

# HOME INITIATIVE PHASE I MODELING ANALYSIS REPORT



**Housing  
Advocacy  
Committee**



## **Housing Advocacy Committee**

As the local chapter of the American Institute of Architects, AIA Austin is the voice for Austin's architecture community. We advocate for our members, the profession, career development, and design excellence. We influence public opinion and the policies that shape our built and natural environment.

The AIA Austin Housing Advocacy Committee intends to promote affordable housing for all Austinites. We track code, policies, and discriminatory housing practices. The intention of this group is to be proactive, not reactive on housing policy, and we look for organizations to partner with on issues as we leverage our own expertise as design professionals and leaders of the community.

This report, authored by the AIA Austin Housing Advocacy Committee, results from months of volunteer effort by committee members in consultation with professionals from across the design and construction industry, clients, developers, housing non-profits, residents, students, public officials, and many other stakeholders.

# REPORT SUMMARY

Our study of the HOME Initiative proposals started broadly, looking holistically at Phase 1 and Phase 2 proposals, other related code amendments, and precedents from other cities to explore the impacts these changes could have on the accessibility and diversity of housing options in Austin. Through the course of these studies, we revised our hypotheses multiple times in response to the data collected, the models created, and feedback received from those speaking both for and against the proposals.

As the studies progressed, we focused more on what became the Phase 1 proposals. We identified a significant loophole in the proposal as originally written for the 26 October 2023 joint meeting, which entirely waived Subchapter F. In addition, nuances from the existing regulations that would have been lost disincentivized the use of the new multi-unit options. At that point, we shifted our focus to finding an alternative implementation that did not create these issues without adding undue complexity to the design and permit review processes.

This report focuses on the Phase 1 items as identified by City Council and Planning Commission. Additional considerations for Phase 2 informed these studies, but the Phase 1 recommendations stand alone as a strong foundation and an incremental improvement. These are fundamental changes and simplifications that will enable future complimentary changes. Phase 1 is ultimately about legalization. Phase 2 can be more about incentivization.

## METHODOLOGY

The core methodology of this report is the modeling of a range of scenarios across multiple lot types to understand what different versions of the proposed regulations would allow. We based these models on our collective experience from actual projects, lot types, and building typologies supplemented by data analysis to investigate how frequently these lot types, sizes, and densities occur throughout the city.

We relied on data from the City of Austin OpenData portal (particularly the Building Permit datasets), the Travis County Appraisal District data, permits and drawings from Austin Build+Connect (aka “Amanda”), and the City’s GIS Property Profile map.

Not all of the models created for this effort are shown. The models included show an initial study of lot sizes with and without Subchapter F to set a baseline for area yields with no additional constraints applied (such as trees, floodplains, utility setbacks, etc.). Supplementing these are existing properties and actual projects that test the assumptions of the general conditions while showing some of the particular cases that commonly occur and impact buildable area on a site. The final set of models looks more specifically at iterations of the proposed ordinance language to test the impact of different aspects of the proposals.

Following the models, the report turns to recommendations for implementation, supplemented by data from the existing development patterns.

This report is not intended to be a comprehensive study. It is the work of volunteer committee members with experience and expertise in finding creative solutions within the existing code and who want to increase the housing opportunities for Austinites.

## KEY CRITERIA

Through the course of our studies, the following criteria or goals emerged as the most important to achieve so that the HOME Initiative can increase housing opportunity and diversity through the tools of zoning available to this effort.

- ↑ ALLOW/INCENTIVIZE MULTI-UNIT USES
- ↑ INCENTIVIZE SMALL UNITS WHILE ACCOMMODATING FAMILY-SIZED UNITS
- ↑ DO NOT ALLOW FOR LARGER SINGLE-FAMILY UNITS THAN CURRENTLY POSSIBLE
- ↑ INCENTIVIZE PRESERVATION OF EXISTING STRUCTURES

## PRIMARY RECOMMENDATIONS FOR 07 DECEMBER 2023

- ↑ REJECT PARKING EXEMPTIONS IN ADDITION TO INCREASED FAR (PC AMENDMENT)
- ↑ INCLUDE PARKING IN FAR DEFINITION FOR THESE USES ONLY (STAFF FAR LIMITS OPTION 1)
- ↑ ADOPT FAR LIMIT OF THE LARGER OF 0.55 OR 3,200 SF FOR TWO-UNIT RESIDENTIAL (PC AMENDMENT, REJECT STAFF FAR LIMITS OPTION 2)
- ↑ ADOPT FAR LIMIT OF THE LARGER OF 0.65 OR 4,350 SF FOR THREE-UNIT RESIDENTIAL (**REVISED** PC AMENDMENT)
- ↑ LIMIT THE FAR OF ANY SINGLE UNIT IN TWO- OR THREE- UNIT RESIDENTIAL TO THE LARGER 0.40 FAR OR 2,300 SF (PC AMENDMENT)
- ↑ SET FRONT YARD SETBACKS TO 15' (**REVISED** PC AMENDMENT) OR 20' WITH 5' ENCROACHMENT FOR PORCHES (STAFF RECOMMENDATION)
- ↑ SET REAR YARDS TO 5' WHEN ON AN ALLEY OR ADJACENT TO PROPERTIES NOT ZONED SF (PC AMENDMENT)
- ↑ SET SIDE STREET YARDS TO THE GREATER OF 5' OR 10' FROM FACE OF CURB (**REVISED** PC AMENDMENT)
- ↑ REMOVE DUPLEX AS DISTINCT ZONING USE FROM TWO-UNIT RESIDENTIAL (PC AMENDMENT)
- ↑ ADOPT PRESERVATION AND SUSTAINABILITY BONUSES AS PROPOSED (PC AMENDMENT)

## KEY FINDINGS

### ↑ **The Status Quo is Not Working For Anyone**

The existing regulations in Subchapter F result unintended formal conformity that was not intended by the ordinance while failing to achieve the goals of limiting dwelling unit size. The time and expense of designing to, documenting, and having the documents reviewed to comply with Subchapter F add significant delays and cost to construction. This burden is felt more by homeowners than professional developers.

### ↑ **Current Land Development Code Regulations Do Not Allow the Creation of New Housing that Resembles Austin's Existing Neighborhoods**

Many who oppose these changes lament the loss of the old neighborhoods. But the current codes do not allow the development patterns visible in the old Austin neighborhoods do to larger setbacks, larger lot sizes, etc.

### ↑ **Changes to Allowable Number of Dwelling Units will Create Opportunities for More Affordable Housing**

First, the creation of more smaller units that require less land cost each will necessarily create units that cost less than one large house on the same lot. The resulting units may still be expensive (that is, affordable to households at well above the Area Median Family Income), but they will be less expensive than the single home that has to account for the same land cost that is shared among multiple units. Second, developers of affordable housing, in particular those who create affordable ownership opportunities through CLTs and small, single-lot condo arrangements, will be able to use these regulations to create more affordable units with income restrictions.

### ↑ **Changes to Allowable Number of Dwelling Units will Create Opportunities to Combat Displacement**

The ability to create an income-generating unit is one tool to combat displacement. Easing the regulations around these ADUs will open that opportunity to more households. There are many other factors that need to be considered, such as access to financing and racist banking practices, that need to be addressed. But increasing the physical feasibility of the units is a necessary step. We have many clients who wanted to build an ADU but were unable to do so due to the overlap of multiple regulations that are proposed to be removed here.

### ↑ **Waiving Subchapter F ("McMansion") Without Replacing it with a Simpler, More Equitable Regulation Will Undercut Some of the Affordability Benefits of the HOME Initiative**

As proposed on 26 October 2023, the complete waiver of Subchapter F opens up the potential for a "stealth McMansion" loophole via the ability to build a tiny fake ADU (such as a pool cabana) and then build a primary unit with considerably more area than allowed under the current regulations. This loophole was also identified by City Staff in the affordability impact statement. This must be closed or the HOME Initiative will result in much larger, much more expensive single-family houses and worsen our housing affordability crises.

### ↑ **Increases to Dwelling Unit Density Do Not Preclude Historic Preservation**

A robust Preservation Incentive should be included in the HOME Initiative. We defer to and support Preservation Austin as the experts in this effort, which has been in the works for some time.

### ↑ **Increases to Dwelling Unit Density Do Not Preclude Environmental Protections**

The Phase 1 proposals do not change any environmental regulations and do not modify Impervious Cover. Any such changes would require

specific, holistic study. With the proposed changes, Impervious Cover will become the most limiting factor for many developments, especially in conjunction with a Preservation Incentive.

### ↑ **Changes to Single Family Zoning Will Impact Households at a Range of Income Levels**

The changes proposed in Phase I of the Home Initiative are will principally impact households in the 150% to 200% MFI bracket. Since a typical house in Austin can require households to earn more than 200% MFI to be considered affordable, this is a demographic experiencing a housing affordability crisis. Many of the increases in housing opportunities these changes will bring about will impact households who do not qualify for other assistance and subsidy programs. Therefore they supplement without reducing the efficacy of other more large-scale and Supportive Housing efforts to address housing instability and unaffordability while taking pressure off the demand of the upper end of the income brackets served by those programs. In addition, developers who currently create affordable housing options within neighborhoods such as Community Housing Development Organizations (CHDOs) and Neighborhood Development Corporations (NDCs) will be able to couple their existing efforts with these new residential uses to create more long-term set-aside affordable units through their existing work and decrease their per-unit costs, stretching their existing funding even further.

## WHAT'S GOING TO HAPPEN?

When considering the possible uses and results of different aspects of the proposed changes, we need to consider the extreme cases and investigate the potential for abuse and unintended consequences. While this is as difficult as any prognostication, there are a couple of tools we used to study these potentials.

First, there is the existing data on what is being built under the current regulations. It is easy to point to the extreme cases and outliers, but more telling to look at the averages and upper percentiles as well as the full spectrum of actual construction patterns.

Second, the combined experience of our team of design professionals and consultations with developers to explore their assumptions of how the regulations could be used in extreme cases and in cases that consider what is feasible or marketable.

And third, considering the spectrum of potential users of the proposed regulations. We identified three potential users: the Market-driven Developer, the Community-driven Developer, and the Existing Homeowner. Each of these users has different priorities, motivations, and goals. Most of the public discussion has been around the Market-driven Developer. This makes sense in that it is like the extreme case in terms of massing and is a visible driving force in the unaffordability of housing. But focusing only on the Market-driven Developer skews the conversation away from potential benefits. So, considering these three unique cases has been helpful throughout these studies. And in the process, we have talked to multiple representatives of these three users.

## THE MARKET-DRIVEN DEVELOPER

### ↑ GOALS AND MOTIVATIONS

Maximize Profit and Minimize Costs, Marketability, Financial Gain, Reputation, Ease of Development Process

### ↑ EXAMPLES

Typical Developers; House-flippers; Non-occupant Owners; Investors; STRs

### ↑ POTENTIAL BENEFITS

When additional units yield a greater return than a single large house, SF changes will create additional units. But the greater return across multiple units will still translate to lower housing costs from the perspective of the individual household. Even when additional units are not sold or rented to additional households, they create future opportunities for extended family or for future owners to sell or rent to others.

### ↑ POTENTIAL DETRIMENTS

If the regulations allow for significantly larger single-unit lots than currently allowed, the easier development and construction process combined with the mark-up of luxury construction will prevent the creation of additional more-affordable units as they take the perceived path of least resistance to maximum profit.

## THE COMMUNITY-DRIVEN DEVELOPER

### ↑ GOALS AND MOTIVATIONS

Maximize Affordable Dwelling Units, Maintain Neighborhoods, Housing is Human Right, Concern for Neighbors

### ↑ EXAMPLES

Community Housing Development Organizations; Neighborhood Development Corporations; Non-profit Developers (i.e., Austin Habitat for Humanity)

### ↑ POTENTIAL BENEFITS

More units on individual properties spreads the land, site, infrastructure, and some structural costs across multiple dwelling units, reducing the construction cost of each unit they create overall. Additional flexibility would allow them to serve a wider range of household types and needs.

### ↑ POTENTIAL DETRIMENTS

Available land is the biggest hurdle for Community-driven Developers. One strategy they use is dealing with lots that are less feasible for Market-driven Developers. If the proposed regulations make more lots more feasible, this could increase competition for those lots.

## THE EXISTING HOMEOWNER

### ↑ GOALS AND MOTIVATIONS

Housing Stability, Prevent Displacement, Generate Income, Keep Property in the Family, Provide for Future Generations

### ↑ EXAMPLES

Long-time Homeowners; First-time Homebuyers; Retirees; Multiple Family Branches Inheriting Properties

### ↑ POTENTIAL BENEFITS

The increased ability to create income-generating unit(s) on the property provide a mechanism to offset perennial increases in property taxes. Increased flexibility in the form, size, and type those units take will allow for greater flexibility in the future, adapting to changing family structures and household composition, and adjust income-generating portions of the property.

### ↑ POTENTIAL DETRIMENTS

Complex development processes, poor support and communication from the City, lack of access to capital, lack of access to professional services, and other on-going institutional barriers will continue to disadvantage long-term and marginalized homeowners against professional Market-driven Developers.



# AFFORDABILITY IMPACTS

## ↑ Affordable for Whom?

In any discussion of affordable housing, the question is not whether a particular house is affordable but from whom is that housing option affordable. All housing is affordable to someone, and we can measure that by calculating what percentage of Area Family Median Income is required for a housing option to be considered affordable. Housing is considered affordable when a household spends no more than 30% of their income (AGI) on total housing costs. We say Austin has a housing affordability crisis because the average sale price in Austin far exceeds 30% of the Area Median Income across all housing sizes (and that's assuming good credit and enough for a down payment!). Average rents also exceed 30% of the Area Median Income.

## ↑ Diversity and Choice

No single program or typology will solve the complex of housing crises. We need measures that consider all income levels, all household types, and all financial situations. Increasing the diversity of housing options available throughout the city will go a long way to creating an environment that allows for choice of housing types. Three particular needs appear consistently in the data and in our experience: deeply affordable and supportive housing for the most vulnerable; smaller, more affordable housing options, especially rental other than apartments and ownership; and family-sized units. The HOME Initiatives can contribute to the second and third of these needs if it enables and encourages smaller single-family houses and does not limit the size of ADUs to be less appropriate for families with multiple children.

## ↑ Supply and Demand

While the majority of developments that use the Two-Unit and Three-Unit Residential uses will most likely be unsubsidized properties without

restrictions on sale prices or rents, simply increasing the number of units will add to the overall housing supply. The mismatch between supply and demand is so great in the Austin housing market, that it is unlikely that enough units can be created to significantly lower prices of individual units, but the growth must be lower than the alternative of doing nothing.

## ↑ But A Property With Two Units Is More Valuable Than A Property With Just One

Yes, but in assessing housing affordability, we are not concerned with the value/cost of a property. We are concerned with the cost to a household. Looking at current sale prices, it is easy to see that sum of the prices of two units on one property exceeds the sale price of the lot next door with just one unit. However, the individual sales price of EACH of the two units, even with the same bedroom count, is less than the house that has to pay for the entire lot itself. Each of those two units may very well exceed the budget of the majority of Austinites in many neighborhoods, but it is still downward pressure

## ↑ Cost of Land

The value of land is major limiting factor in the affordability of housing. Austin chose to exacerbate this issue by setting unusually high minimum lot sizes in an attempt to exclude certain populations from owning homes. Reducing the amount of land required to be purchased with a dwelling unit, whether by reducing lot sizes or creating multiple units on an existing larger lot, will in turn reduce the overall cost of the housing. The sum of the reduced-cost portions may be somewhat greater on the market than the cost of the original whole, but the burden on individual households is still significantly lessened in the end. Any additional potential return by taking the action to subdivide or build multiple units serves as a market-driven incentive to provide the community benefits of multiple, lower-cost housing units

## ↑ **Property Tax Implications**

The County Appraisal Districts do not base their appraisals on potential entitlements. The methodology used, while complex and opaque, differs from the methods used in real estate speculation. While increased value of comparable properties may increase indirectly as similar properties increase in value, properties with different unit counts, different sizes and type of improvements, are less comparable. Also, since these entitlements will be applied city-wide, the potential for individual impacts are greatly diminished. For properties that choose to develop more units, the property taxes will increase since the value of improvements on the parcel have increased. But as this is now housing more people and/or generating income, that is simply part of the calculations that need to be considered when undertaking a project. Far more impactful is that whatever the property taxes are on a multi-unit property, they are being spread across more households, decreasing the burden. And that household's individual burden will be less than if they had to support the cost of the entire lot.

## ↑ **Opportunities for Compassionate Development**

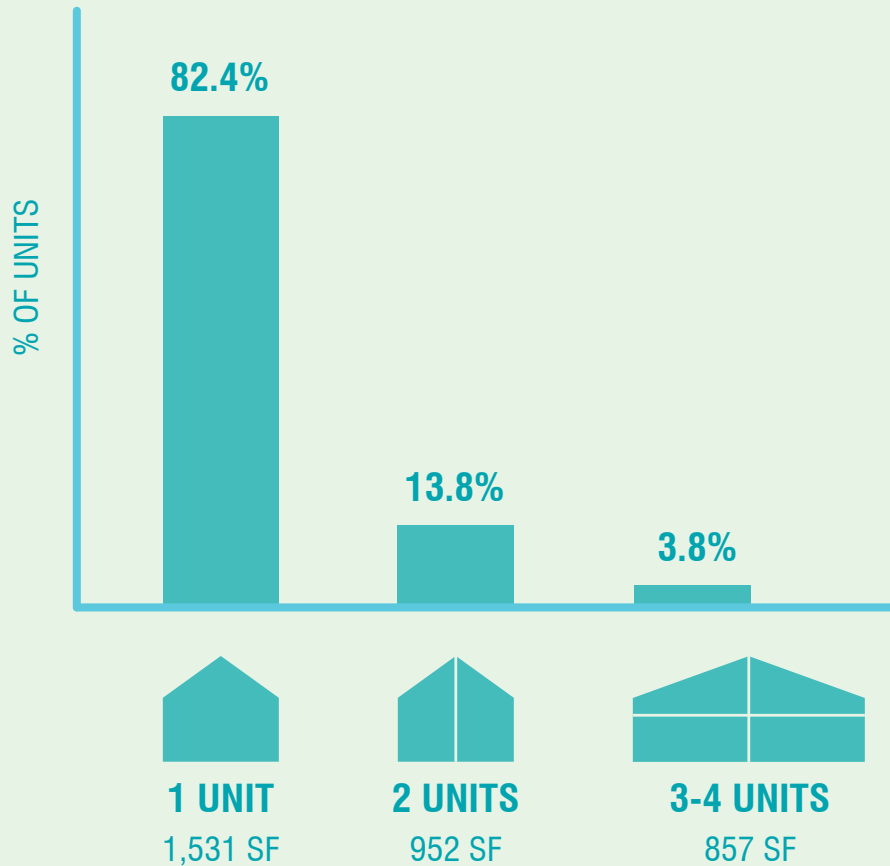
All of the above considers the case of market-driven development, where maximizing buildable area and thereby maximizing profit are the primary goals. But that is not the only type of development or developer who will use these regulations. There are many examples of Community Housing Development Organizations who build housing in Austin that is limited to 80% MFI for ownership and lower for rental. Their biggest hurdle in doing so is the ability to purchase land. But they have existing properties that are ready for an additional unit or two that cannot currently be built. Whereas the complications that remain around permitting, financing, availability of trades, and the inertia of building existing models of housing will all make it less likely for many market-driven developers to adopt the Two- and Three-Unit Residential Uses, developers whose primary goal is the number of families housed

in affordable units are more accustomed to dealing with these issue by the nature of their work. There is significant pent-up demand to build additional affordable units that is currently blocked by the existing ADU regulations or the limit of 2 units per lot.

# BACKGROUND RESEARCH + DATA

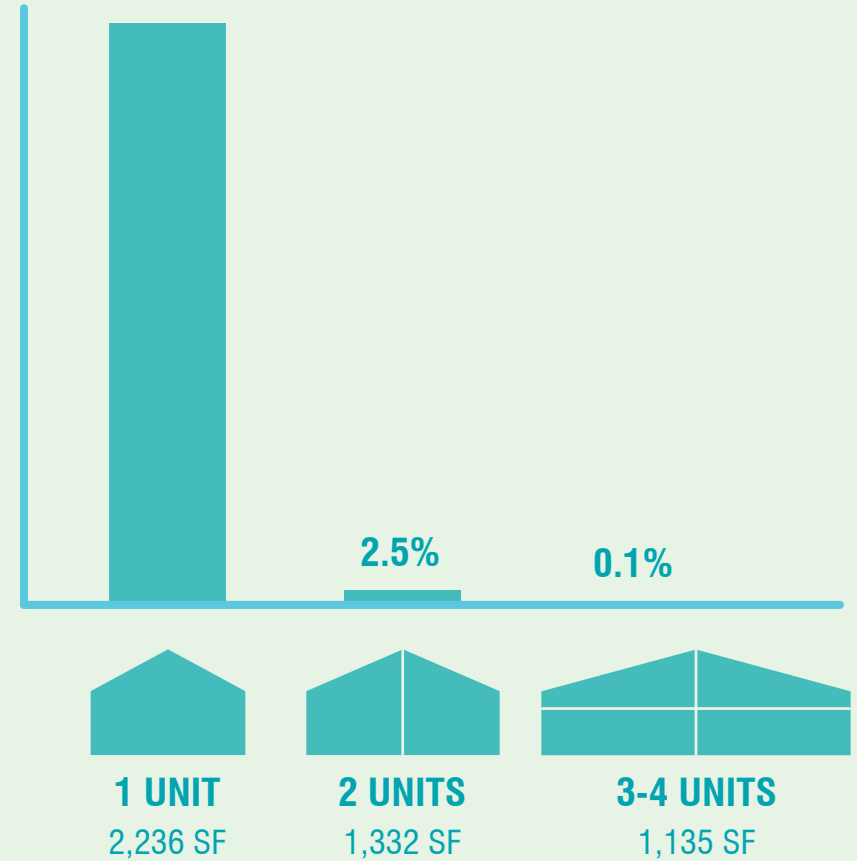
# CITY OF AUSTIN - HOUSE SIZES & TYPES

## PRE 1990



HOUSING TYPE AND AVERAGE SIZE PER UNIT

## 1991 - 2020

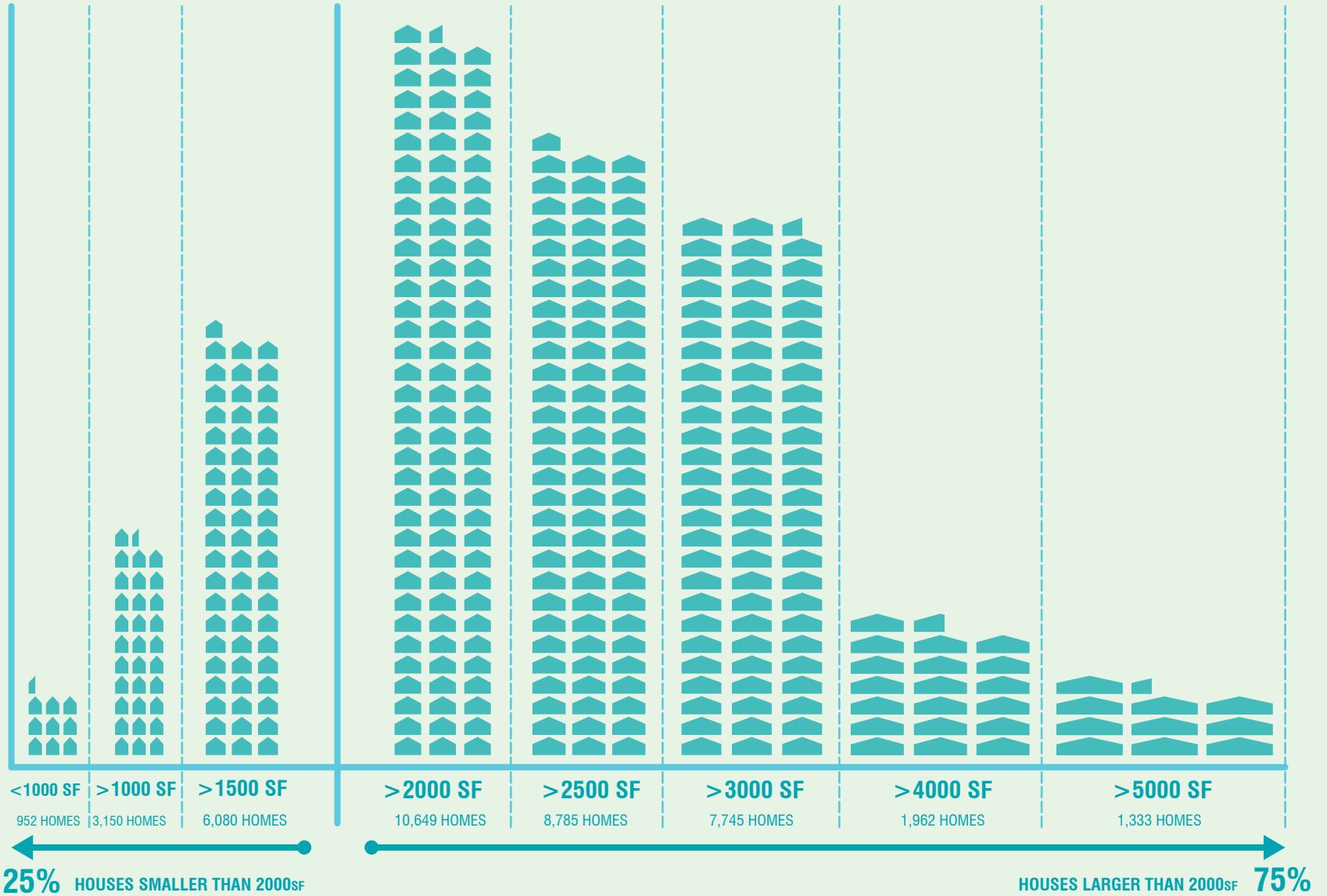


HOUSING TYPE AND AVERAGE SIZE PER UNIT

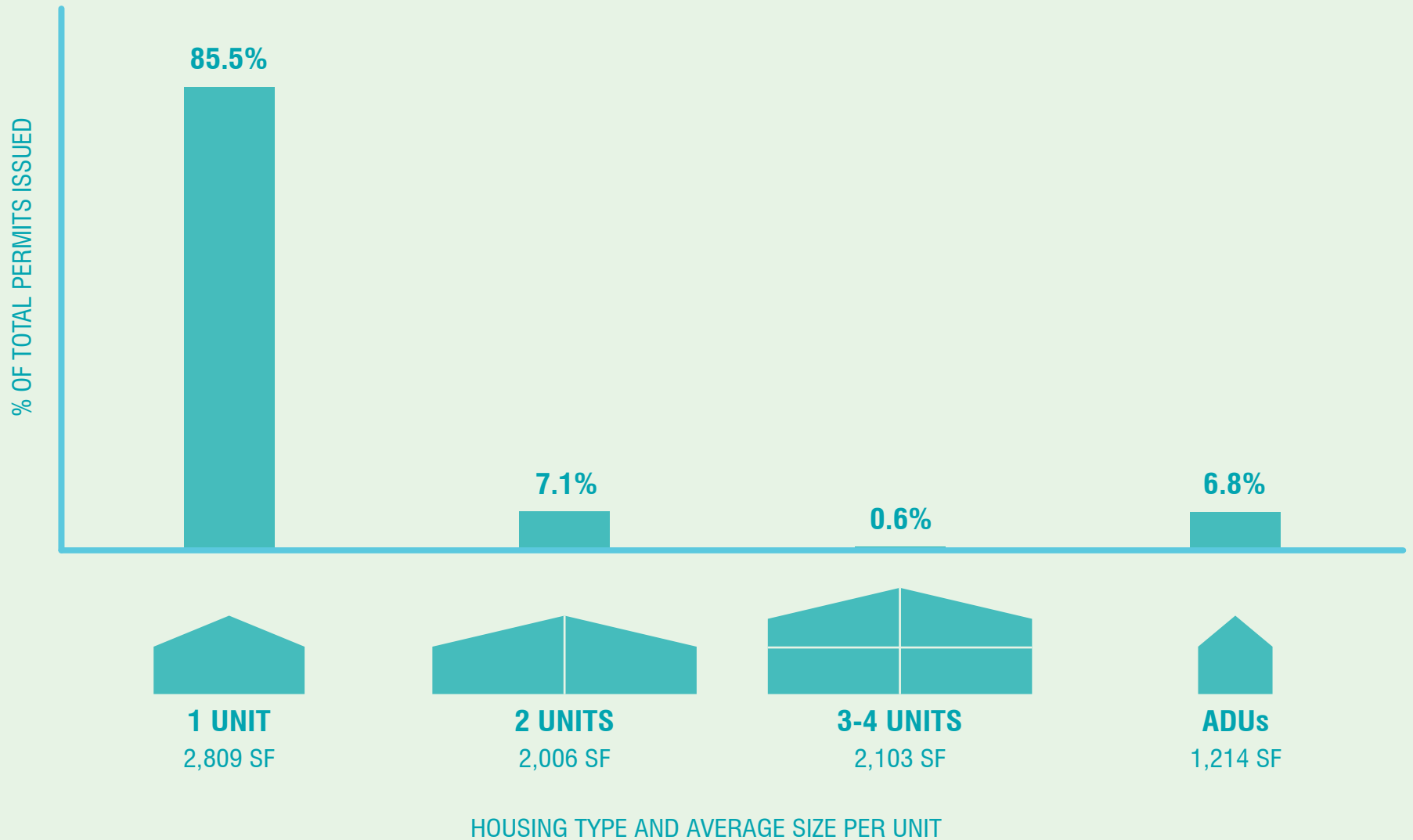
Source: Travis County Central Appraisal District

