



Strategic Framework Plan

Proposed Changes Document – February 8, 2018

Prepared by:

City of San Antonio Planning Department

How to use this document

Contained in this document are all significant proposed language, text changes, and additions to the SA Corridors Strategic Framework Plan Draft dated October 2017. Proposed additions are noted in [blue underline text](#); proposed deletions in ~~strikethrough red~~.

EXECUTIVE SUMMARY - TSLU FRAMEWORK

Add page after page 8 of Executive Summary

IMPLEMENTATION PROCESS

[In order to realize the SA Tomorrow Comprehensive Plan’s vision for growth and economic development around a rapid transit system, the proper regulations and incentives will need to be in place. The SA Corridors Strategic Framework Plan provides a reference for the best practices of transit-supportive land use and development strategies, incentives, and regulations specifically tailored to San Antonio. Implementation of these recommendations will vary depending on the strategy.](#)

[Regulatory aspects of the Framework Plan, primarily zoning, will require amendments to Chapter 35 of the City Code, the Unified Development Code \(UDC\). Amendments to the UDC typically occur on a five year cycle, with the most recent cycle occurring in 2015. Consequently, the recommendations made by this Framework Plan, in addition to updates recommended by the SA Tomorrow Comprehensive Plan, are expected to be reviewed as part of the 2020 amendment process.](#)

[Development incentives and infrastructure investment priorities may have substantial implications on the municipal budget and as such must be implemented with direction from the City Council.](#)

[Prior to the adoption of the SA Tomorrow Comprehensive Plan, the City did not have adopted policies proactively supporting development patterns that accommodate projected growth and support high-capacity transit use. SA Corridors represents meaningful coordination between the City and VIA and will support, and make more competitive, VIA’s future applications for federal funding for transit projects.](#)

FUTURE LAND USE | CORRIDOR PROFILES Page 3

HOW WILL THE FUTURE LAND USE MAP BE USED?

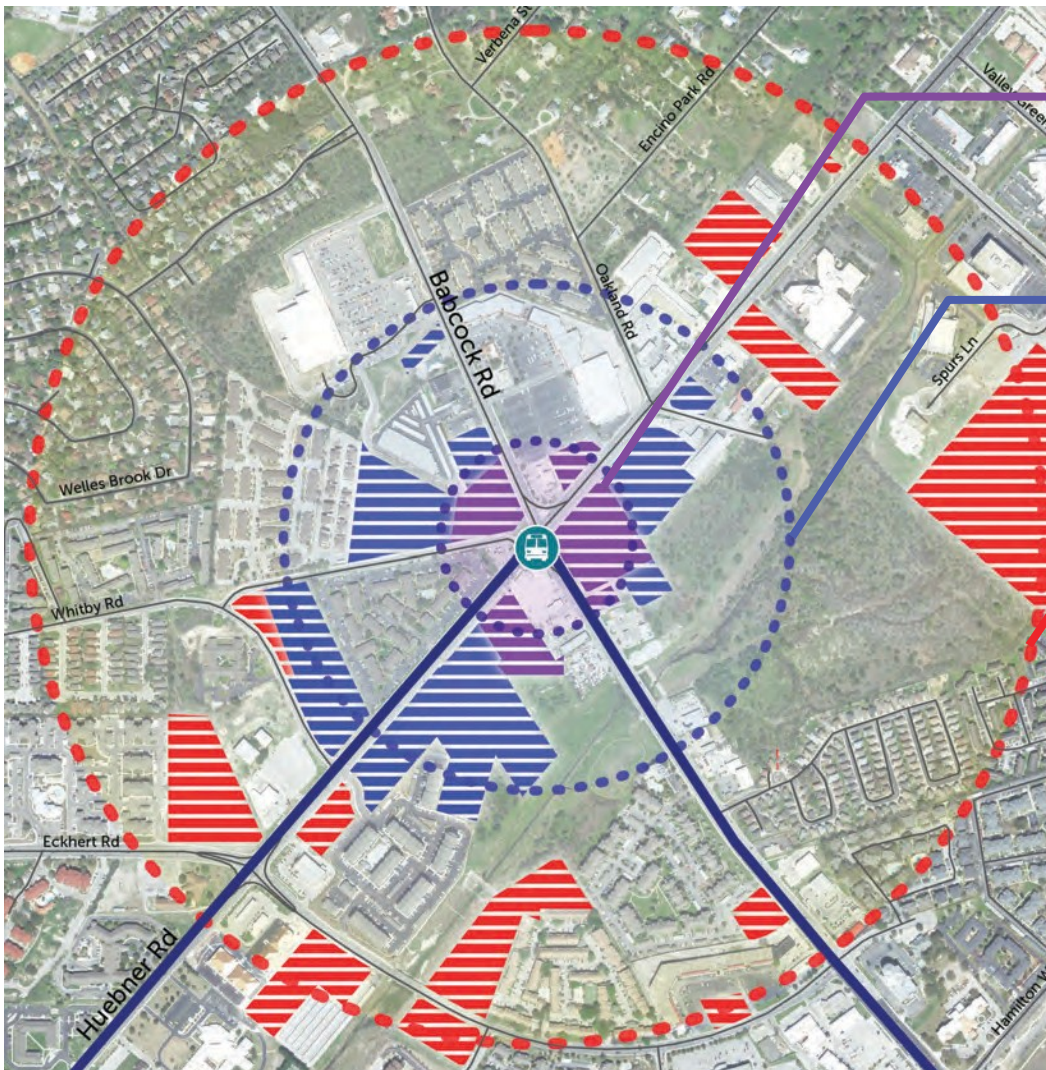
The FLUM provides a reference by which the City of San Antonio and its residents can evaluate and track growth. [The FLUM does not adopt new land use classifications or maps for the study area.](#) As development is proposed in SA’s transit corridors and station areas, the FLUM can be used to make sure that development is in-line with local and citywide priorities. As new planning efforts are undertaken, [such as the Regional Centers and Community Sub-Area Plans](#), they too will reference the FLUM, using it

