


City Secretary

From:  Brandon Melland <bmelland@kfriese.com>
Sent: Thursday, December 1, 2022 5:01 PM
To: Andy Davenport; Jeff Rasco
Cc: kent@thewymorelawfirm.com; City Secretary; Selina Angel
Subject: RE: City of Woodcreek - Public Hearing - January 2, 2023 (P&Z Meeting)

Afternoon All! Typically, I'd provide my feedback in the documents themselves through track changes – but from a policy standpoint – this process looks to be pretty far down the road. And policy advice is generally my role on things like this. So with that said, I think the best value I can offer the City on this, short of rewriting the whole thing 😊, is the general comments below.

General Recommendations/Comments/Observations

1. **As interpret the draft code, STR's will only be allowed in the MF-1 and SF-4 District. Based on the City's zoning map, there is only one MF-1 property in the City (an apartment complex) and 7 properties zoned SF-4.**
2. **From a safety standpoint, it seems counter intuitive in my opinion, to allow STR's in the MF-1 District. If additional traffic due to long or short term rentals is a concern within the community, I would recommend limiting additional transient traffic in multifamily areas (the most congested areas), not focusing it there.**
3. **Also, apartments are often the most challenging properties from a disturbance standpoint, similar to short-term rentals. I would recommend not clustering these two similar uses together.**
4. **Also, from an equity standpoint, the ordinance makes it clear that short term rentals are viewed as something that has the potential to erode the character of existing neighborhoods. An apartment complex may not be a neighborhood as we generally understand it, but it's still a place where families and children live – and typically those that are lower income. On the surface, I feel like the draft ordinance gives the appearance that the City is relegating an undesirable use to a lower income residential area.**
5. **Lastly regarding STR's in the MF-1 District, I feel confident saying that I don't think the owners of the apartment complex are going to allow their tenants to rent out their units for short term rentals. The building code may not allow it either. So it's possible that STR's being allowed in the MF-1 District is a moot point.**
6. **Regarding allowing STR's in the SF-4 District, I understand the logic, because they are next to the golf course; but has the City reached out to those property owners to make sure that they are each fine with this? If not, I would recommend checking with them before adopting the ordinance.**
7. **I don't see anywhere in the ordinance where a certificate of occupancy is required in order to operate a short-term rental. I would highly recommend you add that language. This provides the City the ability to ensure that the facility is safe for transient occupancy. Also, without a certificate of occupancy, an STR owner can never argue that they are grandfathered if the City ever changed the code to not allow them in the districts proposed.**
8. **The ordinance and application establishes a lot of administration for staff, considering how few properties there are only 8 properties that STR's would be allowed on.**
9. **Overall, my recommendation is to allow STR's based on lot size, not district type. In my opinion, the larger the lot size, the less impact an STR will have. Also, the larger the lot size(s), the less an area is a neighborhood**

and the more it becomes rural. My recommendation would be to allow them by right on lots that are one acre or more. I think this addresses safety, disturbance, and neighborhood character.

I hope this helps and let me know if I can be of further assistance!



Respectfully,
Brandon

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From: Andy Davenport <ldavenpo@gmail.com>
Sent: Wednesday, November 30, 2022 7:52 AM
To: Jeff Rasco <jeff.rasco@woodcreektx.gov>
Cc: kent@thewymorelawfirm.com; City Secretary <city.secretary@woodcreektx.gov>; Brandon Melland <bmelland@kfriese.com>; Brenton Lewis <manager@woodcreektx.gov>
Subject: Re: City of Woodcreek - Public Hearing - January 2, 2023 (P&Z Meeting)

I use Apple's Pages and Keynote to draft the originals, but I've gone back in and deleted the watermarks and headers before exporting to Word this time to make the text a bit easier to manage. Once we have the text we want, I'm happy to re-format back into a more aesthetic document.

The official retirement date is this Saturday - super excited!

Thanks!!
Andy

Louis Davenport
ldavenpo@gmail.com

On Nov 30, 2022, at 7:35 AM, Jeff Rasco <jeff.rasco@woodcreektx.gov> wrote:

Bud, can you work with these files? Andy, just out of curiosity what is the software you used to create the doc? It didn't convert very cleanly to Word, but I think it's probably workable. When I view them, it's mostly the header graphic that gets in the way, but it might be fine for Bud.

Thank you, it's great work.