# CITY OF AUSTIN - NEW RESIDENTIAL PERMITS / 2012-2022

NUMBER OF HOMES - 1 ICON = 100 PERMITS  
SOURCE: CITY OF AUSTIN OPEN DATA - NEW RESIDENTIAL DEVELOPMENT



# CITY OF AUSTIN - RESIDENTIAL PERMITS / 2012-2022

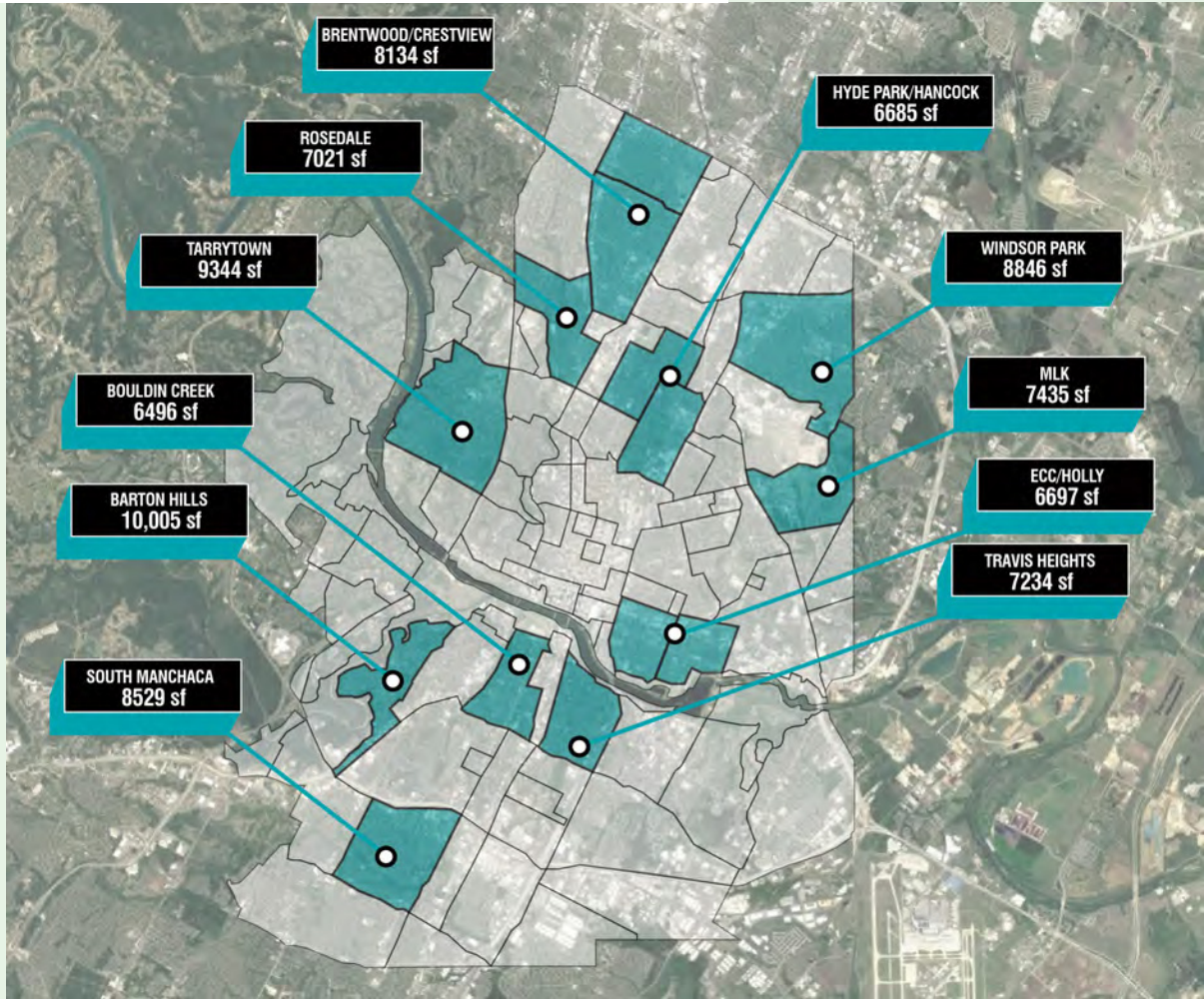


NEW CONSTRUCTION PERMITS - CITY OF AUSTIN

YEAR	SQUARE FOOTAGE OF UNITS (INC GARAGES, PORCHES)										Av SF
	>5000sf	>4000sf	>3000sf	>2500sf	>2000sf	>1500sf	>1000sf	<1000sf	No Data	Total Units	
<b>2023</b>											
Single Family	101	108	297	341	275	117	72	3	2	1316	3088
Duplex				18	30	62	14	4		128	2075
Secondary Apt		1	2		3	46	118	37		207	1317
	<b>101</b>	<b>109</b>	<b>299</b>	<b>359</b>	<b>308</b>	<b>225</b>	<b>204</b>	<b>44</b>	<b>2</b>	<b>1651</b>	<b>2787</b>
	6.1%	6.6%	18.1%	21.7%	18.7%	13.6%	12.4%	2.7%	0.1%		
Average Square Ft	<b>71.2%</b>					<b>28.8%</b>					
<b>2022</b>											
Single Family	123	237	751	748	663	318	112	6	1	2959	2950
Duplex			8	34	88	64	10	12		216	2063.5
Secondary Apt	1		1	1	2	74	202	60		341	1289
	<b>124</b>	<b>237</b>	<b>760</b>	<b>783</b>	<b>753</b>	<b>456</b>	<b>324</b>	<b>78</b>	<b>1</b>	<b>3516</b>	<b>2734</b>
	3.5%	6.7%	21.6%	22.3%	21.4%	13.0%	9.2%	2.2%	0.0%		
	<b>75.6%</b>					<b>24.4%</b>					
<b>2021</b>											
Single Family	126	174	770	1002	1117	446	85	20	7	3747	2791
Duplex			16	36	76	100	4		2	234	2209
Secondary Apt			2		3	71	222	49		347	1314
	<b>126</b>	<b>174</b>	<b>788</b>	<b>1038</b>	<b>1196</b>	<b>617</b>	<b>311</b>	<b>69</b>	<b>9</b>	<b>4328</b>	<b>2641</b>
	2.9%	4.0%	18.2%	24.0%	27.6%	14.3%	7.2%	1.6%	0.2%		
	<b>76.8%</b>					<b>23.2%</b>					
<b>2020</b>											
Single Family	117	162	685	1038	1070	483	57	8	8	3628	2762
Duplex			4	24	68	100	6			202	2092
Secondary Apt		1	1		6	66	228	29		331	1333
	<b>117</b>	<b>163</b>	<b>690</b>	<b>1062</b>	<b>1144</b>	<b>649</b>	<b>291</b>	<b>37</b>	<b>8</b>	<b>4161</b>	<b>2616</b>
	2.8%	3.9%	16.6%	25.5%	27.5%	15.6%	7.0%	0.9%	0.2%		
	<b>76.3%</b>					<b>23.7%</b>					
<b>2019</b>											
Single Family	130	169	813	959	1056	592	146	20	7	3892	2721
Duplex			14	30	106	124	18	46		338	1937
Secondary Apt			4		7	74	259	34	1	379	1340
	<b>130</b>	<b>169</b>	<b>831</b>	<b>989</b>	<b>1169</b>	<b>790</b>	<b>423</b>	<b>100</b>	<b>8</b>	<b>4609</b>	<b>2550</b>
	2.8%	3.7%	18.0%	21.5%	25.4%	17.1%	9.2%	2.2%	0.2%		
	<b>71.3%</b>					<b>28.7%</b>					
<b>2018</b>											
Single Family	108	173	719	926	1093	453	127	8		3607	2735
Duplex	2		8	10	96	100	78	128		422	1568
Secondary Apt				1		52	241	53	1	348	1244
	<b>110</b>	<b>173</b>	<b>727</b>	<b>937</b>	<b>1189</b>	<b>605</b>	<b>446</b>	<b>189</b>	<b>1</b>	<b>4377</b>	<b>2504</b>
	2.5%	4.0%	16.6%	21.4%	27.2%	13.8%	10.2%	4.3%	0.0%		
	<b>71.6%</b>					<b>28.4%</b>					

YEAR	SQUARE FOOTAGE OF UNITS (INC GARAGES, PORCHES)										Av SF
	>5000sf	>4000sf	>3000sf	>2500sf	>2000sf	>1500sf	>1000sf	<1000sf	No Data	Total	
<b>2017</b>											
Single Family	143	227	838	824	1068	461	153	39		3753	2795
Duplex			8	40	84	94	26	4		256	2048
Secondary Apt	1	2	1		6	39	243	69		361	1242
	<b>144</b>	<b>229</b>	<b>847</b>	<b>864</b>	<b>1158</b>	<b>594</b>	<b>422</b>	<b>112</b>	<b>0</b>	<b>4370</b>	<b>2623</b>
	3.3%	5.2%	19.4%	19.8%	26.5%	13.6%	9.7%	2.6%	0.0%		
	<b>74.2%</b>					<b>25.8%</b>					
<b>2016</b>											
Single Family	132	204	883	864	938	455	91	8		3575	2851
Duplex		4	18	36	118	88	22	8		294	2135
Secondary Apt			1	1	2	33	157	44		238	1250
	<b>132</b>	<b>208</b>	<b>902</b>	<b>901</b>	<b>1058</b>	<b>576</b>	<b>270</b>	<b>60</b>	<b>0</b>	<b>4107</b>	<b>2707</b>
	3.2%	5.1%	22.0%	21.9%	25.8%	14.0%	6.6%	1.5%	0.0%		
	<b>77.9%</b>					<b>22.1%</b>					
<b>2015</b>											
Single Family	109	177	693	587	713	238	135	11	1	2664	2908
Duplex		2	14	32	142	108	18	2		318	2121
Secondary Apt				2	3	16	92	45		158	1157
	<b>109</b>	<b>179</b>	<b>707</b>	<b>621</b>	<b>858</b>	<b>362</b>	<b>245</b>	<b>58</b>	<b>1</b>	<b>3140</b>	<b>2740</b>
	3.5%	5.7%	22.5%	19.8%	27.3%	11.5%	7.8%	1.8%	0.0%		
	<b>78.8%</b>					<b>21.2%</b>					
<b>2014</b>											
Single Family	114	168	661	517	705	389	60	13		2627	2858
Duplex		4	4	36	92	72	8	2		218	2148
Secondary Apt	1	1				8	77	53		140	1110
	<b>115</b>	<b>173</b>	<b>665</b>	<b>553</b>	<b>797</b>	<b>469</b>	<b>145</b>	<b>68</b>	<b>0</b>	<b>2985</b>	<b>2724</b>
	3.9%	5.8%	22.3%	18.5%	26.7%	15.7%	4.9%	2.3%	0.0%		
	<b>77.2%</b>					<b>22.8%</b>					
<b>2013</b>											
Single Family	130	142	405	506	697	469	99	13	1	2462	2736
Duplex			2	48	80	78	14	6		228	2123
Secondary Apt			1		1	5	35	54	1	97	1004
	<b>130</b>	<b>142</b>	<b>408</b>	<b>554</b>	<b>778</b>	<b>552</b>	<b>148</b>	<b>73</b>	<b>2</b>	<b>2787</b>	<b>2626</b>
	4.7%	5.1%	14.6%	19.9%	27.9%	19.8%	5.3%	2.6%	0.1%		
	<b>72.2%</b>					<b>27.8%</b>					
<b>2012</b>											
Single Family	89	107	390	431	489	291	69	8	1	1875	2794
Duplex			6	24	22	66	10	26	6	160	1619
Secondary Apt				1		1	11	14		27	1069
	<b>89</b>	<b>107</b>	<b>396</b>	<b>456</b>	<b>511</b>	<b>358</b>	<b>90</b>	<b>48</b>	<b>7</b>	<b>2062</b>	<b>2680</b>
	4.3%	5.2%	19.2%	22.1%	24.8%	17.4%	4.4%	2.3%	0.3%		
	<b>75.6%</b>					<b>24.4%</b>					

# MEDIAN LOT SIZES BY NEIGHBORHOOD



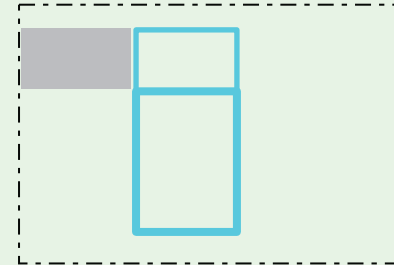
# TYPICAL LOT TYPES

## PRE 1950



- Typical lot width of ~50'-0"
- Smaller bungalow-style houses closer to street (typically less than 25'-0")
- Single width driveway, typically to the side of house
- Garage in the rear, if any
- Alley access at rear is common

## POST 1950



- Typical lot width of 65'-0" +
- Wider, bigger ranch-style houses with large front yards (typically 25'-0" or more)
- Double width driveway, with carport or garage to the side of house
- Alley access is very rare; no vehicle access to rear of lot without demolishing part of existing house

NEIGHBORHOOD / MEDIAN RESIDENTIAL LOT SIZE		
<b>PRE 1950</b>	East Cesar Chavez/Holly	6697 sf
	MLK	7435 sf
	Clarksville	6665 sf
	Hyde Park / Hancock	6685 sf
	Travis Heights	7234 sf
	Bouldin Creek	6496 sf

NEIGHBORHOOD / MEDIAN RESIDENTIAL LOT SIZE		
<b>POST 1950</b>	Brentwood/Crestview	8134 sf
	Pecan Springs	9349 sf
	Tarrytown	9344 sf
	Barton Hills	10005 sf
	Windsor Park	8846 sf
	South Manchaca	8529 sf

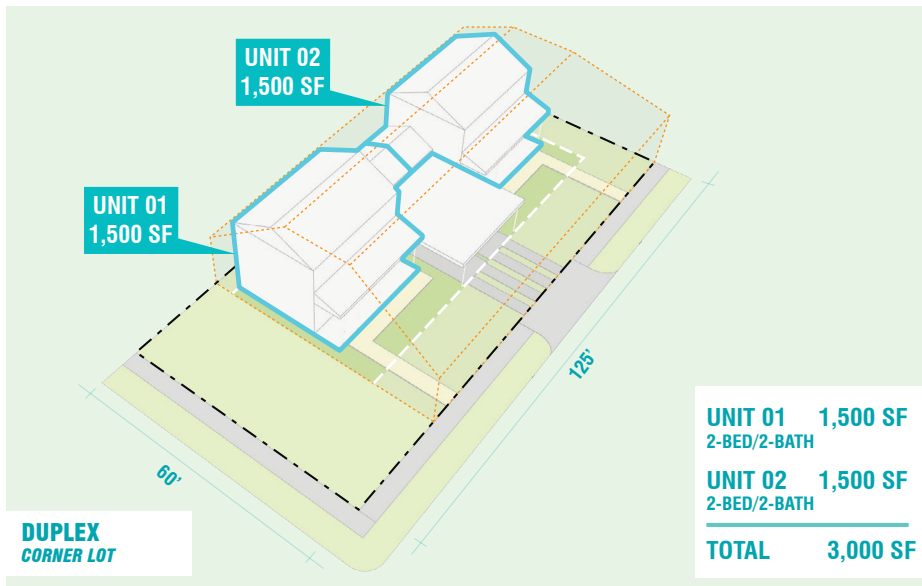
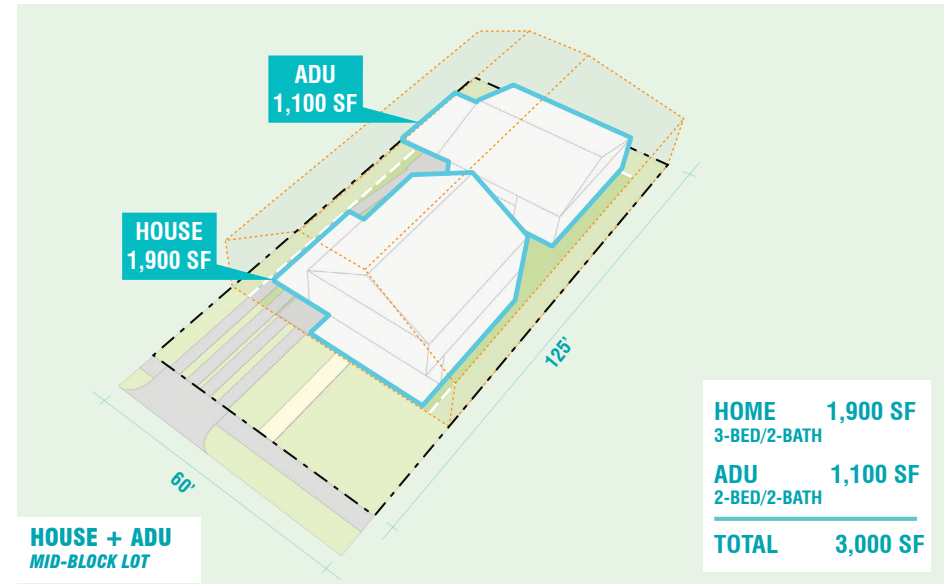
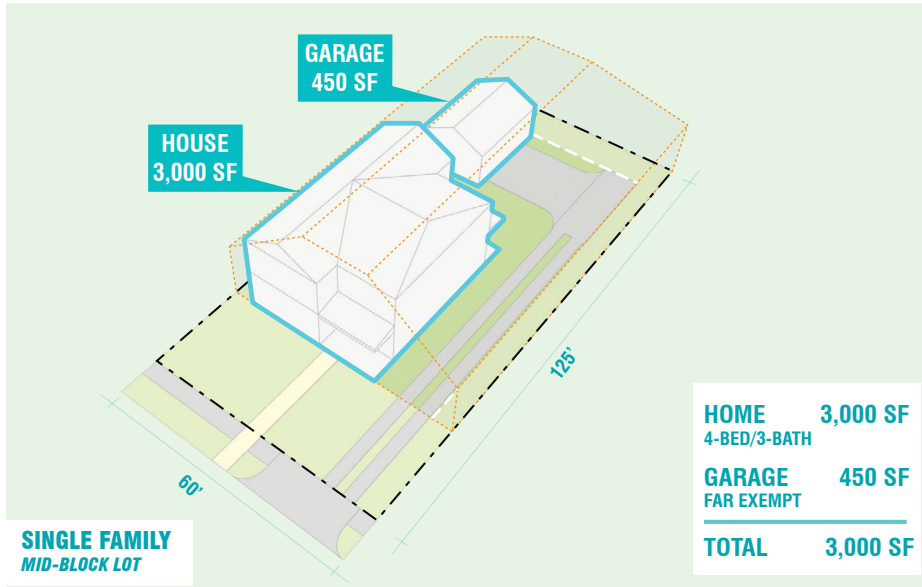
## MEDIAN RESIDENTIAL LOT SIZE IN CITY OF AUSTIN:

**7976 SF**



# PERMITTED DEVELOPMENT SCENARIOS / CURRENT CODE

7500 SF LOTS WITH SUBCHAPTER F



		ZONING STANDARDS	
<b>ZONING</b>	<b>Lot Size:</b>	7500 sf	SF-3 - median
	<b>Impervious Cover:</b>	45% of lot (3375sf)	SF-3
	<b>Floor Area Ratio:</b>	40% of lot (3000sf)	Subchapter F
	<b>Setbacks :</b> (front/rear/side/ street-side)	25' / 10' / 5' / 15'	SF-3
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	Appendix A
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F

## HOME Initiative Phase 1 Recommendations

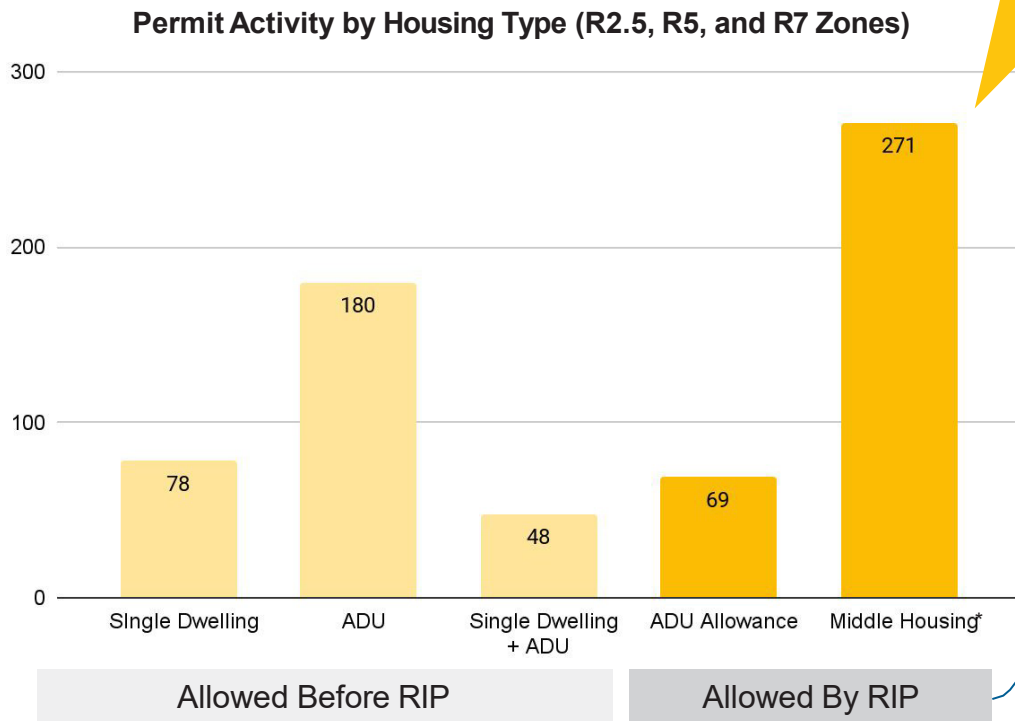
# PRECEDENT RESEARCH

## ↑ PORTLAND RESIDENTIAL INFILL PROJECT

↑ The Year-One Report indicates Portland was able to increase the amount of ‘missing middle’ housing options under development significantly by allowing more multi-unit types in it’s single family neighborhoods.

### Permit Activity Overview

**Key Finding**  
Three quarters of permitted middle housing units were in fourplexes



### RIP-Enabled Units Permitted by Housing Type

Aug 1, 2021- July 31, 2022

	ADU Allowances	69
	Duplex	34
	Triplex	27
	Fourplex	204
	Sixplex	2

\*Middle Housing category includes 4 corner duplexes  
Source: City of Portland Building Permit Data R2.5-R7 Zones, 8/21-7/22

# PRECEDENT RESEARCH

## ↑ PORTLAND RESIDENTIAL INFILL PROJECT

- ↑ The homes built under the Portland Residential Infill Project stepped down in size the more units were allowed.

### DEVELOPMENT CHARACTERISTICS

#### Unit Size By Housing Type in Each Zone



#### Key Finding #6

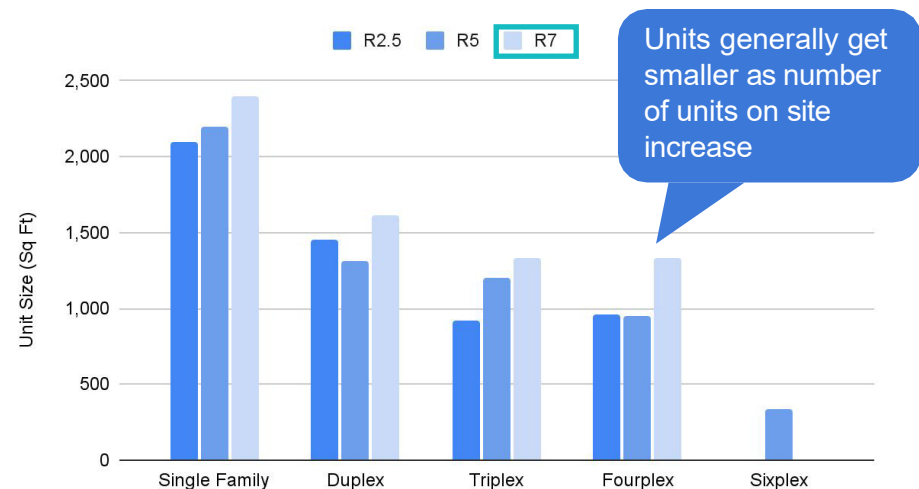
Even with new FAR limits for all building types, Middle Housing units tend to be much smaller than detached single dwellings.

This trend is also visible within Middle Housing types. For example, fourplexes tend to include smaller units than triplexes and duplexes.

The Planning Commission revised FAR limits for fourplexes as part of RIP2 to better enable larger sized units.

Source: City of Portland Building Permit Data R2.5-R7 Zones, 8/21-7/22

Average Unit Size (Sqft) by Housing Type and Zone



# PRECEDENT RESEARCH

## ↑ PORTLAND RESIDENTIAL INFILL PROJECT

↑ Portland restricts single family homes to .40 FAR and allows for a .10 FAR step per unit.

Austin’s average lot size is most similar to the R7 zone and currently allows for .40 FAR with numerous exemptions in most residential areas.

### PRE-RIP CONTEXT ANALYSIS

#### New Floor Area Ratio (FAR) Restrictions Imposed by RIP

In addition to allowing more units per parcel, RIP placed limits on the maximum floor area allowed for single unit dwellings. To understand the potential impact of these limits, residential sales were analyzed for the three years preceding RIP adoption.

The Pre-RIP Context Analysis focuses on detached single-family homes built between 2018 and 2022 that are above and below RIP floor-to-area (FAR) limits for single unit dwellings. Under RIP, there is a sliding scale for maximum FAR that varies by zone and number of units per lot.

Under RIP1, the FAR for four units was the same as for three units. This was changed with RIP2.

FAR by Zone and Units per Lot

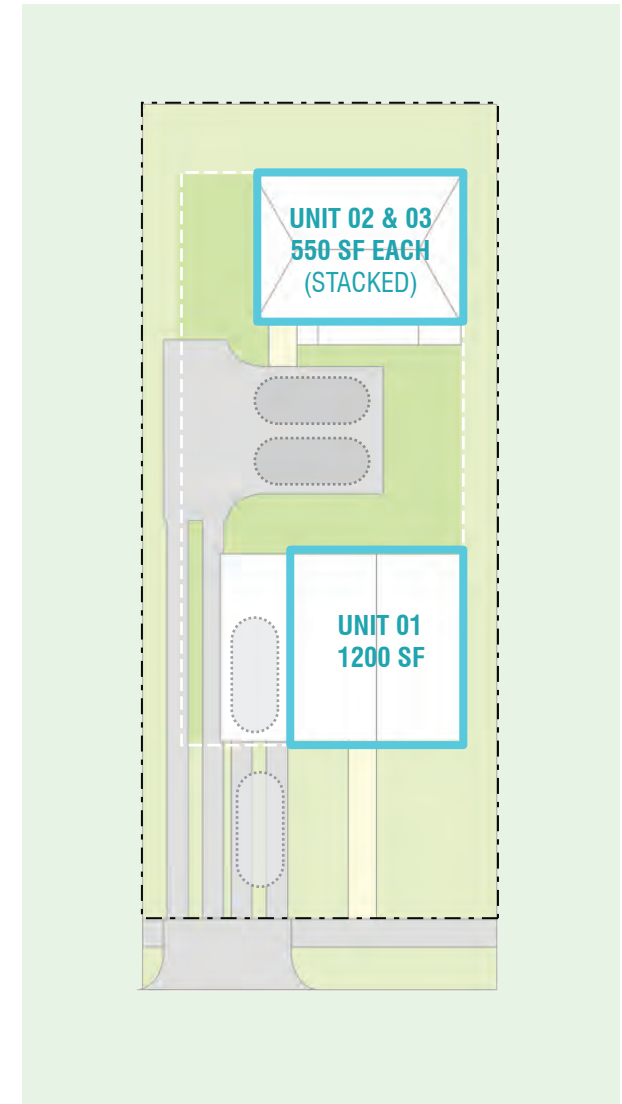
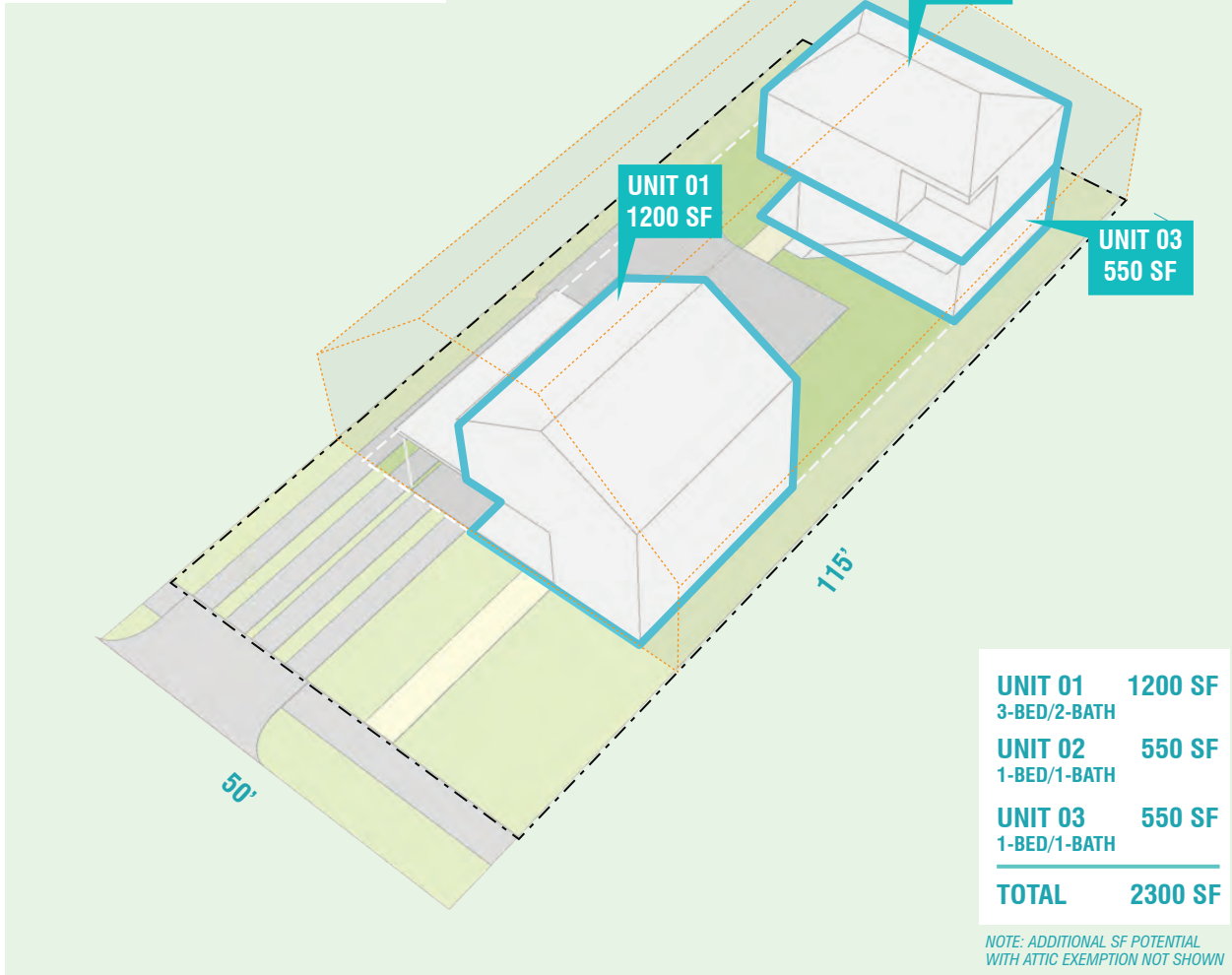
Units	R7	R5	R2.5
1	0.4 to 1	0.5 to 1	0.7 to 1
2	0.5 to 1	0.6 to 1	0.8 to 1
3+	0.6 to 1	0.7 to 1	0.9 to 1

Source:

<https://www.portland.gov/bds/zoning-land-use/residentia>

# LDC MINIMUM LOT MODELS (5750 SF)

**5750 SF LOT / MID-BLOCK**  
WITH SUBCHAPTER F

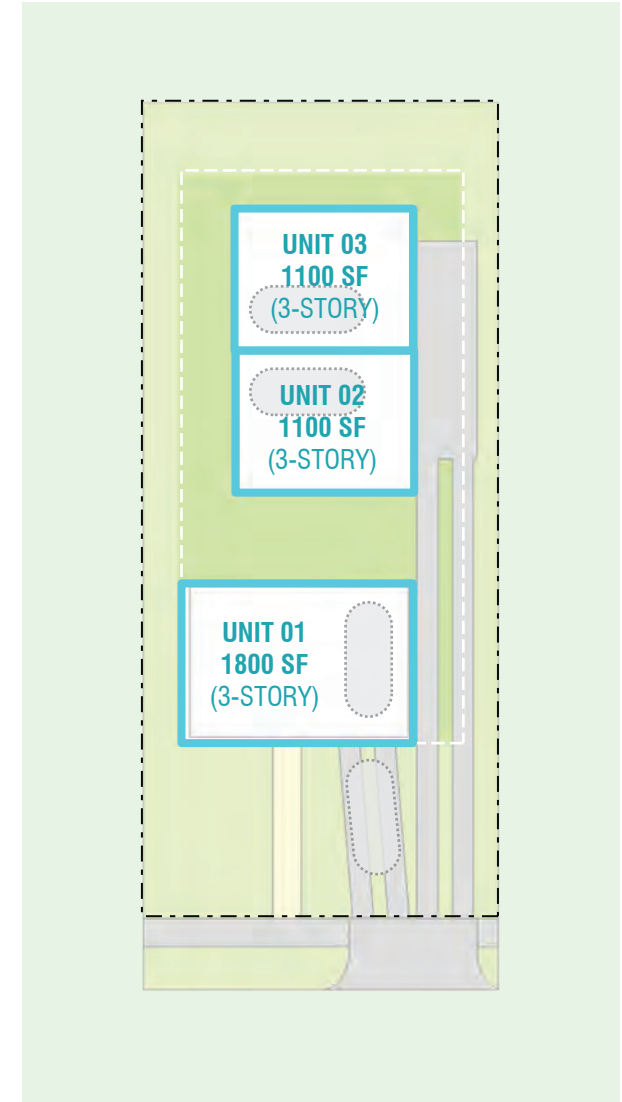
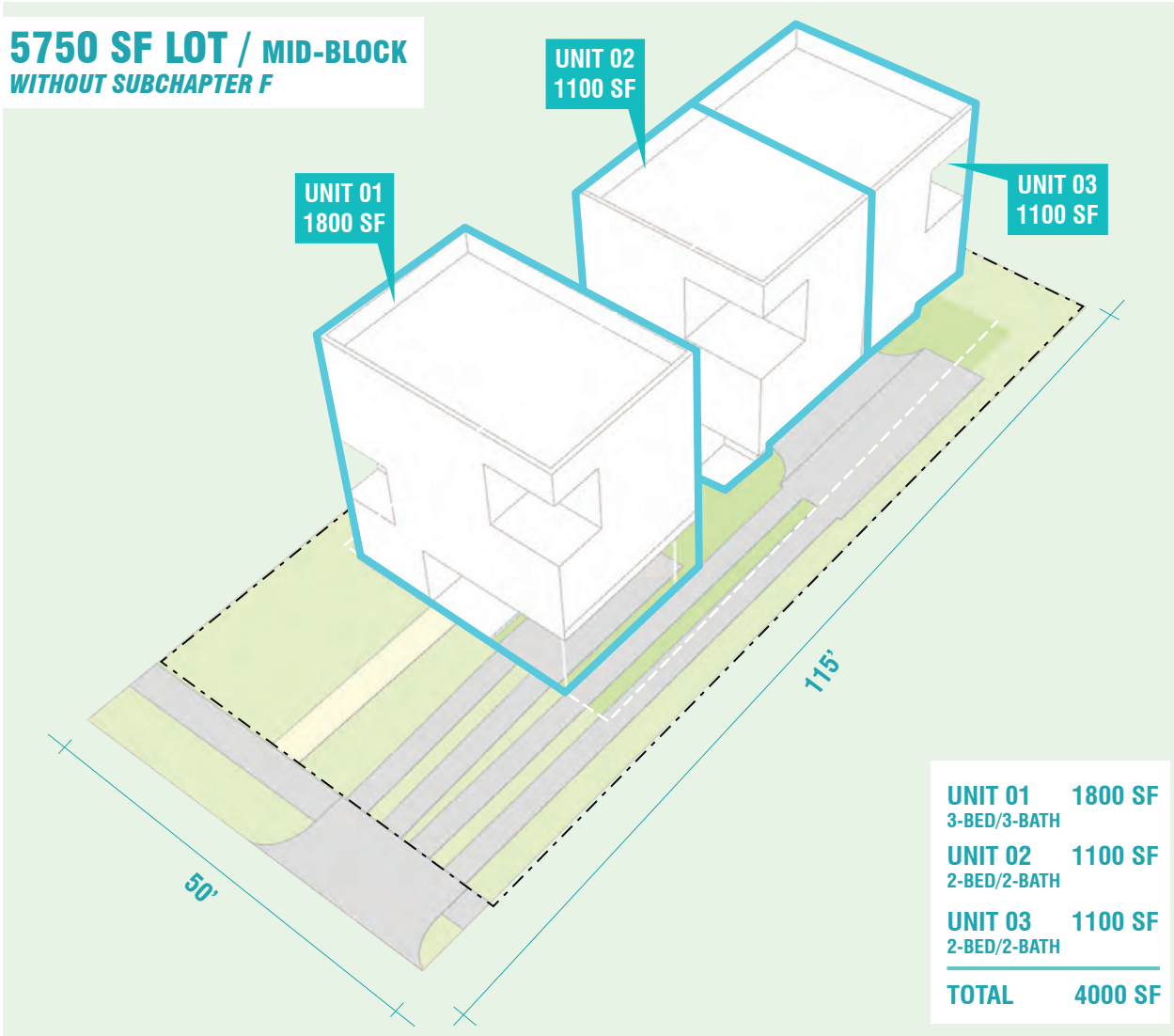


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	5750 sf	SF-3 min - unchanged
	<b>Lot Type:</b>	Mid-block, no alley	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 max - unchanged
	<b>Floor Area Ratio:</b>	40% of lot (2300sf)	Subchapter F max - unchanged
	<b>Setbacks (front/rear/side):</b>	25' / 10' / 5'	SF-3 - unchanged
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

**FINDINGS**

- Long driveway to the rear is necessary for parking
- Two of the units likely need to be stacked to fit on lot.
- Development complexities such as a protected tree critical root zone, easement or power line clearance may make it challenging to fit 3 units and on-site parking within building envelope.

**5750 SF LOT / MID-BLOCK**  
WITHOUT SUBCHAPTER F

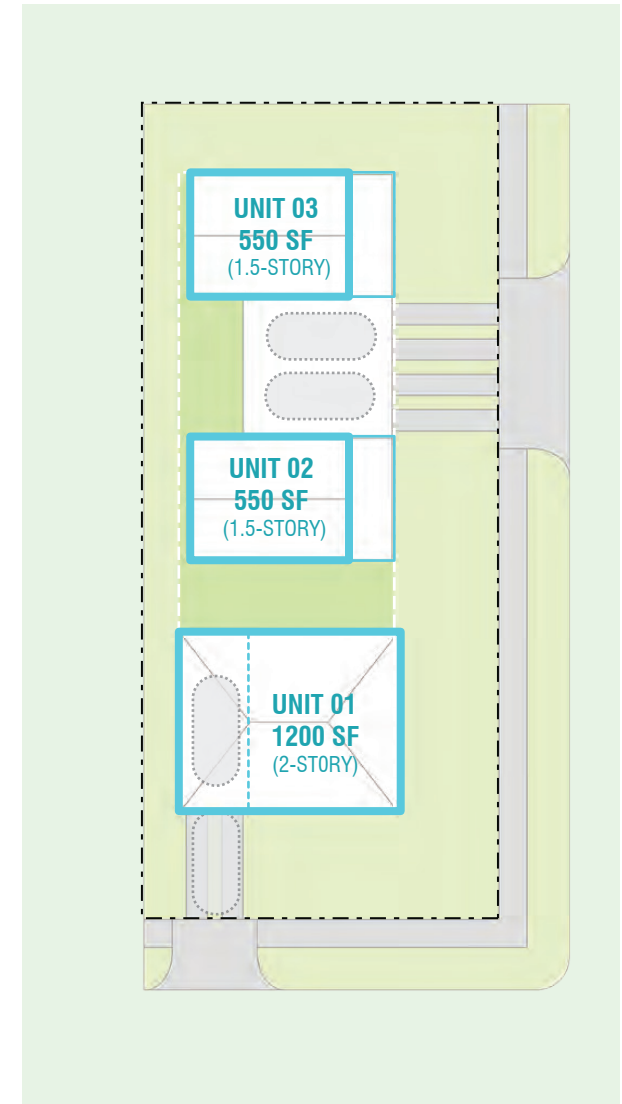
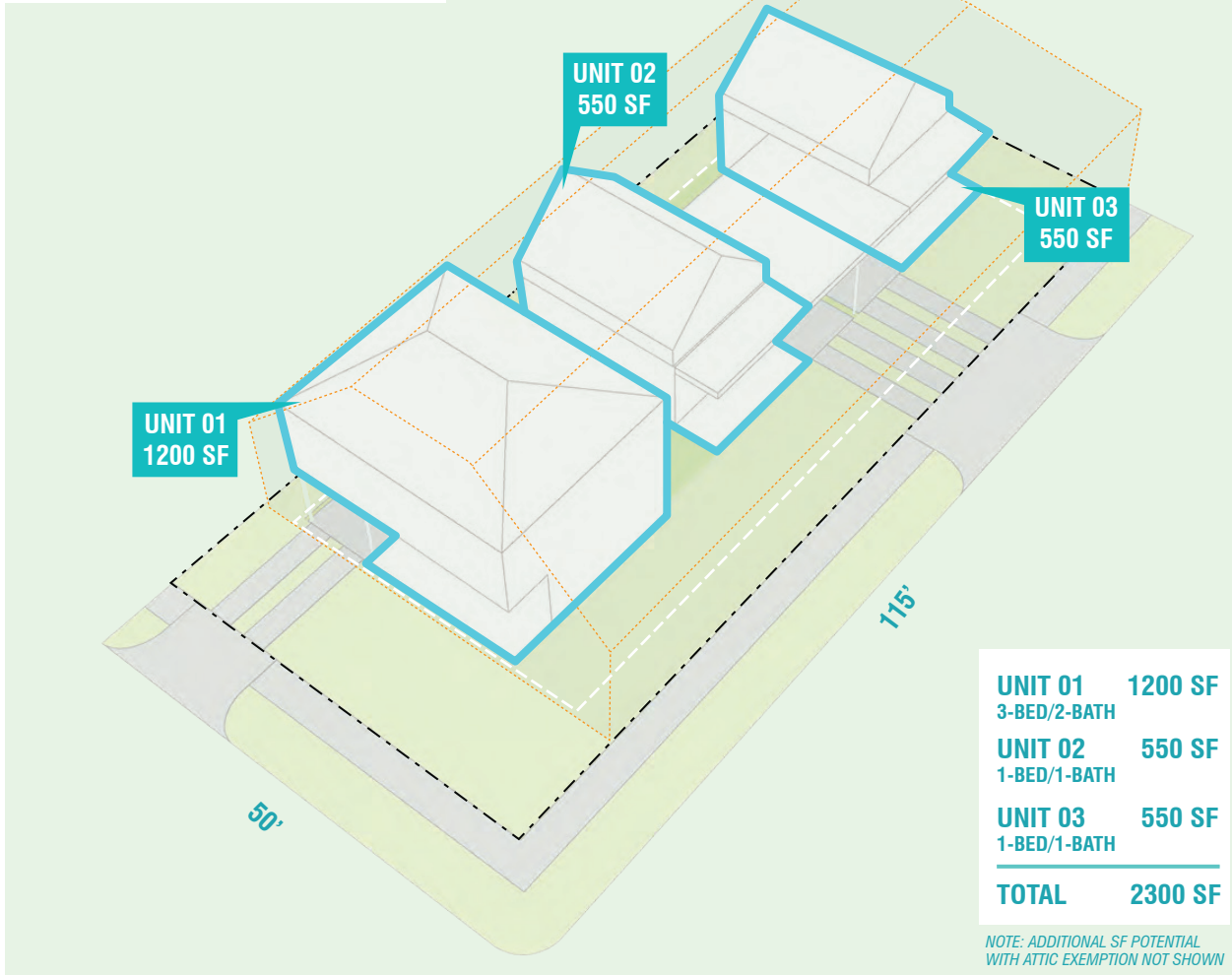


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	<b>5750 sf</b>	SF-3 - minimum - unchanged
	<b>Lot Type:</b>	<b>Mid-block, no alley</b>	-
	<b>Impervious Cover:</b>	<b>45% of lot</b>	SF-3 max - unchanged
	<b>Floor Area Ratio:</b>	<b>70% of lot (4000sf)</b>	unlimited FAR (no SubF)
	<b>Building Coverage</b>	<b>30% of lot (4000sf)</b>	SF-3 max = 40%
	<b>Setbacks (front/rear/side):</b>	<b>25' / 10' / 5'</b>	SF-3 - unchanged
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
<b>Building Height</b>	<b>35'</b>	no McMansion Tent	

**FINDINGS**

- Limiting maximum development by SF-3 impervious cover, bldg coverage and height only (without FAR limit or McMansion tent) appears to significantly increase the potential development yield.

**5750 SF LOT / CORNER**  
WITH SUBCHAPTER F



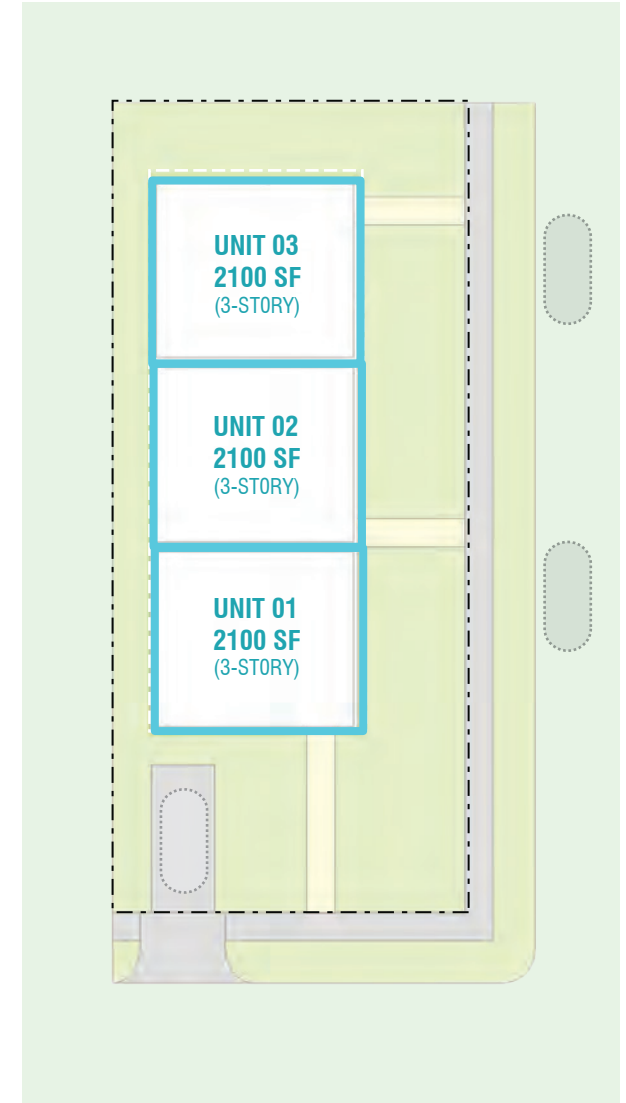
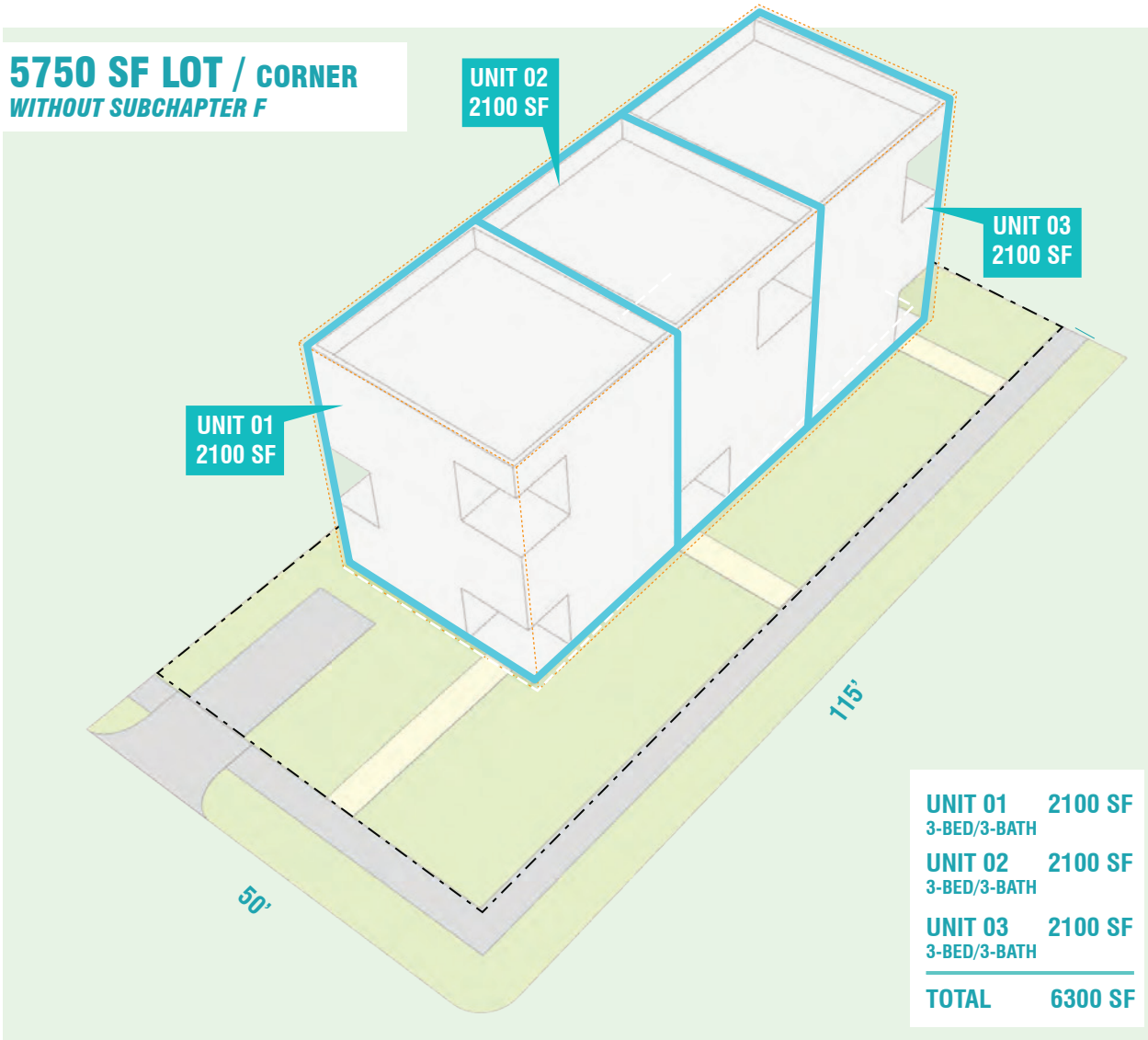
		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	5750 sf	SF-3 - minimum - unchanged
	<b>Lot Type:</b>	Corner	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 max- unchanged
	<b>Floor Area Ratio:</b>	40% of lot (2300sf)	Subchapter F - unchanged
	<b>Setbacks</b> : (front/rear/ street-side/side)	15' / 10' / 15' / 5'	15' as front yard setback
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

**FINDINGS**

- Easier to separate units because doesn't require long driveway. Additional on-street parking in front of each unit.
- Street side-yard setback of 15' limits developable area of lot more than mid-block lots.
- 15' front yard setback is necessary to achieve 10' separation btwn units and covered parking within setbacks.



**5750 SF LOT / CORNER**  
WITHOUT SUBCHAPTER F

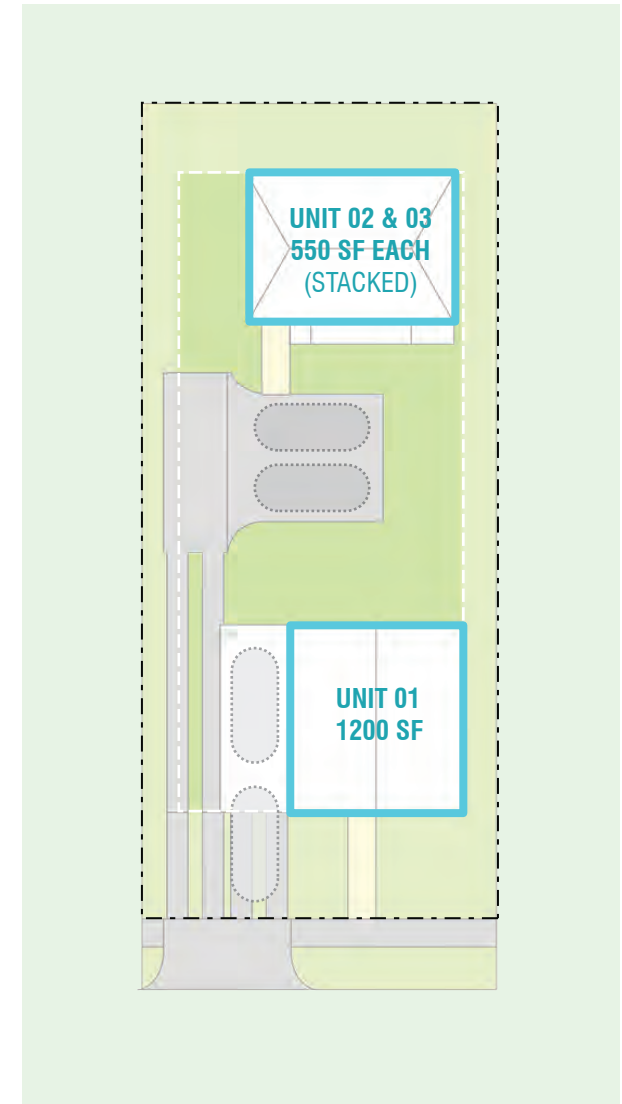
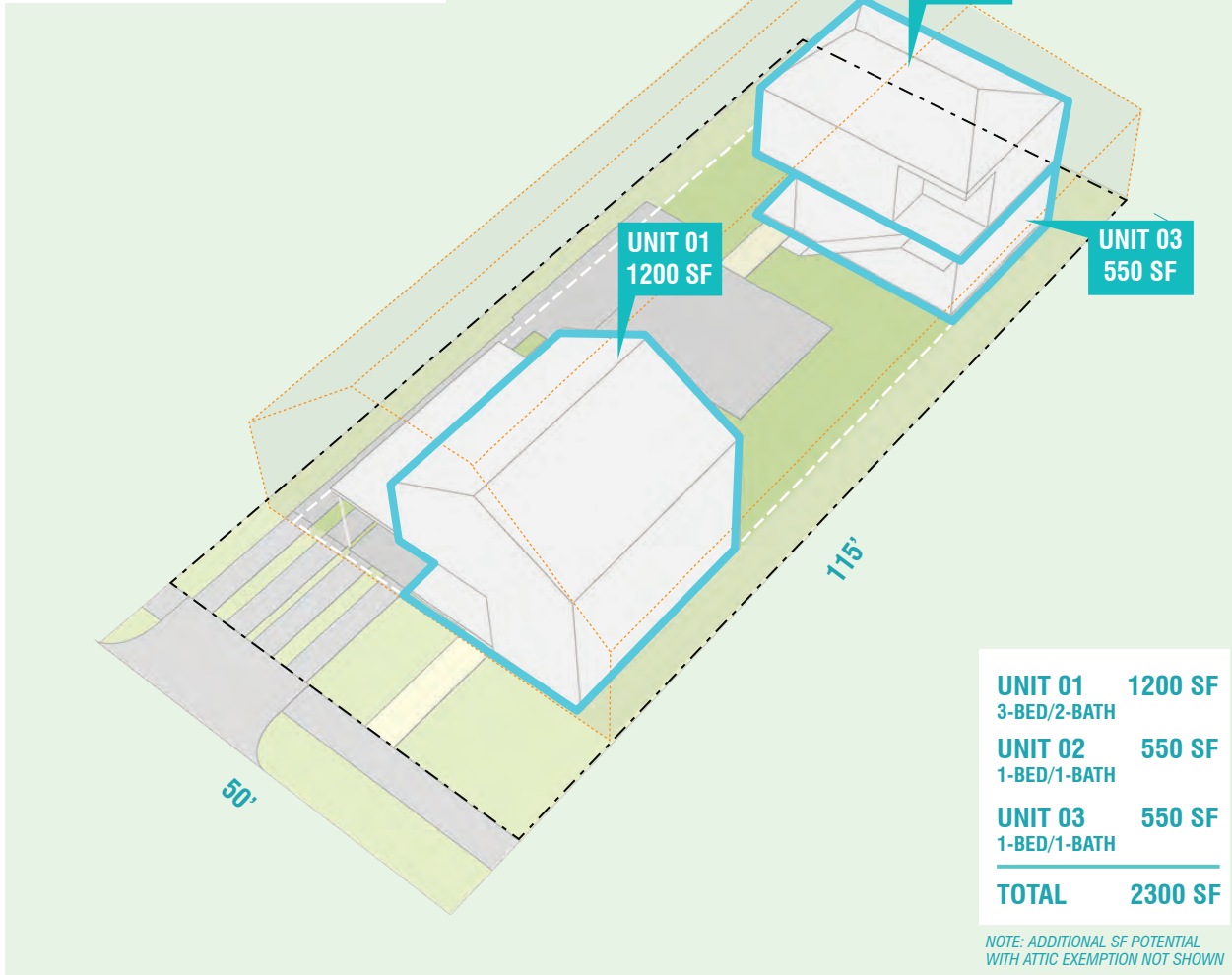


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	<b>5750 sf</b>	SF-3 - minimum - unchanged
	<b>Lot Type:</b>	<b>Corner</b>	-
	<b>Impervious Cover:</b>	<b>45% of lot</b>	SF-3 max = 45%
	<b>Floor Area Ratio:</b>	<b>110% of lot (6300sf)</b>	<b>unlimited FAR (no SubF)</b>
	<b>Building Coverage</b>	<b>40% of lot (2300sf)</b>	SF-3 max - unchanged
	<b>Setbacks (front/rear/side):</b>	<b>25' / 10' / 5'</b>	SF-3 - unchanged
	<b>Parking:</b>	<b>1 off-street space</b>	<b>no min parking requirements</b>
<b>Building Height</b>	<b>35'</b>	<b>no McMansion Tent (no SubF)</b>	

**FINDINGS**

- Limiting maximum development by SF-3 impervious cover, bldg coverage and height only (without FAR limit or McMansion tent) appears to significantly increase the potential development yield.
- Off-street parking is less critical if lot is on a corner due to increased street frontage.

**5750 SF LOT / MID-BLOCK**  
WITH SUBCHAPTER F

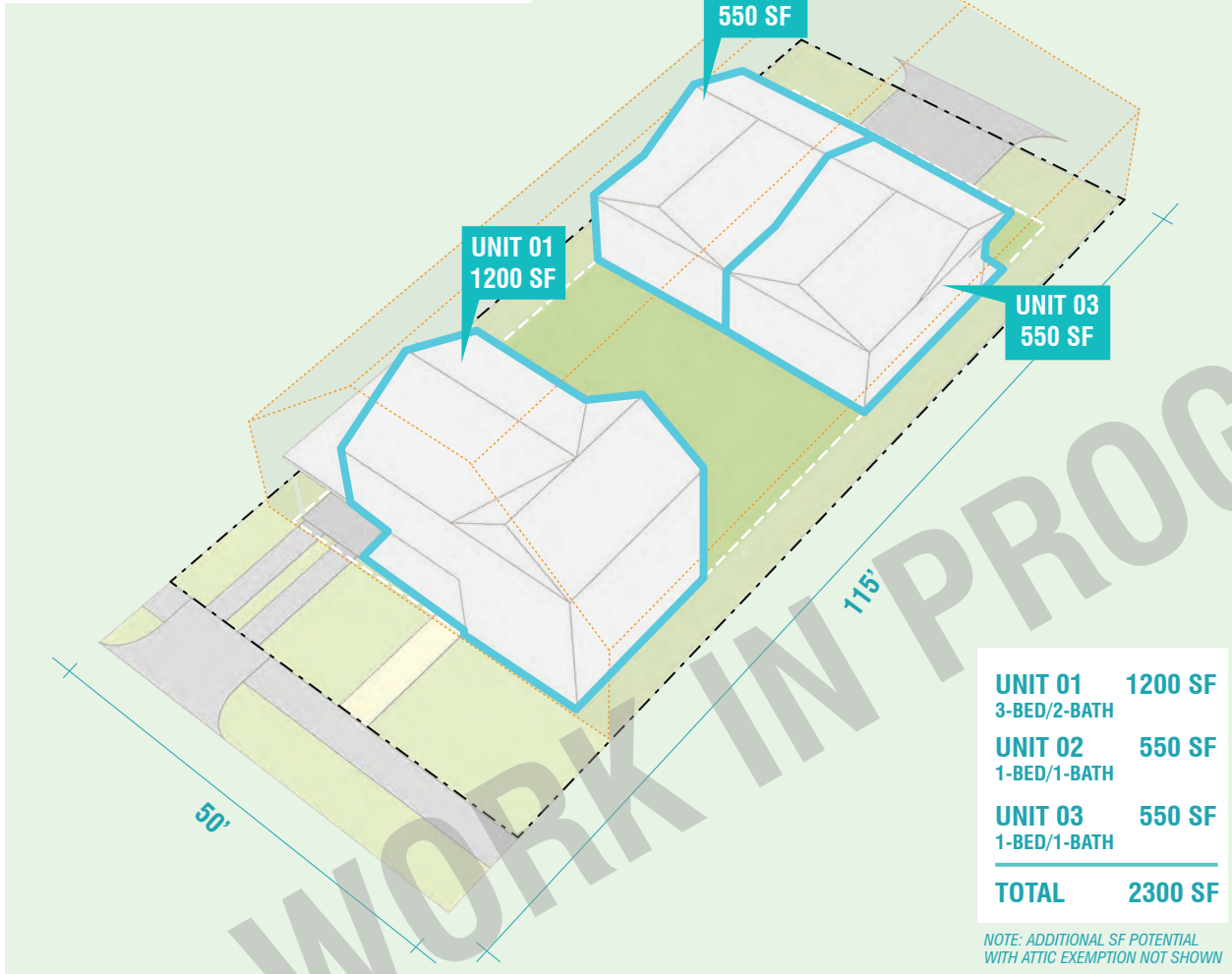


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	5750 sf	SF-3 - minimum - unchanged
	<b>Lot Type:</b>	Mid-block, no alley	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 max- unchanged
	<b>Floor Area Ratio:</b>	40% of lot (2300sf)	Subchapter F max - unchanged
	<b>Setbacks (front/rear/side):</b>	15' / 10' / 5'	15' as front yard setback
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

**FINDINGS**

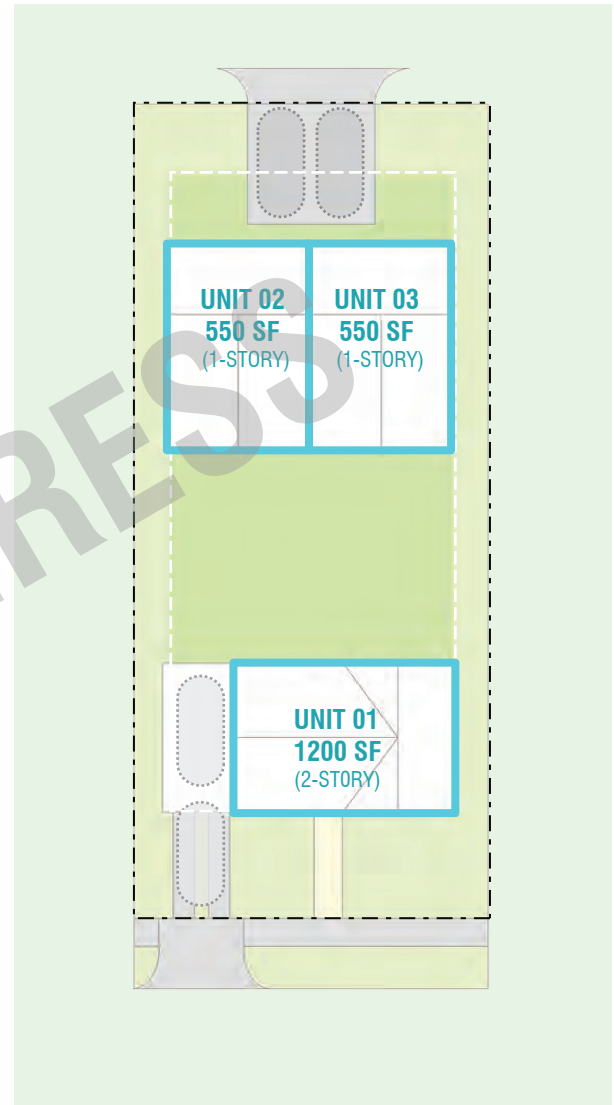
- Long driveway to the rear is necessary for parking
- Two of the units likely need to be stacked to fit on lot.
- Adjusted Front yard setback standard of 15' makes it easier to accommodate development complexities (tree root zones, easements etc)
- Front yard averaging would only required for setbacks under 15' (decreases expenses and time).