to develop strategies and recommendations [in conjunction with additional public input and concept development.](#)

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TOD SPECIAL DISTRICT

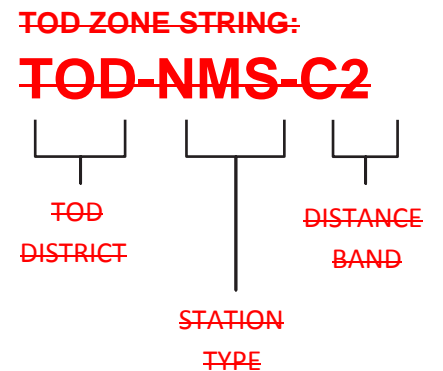
San Antonio’s TOD Special District regulations are meant to specifically address the need for denser development around transit stations. Rather than replacing existing zoning, developers or property owners can “opt-in” to the TOD Special District in lieu of their existing base zone. That means that developers working on properties located within 1/4 mile of a “transit station” can request [to change the zoning of their property to the](#) ~~that~~ [TOD Special District.](#) ~~standards apply to their development project, rather than the standards offered in their property’s base zone.~~



TOD-NMS-C1
Core 1: Area within 500 feet of a transit station. Greatest intensity and mix of uses should be focused here.

TOD-NMS-C2
Core 2: Area between 500 feet and 1/4 mile from station.

TOD-NMS-P
Periphery: Area between 1/4 mile and 1/2 mile. Here intensity should step down to reflect longer walking distance to the transit station.



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A MORE POWERFUL TOOL FOR TOD

The table below shows existing TOD Special district standards [prescribed by Section 35-208 of the Unified Development Code](#). Note that without a Transfer of Development Rights (TDR^{*2}), maximum densities for residential uses (column C) are at or below the minimum threshold (40 units per acre) that is typically considered transit-supportive. Moreover, many existing multifamily zones (MF-33, MF-40, MF-50, etc) already allow densities at or above the maximums in column C.

EXISTING TOD SPECIAL DISTRICT STANDARDS							
	(A) LOT SIZE	(B) MIN. DENSITY (UPA ¹)	(C) MAX DENSITY (UPA ¹)	(D) MAX DENSITY W/ TDR ^{*2}	(E) MIN. FAR ³	(F) MAX FAR ³	(G) MAX FAR ³ W/ TDR ^{*2}
TOD-C "Core"	Less than 2 acres	16	40	80	2.5	6.0	12.0
	2 acres or more	12	36	72	2.0	4.0	6.0
TOD-P "Periphery"	Less than 2 acres	12	36	70	1.5	4.0	6.0
	2 acres or more	8	32	60	1.0	2.0	4.0

¹ UPA, or Units Per Acre, is a measurement of the number of dwelling units divided by the land area.

