEXT. I have served on the board of affordable housing non-profits, and, going back to 1979, I have studied growth-related issues. I am an advocate of inclusionary zoning, of the development of a range of housing options and of affordable housing. With this background, I arrive at these comments and questions about housing affordability and the CodeNEXT process, with the hope that Austin will address boldly and comprehensively the issue of affordability:

CodeNEXT is based on the goals and objectives of Imagine Austin and, as others have pointed out, CodeNEXT continues with the same flaws found in Imagine Austin: no economic growth analysis, no economic analysis of small or big ideas concerning the "fixes" to the land code, no analysis of infrastructure needs, and the costs or development impacts on existing infrastructure. In addition, there has been no analysis as to the unintended consequences of ADUs and other infill tools, such as property tax increase for homeowners or neighboring property of ADUs.

As everyone realizes, providing affordable housing is a complex issue that cannot alone be solved through changes to the land code, yet, the CodeNEXT process, by focusing on missing middle housing and infill tools, has forwarded the notion that a change in land codes alone will squarely meet Austin's affordable housing needs.

- 1) When will CAG and or the CodeNEXT process produce an economic analysis with data that shows missing middle housing or infill tools will provide affordable rental or single family homes, and at what level of MFI – 80%, 60%, 30%?
- 2) How many additional affordable rental units could be provided with these tools? How many affordable single-family residences? Why is it that so few ADUs have been built on allowable lot sizes. Is it due to costs? Are loans not available at the income level of the homeowner?
- 3) How can we ensure that ADUs and missing middle housing will be affordable, particularly in this market?
- 4) What economic analysis and data shows that increasing Austin's housing supply, again in this marketplace, will drive down rental and/or home prices to an affordable level, say 80% to 60% of MFI.
- 5) When will CAG and/or the CodeNEXT process discuss whether there is a relationship between horizontal densification or density of SF-3 zones and affordable housing. This has become a prevailing theory, and yet has the CodeNEXT process addressed whether there is an actual link between housing affordability and horizontal density?
- 6) The CodeNEXT process seems to assume that using infill tools and missing middle housing in all SF-3 zones will bring about more affordable housing without looking closely at the constraints in the land code that prevent these tools for MF zoned properties. The lack of discussion has resulted in the targeting of SF-3 zoning to address everything from climate change to housing affordability.

7) When will there be an analysis of the number of, and reasons for the loss of affordable rental units and affordable homes due to gentrification and property taxes? Or other reasons?

8) Why has the CodeNEXT process allowed the perception that all SF-3 zoned neighborhoods are the same, which has led many to think the core pre-1940 neighborhoods are an "issue" and should be targeted for further development when in fact, CodeNEXT consultants have repeatedly stated that Austin's core pre-1940s neighborhoods are dense, compact, walkable, and already contain the range of missing middle housing?

9) Where is the discussion about affordable housing, missing middle housing for new developments, annexed developments? What are all the incentives and/or strategies available?

10) Opticos has pointed out Austin's non-profit affordable housing developers have provided quality housing, yet there are few private developers doing so. Shouldn't we ask why? Will the marketplace ever provide affordable housing, whether missing middle housing or through infill tools? (The developer of the Bull Creek/45th street project indicated affordable housing is not in the offering and the full range of missing middle housing does not seem to be)

11) How many affordable rental units will be lost by the redevelopment designs for Rosewood public housing and other public housing under Austin's Housing Authority? How many rental units under the tax credit program will be lost when the tax credit period ends and they become market rate units? What are the strategies the City can employ to retain those affordable units?

12) While not directly related to the land code, the CodeNEXT Diagnostic report suggested there are a full range of affordable housing financing mechanisms which Austin has not used. When will the CodeNEXT process discuss the use of a "robust land bank" and what it could accomplish? Or the establishment of a Redevelopment Agency? When will those financing options be discussed to ascertain their viability and the number of affordable rental units and affordable homes that could be produced?

13) Though similarly tangential to the Land Code, wouldn't it be useful to know whether the lack of meaningful wage increases over the last three to four decades has some relationship to the need for and increasing need for affordable housing? What can the City do to increase wages?

Reordering and simplifying Austin's land code is of course extremely worthwhile, but CodeNEXT staff and CAG should not continue looking at affordability issues without a more thorough analysis that addresses the complexities I have outlined here.

Finally, when the code rewrite occurs, there needs to be a side by side comparison between current law and the recommended change and why-- for transparency, clarity, and public input.

Best regards,
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April 14, 2015

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