**5750 SF LOT / MID-BLOCK, ALLEY**  
WITH SUBCHAPTER F



<b>UNIT 01</b>	<b>1200 SF</b>
3-BED/2-BATH	
<b>UNIT 02</b>	<b>550 SF</b>
1-BED/1-BATH	
<b>UNIT 03</b>	<b>550 SF</b>
1-BED/1-BATH	
<b>TOTAL</b>	<b>2300 SF</b>

NOTE: ADDITIONAL SF POTENTIAL WITH ATTIC EXEMPTION NOT SHOWN



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<b>ZONING</b>	<b>CURRENT ZONING COMPARISON</b>		
	<b>Lot Size:</b>	<b>5750 sf</b>	SF-3 - minimum - unchanged
	<b>Lot Type:</b>	<b>Mid-block, alley</b>	-
	<b>Impervious Cover:</b>	<b>45% of lot</b>	SF-3 max - unchanged
	<b>Floor Area Ratio:</b>	<b>40% of lot (2300sf)</b>	Subchapter F - unchanged
	<b>Setbacks (front/rear/side):</b>	<b>15' / 10' / 5'</b>	15' as front yard setback
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	<b>per Subchapter F</b>	Subchapter F - unchanged

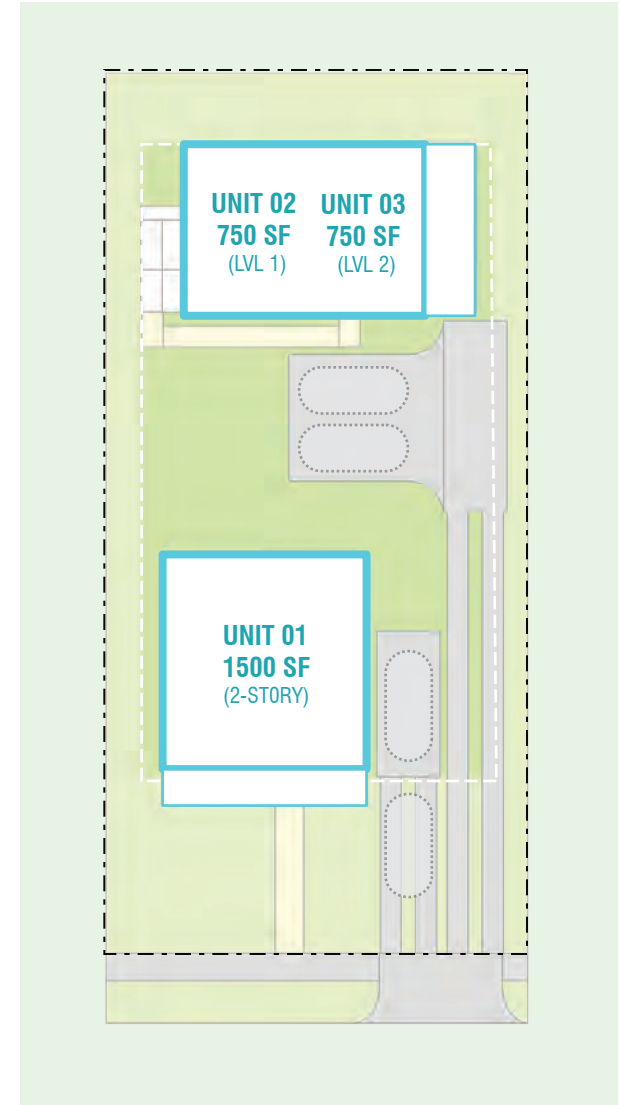
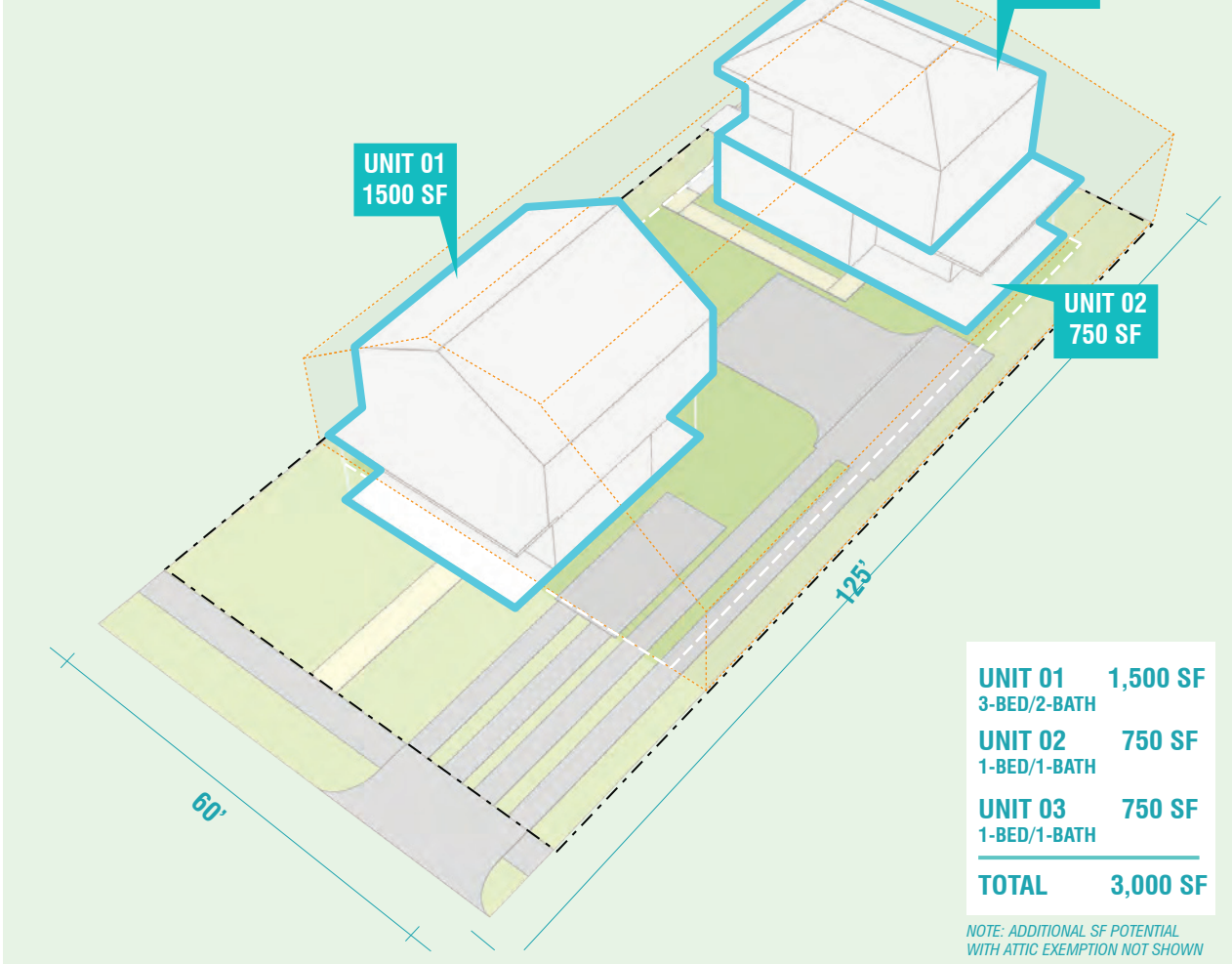
**FINDINGS**

- Avoids need for a long driveway to rear, reduces space given over to parking access.
- Easier for units to be side by side.
- Works with 25' front yard setback too.



# AVERAGE LOT MODELS (7500 SF)

**7500 SF LOT / MID-BLOCK**  
WITH SUBCHAPTER F

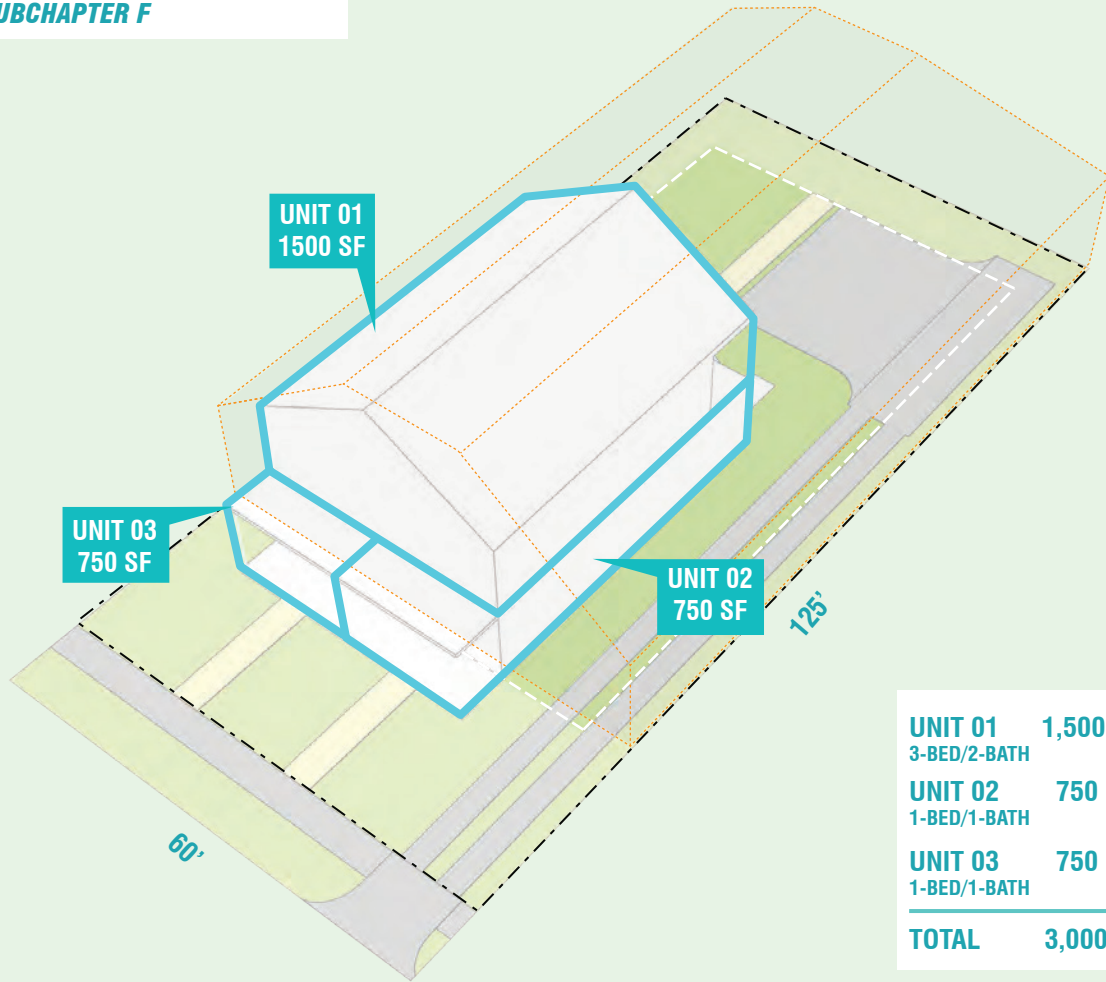


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	7500 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	40% of lot (3000sf)	Subchapter F - unchanged
	<b>Setbacks:</b> (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

**FINDINGS**

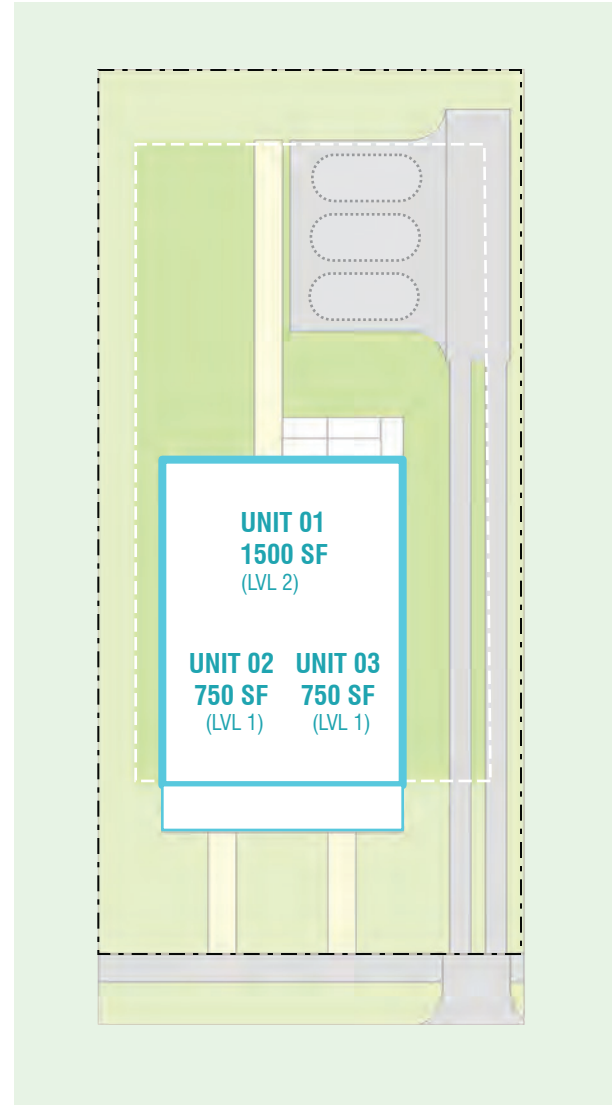
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**7500 SF LOT / MID-BLOCK**  
WITH SUBCHAPTER F



<b>UNIT 01</b>	<b>1,500 SF</b>
3-BED/2-BATH	
<b>UNIT 02</b>	<b>750 SF</b>
1-BED/1-BATH	
<b>UNIT 03</b>	<b>750 SF</b>
1-BED/1-BATH	
<b>TOTAL</b>	<b>3,000 SF</b>

NOTE: ADDITIONAL SF POTENTIAL WITH ATTIC EXEMPTION NOT SHOWN

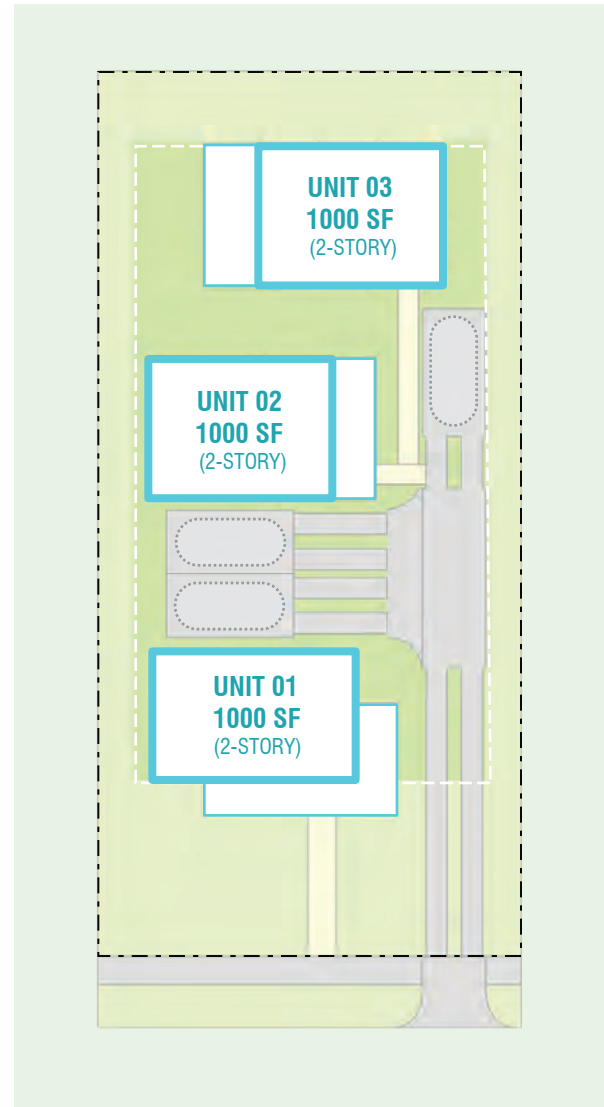
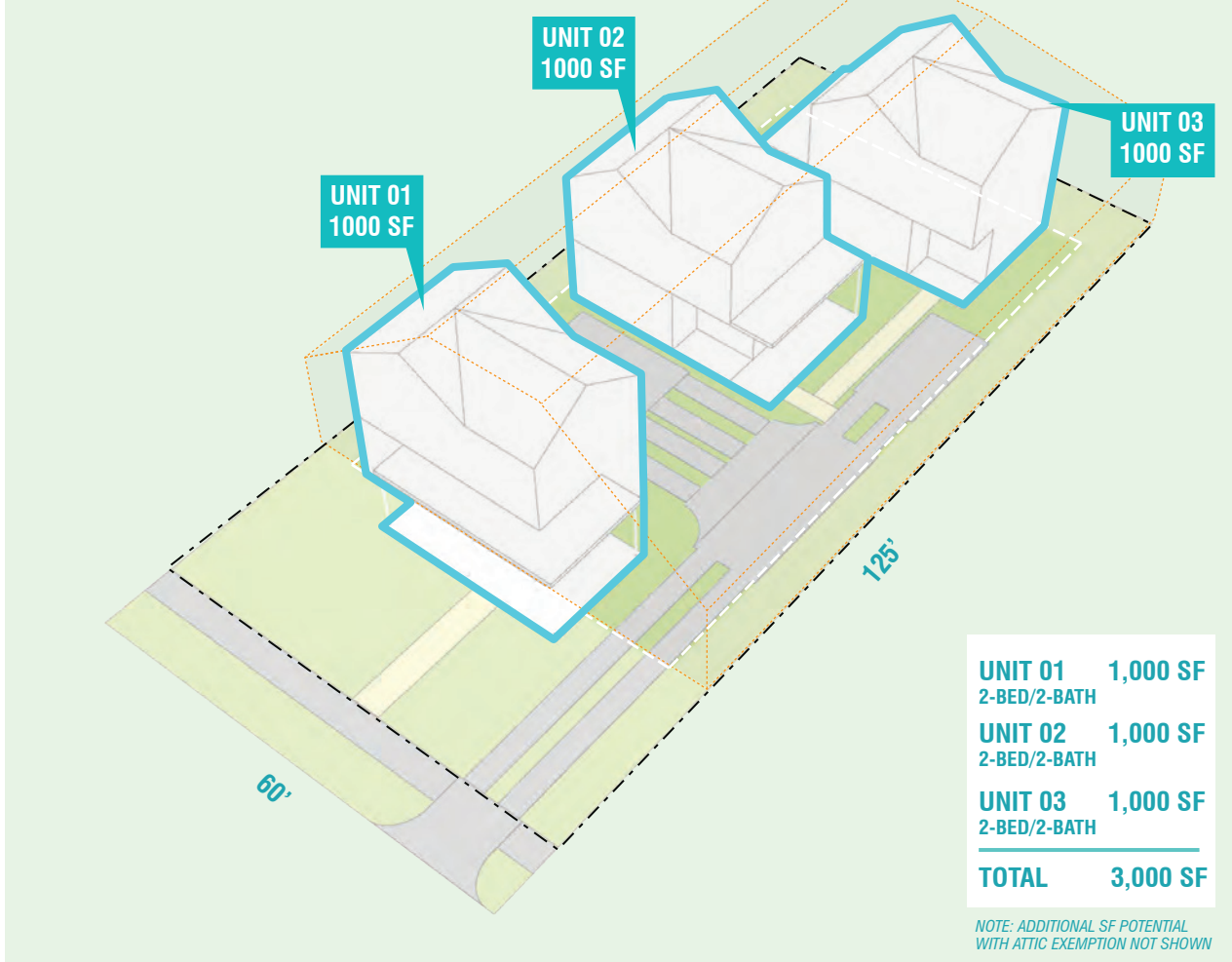


<b>ZONING</b>	<b>CURRENT ZONING COMPARISON</b>		
	<b>Lot Size:</b>	<b>7500 sf</b>	SF-3 - median
	<b>Lot Type:</b>	<b>Mid-Block</b>	-
	<b>Impervious Cover:</b>	<b>45% of lot</b>	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	<b>40% of lot (3000sf)</b>	Subchapter F - unchanged
	<b>Setbacks</b> : (front/rear/ street-side/side)	<b>25' / 10' / 15' / 5'</b>	SF-3 - unchanged
	<b>Parking:</b>	<b>1 space per unit</b>	no minimum parking req
<b>McMansion Tent:</b>	<b>Per Subchapter F</b>	Subchapter F - unchanged	

**FINDINGS**

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**7500 SF LOT / MID-BLOCK**  
WITH SUBCHAPTER F



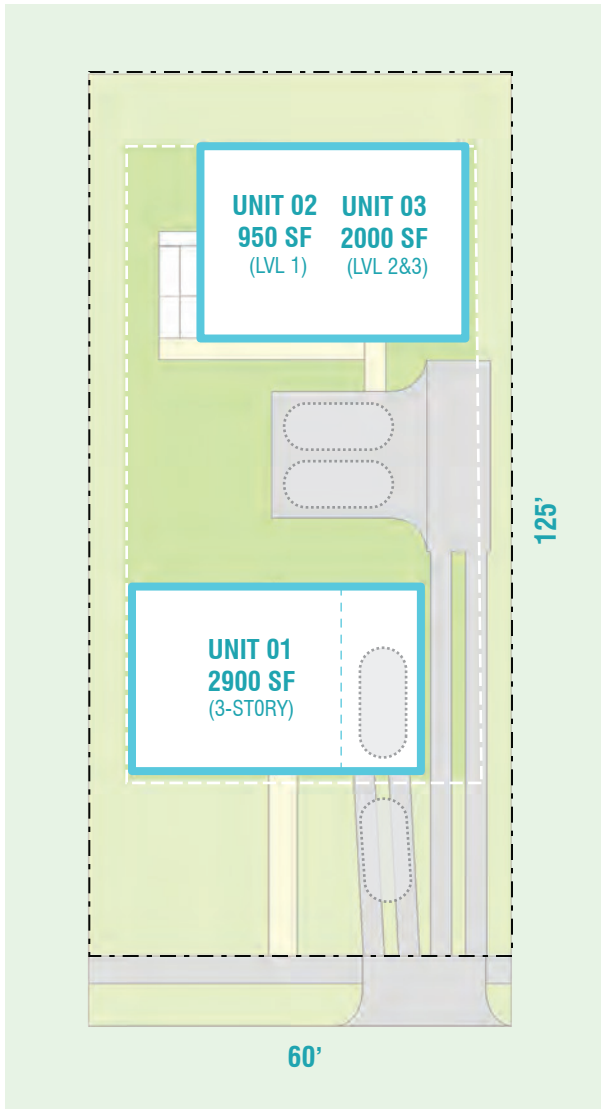
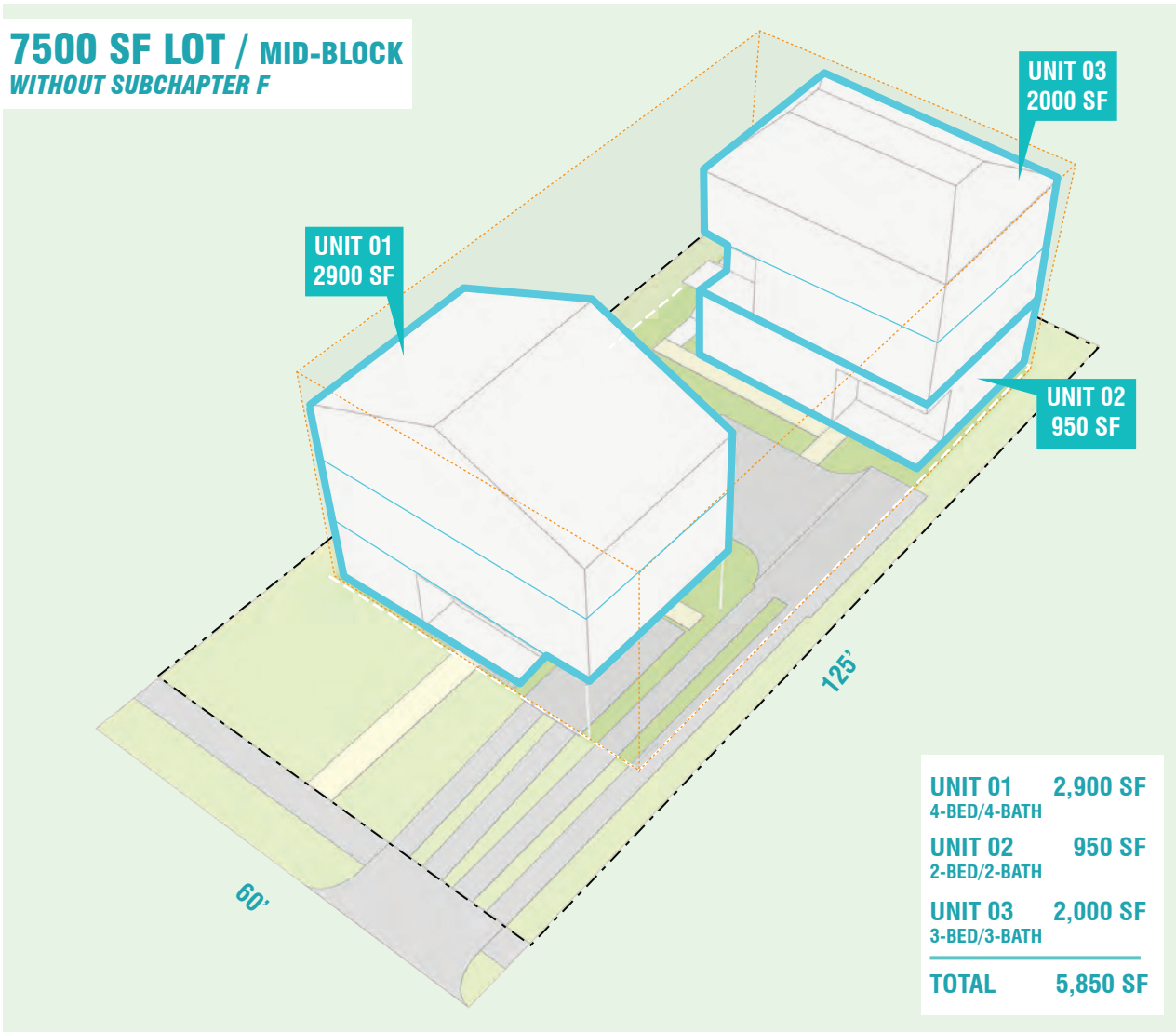
ZONING	CURRENT ZONING COMPARISON		
	Lot Size:	7500 sf	SF-3 - median
	Lot Type:	Mid-Block	-
	Impervious Cover:	45% of lot	SF-3 - unchanged
	Floor Area Ratio:	40% of lot (3000sf)	Subchapter F - unchanged
	Setbacks : (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	Parking:	1 space per unit	no minimum parking req
McMansion Tent:	Per Subchapter F	Subchapter F - unchanged	

**FINDINGS**

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**7500 SF LOT / MID-BLOCK**  
**WITHOUT SUBCHAPTER F**