^{*2}TDR, or Transfer of Development Rights, is a mechanism whereby the density of development allowed on a "sending" site is purchased and transferred to a "receiving" site. This allows additional development on the "receiving" site. ["Sending" sites can be environmentally sensitive areas, agricultural, or other land that should be conserved, or land within proposed right-of-way. "Receiving" sites are those areas which are planned to accommodate growth and development, in this case the TOD Special District. Column D in the table above prescribes the maximum limit of additional residential density for the existing TOD Special District.](#)

³ FAR, or Floor Area Ratio, is the ratio of the total building area to the total land area of a site.

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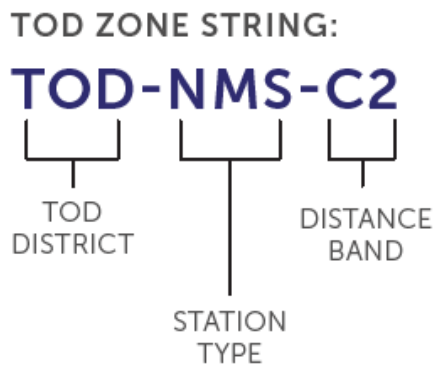
TOD SPECIAL DISTRICT RECOMMENDATIONS

Designate TOD Special District Areas

The City of San Antonio should adopt specific TOD Special District boundaries based on planned and existing locations of VIA Rapid Transit stations. These should include any existing Primo stations as well as proposed stations in advanced stages of planning. VIA is currently in advanced stages of planning four rapid transit routes. Within the next two years, they will begin applying for federal funding to build one of these four routes. It is at this time - when a preferred mode, alignment, and stations have been identified - that the City of San Antonio should designate new TOD Special District areas [through sub-area plan updates or other voluntary means. As detailed station area planning is undertaken special consideration should be given to the transition between higher density development and the surrounding areas.](#)

Adjust Density Maximums and Parking Minimums

Increasing density and encouraging less parking near transit stations is not just good policy - it also makes financial sense. One of the major reasons that TOD districts have not been more widely opted-into by developers is because there is not a good enough incentive to do so. Development feasibility in station areas will be greatly improved and the TOD district will become more ubiquitous if density maximums are increased and parking ratios are decreased. [However, rather than a one-size fits all approach, the City of San Antonio should vary the station area development standards in recognition of the area’s characteristics and utilize the station typologies detailed previously to differentiate between the various settings. The resulting TOD zoning string is depicted below.](#)



Detailed pro-forma testing of different transit-supportive building types produced the recommendations in the table below.

TOD DISTRICT PROPOSED DENSITY MAXIMUMS			
Station Type	TOD-C1 (Core 1)	TOD-C2 (Core 2)	TOD-P (Periphery)
Urban Center (UC)	115 UPA ¹ (12 FAR ²)	115 UPA ¹ (12 FAR ²)	115 UPA ¹ (6 FAR ²)
Community Corridor (CC)	115 UPA (6 FAR)	55 UPA (4 FAR)	45 UPA (3 FAR)

Neighborhood Main Street (NMS)	60 UPA (4 FAR)	55 UPA (4 FAR)	45 UPA (3 FAR)
Commuter Station (CS)	55 UPA (4 FAR)	40 UPA (3 FAR)	40 UPA (2FAR)
	0-500 Feet	500 feet – ¼ Mile	¼ - ½ Mile

¹ [UPA, or Units Per Acre, is a measurement of the number of dwelling units divided by the land area.](#)

² [FAR, or Floor Area Ratio, is the ratio of the total building area to the total land area of a site.](#)

TOD DISTRICT PROPOSED MINIMUM PARKING REQUIREMENTS (% OF STANDARD REQUIREMENT)			
Station Type	TOD-C1 (Core 1)	TOD-C2 (Core 2)	TOD-P (Periphery)
Urban Center (UC)	0%	0%	0%
Community Corridor (CC)	0%	50%	75%
Neighborhood Main Street (NMS)	0%	50%	75%
Commuter Station (CS)	0%	75%	75%
	0-500 Feet	500 feet – ¼ Mile	¼ - ½ Mile

