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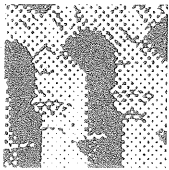
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February 7, 2008

Ms. Jana McCann
 ROMA Design Group - Austin
 515 Congress Avenue, Suite 1600
 Austin, Texas 78701

Dear Ms. McCann,

I write on behalf of the Heritage Society of Austin (HSA) with regard to the Phase One Document Draft of the Downtown Austin Plan (DAP). Because the preservation of the historic built environment of Austin is important to the envied quality of life of our City, we offer these comments and suggestions.¹



**HERITAGE
 SOCIETY OF
 AUSTIN**

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As you are aware, within the DAP boundaries are significant and unique historic resources. Four of the City's National Register Historic Districts are within the DAP area, as are numerous individual structures ranging from the elegant grandeur of the historic Driskill Hotel and Paramount Theatre to the modest homes located along Rainey Street and West Avenue. The DAP encompasses the inspiring State Capitol Building and the numerous parks with historic assets and relevance – including those that make up part of the original Waller Plan – that provide a cohesive underpinning to our urban fabric.

We are very encouraged by the proposal in the Phase One Document Draft (“Draft”) to establish distinct districts to recognize various uses and identities. Recognizing the unique sense of place of these districts enables our city to pursue appropriate development reflective of the long-term goals specific to the area. Downtown's districts contain an interesting mix of historic structures and modern development, which together illustrate the city's continuous evolution. Of course, we trust that the proposal will result in a product that is respectful and sensitive to the character of the districts, including established residential neighborhoods and clusters of historic structures. As we have discussed, HSA would like to offer our assistance in identifying the appropriate regulations for specific districts.

HSA was not as encouraged by the treatment of some other issues in the Draft. It is disappointing that the “Five Top Priorities” document released to the public lacked

¹ When addressing the CVCs, HSA offers these comments on behalf of itself and its sister preservation organizations across Texas, including, but not limited to, Preservation Texas, Inc., the Abilene Preservation Alliance, the El Paso Historical Commission, the Galveston Historical Foundation, the Greater Houston Preservation Alliance, Historic Amarillo, Historic Fort Worth, Historic Houston, Historic Mesquite, Historic Tyler, Historic Waco, Preservation Dallas, the San Antonio Conservation Society, Victoria Preservation, Inc., the Williamson County Historical Commission, and others.

direct acknowledgement of the positive and vital role of historic preservation to our downtown. In creating the exciting future of downtown, we must not overlook or take for granted the efforts of those who came before us to preserve the resources that we now recognize as quintessential to Austin's downtown. The DAP recognizes that Austin is currently enjoying a boom in downtown development. We must also recognize that without careful planning, we risk losing the same things that contribute so much to Austin's quality of life and make it attractive to development. Google's choice to office in the Scarbrough Building rather than in new downtown construction affirms the draw of Austin's unique historic character. We respectfully urge you to include Historic Preservation as a Strategy to "Keep it Authentic and Diverse" along with Live Music, Retail and Affordable Housing.

We are also concerned with the framing of some issues in the Draft. For example, the Draft cites the risk of downtown losing its "competitive position" in the region to suburban destinations such as the Domain.² Specifically, the Draft cites the risk of Downtown, without intervention, of becoming "a quaint historic district." HSA has never advocated for such an outcome nor would we be supportive of such a result. To the contrary, HSA has consistently held the position that the vibrant growth and densification of our downtown is positive for preservation, enabling more to enjoy the historic resources that contribute significantly to Downtown's sense of place and creating viable options for adaptive use of historic buildings. It should also be acknowledged that while Downtown may not offer suburbia's quantity of available space, lower costs, or plentiful parking, HSA maintains that suburban development cannot compete with Downtown Austin's special qualities, including its natural setting, historic and cultural resources, and diverse mix of local and regional businesses.

Finally, preserving the Capitol View Corridors (CVCs) is an issue of significant importance to Austinites and Texans. Over 300 individuals and organizations to date have expressed their opposition to weakening of the CVCs, including every sitting member of the Travis County Delegation serving in the Texas House of Representatives and an overwhelming number of their colleagues. HSA did not learn of the Draft's call to "revisit and reevaluate" the CVCs until the stakeholder meeting, despite the preservation of the CVC's being stated as one of HSA's top three priorities in our requested input to ROMA.

HSA strongly urges the Downtown Planning process not be used to weaken the protections that, for close to a quarter century, have allowed the vibrant growth of our downtown while preserving our most significant Capitol views. Much community attention was focused on a recent effort by the City's Downtown Commission to review the CVCs, which concluded in recommendations for the elimination or modification of various view corridors.³ These recommendations

² The City appears to be pursuing competing goals, as the North Burnet/Gateway Master Plan (November 1, 2007), which includes the Domain, cites the need for similar approaches to those cited in the Draft to encourage the growth of this suburban area as a destination.

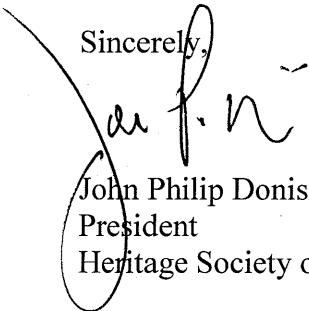
³ It should be noted that the City Council specifically declined to embrace any recommendations made by the Downtown Commission at a Council briefing on October 11, 2007, and formally took

were countered by significant opposition, cited above. Simply put, even under the scrutiny of the Commission's review, the compromise embraced by the City and State with the CVCs close to 25 years ago continues to enable development in appropriate locations to thrive.⁴

The Draft states that "a few" of the CVCs have eliminated "the ability of some private sites to redevelop at all." In fact, the City's Downtown Commission was unable to name a single development that has not sited in downtown because of the view corridors, or a dime of lost tax revenue – ad valorem or otherwise – due to displaced downtown development. We believe continued signals of willingness to weaken the CVCs only encourages speculative investment in CVC-constrained sites.⁵ The practical result is that these properties will lay fallow, under or undeveloped, adding no density and generating minimal revenue for the City, for years while owners wait for broad relief from the CVCs. As such, creating an expectation of relief from the CVCs undermines the City's very goals. We believe a better course of action is to embrace the CVCs and to work to find private partners who are interested in developing these sites in a manner consistent with our community values.

In closing, HSA asks that due consideration be given to the character defining value of historic buildings and spaces that makes Austin envied across the nation and the world. Community leaders have invested countless hours and effort in selling the uniqueness of Austin far and wide – including the majesty of its historic built environment. Growth and change in Austin's downtown may be inevitable, but loss of identity is not.

Sincerely,



John Philip Donisi
President
Heritage Society of Austin

no action. Some suggested that the Commission report be forwarded to ROMA as a resource to be considered along with those of other interest groups and stakeholders.

⁴ The "compromise" was struck after years of study and review, recognizing that a blanket height cap proposed at anywhere from 120' to 200' would severely limit the viability of downtown, and continued passive control over development would soon result in a proliferation of structures dwarfing the Capitol. The compromise allowed for unhindered development in appropriate areas downtown while protecting a number of prominent remaining views.

⁵ See *Developers Buy Downtown Block*, Shonda Novak, Austin American Statesman, October 19, 2007, stating that the City "is reviewing the Capitol view corridor restrictions, and the corridor that slices through the block could be eliminated. If that happens, "the sky's the limit," [the purchaser] said. "It just gives us a lot of other options."