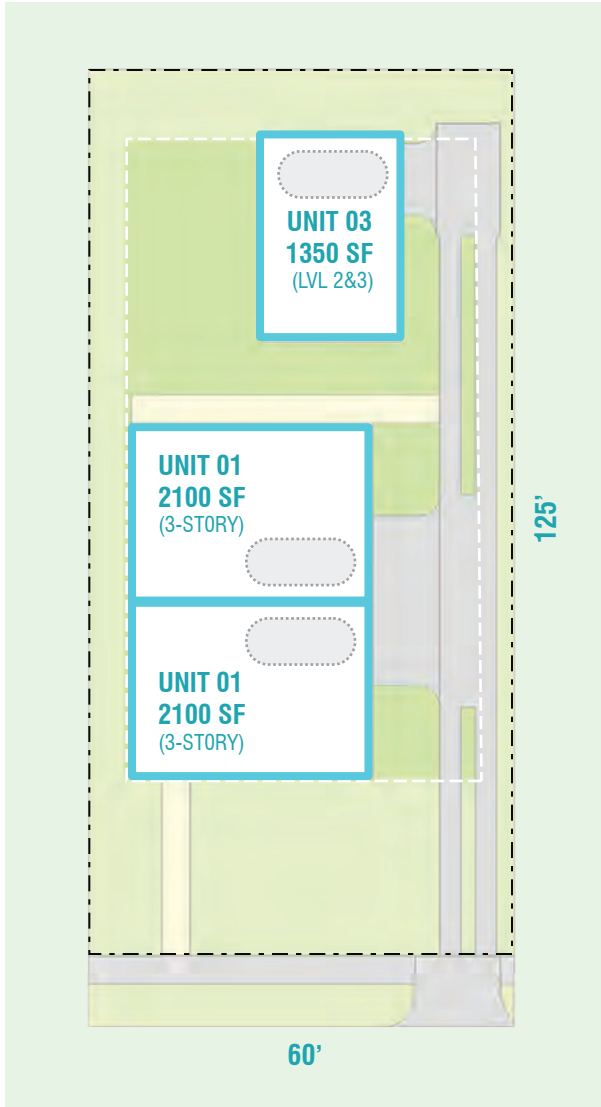
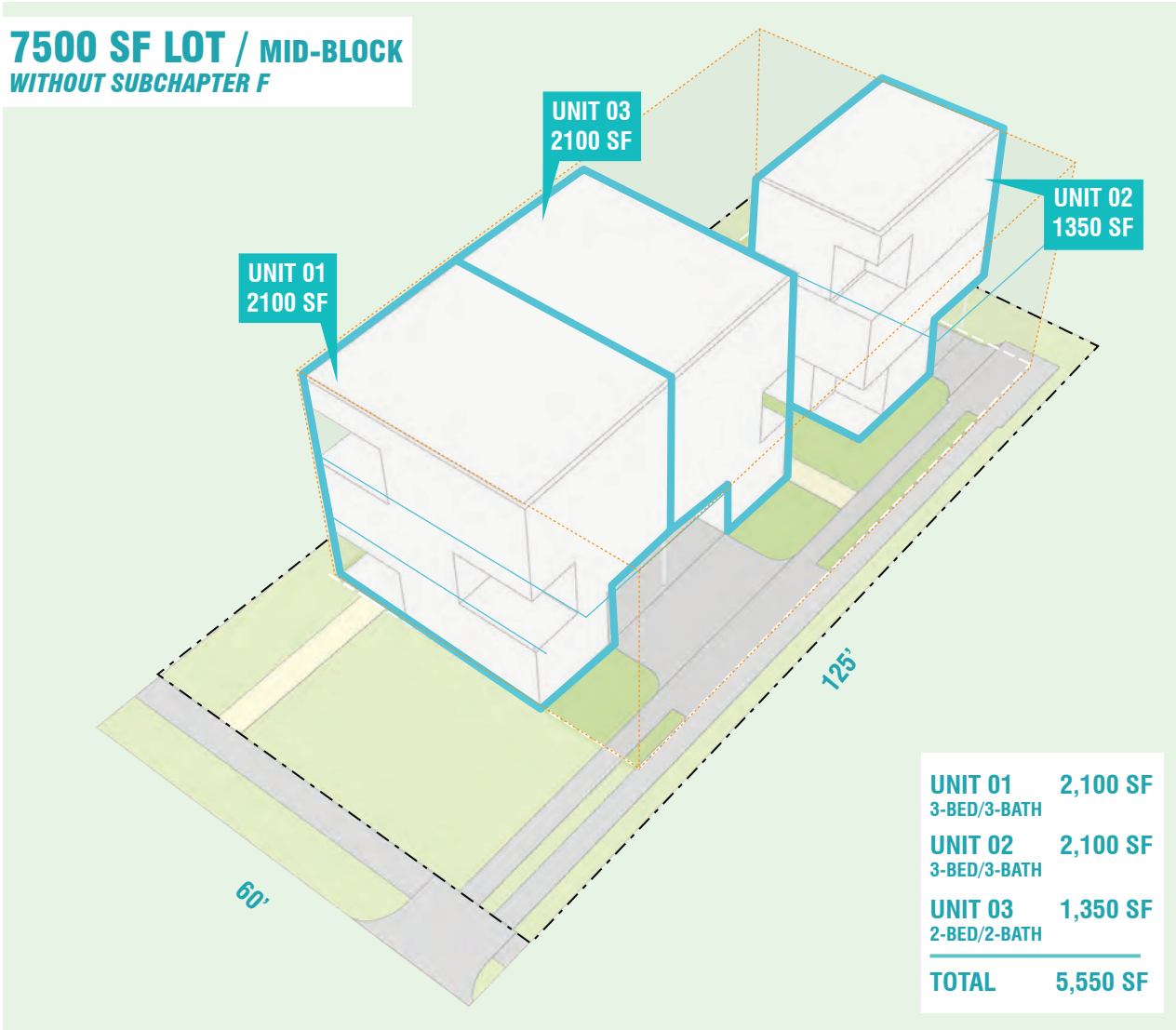


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	7500 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	78% of lot (5850sf)	no FAR limits (no SubF)
	<b>Setbacks:</b> (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	<b>Parking:</b>	4 off-street spaces	no minimum parking reqs
	<b>Height:</b>	35'	SF-3 - no McMansion Tent

**FINDINGS**

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**7500 SF LOT / MID-BLOCK**  
WITHOUT SUBCHAPTER F



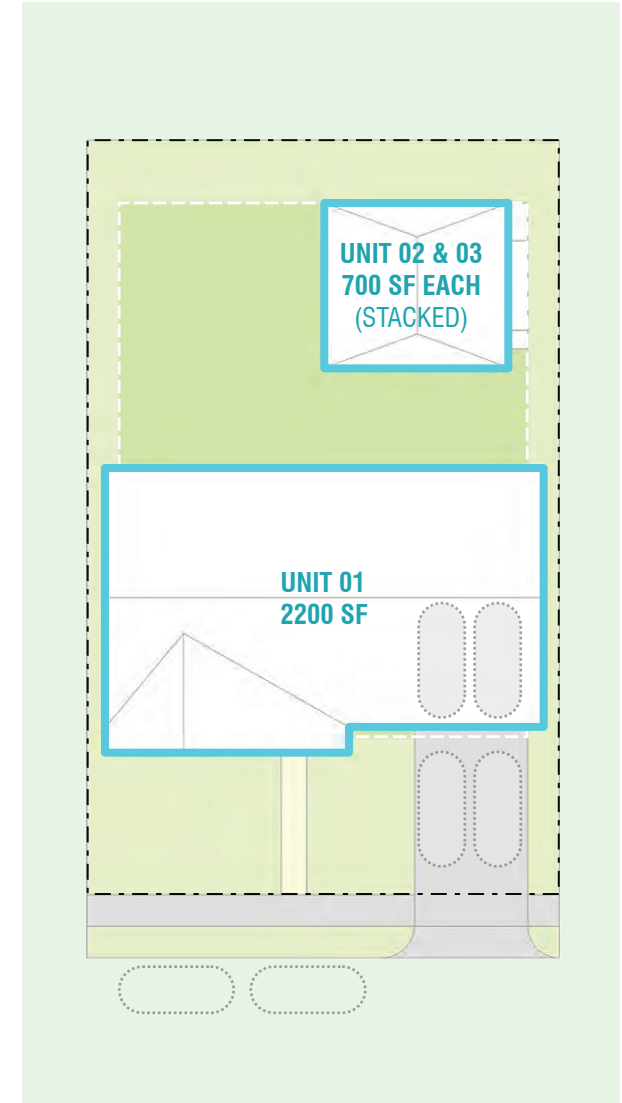
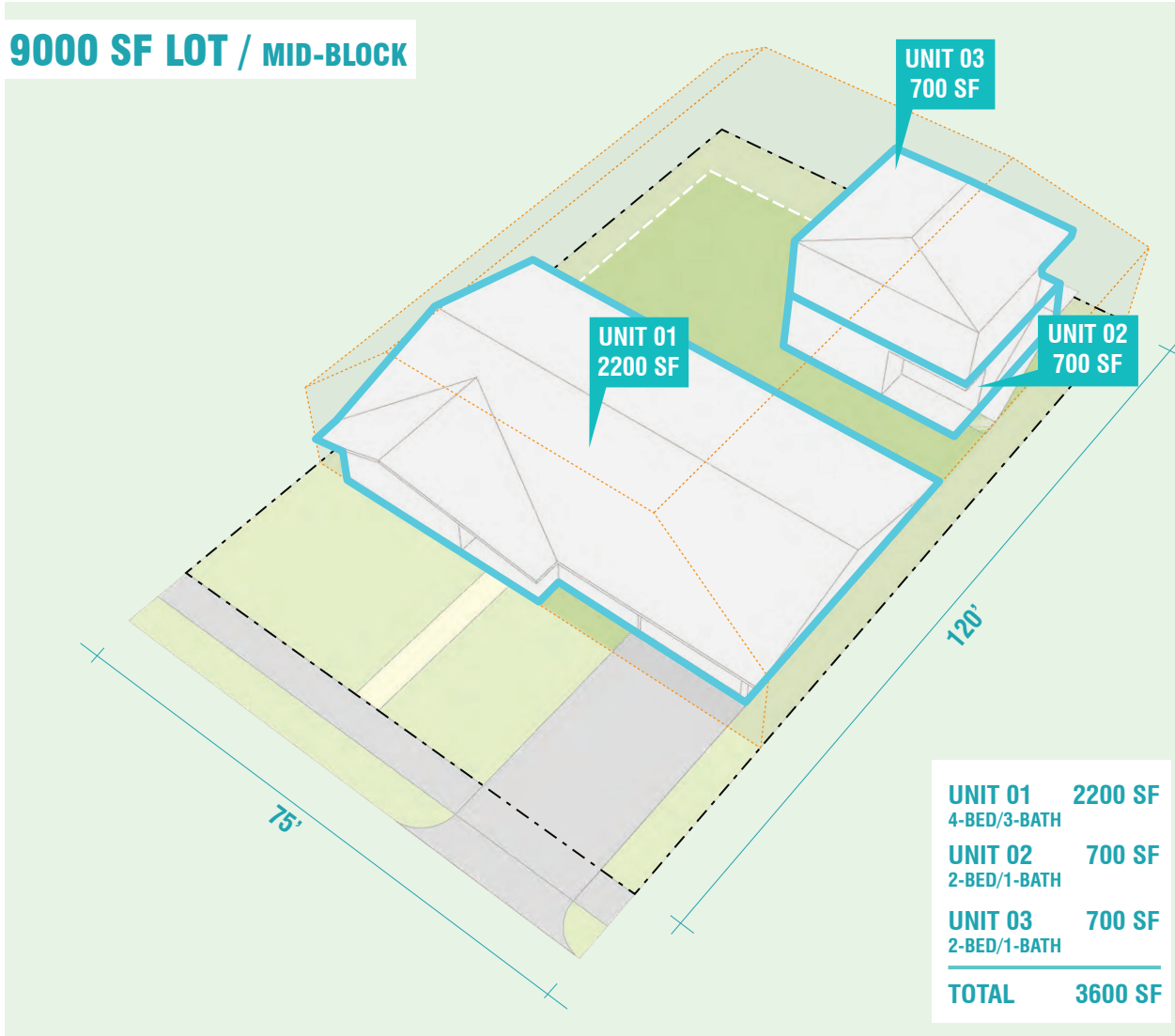
		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	7500 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	74% of lot (5550sf)	no FAR limits
	<b>Setbacks:</b> (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	<b>Parking:</b>	1 space per unit	no minimum parking req
	<b>Height:</b>	35'	SF-3 - no McMansion Tent

**FINDINGS**

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# LARGE LOT MODELS (9000 SF)

# 9000 SF LOT / MID-BLOCK

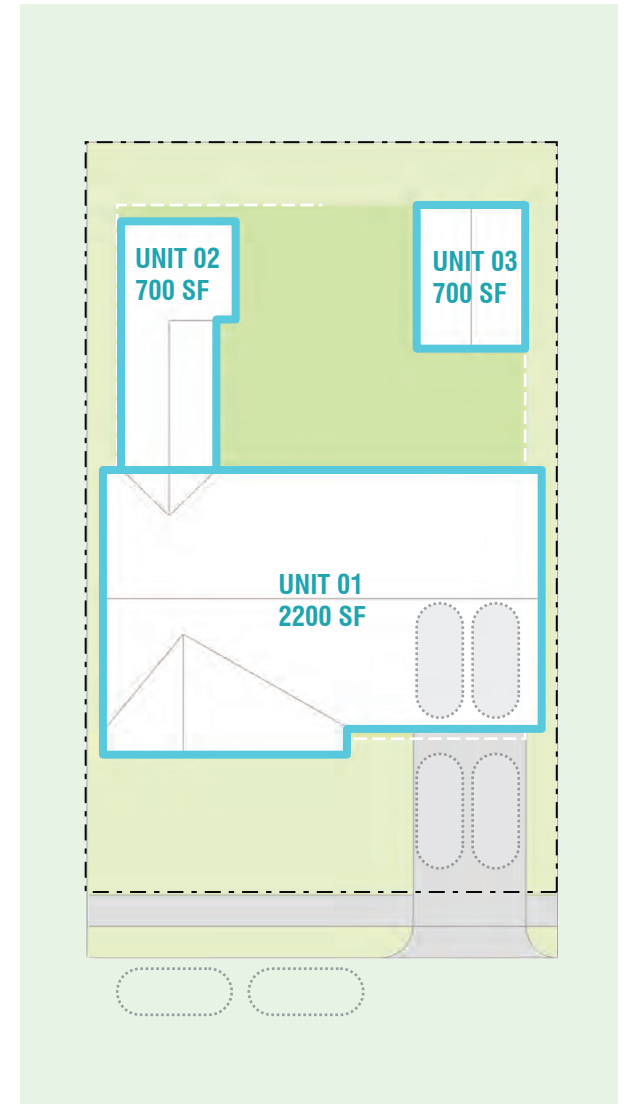
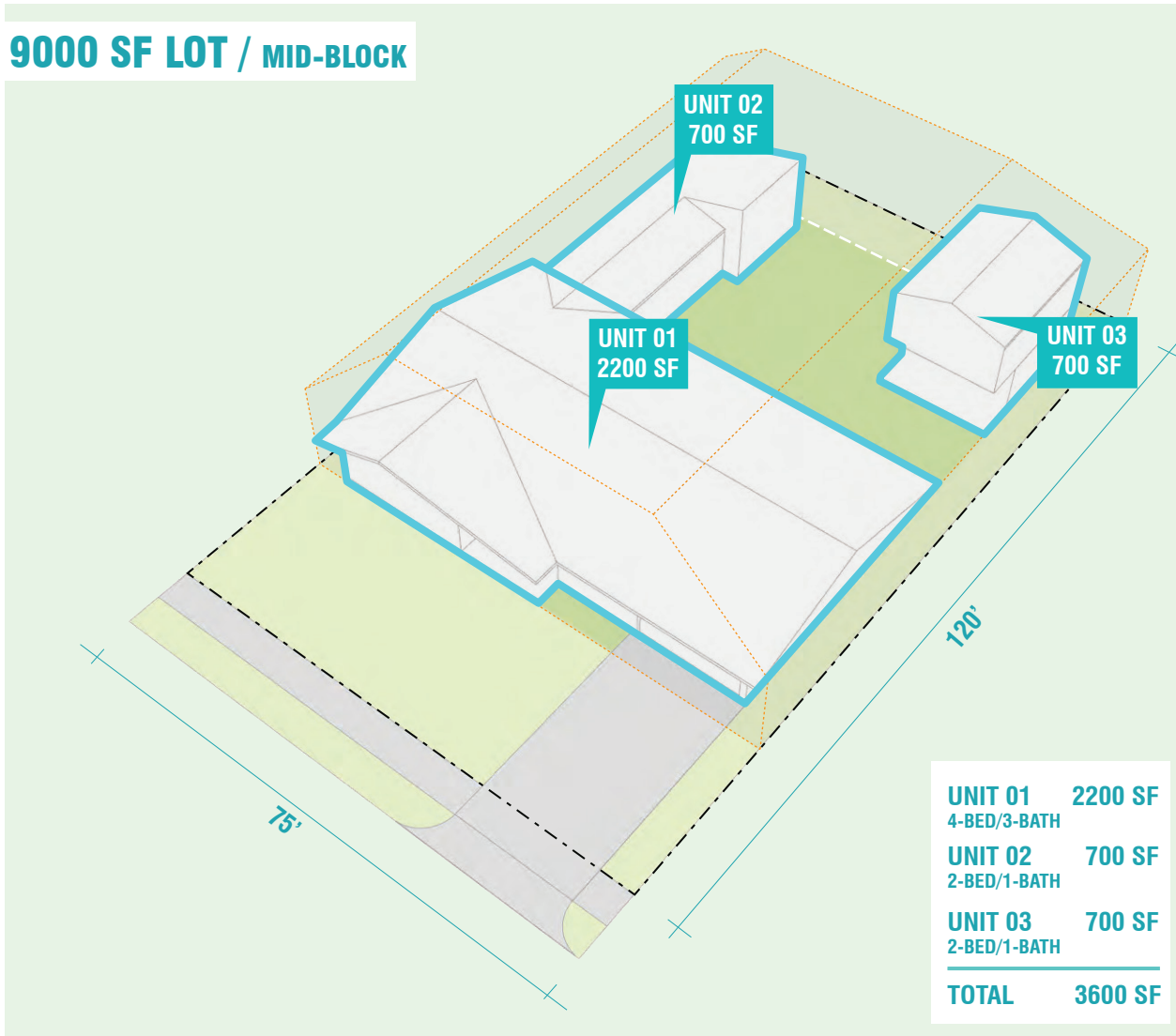


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9000 sf	SF-3 - city average
	<b>Lot Type:</b>	Mid-block, no alley	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	40% of lot (3600sf)	Subchapter F - unchanged
	<b>Setbacks (front/rear/side):</b>	25' / 10' / 5'	SF-3 - unchanged
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

## FINDINGS

- Shows a typical existing house that stretches across the lot.
- Flexible for two additional units in rear to stack or side by side.
- No way to provide independent parking access on site for 3 units without some demolition of existing house. Parking would likely be accommodated on-street.

# 9000 SF LOT / MID-BLOCK

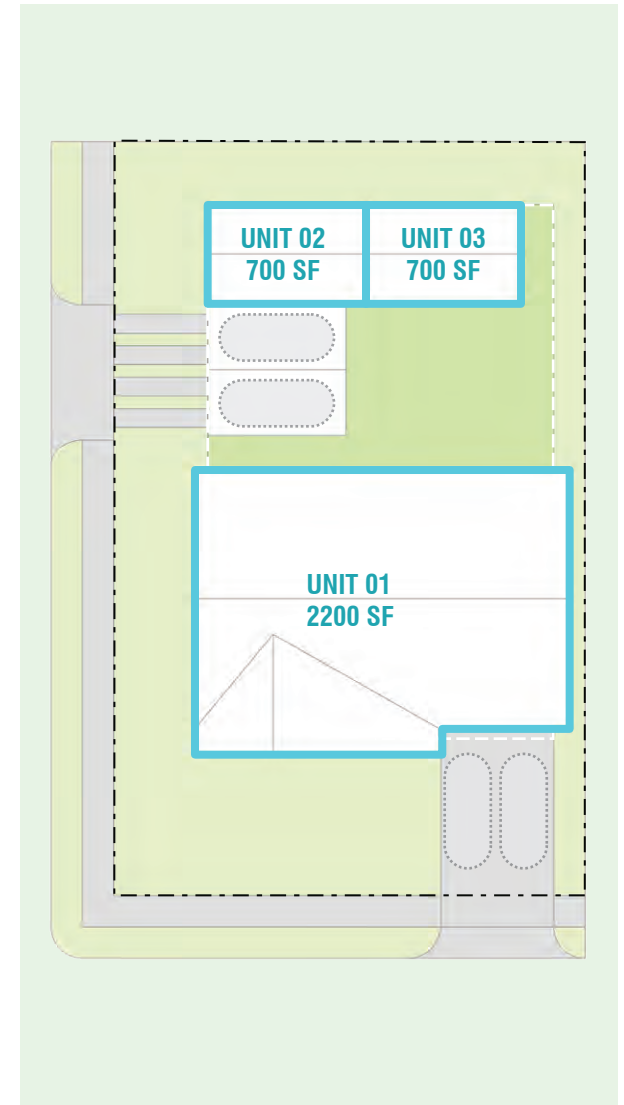
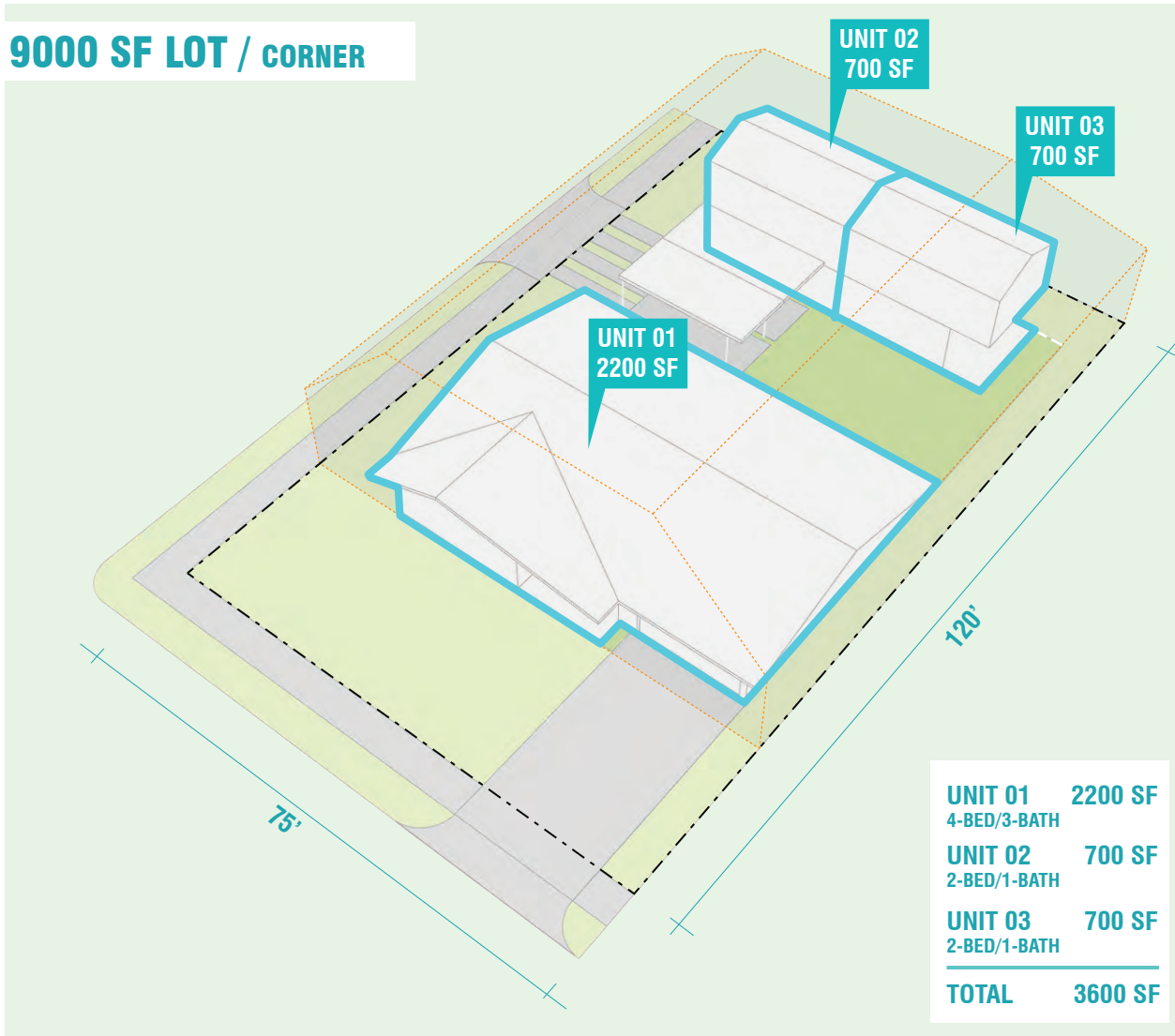


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9000 sf	SF-3 - city average
	<b>Lot Type:</b>	Mid-block, no alley	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	40% of lot (3600sf)	Subchapter F - unchanged
	<b>Setbacks (front/rear/side):</b>	25' / 10' / 5'	SF-3 - unchanged SF-3 -
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

## FINDINGS

- Shows a typical existing house that stretches across the lot.
- Shows 1 attached additional unit and 1 detached additional unit (requires adjustment to current ADU and duplex rules).
- No way to provide independent parking access on site for 3 units without some demolition of existing house. Parking would likely be accommodated on-street.

# 9000 SF LOT / CORNER



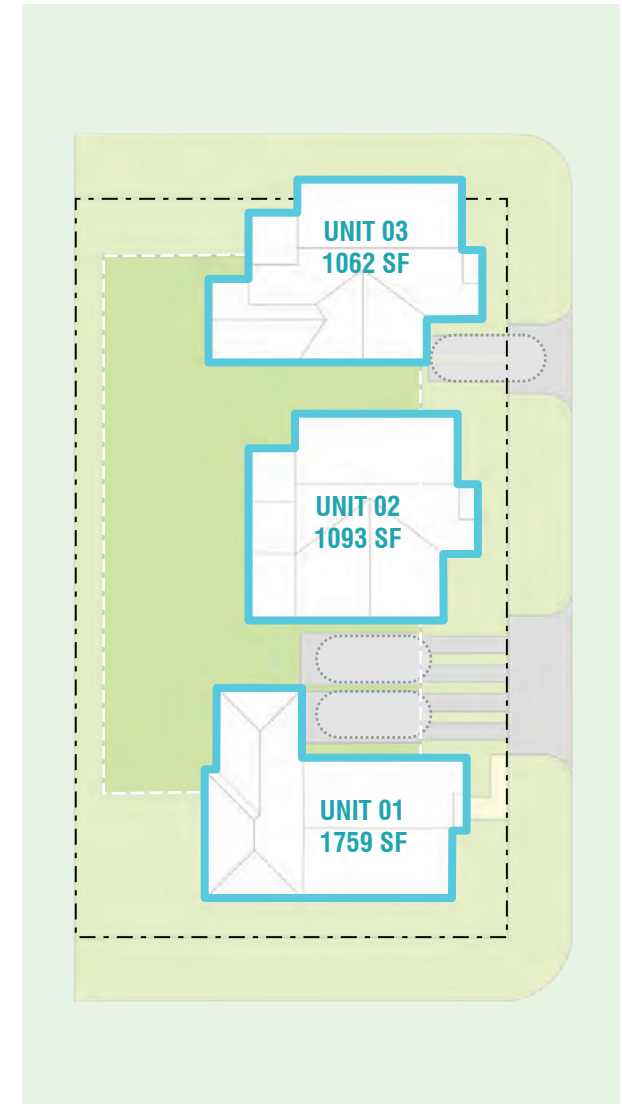
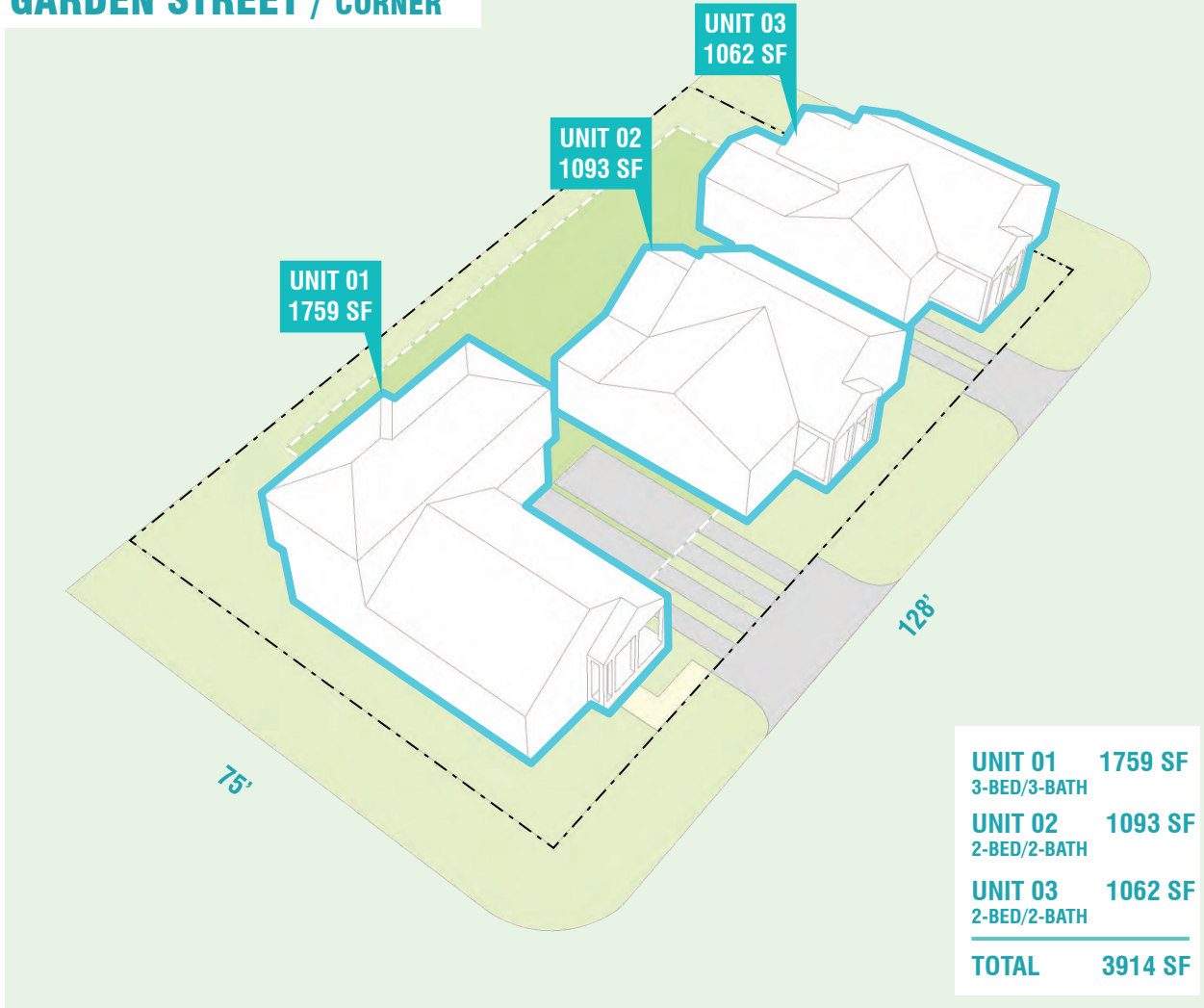
		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9000 sf	SF-3 - city average
	<b>Lot Type:</b>	Corner	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	40% of lot (3600sf)	Subchapter F - unchanged
	<b>Setbacks (front/rear/side):</b>	25' / 15' / 10' / 5'	SF-3 - unchanged
	<b>Parking:</b>	2 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

## FINDINGS

- Additional units can have street frontage.
- Possible to accommodate off-street parking for additional units.