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ADDITIONAL ZONING RECOMMENDATIONS

Expedite Permitting [Streamline TOD Zoning Process](#) in Station Areas

The City of San Antonio requires site plan review for development proposals requesting ~~IDZ and~~ TOD special district zoning. This requirement adds time and complexity to an already complex process. The SA Corridors Future Land Use Map (FLUM) will provide the City with a reference against which to measure the transit-supportiveness of development proposals. The City should consider waiving the site planning requirements currently included in ~~both the IDZ and~~ TOD zoning standards for development proposals in designated station areas that support the FLUM. Any changes that can increase the speed and reliability of permitting for projects the city deems transit-supportive will further incentivize private investment in station areas.

Waive Traffic Impact Analysis Requirements in TOD Districts

Traffic impact analysis (TIA) is typically undertaken to determine rough proportionality of the impact that a new development is likely to have on surrounding roadways. Currently, [a TIA is not required in](#) the TOD Special District, [although Sec. 35-208\(f\) indicates that](#) ~~requires an assessment of trip generation~~

~~from a project and an assurance that the project will not cause surrounding roadways to exhibit below level of service (LOS) “E” during peak hours~~ [is the adopted level of service. This requirement is later waived by Sec. 35-502.](#) ~~It is recommended that the City of San Antonio consider waiving this requirement for the TOD Special District as is done with IDZ and D zones.~~ TOD districts, by their nature, will be designated in close proximity to rapid transit ~~thus reducing the need for costly TIAs resulting in fewer trips being car generated than in low-density transit-adjacent areas.~~ [Until such time as the TIA requirement is reevaluated to identify an approach that allows for mitigation of a project’s impact in a manner that supports transit use and the Unified Development Code is updated accordingly, it is recommended that the City of San Antonio continue waiving the requirement for the TOD Special District.](#)

Extend IDZ to Station Areas

Currently the Infill Development Zone (IDZ) is only available to property owners in the Community Revitalization Action Group (CRAG) area. IDZ provides flexibility in terms of parking standards, setbacks, and density maximums and tends to produce transit-supportive development. The City of San Antonio should consider extending IDZ to station areas in conjunction with the TOD Special District to provide a broader range of tools for developers. [As of January 2018 IDZ is being reviewed to determine the effects of its standards on the compatibility of new development with the community.](#) [Implementation of this recommendation should consider the outcome of the IDZ review process.](#)

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INCENTIVES

Vacant Dwelling Tax Credit

Promoting re-use and renovation of 1-4 unit residential structures [as residences](#), particularly in the “nurture” cluster, can be an impactful strategy for stabilizing real estate markets and preventing displacement. Vacant dwelling property tax credits are designed to encourage renovation and reuse of existing vacant properties. The tax credit typically provides 100% protection from property tax increases with an incremental reduction of that protection over 5-10 years.

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AFFORDABLE HOUSING PRESERVATION (NURTURE/CATALYZE)

Land Banking

Land Banking is the purchase of land by a local government for use or resale at a later date. The City of San Antonio should engage in land banking in proposed station areas as VIA selects preferred alignments and modes for its rapid transit lines, with the goal of proactively acquiring and preserving locations for affordable housing. This should be done before transit service is implemented to avoid speculative increases in land costs. In Denver, the Urban Land ~~Concervance~~ Conservancy (ULC) is using this approach to preserve affordable housing in urban areas to ensure their continued benefit to the community.

Affordable Housing Reserve Fund

The largest source of affordable housing in most cities is older, Class B and Class C apartments. These properties are also often the first to be redeveloped when ~~markets improve~~ demand for real estate increases. Such apartments in existing and proposed station areas are of particular concern as they are ideally located for transit-dependent residents. The City of San Antonio should consider developing a reserve fund for purchasing strategically located multifamily properties before they are redeveloped with the goal of providing affordable housing in areas well served by transit.

The chart below shows the relative strategic value of acquiring multifamily mutlifamily properties in San Antonio’s transit corridors. Ideally, the City should focus its affordable housing preservation efforts in corridors with a high number of vulnerable units without long term affordability protection and low development pressure.

