

LINK HOUSTON

February 17, 2020

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Director

Department of Planning and Development

City of Houston

611 Walker

Houston, TX 77002

Dear Director Wallace Brown:

At LINK Houston, we advocate for a robust and equitable transportation network so that all people can reach opportunity. Transit and walkability are key components of the system we envision, and therefore we are keenly interested in the regulatory changes proposed by the Walkable Places and Transit-Oriented Development Ordinance efforts.

Safe, comfortable access by foot, bike, or wheelchair is critical for making transit a preferred mobility choice for more Houstonians. In a virtuous cycle, dense housing and employment surrounding transit stops support the high ridership that justifies frequent bus and rail service that people can rely upon. For several decades, Houston's development regulations have hindered the creation of walkable, transit-oriented neighborhoods in most of the city. Ensuring that all Houstonians have affordable options for living in such places will require making sure they are abundant. We applaud the Houston Planning Commission and Planning and Development Department for taking on this important effort.

LINK Houston has been engaged with affordable housing development and service organizations through our Housing + Transportation project, a partnership with Rice University's Kinder Institute for Urban Research funded by The Cullen Foundation. The goal of the project is to develop the necessary information and tools to ensure that affordable development decisions support affordable, low-car transportation options.

LINK Houston | 708 Main Street, 10th Floor, Houston, TX 77002



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A recent study based on U.S. Department of Housing and Urban Development data shows that Houston is currently less affordable than New York City when transportation costs are factored into overall housing costs. LINK Houston partnered with the Rice University's Kinder Institute to study where affordable housing and high-quality affordable transportation currently coexist in Houston; how well the existing affordable housing and affordable transportation options serve families and individuals; and what decisionmakers should consider for future developments to keep housing truly affordable. We will launch our affordable housing + transportation report at a public breakfast event on April 2 at Leonel Castillo Community Center.

Based on the study outlined above, as well as our daily work engaging with everyday Houstonians who seek safe, affordable access to opportunity, we respectfully submit the following three recommendations to ensure that the Walkable Places and Transit-Oriented Development rules realize their target outcomes to equitably expand the availability of walkable, transit-rich neighborhoods at all price points.

- 1. Expand the definition of TOD Streets to extend the benefits of the ordinance to more areas.** The current proposal disqualifies streets with open ditches, current single-family residential land use, or that do not meet the vague definition of "meet[ing] applicable Infrastructure Design Manual Standards." The rationale for continuing to require low-density, car-oriented development on streets in proximity to transit is unclear and is at odds with the goal of making walkable, transit-friendly neighborhoods widespread and abundant. *The stipulations around open ditch drainage and vaguely defined design manual standards should be removed.*
- 2. Couple Walkable Place designation with parking requirement relief.** Working with affordable housing developers, we've come to understand the detrimental impact parking requirements have on affordability. Furthermore, our experiences as people who walk, bike, and take transit show us that excess parking is at direct odds

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with a pleasant pedestrian experience. Limiting developable area and pushing up development costs with parking requirements mean development in Walkable Place areas is less likely to occur and less likely to maintain an affordable price point for small-scale developers or moderate income commercial and residential tenants. ***A 50% reduction off Chapter 26 requirements should be a condition of Walkable Place designation.***

- 3. Align the façade transparency requirement with best practices for walkable development and public safety.** “Eyes on the street” are critical for ensuring the safety of the public realm. Natural surveillance is a core principle of crime prevention through environmental design (CPTED). It is well understood that visual interest and interaction between the public and private realms promote walkability. Our review of similar form-based codes around the country found no precedent for a façade transparency requirement as low as the 10% to 15% proposed. ***Required transparency should be increased to, at a minimum, 60% on primary streets and 40% on secondary streets.***

We are encouraged by the direction of the Walkable Places and Transit-Oriented Development Ordinance changes overall. We believe they represent a step in the right direction for a more equitable, resilient, vibrant, and prosperous Houston. With the revisions outlined above we will be prepared to offer our support for their passage at City Council.

Sincerely,



Richard Petty
Chair, Board of Directors



Oni K. Blair
Executive Director