# CASE STUDY MODELS

# GARDEN STREET / CORNER



		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9600 sf	SF-3 - large
	<b>Lot Type:</b>	Corner	-
	<b>Impervious Cover:</b>	44% of lot (45% allowed)	SF-3 max - unchanged
	<b>Floor Area Ratio:</b>	41% of lot (40% allowed)	Legal non-complying
	<b>Setbacks (front/rear/side):</b>	Legal non-complying	SF-3 shown
	<b>Parking:</b>	1 space per unit	Legal non-complying
	<b>McMansion Tent:</b>	Legal non-complying	Not applicable

## FINDINGS

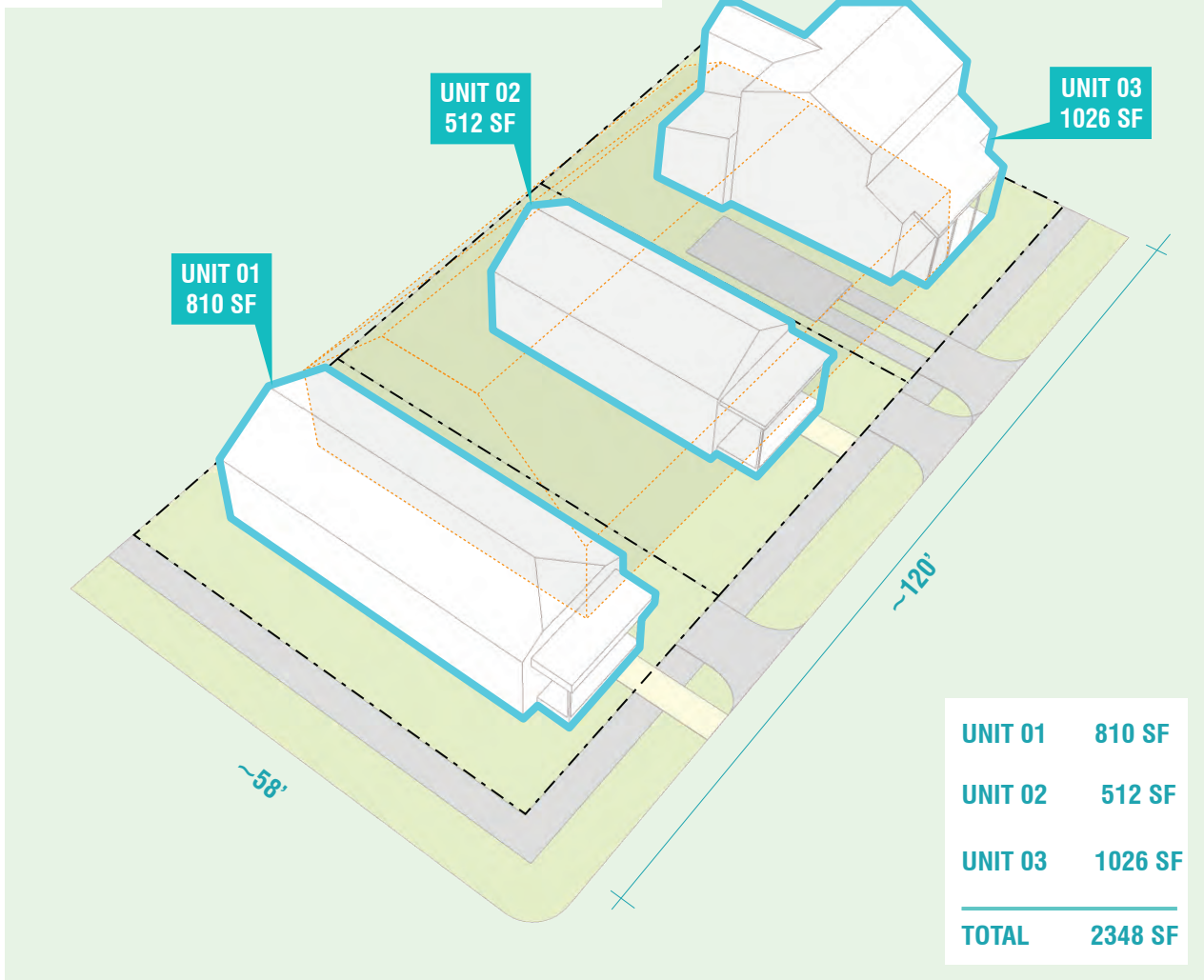
- Existing development in East Cesar Chavez neighborhood, pre-dating current zoning.
- Front and rear yard setbacks are encroached within, allowing for units to be separated.
- Street side yard setbacks are encroached within, allowing for small backyards for each unit.



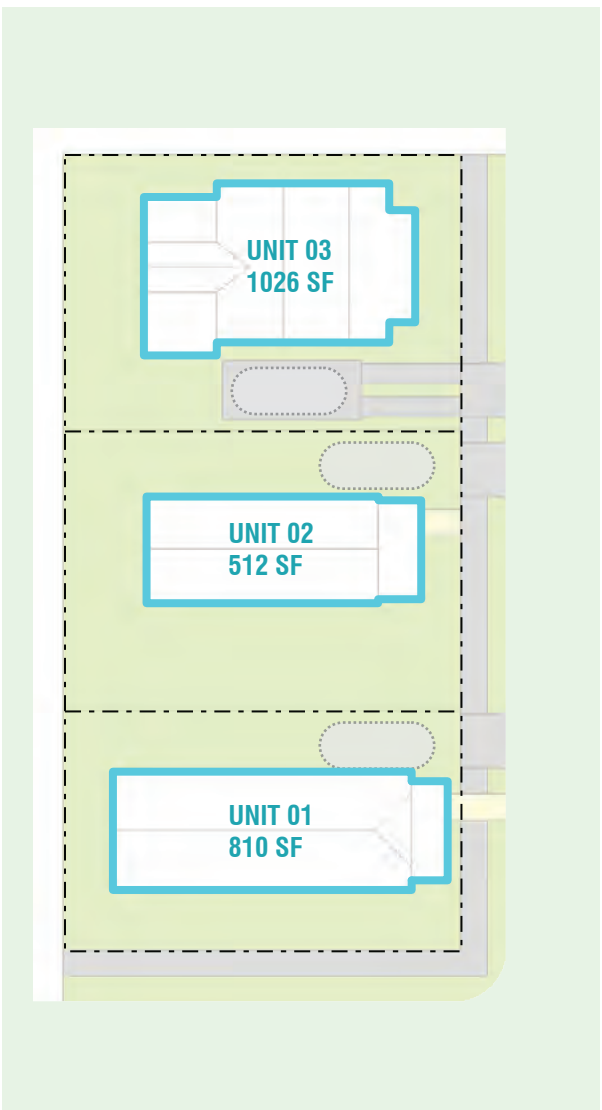
# GARDEN STREET / CORNER



# NAVASOTA STREET / CORNER, SUBDIVIDED



UNIT 01	810 SF
UNIT 02	512 SF
UNIT 03	1026 SF
<b>TOTAL</b>	<b>2348 SF</b>



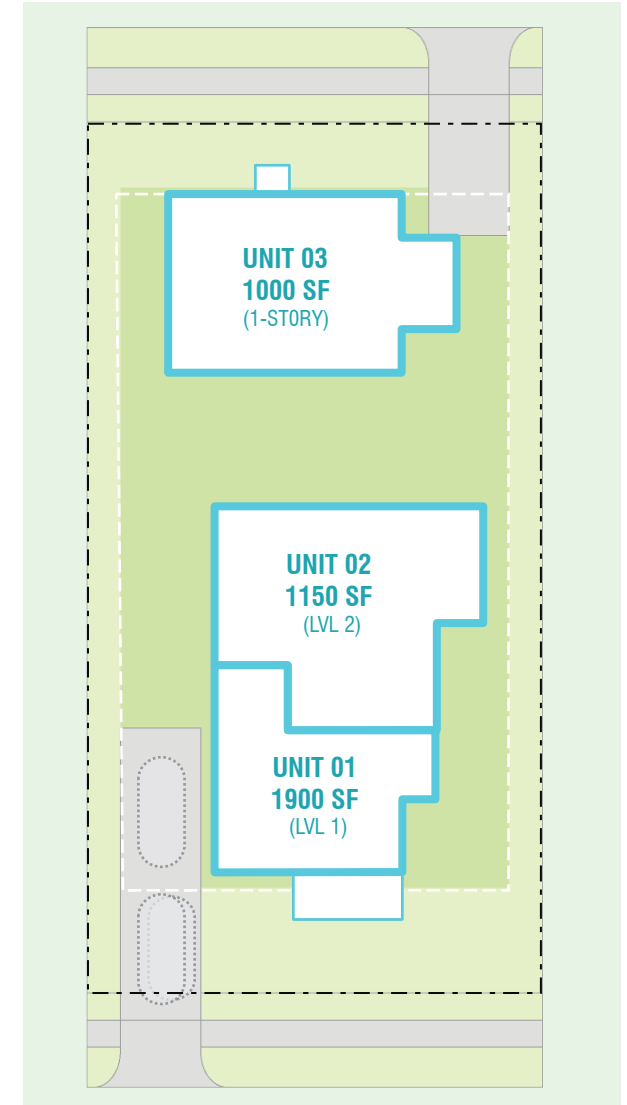
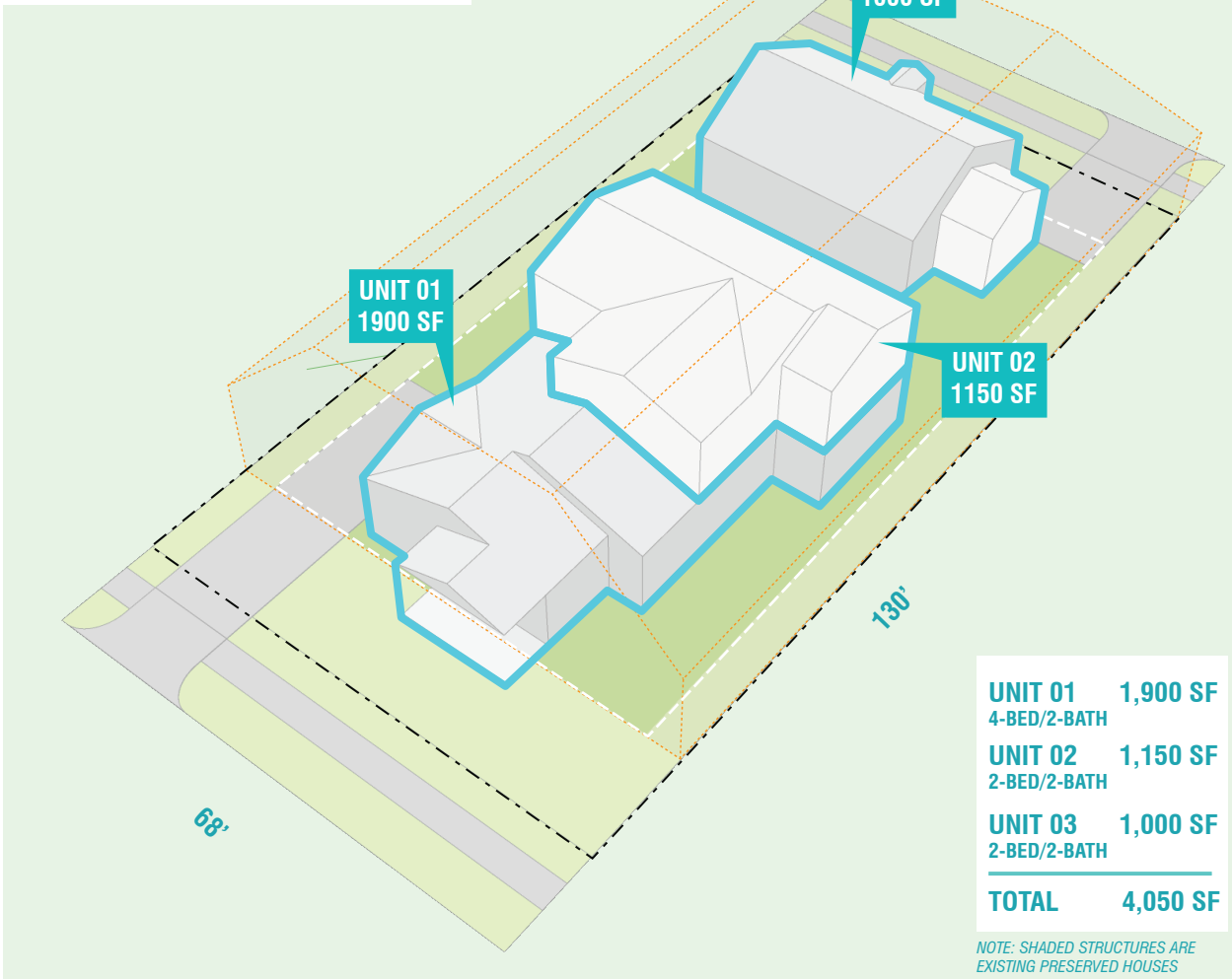
ZONING	CURRENT ZONING COMPARISON		
	Lot Size:	7048 > 2163, 2346, 2539 sf	Legal non-complying / Small Lot Amnesty
	Lot Type:	Corner, subdivided	-
	Impervious Cover:	43%, 23%, 48%	Small Lot Amnesty - 65%
	Floor Area Ratio:	37%, 22%, 40%	Small Lot Amnesty - 2300sf
	Setbacks (front/rear/side):	Legal non-conforming	25' / 10' / 5'
	Parking:	1 space per unit	Legal non-conforming
Mcmansion Tent	Predates Sub F	Not applicable	

## FINDINGS

## NAVASOTA STREET / CORNER, SUBDIVIDED



# 8840 SF LOT / THRU-BLOCK

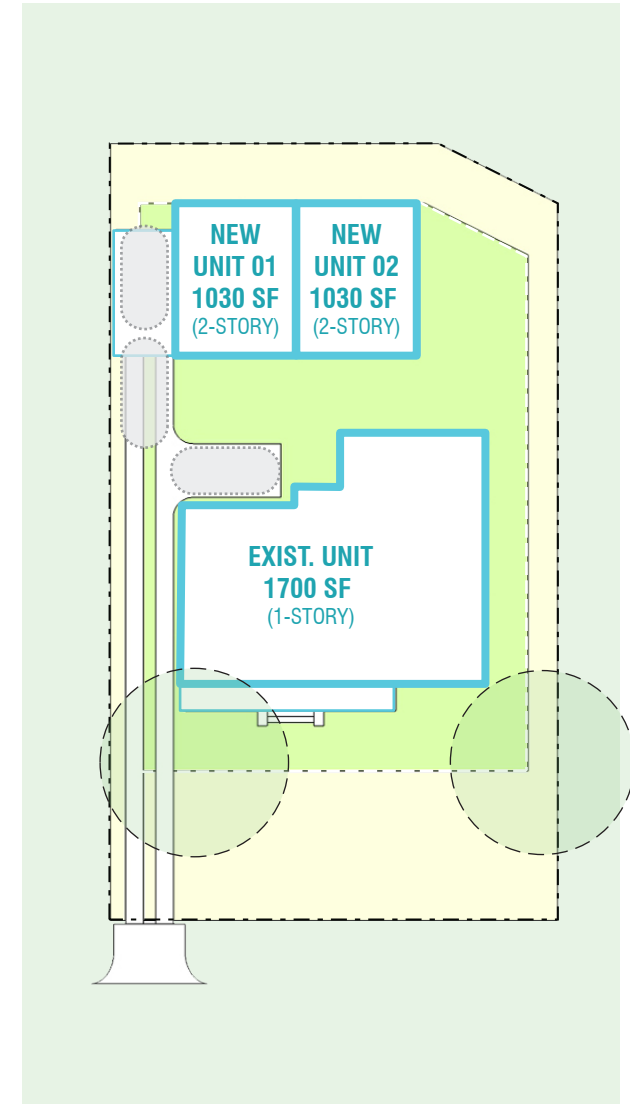
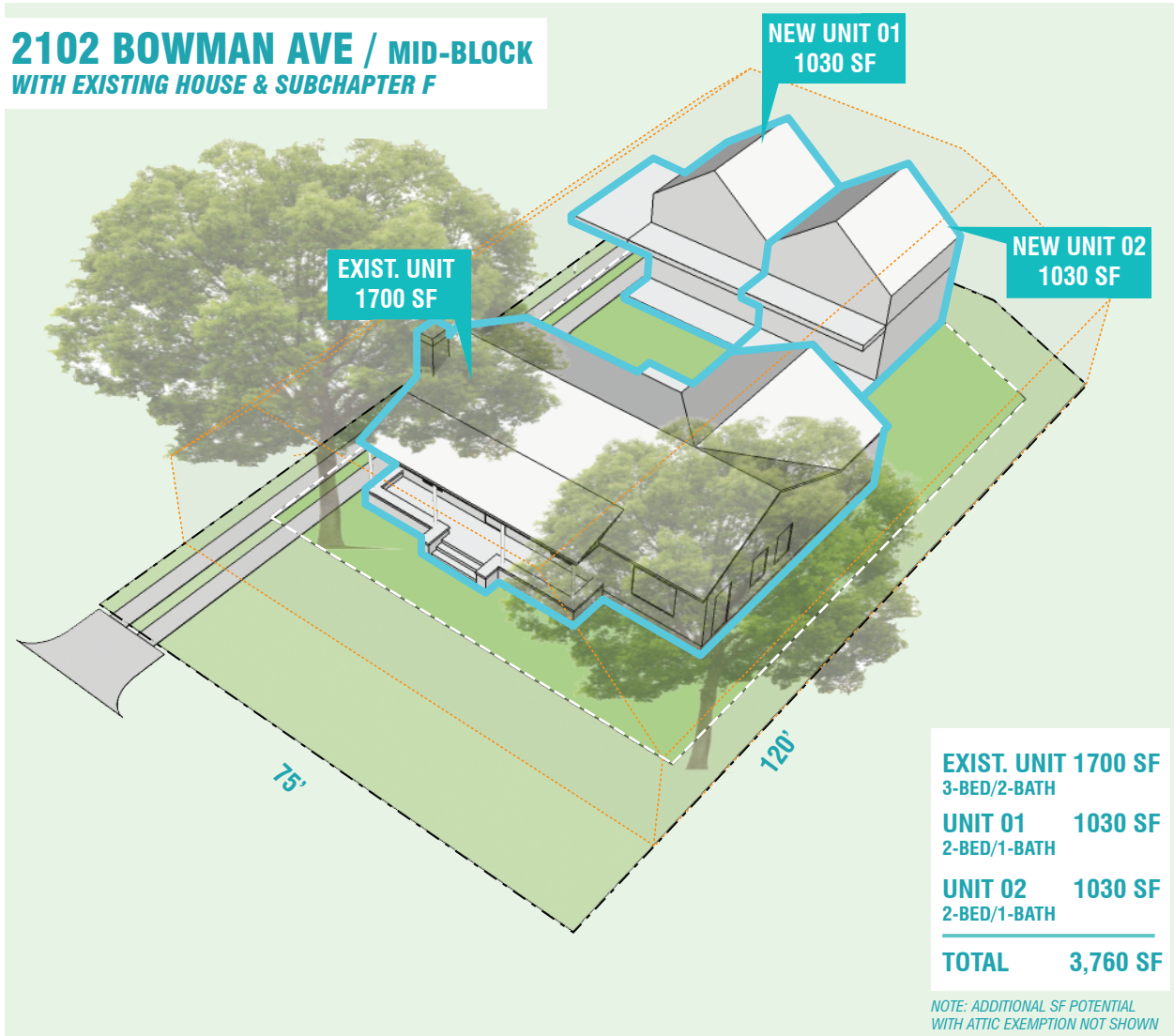


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	Lot Size:	8,840 sf	SF-3 - median
	Lot Type:	Thru-Block	-
	Impervious Cover:	43% of lot	SF-3 - unchanged
	Floor Area Ratio:	46% of lot (4050 sf)	no FAR limits
	Setbacks : (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	Parking:	1 space per unit	no minimum parking req
	McMansion Tent:	per Subchapter F	Subchapter F - unchanged

## FINDINGS

- 
- 
- 
-

**2102 BOWMAN AVE / MID-BLOCK**  
WITH EXISTING HOUSE & SUBCHAPTER F

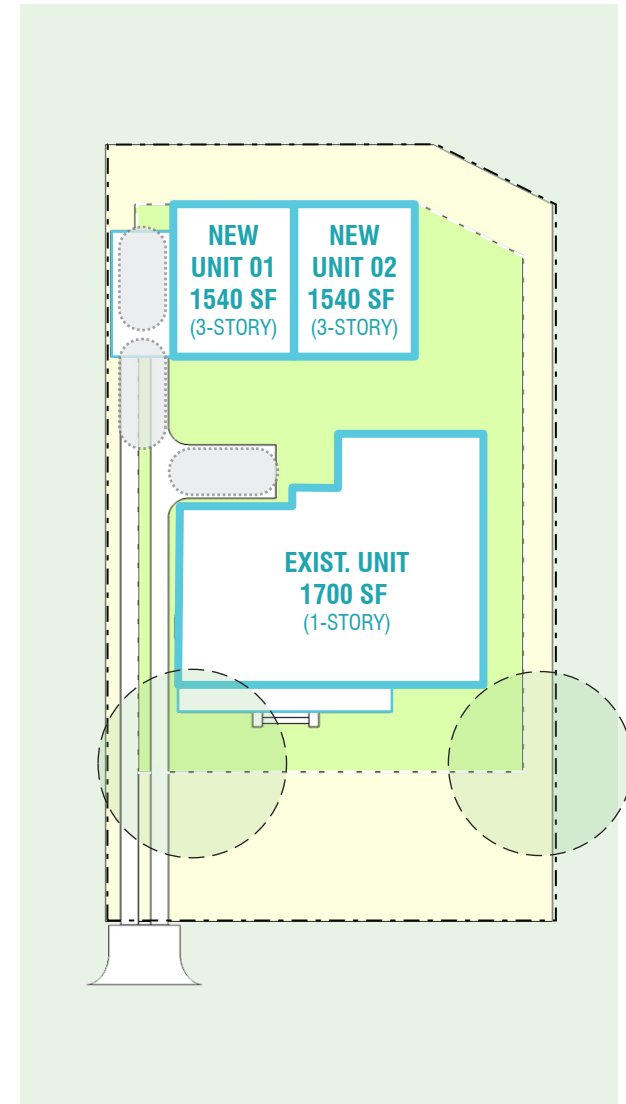
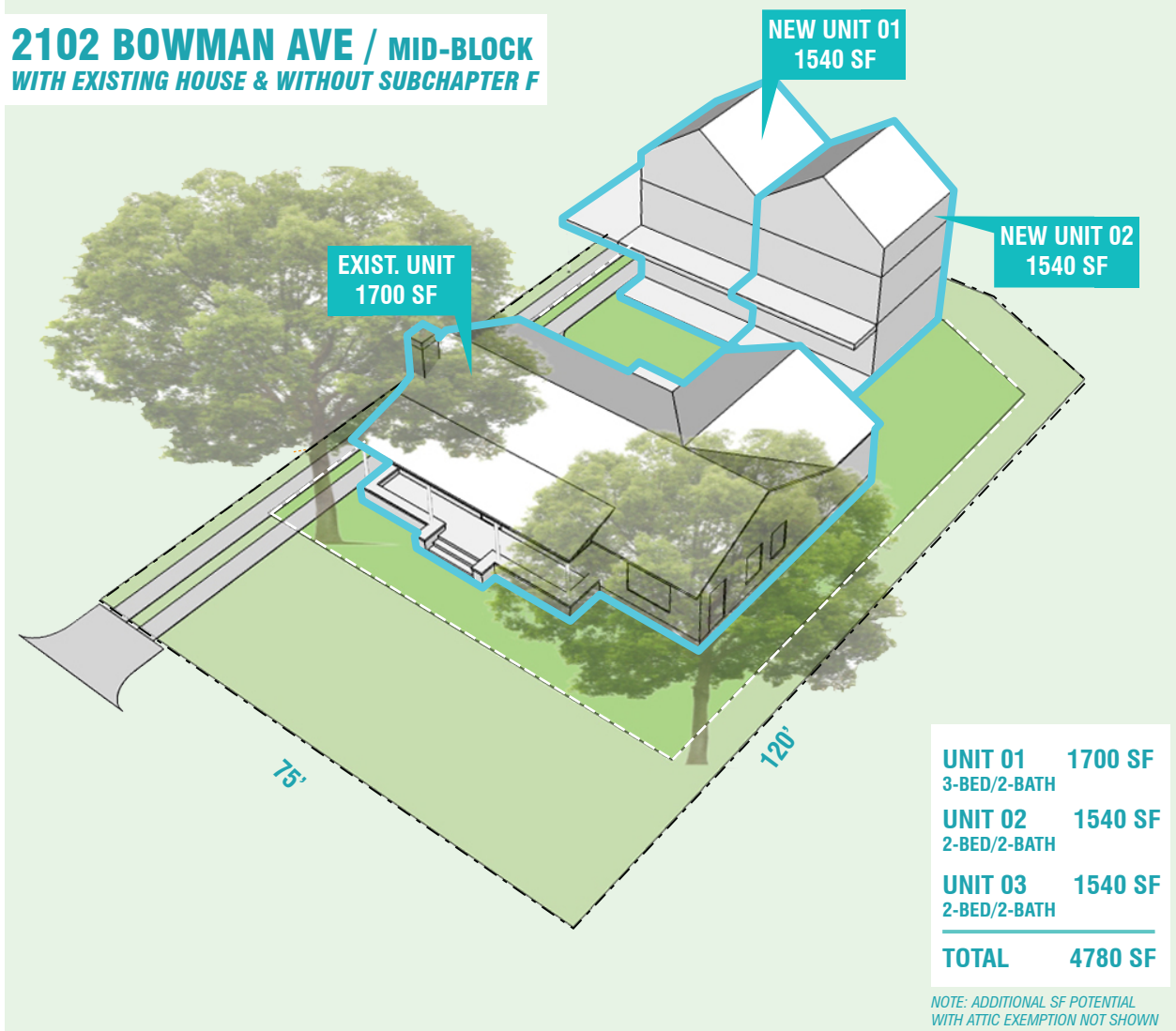


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9640 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	39% of lot (3760sf)	Subchapter F - unchanged
	<b>Setbacks :</b> (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	<b>Parking:</b>	1 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	per Subchapter F	Subchapter F - unchanged

**FINDINGS**

- Existing house and trees limit parking on site

**2102 BOWMAN AVE / MID-BLOCK**  
 WITH EXISTING HOUSE & WITHOUT SUBCHAPTER F

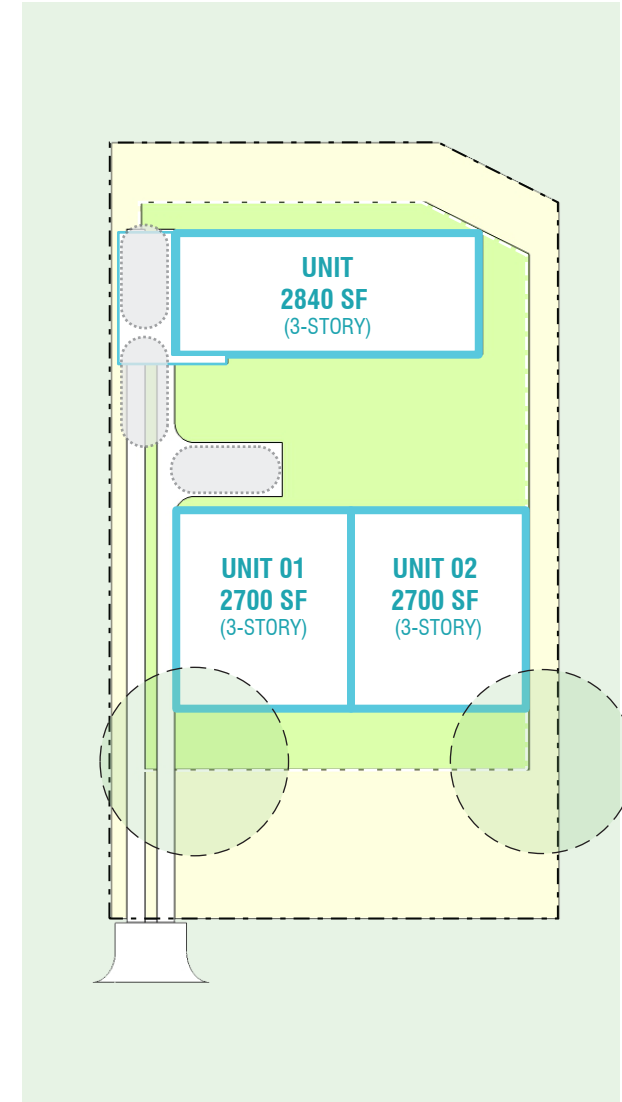
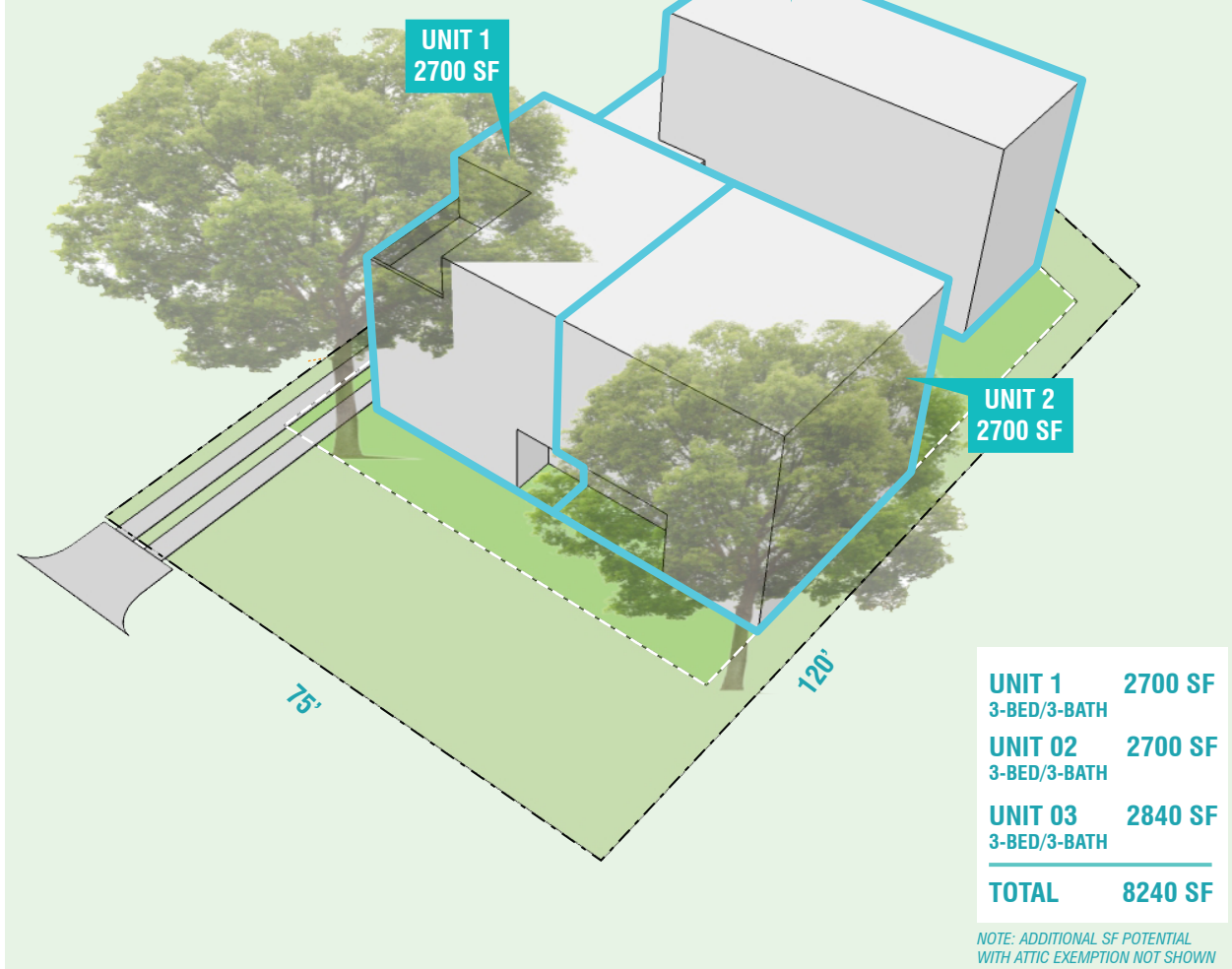


		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9641 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	50% of lot (4780sf)	no FAR limits
	<b>Setbacks</b> : (front/rear/ street-side/side)	25' / 10' / 15' / 5'	SF-3 - unchanged
	<b>Parking:</b>	1 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	35'	SF-3 - no McMansion tent

**FINDINGS**

- Existing house and trees limit parking on site
- With existing house and limited impervious cover increased FAR encourages 3-story units

**2102 BOWMAN AVE / MID-BLOCK**  
**NEW CONSTRUCTION WITHOUT SUBCHAPTER F**



		CURRENT ZONING COMPARISON	
<b>ZONING</b>	<b>Lot Size:</b>	9640 sf	SF-3 - median
	<b>Lot Type:</b>	Mid-Block	-
	<b>Impervious Cover:</b>	45% of lot	SF-3 - unchanged
	<b>Floor Area Ratio:</b>	<b>85% of lot (4780sf)</b>	no FAR limits
	<b>Setbacks</b> : (front/rear/ street-side/side)	<b>25' / 10' / 15' / 5'</b>	SF-3 - unchanged
	<b>Parking:</b>	1 spaces per unit > 1100 sf 1 space per unit < 1100 sf	SF-3 - unchanged
	<b>McMansion Tent:</b>	<b>35'</b>	SF-3 - no McMansion tent

**FINDINGS**

- Existing trees limit parking on site
- With limited impervious cover unlimited FAR encourages 3-story units
- Tearing down the existing 1-story house significantly increase the buildable SF allowed on the site without FAR limits





# RECOMMENDATIONS & BALANCING

The following page contains our primary recommendations to the Planning Commission and City Council upon reading the draft discussed at the joint meeting on 26 October 2023.

