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Dear Mayor Turner and City Council Members:

As chair of the Planning Commission, I want to share my perspective on the Commission's recent action to advance proposed changes to Houston's Development Code for your consideration. I don't know anyone who disagrees that Houston's future economic vitality depends on our ability to provide housing for a growing workforce at all points on the pay scale. To this end, the Department of Planning and Development has undertaken a three-year process to devise a strategy to diversify housing options in the City of Houston. This daunting and highly significant endeavor required the tireless work of Department staff and the Livable Places Action Committee - a group of volunteers representing all stakeholders in the residential development process.

The majority of the changes before you have been extensively vetted and, I believe, have strong support, with the exception of narrow lot development regulations. The Planning Commission's vote to forward these changes to the Mayor and City Council was not the result of universal approval of every detail. As one could discern from our lively debate, Commissioners' opinions reflected the same divergence that has been expressed by stakeholders in public discussion. But the vote to send a *complete proposal* to the Mayor and Council is an indication of how strongly the Commission believes in the broad benefit of the Chapter 42 amendments. We acknowledge that at the staff and Commission level, we have failed to come up with an acceptable compromise on narrow lot development with front-loading driveways. This issue is complex, and finding a policy solution requires answering a very subjective question: How do we want Houston to grow? The correct venue for that somewhat philosophical discussion is with you, the elected leaders of our city.

Houston's inner-city neighborhoods have seen robust development through subdividing typical 50' lots to build two single family homes on 25' lots. The most popular and marketable of these are those with driveway access from the street into a two-car garage (front-loaders). Building two side-by-side townhomes currently allows paving 32' of City-owned right-of-way for driveway approaches, frequently resulting in paving almost the entire space from the garage doors to the street. This denser development has spurred growth in many inner-city neighborhoods, but it is often unpopular with residents living nearby. When the Planning Commission reviews plat applications for this type of development, we often hear complaints about more traffic, more concrete, poorer drainage and changed neighborhood character.

It is important to analyze any type of development with an eye toward what it would mean if an entire block or even a whole neighborhood were developed that way. A single subdivided lot (1 into 2) may have minimal impact on the neighborhood compared to two adjacent lots divided into four, and eventually, four adjacent lots divided into eight. An existing street of one-driveway bungalows does not suffer much with the addition of one additional driveway, but a streetscape of green front yards is permanently erased when eight adjacent lots become 16, sometimes on both sides of the street. We can see these results in older inner-city neighborhoods where narrow streets and open ditch drainage

seem insufficient for the housing density. The Planning Commission considers and approves these types of plats regularly, in many cases because we have no other choice.

Our concern is not with what someone chooses to build on their private property. It is no surprise that narrow front loaders are highly marketable. They offer attractive, convenient, suburban style homes in neighborhoods close to Downtown. But we do have grave concerns about the effect this development has on the city's right-of-way. This space, a valuable asset owned by all Houstonians, constitutes our drainage infrastructure and mobility network for cars, bicycles and pedestrians. Currently we are allowing builders to appropriate the public's right-of-way for private use. We are encouraging block after block of development that brings more interactions between moving cars and pedestrians and more parked cars blocking sidewalks. Pedestrian, wheelchair and tricycle access becomes difficult and dangerous. The streetscape becomes mostly concrete, with little grass and virtually no trees. "Shady Acres" becomes "Heat Island Hills" - forever. Is this the *permanent* change we want to encourage in our oldest neighborhoods? Is this the way we want our city to grow?

Of course, neighborhoods with enforceable deed restrictions can successfully prevent unpopular development, and the Minimum Lot Size/Building Line programs can be a solution for non-deed-restricted neighborhoods. We have seen a dramatic increase in MLS/MBL applications. Unfortunately, many of Houston's older neighborhoods have no or unenforceable deed restrictions, low rates of owner occupancy and difficulty in determining ownership. These areas are ripe for development but unable to take advantage of the tools available to maintain their current neighborhood character.

For these reasons – pleas from neighborhood residents and concern for the irreparable harm we are doing to our streetscapes – the Planning Commission asked the Planning and Development Department three years ago to seek ways to *improve* narrow lot front-loading development. *No one is seeking to eliminate it entirely.* The proposal before you is fairly simple: establish a 33' minimum width for a single-family residence with direct driveway access from the street. This would mean that two 50' adjacent lots could be subdivided into three lots, as opposed to four, each having its own driveway. Lots narrower than 33' would be required to use shared driveways or other designs, and as always, projects with special circumstances could seek variances from the Planning Commission. After three years of seeking solutions, this modest proposal seems to offer some hope of preserving precious public right-of-way. We cannot undo the damage already done, but we would like to at least try to mitigate it in those neighborhoods that are about to become "Heat Island Hills."

Sincerely,

Marty Stein
Chair, Houston Planning Commission

cc: Planning Commissioners