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AFFORDABLE HOUSING PRODUCTION (CATALYZE/SUPPORT)


Inclusionary Zoning and the Density Bonus

One example of voluntary inclusionary zoning is called a density bonus. Many cities use density bonuses to offer additional height or density to developers in exchange for affordable housing or fees-in-lieu. The City of San Antonio’s UDC already includes a density bonus policy; however it is little-used and often overlooked by developers. There are two reasons for the bonus program’s lack of success: the incentive to include affordable housing does not outweigh its expense and the City does not offer a fee-in-lieu alternative whereby a payment may be made as a substitute for the mandatory inclusion of affordable housing units. While consideration of a fee-in-lieu alternative may be appropriate in some situations, the payment of a fee alternative instead of providing affordable housing units is not considered in this analysis as it is contrary to the goal of providing affordable housing units in areas served by transit.

DENSITY BONUS RECOMMENDATIONS

The existing density bonus structure, as set forth in the Unified Development Code (UDC) is below. The City of San Antonio defines two below-market household income segments: low income and very low income. These are defined by a commonly-used benchmark, Area Median Income (AMI). For reference, the Area Median Income for [a family of four](#) in the San Antonio-New Braunfels metro area was \$63,500 in ~~2016~~2017. [Low income and very low income are currently defined by the Department of Housing and Urban Development \(HUD\) as 80% or less of the AMI for “Low” and 50% or less of the AMI for “Very Low”.](#) The density bonus structure works by providing increased density (column B) in exchange for a percent of total units being offered at rents affordable for low and very low income households (column A). [For example, a unit being offered with a rent of \\$1,270 per month is considered affordable for a household with an annual income of \\$50,800 \(80% AMI\).](#)

Prioritizing Transit-Supportive Infrastructure

 <p>Quality of Life</p> <p>This goal seeks to prioritize projects that enhance the health and wellbeing of San Antonio’s population and the natural environment.</p>	 <p>Congestion</p> <p>This goal seeks to prioritize projects that maximize the efficiency of vehicular travel within the roadway network.</p>
 <p>Economic Vitality</p> <p>This goal seeks to prioritize projects that strengthen and increase economic opportunity across San Antonio by connecting people to employment while preserving the efficient movement of goods.</p>	 <p>Management of Existing Systems</p> <p>This goal seeks to prioritize projects that improve the effectiveness and condition of existing infrastructure through targeted investments.</p>
 <p>Strategic Development</p> <p>This goal seeks to prioritize projects in areas where new investment will utilize existing investments and be responsive to land use patterns.</p>	 <p>Safety and Security</p> <p>This goal seeks to provide a transportation system safe for all users and secure against natural disasters.</p>
 <p>Mobility</p> <p>This goal seeks to prioritize projects that enhance access and connectivity (minimize gaps) across all modes of transportation.</p>	 <p>Feasibility & Implementation</p> <p>This goal seeks to prioritize projects that are shovel-ready and have demonstrated support among all project sponsors.</p>

[SA Tomorrow Multimodal Transportation Plan Project Prioritization Goals](#)

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TIMELINE FOR VIA/COSA COORDINATION

In order to align infrastructure investments with the implementation of high capacity transit, VIA and the City will need to work closely to coordinate their planning efforts. One major milestone to consider is the development of the 2022 General Obligation Bond. The table below shows a proposed schedule for coordination between VIA and the City of San Antonio leading up to the next bond proposal. These ~~reocmmendations~~ [recommendations](#) are provided here at a high level and are intended to serve only as a conceptual framework. Further coordination between VIA and the City of San Antonio, including a memorandum of understanding (MOU), [a written agreement clearly outlining each parties responsibilities](#), are needed before such activities can take place.

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CHANGING THE VIA/CITY OF SAN ANTONIO PARADIGM

Among the options available, three inter-related actions are recommended for consideration to better align TCI and capital bonding with VIA Investment priorities:

- Directly incorporate transit-supportive improvements as part of the TCI program. This would be a logical and natural extension of existing funding commitments for pedestrian and streetscape improvements, albeit with a more explicit TSLU focus with future project initiatives. While the projects included in the 2017-22 bond have already been selected, TCI should look for opportunities to prioritize projects that support the preferred alignment that emerges from VIA’s Rapid Transit Corridor Study [and coordinate projects to prevent inefficiency](#).