The pages that follow go into additional detail on our recommended methodology for establishing and tuning the FAR gradient with some of the data used to determine potential ranges for those numbers. We provided Planning Commission with four options to implement the FAR gradient. Third and Fourth options are our recommended methods that would achieve approximately the same resultant outcome through different methods of codification. The first two options (doing nothing and the 26 October language) were provided for context.

# RECOMMENDATIONS (TO 26 OCT DRAFT)

## ↑ REPLACE SUBCHAPTER F 0.4 FAR WITH FAR GRADIENT

Recommend starting with the equivalent of what is available under Subchapter F with waivers - effectively 0.5, and add a 0.1 bonus per unit added. These numbers are based on research so far, but calibration still needed. Lots smaller than 5,750 sf will also need FAR boosts.

## ↑ REMOVE 1,1100 SF LIMIT FOR TWO-FAMILY

This unnecessarily limits ability to create family-friendly additional units and encourages larger, more expensive units. Removing allows for better response to lot-specific conditions and provides more usable flexibility for affordable housing developers. This would also make Duplex redundant and could collapse to one Two-Unit Residential Use. (To further incentivize more balanced units and disincentivize deluxe, this could be replaced with a MINIMUM GSF %.)

## ↑ DECREASE SETBACKS ON TWO- AND THREE-UNIT

This is a major blocker for ADUs today where they are allowed. Recommend 15' Front Yard (approximate typical averaged case), 5' street side yard (match side yard in all zones), 5' rear yard

## ↑ ADOPT PRESERVATION INCENTIVE

Defer to Preservation Austin and those already working on that; calibrate to ensure the additional entitlement available through the Two-Unit and Three-Unit Residential uses. Additional FAR, additional units, reduced setbacks, impervious cover have all been proposed, but other bonuses should be considered.

# FAR GRADIENT METHODOLOGY

## ↑ IN PHASE 1, FAR GRADIENT APPLIES ONLY WITHIN SUBCHAPTER F AREA

- ↑ Due to not wanting to decrease existing entitlement, but this needs to be holistically considered in the future

## ↑ FAR GRADIENT APPLIES ONLY IN SF-1, SF-2, SF-3

- ↑ Base Zoning FAR should apply in all other zones

## ↑ DETERMINE EQUIVALENT CURRENT FAR LIMIT

- ↑ Retain Subchapter F method with waivers -OR- establish equivalent without waivers
- ↑ Must account for porches, attics, and garages/carports
- ↑ Prevent tuck-under parking from pushing living area higher
- ↑ Do not create yet another measure of “building area” or “FAR” in the code.

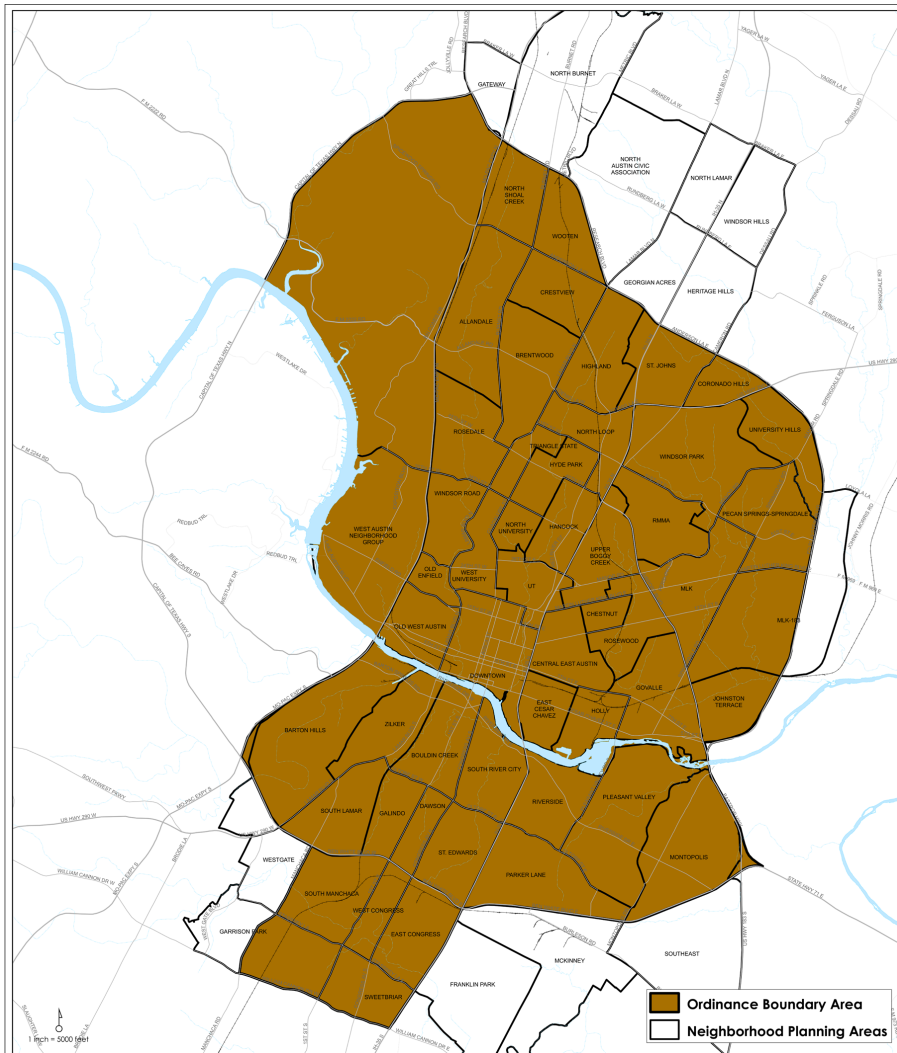
## ↑ DETERMINE INCREASE FOR ADDITIONAL UNITS

- ↑ Needs to be large enough to allow for family units
- ↑ Does not need to be the size of the additional unit which would discourage smaller/more affordable units
- ↑ Consider existing patterns and precedent programs

## ↑ SIMPLIFY IMPLEMENTATION

- ↑ Use upper range of what is possible today to not reduce entitlement or dilute benefit
- ↑ OPTION 3 - Add increment to base allowed in Subchapter F (but waive other portions)
- ↑ OPTION 4 - Hard code FAR limits in Use definition (but needs to account for garages, porches, etc...)

# SUBCHAPTER F AREA



Residential Design and Compatibility Standards Area (McMansion Ordinance) and Neighborhood Planning Areas

Created August 26, 2010  
 By Paul Frank  
 mcmansion boundary updated.mxd

	INSIDE	OUTSIDE
CURRENT FAR LIMIT	LARGER OF 0.40 OR 2300 sf	NONE
AREA ABOVE FAR LIMIT	PORCH, GARAGE, ATTIC, BASEMENT	N/A
MOST COMMON LIMITING FACTORS	FAR TENT IMPERVIOUS COVER	% BUILDING COVER HEIGHT IMPERVIOUS COVER
NEW CONSTRUCTION 2012-2022 - EFFECTIVE FAR		
SMALL LOT (3150-4450)	AVG = 0.57 - 0.74 75th %ile = 0.66 - 0.88	AVG = 0.51 - 0.66 75th %ile = 0.59 - 0.81
CODE MINIMUM LOT (5750)	AVG = 0.33 - 0.36 75th %ile = 0.44 - 0.47	AVG = 0.57 - 0.74 75th %ile = 0.48 - 0.51
TYPICAL LOT (7050-8350)	AVG = 0.33 - 0.31 75th %ile = 0.43 - 0.45	AVG = 0.37 - 0.41 75th %ile = 0.44 - 0.45

# 0.05 INCREMENT

		1 UNIT		2 UNIT		3 UNIT	
SMALL LOT	FAR RANGE	0.66	0.88	0.71	0.93	0.76	0.98
3150-4450 sf	LOT SIZES	4450	3150	4450	3150	4450	3150
	THEOR MAX	2937.00	2772.00	3159.50	2929.50	3382.00	3087.00
	ADDED AREA			222.50	157.50	445.00	315.00
	SPLIT			1579.75	1464.75	1127.33	1029.00
CODE MIN LOT	FAR RANGE	0.44	0.47	0.49	0.52	0.54	0.57
5750 sf	LOT SIZES	5750	5750	5750	5750	5750	5750
	THEOR MAX	2530.00	2702.50	2817.50	2990.00	3105.00	3277.50
	ADDED AREA			287.50	287.50	575.00	575.00
	SPLIT			1408.75	1495.00	1035.00	1092.50
TYPICAL LOT	FAR RANGE	0.43	0.45	0.48	0.5	0.53	0.55
7050-8350 sf	LOT SIZES	8350	7050	8350	7050	8350	7050
	THEOR MAX	3590.50	3172.50	4008.00	3525.00	4425.50	3877.50
	ADDED AREA			417.50	352.50	835.00	705.00
	SPLIT			2004.00	1762.50	1475.17	1292.50

# 0.10 INCREMENT

		1 UNIT		2 UNIT		3 UNIT	
SMALL LOT	FAR RANGE	0.66	0.88	0.76	0.98	0.86	1.08
3150-4450 sf	LOT SIZES	4450	3150	4450	3150	4450	3150
	THEOR MAX	2937.00	2772.00	3382.00	3087.00	3827.00	3402.00
	ADDED AREA			445.00	315.00	890.00	630.00
	SPLIT			1691.00	1543.50	1275.67	1134.00
CODE MIN LOT	FAR RANGE	0.44	0.47	0.54	0.57	0.64	0.67
5750 sf	LOT SIZES	5750	5750	5750	5750	5750	5750
	THEOR MAX	2530.00	2702.50	3105.00	3277.50	3680.00	3852.50
	ADDED AREA			575.00	575.00	1150.00	1150.00
	SPLIT			1552.50	1638.75	1226.67	1284.17
TYPICAL LOT	FAR RANGE	0.43	0.45	0.53	0.55	0.63	0.65
7050-8350 sf	LOT SIZES	8350	7050	8350	7050	8350	7050
	THEOR MAX	3590.50	3172.50	4425.50	3877.50	5260.50	4582.50
	ADDED AREA			835.00	705.00	1670.00	1410.00
	SPLIT			2212.75	1938.75	1753.50	1527.50

# 0.15 INCREMENT

		1 UNIT		2 UNIT		3 UNIT	
SMALL LOT	FAR RANGE	0.66	0.88	0.81	1.03	0.96	1.18
3150-4450 sf	LOT SIZES	4450	3150	4450	3150	4450	3150
	THEOR MAX	2937.00	2772.00	3604.50	3244.50	4272.00	3717.00
	ADDED AREA			667.50	472.50	1335.00	945.00
	SPLIT			1802.25	1622.25	1424.00	1239.00
CODE MIN LOT	FAR RANGE	0.44	0.47	0.59	0.62	0.74	0.77
5750 sf	LOT SIZES	5750	5750	5750	5750	5750	5750
	THEOR MAX	2530.00	2702.50	3392.50	3565.00	4255.00	4427.50
	ADDED AREA			862.50	862.50	1725.00	1725.00
	SPLIT			1696.25	1782.50	1418.33	1475.83
TYPICAL LOT	FAR RANGE	0.43	0.45	0.58	0.6	0.73	0.75
7050-8350 sf	LOT SIZES	8350	7050	8350	7050	8350	7050
	THEOR MAX	3590.50	3172.50	4843.00	4230.00	6095.50	5287.50
	ADDED AREA			1252.50	1057.50	2505.00	2115.00
	SPLIT			2421.50	2115.00	2031.83	1762.50



# 0.20 INCREMENT

		1 UNIT		2 UNIT		3 UNIT	
SMALL LOT	FAR RANGE	0.66	0.88	0.86	1.08	1.06	1.28
3150-4450 sf	LOT SIZES	4450	3150	4450	3150	4450	3150
	THEOR MAX	2937.00	2772.00	3827.00	3402.00	4717.00	4032.00
	ADDED AREA			890.00	630.00	1780.00	1260.00
	SPLIT			1913.50	1701.00	1572.33	1344.00
CODE MIN LOT	FAR RANGE	0.44	0.47	0.64	0.67	0.84	0.87
5750 sf	LOT SIZES	5750	5750	5750	5750	5750	5750
	THEOR MAX	2530.00	2702.50	3680.00	3852.50	4830.00	5002.50
	ADDED AREA			1150.00	1150.00	2300.00	2300.00
	SPLIT			1840.00	1926.25	1610.00	1667.50
TYPICAL LOT	FAR RANGE	0.43	0.45	0.63	0.65	0.83	0.85
7050-8350 sf	LOT SIZES	8350	7050	8350	7050	8350	7050
	THEOR MAX	3590.50	3172.50	5260.50	4582.50	6930.50	5992.50
	ADDED AREA			1670.00	1410.00	3340.00	2820.00
	SPLIT			2630.25	2291.25	2310.17	1997.50

# ADDITIONAL TUNING

## ↑ GRADIENT BALANCING

- ↑ 0.5 would result in more smaller units and strengthen preservation incentive, but result in less uptake from market-driven developers
- ↑ 0.10 would be a greater incentive to create multiple units and create more family-sized units but potentially fewer units sub 1700 sf
- ↑ 0.15 would allow some triplexes to develop at the unrestricted level
- ↑ 0.20 is what we have heard many developers propose but would allow Three-Unit developments similar to the unrestricted models
- ↑ Balance incentive for additional units against creating significantly larger homes
- ↑ Tension between family-sized units and smaller units to drive affordability
- ↑ TDHCA Minimum units are 850 for 2BD, 1050 for 3BD, 1250 for 4BD, so a family-friendly triplex could be as small as 2,550, which is 0.44 FAR on a code minimum lot

## ↑ Additional Beneficial Conditions to Add to Implementation

- ↑ Incorporate Garage Placement (25-2-1604) into Subchapter F and/or 2- and 3-Unit Uses
- ↑ Reduce Street Side Yard Setback to 5' (utility, fire clearances will still apply)
- ↑ Lock in Street Setbacks as averaged (15'?)
- ↑ Add 0.4 hard cap to 1-unit in Subchapter F to further incentivize adoption of multiple units
- ↑ Add Tree Preservation Incentive similar to Preservation Incentive (separate ordinance as with Preservation)

# WHAT IS A FAMILY-SIZED UNIT?

While we need housing options in a variety of sizes, family-sized units are a high priority. The City of Austin’s Strategic Housing Blueprint prioritizes family-friendly units and defines them as 2 or more bedrooms and with family-oriented amenities. Particularly in with rentals, the market produces fewer of these units than the demand for them. On the other hand, in the ownership market, family-sized units tend to be 2,400 sf or more. What is missing is more modest, smaller family-sized housing options.

This chart looks at one benchmark for what qualifies as a “family-sized” unit: the larger of the minimums used by the TDHCA for Housing Tax Credit projects. These are numbers for apartments, so additional area would need to be added to account for parking and other amenities provided in multi-family buildings (and often allowances for stairs), but these serve as a corrective to the assumption that houses must be 2,400 sf or larger to house a family.

	2 BEDROOM		3 BEDROOM		4 BEDROOM	
TDHCA 9% MIN	850		1050		1250	
	2-PLEX	3-PLEX	2-PLEX	3-PLEX	2-PLEX	3-PLEX
TDHCA 9% MIN	1,700	2,550	2,100	3,150	2,500	3,750

FAR BY LOT SIZE						
2500	0.68	1.02	0.84	1.26	1.00	1.50
3150	0.54	0.81	0.67	1.00	0.79	1.19
3800	0.45	0.67	0.55	0.83	0.66	0.99
4450	0.38	0.57	0.47	0.71	0.56	0.84
5100	0.33	0.50	0.41	0.62	0.49	0.74
5750	0.30	0.44	0.37	0.55	0.43	0.65
6400	0.27	0.40	0.33	0.49	0.39	0.59
7050	0.24	0.36	0.30	0.45	0.35	0.53
7700	0.22	0.33	0.27	0.41	0.32	0.49
8350	0.20	0.31	0.25	0.38	0.30	0.45
9000	0.19	0.28	0.23	0.35	0.28	0.42

# IMPLEMENTATION - OPTION 1

## OPTION 1 - DO NOTHING

### ANALYSIS

Continued production of increasingly expensive large homes well over 2000sf with escalating use of attic exemptions to increase square footage to offset land costs; continued demolition of smaller homes; continued shortage of homes under 2000sf

No streamlining to current permitting processes

Neighborhood scale continues to be defined by McMansion tent

Perpetuates racially-motivated zoning codes and restrictions on home ownership

For whom is the status quo working?

# IMPLEMENTATION - OPTION 2

## FULL WAIVER

2 UNIT

3 UNIT

### OPTION 2 - PROPOSED ORDINANCE 26 OCT 2023

FAR MAX

NL

NL

1. Subchapter F Waived in Full
2. Units beyond first limited to 1,100 SF

## ANALYSIS

More flexibility for homeowners and developers (profit and non-profit) for 2 and 3 unit developments = more units likely to be developed

Unlimited FAR for two- and three- unit development will incentivize over single-family developments

Creates opportunity for “Stealth McMansion” by building small ADUs and giving additional floor area to “main” unit

Unlimited FAR for two and three units will mean units are likely to be as larger than current housing production, with no incentives against street-facing garages.

Same IC and bldg coverage limits will push developments to 3 stories with parking underneath, potentially leading to neighborhood backlash

Increased entitlements could accelerate demolition of older, smaller housing stock

Less burdensome permitting without McMansion tent review

Creates some opportunities for affordable housing developments, but far outweighed by impact of ability to create even larger units

# IMPLEMENTATION - OPTION 3

	0.05 INCREMENT		0.10 INCREMENT		0.15 INCREMENT		0.2 INCREMENT	
	2 UNIT	3 UNIT	2 UNIT	3 UNIT	2 UNIT	3 UNIT	2 UNIT	3 UNIT
<b>OPTION 3 - MODIFY SUBCHAPTER F</b>								
BASE FAR	0.45	0.50	0.50	0.60	0.55	0.70	0.60	0.80
OR SF	2588	2875	2875	3450	3165	4025	3450	4600

This implementation would create Modify Two-Unit Residential Use and create a Three-Unit Residential Use (using the same structure as the 26 October 2023 draft) with the following criteria included (in place of fully waiving Subchapter F):

1. No single unit can exceed the allowable area currently under Subchapter F (can be replaced in the future with other simplified metric)
2. For properties zoned SF-1, SF-2, and SF-3, Waive Subchapter F 2.1 (Maximum Development Permitted) and replace with “the greater of 0.XX FAR or XXXX of gross floor area” according to the chart above. In all other zones, base zoning FAR applies.
3. Waive Subchapter F 2.2 (Building Height), 2.5 (Side Yard Setbacks), 2.6 (Setback Planes), 2.7 (Side Wall Articulation)
4. Waive Subchapter F 3.3.3.5 (15’ Foot High Space)

## ANALYSIS

Same Subchapter F FAR limits and with more flexibility for two-unit developments will create opportunities for smaller housing units

Limited streamlining to current permitting processes as Subchapter F stays in place; but works within existing structure to not add new definition

Waiving the tent (2.6) is a point of discussion.

Waiving the Subchapter F tent would remove one of the most complicated portions of the review

If not waived, Subchapter F tent would continue to define neighborhood scale, but would make 3-unit developments difficult to fit and would retain what is understood to be the single most time-consuming portion of additional review time added by Subchapter F to residential Permit Review cases.

# IMPLEMENTATION - OPTION 4

	0.05 INCREMENT		0.10 INCREMENT		0.15 INCREMENT		0.2 INCREMENT	
	2 UNIT	3 UNIT	2 UNIT	3 UNIT	2 UNIT	3 UNIT	2 UNIT	3 UNIT
<b>OPTION 4 - HARD CODE</b>								
FAR MAX	0.50	0.55	0.55	0.65	0.60	0.75	0.65	0.85
OR SF	2875	3163	3163	3738	3450	4313	3738	4888

This implementation would create Modify Two-Unit Residential Use and create a Three-Unit Residential Use (using the same structure as the 26 October 2023 draft) with the following criteria included (in place of fully waiving Subchapter F):

1. No single unit can exceed the allowable area currently under Subchapter F (can be replaced later with other simplified metric)
2. For properties zoned SF-1, SF-2, and SF-3, Waive Subchapter F 2.1 (Maximum Development Permitted) and replace with “the greater of 0.XX FAR or XXXX of gross floor area” according to the chart above. In all other zones, base zoning FAR applies.
3. Waive Subchapter F 2.2 (Building Height), 2.5 (Side Yard Setbacks), 2.6 (Setback Planes), 2.7 (Side Wall Articulation), 3.3.3.5 (15’ Foot High Space)
4. Amend 25-1-21 definition of Gross Floor Area (creates yet another definition in the LDC) for the purposes of these two uses. Garages must be explicitly INCLUDED in Gross Floor Area in these uses. The other differences between the Subchapter F definition of Gross Floor Area and the Base Code definition of Gross Floor Area need to be accounted for.

## ANALYSIS

The base equivalent of 0.45 accounts for approximately the 75% of use cases of subchapter F, but not the maximum. Garages must be explicitly INCLUDED in Gross Floor Area in these uses. Carports and Porches (unenclosed) area already excluded. Habitable Attics are already included (when interior height is greater than 6’), but this is would be the greatest opportunity for loss of current entitlements if not waived that the 0.45 base for 1 unit does not represent. However, increasing the base above 0.45 would greatly increase building area overall rather than allowing for conditional uses of the attic exemption.

Maintaining single-family homes under Subchapter F and creating separate FAR limits for two- and three-unit developments under City’s base Floor Area definition will create two different ways to account for FAR (see spreadsheet), adding confusion.

# ADDITIONAL IMPLEMENTATION

## ↑ ADOPT PRESERVATION INCENTIVE

Defer to recommendations of Preservation Austin for Phase I and recommend bolstered incentives in Phase II including a tree preservation bonus.





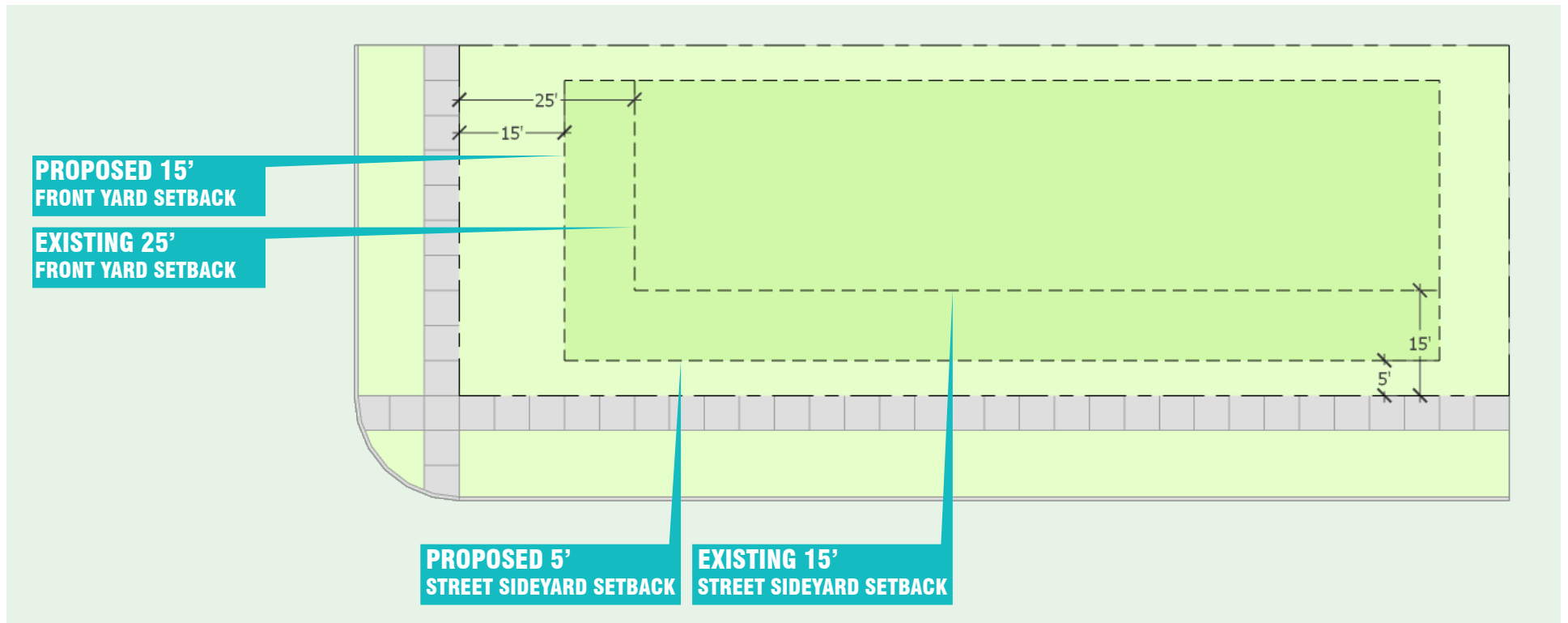
# ADDITIONAL IMPLEMENTATION

## ↑ REDUCE FRONT YARD SETBACKS TO 15'

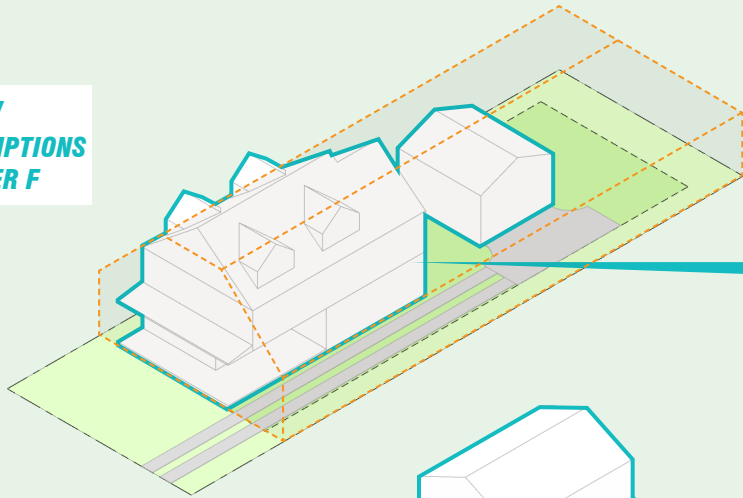
Provide benefit of front yard averaging to all

## ↑ REDUCE STREET SIDE YARD TO 5'

This allows for easier development of three units

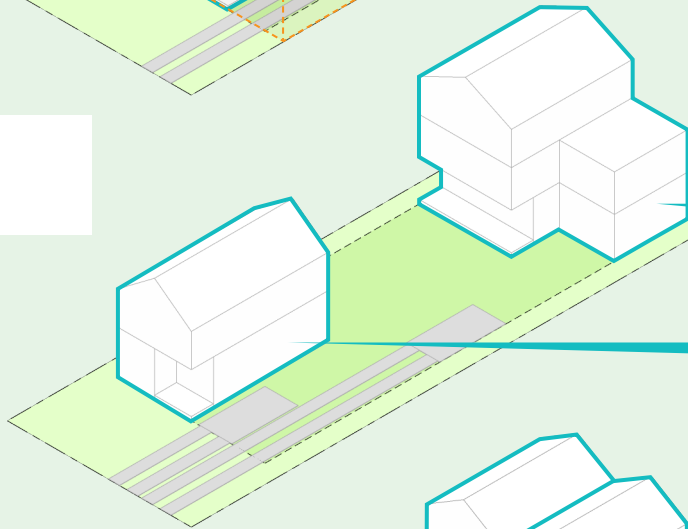


**SINGLE FAMILY  
FAR .40 + EXEMPTIONS  
WITH SUBCHAPTER F**



**3375 SF EXEMPTIONS:  
GARAGE, PORCH, ATTIC**

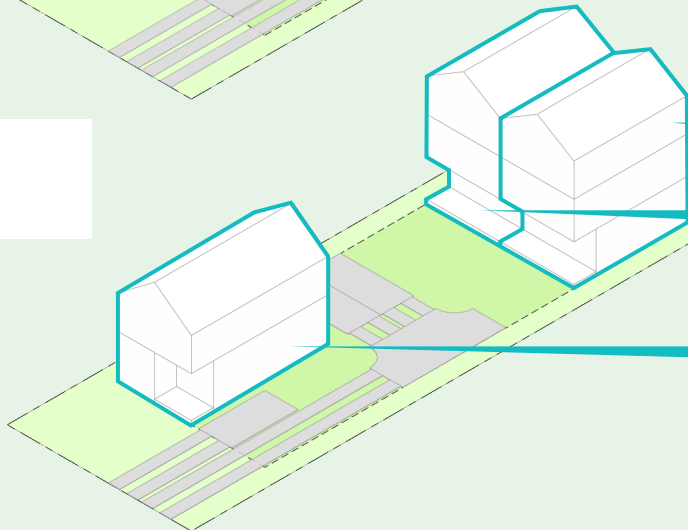
**TWO UNIT  
FAR .55**



**2625 SF**

**1500 SF**

**TRIPLEX  
FAR .65**

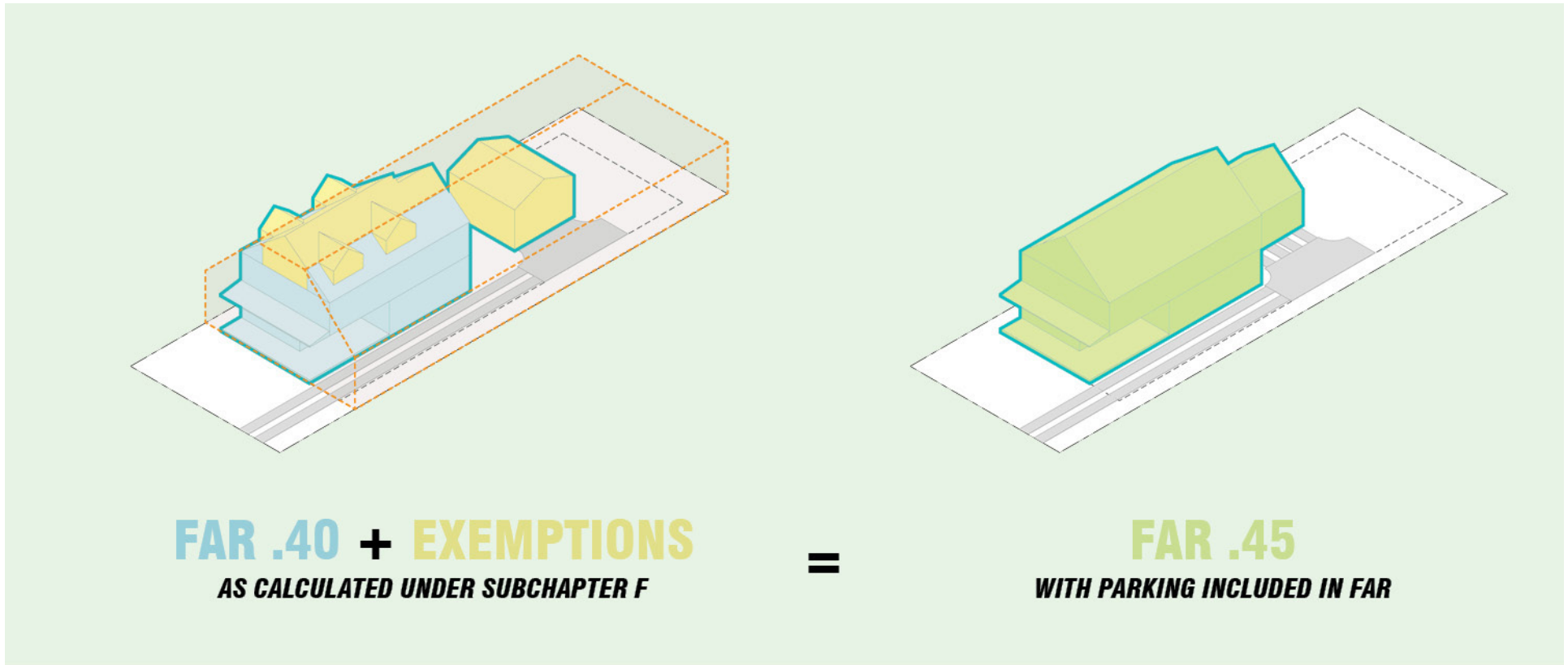


**1700 SF**

**1700 SF**

**1500 SF**

<b>ZONING</b>	<b>LOT SIZE</b>	<b>7500 SF LOT</b>
	<b>LOT TYPE</b>	<b>MID-BLOCK</b>
	<b>IMPERVIOUS</b>	<b>45% OF LOT</b>
	<b>FAR</b>	<b>VARIES W/ EXEMPTIONS</b>
	<b>SETBACKS</b>	<b>25'/10'/5'</b>
	<b>PARKING</b>	<b>1 SPACE PER UNIT</b>
	<b>SETBACK TENT</b>	<b>VARIES</b>



This graphic illustrates how basing the FAR Gradient increment on 0.45 captures the 90th percentile current FAR usage of Subchapter F with the garage and attic exemptions in the base FAR of 0.45.

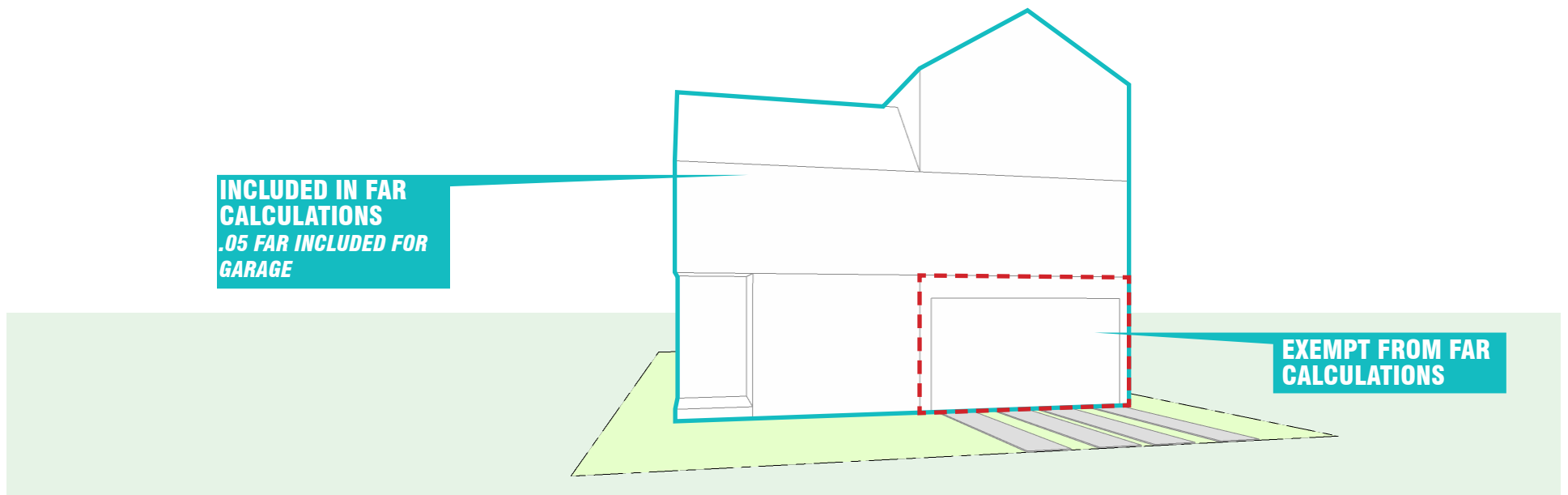
It is possible to exceed 0.45 FAR under Subchapter F on lots greater than 5,750 SF, but it is rare that a property exceeds 0.55 even with two units and multiple exemptions. The examples found that do exceed 0.55 used the basement exemption on a sloped lot. These are exceedingly rare.

# ADDITIONAL IMPLEMENTATION

## ↑ Parking Structures should be included in FAR

There is a difference between how FAR is calculated in the base building code and how it was calculated for Subchapter F - parking structures are 100% exempt from the base building code calculations, whereas Subchapter F allowed for only 450 sf detached, or 200 sf attached.

- ↑ Our FAR gradients already include a .05 FAR increase to account for parking. By excluding parking structures from FAR we are giving a double bonus and encourage garage-centric housing development.
- ↑ Allowing developers to decide between building more living space or car storage with the extra FAR builds in more flexibility to the market.



# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### PLANNING COMMISSION AMENDMENT: AIA COMMENTS

Gross Floor Area is defined as in § 25-1-21, with carports and parking structures such as garages exempted from the FAR calculation.

Garages are excluded from gross floor area **per unit** for purposes of this ordinance: ← This appears similar to the exemptions in Subchapter F, but provides the exemptions **per unit** and **excludes carports**, while Subchapter F provides the exemptions **per site** and **includes carports**.

A. Up to 450 square feet of: = **2-car garage**

1. A detached rear parking area that is separated from the principal structure by not less than 10 feet; ←
2. A rear parking area that is 10 feet or more from the principal structure, provided that the parking area is either:
  - a. detached from the principal structure; or ← This exemption will need to be clarified because Two-Unit and Three-Unit Uses do not define the principal structure.
  - b. attached by a covered breezeway that is completely open on all sides;

B. Up to 200 square feet of: = **1-car garage** ←

1. An attached parking area; or
  2. A garage that is less than 10 feet from the rear of the principal structure, provided that the garage is either:
    - a. detached from the principal structure; or
    - b. attached by a covered breezeway that is completely open on all sides
- ← Under Subchapter F, the 200sf exemption for attached parking areas only applies if used to meet minimum parking requirements. It is no longer applicable under current code since parking minimums have been removed (*to be confirmed by staff*).

PC amendment excludes clause (C) from Subchapter F, which clarifies total exemptions per site. Therefore, it is possible that this amendment could provide for a 650sf (450sf + 200sf) garage exemption per unit, or a total of 1950sf per site, depending on the definition of 'principal structure' under Two-Unit and Three Unit Uses.

# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### AIA RECOMMENDATION FOR FLOOR-AREA MAXIMUM PER USE

<b>SINGLE-FAMILY USE</b> (Existing, Subchapter F)	0.4 FAR + <u>0.05 FAR</u> <i>(450sf garage exemption on average 8000sf lot)</i> <b>0.45 FAR</b> <i>(effective FAR max under Subchapter F)</i>
<b>TWO UNIT USE:</b> (HOME ordinance)	<b>0.55 FAR</b> <i>(AIA recommendation with parking structures included in floor area)</i>
<b>THREE-UNIT USE:</b> (HOME ordinance)	<b>0.65 FAR</b> <i>(AIA recommendation with parking structures included in floor area)</i>

# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### EFFECTIVE FLOOR-AREA RATIOS WITH PC AMENDMENT (on average 8000sf lot)

<b>SINGLE-FAMILY USE</b> (Existing, Subchapter F)	0.4 FAR + <u>0.05 FAR</u> (450sf garage exemption on average 8000sf lot) <b>0.45 FAR</b> (effective FAR max under Subchapter F)
<b>TWO UNIT USE:</b> (HOME ordinance)	0.55 FAR (AIA recommendation with parking structures included in floor area) + <u>0.11 FAR</u> (2x 450sf exemptions - 1 per unit) <b>0.66 FAR</b> (effective FAR max)
<b>THREE-UNIT USE:</b> (HOME ordinance)	0.65 FAR (AIA recommendation with parking structures included in floor area) + <u>0.14 FAR</u> (1x 200sf + 2x 450sf exemptions - 1 per unit - considered most likely max outcome) <b>0.79 FAR</b> (effective FAR max)

# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### EFFECTIVE MAXIMUM UNIT SIZES WITH AIA RECOMMENDATION (on average 8000sf lot)

<b>SINGLE-FAMILY</b> (Existing, Subchapter F)	0.4 FAR <u>+0.05 FAR</u> <b>0.45 FAR</b>	3,200 sf <u>+ 450 sf</u> garage <b>3650 sf</b>	<b>TWO-UNIT USE</b>	0.55 FAR  <b>0.55 FAR</b>	2,200 sf unit 1 (or 2000sf+1-car garage) <u>2,200 sf</u> unit 2 <b>4,400 sf</b>
<b>HOUSE + ADU</b> (Existing, Subchapter F)	0.4 FAR <u>+0.05 FAR</u> <b>0.45 FAR</b>	2,100 sf house 1,100 sf ADU <u>+ 450 sf</u> garage <b>3650 sf</b>	<i>with existing max under Subchapter F</i>		3,650 sf existing house+2-car garage <u>750 sf</u> unit 2 with HOME <b>4,400 sf</b>
<b>DUPLEX</b> (Existing, Subchapter F)	0.4 FAR <u>+0.05 FAR</u> <b>0.45 FAR</b>	1,600 sf unit 1 1,600 sf unit 2 <u>+ 450 sf</u> garage <b>3650 sf</b>	<b>THREE-UNIT USE</b>	0.65 FAR  <b>0.65 FAR</b>	1,750 sf unit 1 (or 1550sf+1-car garage) 1,750 sf unit 2 <u>1,700 sf</u> unit 3 <b>5,200 sf</b>



# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### LIKELY\*\* MAXIMUM UNIT SIZES WITH PC AMENDMENT (on average 8000sf lot)

\*\*needs confirmation of principal structure definition under Two-Unit and Three-Unit Uses by staff

<b>SINGLE-FAMILY</b> (Existing, Subchapter F)	0.4 FAR	3,200 sf	<b>TWO-UNIT USE</b>	0.55 FAR	2,650 sf unit 1 (2,200sf+2-car garage*)
	+ <u>0.05 FAR</u>	+ <u>450 sf</u> garage			<u>2,650 sf</u> unit 2 (2,200sf+2-car garage*)
	<b>0.45 FAR</b>	<b>3650 sf</b>		<b>0.66 FAR</b>	<b>5300 sf</b>
<b>HOUSE + ADU</b> (Existing, Subchapter F)	0.4 FAR	2,100 sf house 1,100 sf ADU	<b>THREE-UNIT USE</b>	0.65 FAR	1,900 sf unit 1 (1700sf+1-car garage*)
	+ <u>0.05 FAR</u>	+ <u>450 sf</u> garage			2,200 sf unit 2 (1750sf+2-car garage*)
	<b>0.45 FAR</b>	<b>3650 sf</b>			<u>2,200 sf</u> unit 3 (1750sf+2-car garage*)
<b>DUPLEX</b> (Existing, Subchapter F)	0.4 FAR	1,600 sf unit 1 1,600 sf unit 2		<b>0.79 FAR</b>	<b>6,300 sf</b>
	+ <u>0.05 FAR</u>	+ <u>450 sf</u> garage			
	<b>0.45 FAR</b>	<b>3650 sf</b>			

*\*assumes 'Principal Structure' is defined as unit closest to street (allowing 2x 2-car garages to be built in the rear of a property for a duplex; and 2-car garages to be attached to a duplex unit in the rear under Three Unit Use), as well as that 3-car garages would be difficult to achieve with other site limitations and not desirable for market in urban core.*

# RECOMMENDATIONS

## 2d. INCLUDE GARAGES & CARPORTS IN THE FLOOR AREA DEFINITION

### WHY INCLUDE PARKING STRUCTURES IN THE FLOOR AREA DEFINITION?

- A floor-area exemption for garages makes them a **PRIORITY** in the code, rather than a **CHOICE**.
- Prioritising garages through exemptions works against the goal of HOME to create smaller homes. Creating floor-area exemptions for garages per PC amendment could make houses up to 25% larger than with the AIA recommendation.
- Garages are often used as ‘bonus rooms’ rather than for daily parking, creating a loophole for producing larger houses than intended by AIA’s recommended FAR maximums.
- Including garages in FAR maximums follows best practices by other cities that have implemented citywide zoning reform in single-family neighborhoods:
  - Garages are included in FAR maximums under Portland’s Residential Infill Project, which informed AIA’s recommendation on the FAR cap gradient for HOME.
  - Minneapolis changed its Floor Area definition to include attached garages when implementing triplex reform.

# AMENDMENT RECOMMENDATIONS

# PLANNING COMMISSION AMENDMENT ANALYSIS

On 14 November 2023, The Planning Commission recommended amendments to the HOME Initiative proposed changes. These amendments addressed many of the issues identified by AIA Austin, Planning Staff, and others by incorporating an “FAR Gradient” and replacements for portions of Subchapter F that, if not included, would result in a reduction of entitlement as compared to the existing code. The following chart lists the most critical amendments with an analysis based on the previous studies and models conducted by AIA Austin Housing Advocacy, along with proposed revised language for the amendments to better align these amendments with the stated goals of the HOME Initiative.

PC PROPOSED AMENDMENT	AIA AUSTIN HOUSING ADVOCACY COMMENTARY	PROPOSED LANGUAGE
<b>FLOOR AREA RATIO (FAR) CAP PER DEVELOPMENT, CAP PER UNIT, AND GROSS FLOOR AREA CALCULATIONS</b>		
Regarding floor area ratio (FAR) cap per development, for a development within the Subchapter F boundary:		<b>(no change)</b>
The maximum amount of development permitted on a property subject to this ordinance with 2 units is limited to the greater of 0.55 floor-to-area ratio or 3,200 square feet of gross floor area as defined below.		<b>(no change)</b>
The maximum amount of development permitted on a property subject to this ordinance with 3 units is limited to the greater of 0.65 floor-to-area ratio or 3,750 square feet of gross floor area as defined below.	Modeling by others indicates that particularly for lots below the average size, additional area and incentives will encourage more uptake of Three-Unit Residential. Maintaining the same FAR but increasing the floor to 0.65 of a 5,750 sf lot plus one 200 sf parking exemption per unit creates a much more feasible floor for three units. Raising the floor rather than creating a parking exemption provides this benefit more equitably and does not require its use for parking.	The maximum amount of development permitted on a property subject to this ordinance with 3 units is limited to the greater of 0.65 floor-to-area ratio or <b>4,350 square feet</b> of gross floor area as defined below.

No change is recommended for a development outside the Subchapter F boundary.		<b>(no change)</b>
Regarding floor area ratio (FAR) cap per unit, for a multi-unit development within the Subchapter F boundary:		<b>(no change)</b>
The maximum amount of development permitted for one unit on a property subject to this ordinance is limited to the greater of 0.40 floor-to-area ratio or 2,300 square feet of gross floor area as defined below for a two unit and three-unit development, with an exception for an existing unit on the site that would not comply with this requirement, as it related to FAR.	<p>This is necessary to prevent the construction of larger individual units than allowed under current regulations. For clarity, "one unit" should be changed to read "any single unit."</p> <p>Might also want to qualify the exemption for existing buildings must be existing at time of adoption of this ordinance, otherwise it would be possible to circumvent by building a single-family Subchapter F house and then come back and build the two- or three-unit Residential.</p>	The maximum amount of development permitted for <b>any single</b> unit on a property subject to this ordinance is limited to the greater of 0.40 floor-to-area ratio or 2,300 square feet of gross floor area <del>as defined below</del> for a two unit and three-unit development, <b>except for an existing unit completed prior to the adoption of this ordinance that exceeds the maximum FAR allowed by this section.</b>
The maximum amount of development permitted for two units on a property subject to this ordinance is limited to the greater of 0.50 floor-to-area ratio or 2,900 square feet of gross floor area as defined below for a three-unit development, with an exception for existing units on the site that would not comply with this requirement, as it related to FAR.	<p>This line is unnecessary and redundant. This will require additional calculations on applications and review that are simply not necessary. Limiting any single unit to 0.40 FAR ensures that additional units (or false additional units) would be built as a loop-hole for larger houses. A de facto minimum exists in that the smallest unit must satisfy the building code requirements to qualify as a unit.</p> <p>This is less critical than the "any single unit" limit. But if adopted, it should align with the two-unit maximum.</p>	<b>(omit)</b> OR The maximum amount of development permitted for <b>any</b> two units on a property with a <b>Three-Unit Residential Use subject to this ordinance is limited</b> to the greater of <b>0.55</b> floor-to-area ratio or <b>3,200</b> square feet of gross floor area <del>as defined below</del> for a three-unit development, <b>except for an existing unit completed prior to the adoption of this ordinance that exceeds the maximum FAR allowed by this section.</b>

<p>The maximum amount of development permitted for three units on a property subject to this ordinance is limited to the greater of 0.65 floor-to-area ratio or 3,750 square feet of gross floor area as defined below for a three-unit development, with an exception for existing units on the site that would not comply with this requirement, as it related to FAR.</p>	<p>This line is doubly unnecessary and redundant. In addition to the comments above, it does nothing that the base FAR for Three-Unit Residential already does.</p>	<p><b>(omit)</b></p>
<p>No change is recommended for a development outside the Subchapter F boundary.</p>	<p>This line is redundant.</p>	<p><b>(omit)</b></p>
<p>Gross Floor Area is defined as in § 25-1-21, with carports and parking structures such as garages exempted from the FAR calculation.</p>	<p>AIA Housing Advocacy STRONGLY OPPOSES this and has repeatedly stated that garages and parking MUST be included in the FAR calculations. The garage exemptions included in Subchapter F have been accounted for in the base FAR numbers given above. The increases per unit are based on 0.45 rather than 0.4, effectively giving everyone the benefit of the unnecessarily complex exemptions with the flexibility to use them for what is most appropriate for their family or their understanding of market forces/desires.</p> <p>This item with the text renders the exemption below moot, unless this may just be poor writing and should read "...exempted from the FAR calculation as follows:"</p>	<p><b>Gross Floor Area is defined as in § 25-1-21 except that parking facilities (including carports and garages) are included in Gross Floor Area for Two-Unit Residential, and Three-Unit Residential uses.</b></p>

<p>Garages are excluded from gross floor area per unit for purposes of this ordinance:</p> <p>A. Up to 450 square feet of:</p> <ol style="list-style-type: none"> <li>1. A detached rear parking area that is separated from the principal structure by not less than 10 feet;</li> <li>2. A rear parking area that is 10 feet or more from the principal structure, provided that the parking area is either: <ol style="list-style-type: none"> <li>a. detached from the principal structure; or</li> <li>b. attached by a covered breezeway that is completely open on all sides;</li> </ol> </li> </ol> <p>B. Up to 200 square feet of:</p> <ol style="list-style-type: none"> <li>1. An attached parking area; or</li> <li>2. A garage that is less than 10 feet from the rear of the principal structure, provided that the garage is either: <ol style="list-style-type: none"> <li>a. detached from the principal structure;</li> <li>b. attached by a covered breezeway that is completely open on all sides.</li> </ol> </li> </ol>	<p>AIA Housing Advocacy STRONGLY OPPOSES this and has repeatedly stated that garages and parking MUST be included in the FAR calculations. The garage exemptions included in Subchapter F have been accounted for in the base FAR numbers given above. This is an attempt by developers to double-dip and gain even more entitlement than the balanced FAR numbers above. The increases per unit are based on 0.45 rather than 0.4, effectively giving everyone the benefit of the unnecessarily complex exemptions with the flexibility to use them for what is most appropriate for their family or their understanding of market forces/desires.</p> <p>Adding the exemption PER UNIT greatly increases the impact per site above the current regulations.</p> <p>In Subchapter F, the 200 sf parking exemption is only allowed if it is used to meet parking minimums, which no longer exist.</p>	<p><b>(omit, use definition as above)</b></p>
<p>Remove the limitation that “One of the dwelling units may not exceed 1,100 total square feet.”</p>	<p>Removing this language will allow for more multi-bedroom family-sized units as well as greater flexibility to use the FAR in configurations that respond to site-specific constraints, individual family needs, existing structures, etc.</p>	<p><b>(no change)</b></p>

## PRESERVATION BONUS

A development can utilize the Preservation Bonus if it preserves a structure built in 1960 or earlier.

- For a development utilizing a Preservation Bonus, the FAR of the preserved existing structure does not count against the FAR limits for any additional allowable dwelling units.
- A development utilizing a Preservation Bonus is entitled to an optional bonus unit in addition to other allowable dwelling units, with no additional FAR allowed, subject to review by the Law Department. Revise the definition of “multifamily residential” and other terms accordingly.
- A development utilizing a Preservation Bonus must preserve at least 50 percent of the existing structure and preserve 100 percent of the street-facing façade with remodeling or alterations allowed using the criteria below:
  - o any remodeling or alterations to a side-gabled, cross-gabled, hipped, or pyramidal roof form must be located behind the existing roof ridgeline or peak.
  - o any remodeling or alterations to a front-gabled, shed roof or flat roof form must be located the lesser of 15 feet from the front façade or one-half of the width of the front wall.
  - o If a development requires a 15 feet clearance on the side of the existing structure in order to build other allowable dwelling units, staff shall permit the removal or alteration of an existing or converted carport or garage to provide such a clearance.
- All modifications to the portion of the existing structure subject to the preservation requirements must meet the requirements of the Historic Design Standards as determined by the Historic Preservation Office.

Defer to Preservation Austin.

We would like to see this strengthened further in Phase 2 when we know more about how effective it is.

Impervious Cover will become the most limiting factor in the vast majority of use cases.

**(no change)**



## SUSTAINABILITY BONUS

A development can utilize the sustainability bonus if it preserves a structure that is older than 20 years and built after 1960.

- For a development utilizing a sustainability bonus, the FAR of the preserved existing structure does not count against the FAR limits for any additional allowable dwelling units.
- A development utilizing a sustainability bonus must preserve at least 50 percent of the existing structure.
- Staff should provide recommendations to Council for additional sustainability incentives, besides FAR, as a part of the adoption of the HOME ordinance.

Defer to Preservation Austin.

We would like to see this strengthened further in Phase 2 when we know more about how effective it is.

Impervious Cover will become the most limiting factor in the vast majority of use cases.

**(no change)**

## FRONT YARD SETBACK - FROM SUBCHAPTER F

A. Minimum Setback Required. The minimum front yard setback required for development subject to this ordinance is the lesser of:

1. The minimum front yard setback prescribed by the other provisions of this Code; or
2. The average front yard setback, if an average may be determined as provided in Subsection B. below.

B. Average Front Yard Setback. The following rules apply for purposes of the setback calculation required by Paragraph A.2:

1. A front yard setback is the distance between the front lot line and the closest front exterior wall or building façade of the principal residential structure located on the lot.
2. Except as provided in paragraph 3, average front yard setback is determined using the front yard setback of the four principal residential structures that are: (a) built within fifty feet of the front lot line; and (b) closest to, and on the same side of the block, as the property subject to the setback required by this section.
3. If less than four structures satisfy the criteria in paragraph B.2, average front yard setback is calculated using the number of existing residential structures on the same side of the street block as the property subject to the setback required by this section. If there are no structures on the same side of the block, average front yard setback is calculated using the front yard setbacks of the four structures on the opposite side of the block that are closest to the property subject to the setback required by this section. If there are less than four structures on the opposite side of the block, the lesser number of structures is used in the calculation.

AIA Austin Housing Advocacy recommends giving all properties the benefit of setback averaging by reducing the front yard setback to 15 feet (based on a typical result of averaging in many neighborhoods where it is used). This would be a simpler implementation, spread the benefit more equitably, and encourage development patterns that reflect traditional central Austin neighborhoods throughout the city, not just certain neighborhoods

Allowing Front Yard Averaging from Subchapter F is a minimum viable requirement for Phase 1 to both enable use of the site to achieve the bonuses allowed for multiple units AND remove a potential incentive to remain within Subchapter F for Single Family rather than use the multi-unit use options.

Removing Averaging documentation simplifies both the application process and the review process.

**Front Yard Setbacks for Two-Unit and Three-Unit Residential uses shall be 15 ft.**

## REAR YARD SETBACK

All structures shall comply with the rear yard setback prescribed by other provisions of this Code, but the minimum rear yard setback of an additional dwelling unit may be reduced to five feet if the rear lot line is adjacent to an alley or lot with a non single-family use. Staff may consider other features to allow for this setback exception, while meeting other health, safety, and environment requirements.

This is allowed by Subchapter F and so should not be a limiting factor for Two-Unit and Three-Unit Residential uses. Otherwise, Single-Family under Subchapter F could be more advantageous, and ADUs currently allowed under Subchapter F could be rendered unfeasible.

**(no change)**

## REDUCE STREET SIDE YARD SETBACK

For a multi-unit development, reduce street side-yard set back to 10 ft. (allows for 5 ft. + room for sidewalk) in the case of a corner lot.

Sidewalks go in the ROW whenever possible! Increasing our recommendation from 5' to 10' for the sake of sidewalks unnecessarily burdens many sites. Better to follow the way this works for commercial zoning with Subchapter E to ensure space for sidewalk and planting zone is maintained.

For a **Two-Unit or Three-Unit Residential Use**, reduce street side-yard set back to **the greater of 5 ft from the property line or 10 ft from the face of curb or edge of pavement.**

## DUPLEX

Remove the distinction between duplex and two-unit residential uses and establish the same requirements for both, subject to review by the Law Department.

Note that the Building Code requirements and allowances will remain for duplexes. There is no need for the Zoning Code's Uses to make this distinction with all other proposed changes. As the Fire Marshall and Building Official stated multiple times in the PC hearing, nothing done here will change the life safety requirements of the building codes. For any building configuration, there are fire separation or protection requirements already in place to cover every iteration of attached and detached buildings on a single site as well as between sites and ROWs.

**(no change)**

# STAFF AMENDMENT ANALYSIS

On 01 December 2023, City staff issued a memo with considerations for implementing the Planning Commission's proposed amendments. These recommendations largely correspond to AIA Austin Housing Advocacy's recommendations and approach while offering options to adjust the amendments for practical and policy considerations. The chart below looks at two of the three items in the memo. Preservation and Sustainability Bonus considerations are outside the scope of this study, but we agree that implementation and enforcement need to be fully considered.

STAFF CONSIDERATION	AIA AUSTIN HOUSING ADVOCACY COMMENTARY
<b>FRONT YARD SETBACK</b>	
<p>To provide flexibility for establishing front yard setbacks, the Planning Commission recommended applying Subchapter F’s “setback averaging” provisions to the new Two and Three-Unit use regulations. While staff appreciates the intent of this recommendation, Subchapter F’s rules on setback averaging have proven challenging and costly to utilize. Therefore, in the interest of providing more cost-effective alternatives, staff has identified the following alternative options from which Council could choose:</p>	<p>Implementing front-yard averaging can require additional work and cost to document/survey existing conditions on neighboring properties. It also requires additional</p>
<p>Alternative Option 1: Change the front setback to 20 feet, with the option for a front porch that is open on three sides to encroach up to 5 feet into the front yard as measured from the front setback line. This is similar to AIA’s recommendation of a 15-foot front setback but provides an incentive for building porches and increasing the connection of new units to the public realm.</p>	<p>This is indeed similar to our proposal and would be a good alternative to implement this intent. Inasmuch as the front-yard averaging allows new construction to conform to the existing and desirable patterns of existing development, the majority of cases where averaging applies, the structures used to establish the setback include front porches.</p>
<p>Alternative Option 2: A simplified version of setback averaging would allow applicants to use the shortest front yard setback of the four existing residential structures closest to, and on the same side of the block, as the new units. The additional detail provided in Subchapter F would be omitted, thereby providing for a more flexible and streamlined process.</p>	<p>This option would still require and some documentation, but would be simpler to execute. However, there are corner cases here to consider. We have seen instances where there are no structures on the same side of the block to use (such as at through lots where an accessory structure fronts the “rear” street but must be treated as a front yard, and no other properties on the block have a frontage). Therefore the prioritization of the same side of the block but the allowance for same street when none exist is necessary. (“Opposite side of the block” in the current Subchapter F text is too ambiguous.) Doing this would also tend to propagate minimum setbacks in extreme cases. Therefore, Option 1 is preferable for simplicity and equity in application.</p>

## FAR MAXIMUMS

In reviewing the average potential unit sizes that could be built with the FAR maximums recommended by Planning Commission, and reviewing the AIA Austin recommendations, staff has identified the following alternative options to reduce the unit sizes, if desired. Alternative Option 1, below, would include the square footage of garages and carports in FAR calculations. Alternative Option 2, below, would reduce the maximum FAR for two-unit developments to lower the size of the units. Council could consider one or both options.

Alternative Option 1: Include the square footage for garages and carports in FAR calculations. This is consistent with the AIA Austin recommendation to include garage and carport space in FAR calculations.

Alternative Option 2: Another option staff believes would further the intent of the HOME initiative is to lower the allowable FAR for two-unit developments from 0.55 to 0.50. This would more closely approximate existing sizes of two-unit projects while still allowing for the inclusion of garages and carports in FAR calculations. An added benefit of this approach is increasing the likelihood that the Preservation and Sustainability Bonuses will be utilized. See the attachment with information about the currently proposed FAR and square footage maximums, potential average unit sizes, and modeling for additional context for this alternative.

This is more about reducing overall massing per site while maintaining the ability to build family-sized units.

This is **absolutely fundamental** for the HOME Initiative to meet its goals. If this option is not enacted and the garage exemptions added by Planning Commission are not removed, **AIA Austin Housing Advocacy will withdraw support of the HOME Initiative.**

The FAR maximums and gradients proposed and considered by Planning Commission already accounted for the garage exemptions (and other exemptions) in the FAR numbers. Adding the garage exemptions on top of these numbers results in a significant increase in buildable area, height, and massing of structures compared to the existing conditions and the balanced approach of an FAR gradient by providing as much as 650 sf per unit.

**Hard no.** There are examples of current two-unit developments that can achieve 0.55 FAR on average-sized lots under Subchapter F (with garage and attic exemptions) and higher on lots below 5,750 sf. Reducing the FAR for Two-Unit Residential Uses to 0.50 market-driven developers from using the Two-Unit Residential. It might mean that some builders choose to continue to build under Subchapter F rather than Two-Unit Residential.