



December 4, 2019

Ms. Margaret Wallace-Brown  
Planning Director, City of Houston  
[Margaret.WallaceBrown@houstontx.gov](mailto:Margaret.WallaceBrown@houstontx.gov)

RE: Proposed Transit-Oriented Development Ordinance

Dear Ms. Wallace – Brown:

Many thanks to you and the Planning Department team for planning for Houston’s future and moving our city in a positive direction. It’s a challenging task in what will likely be the third-largest city in the US, and the only one with no zoning. Your department’s thoughtful consideration regarding mobility, quality of life, equity, and environment are most appreciated, as these elements are the top priorities for Museum Park Super Neighborhood (MPSN).

MPSN understands that the Planning Department and the Planning Commission have devoted valuable resources and much time to crafting the proposed Transit-Oriented Development Ordinance (TOD). We appreciate the time that the Planning Department has spent with Museum Park Super Neighborhood stakeholders in helping us better understand an ordinance that will have a significant impact on our destination-rich neighborhood, located in the midst of major employment centers.

While we generally agree with the long-term goals of the TOD, given the limited mass transit options now available in and out of our area, we believe that TOD's aggressive approach is premature for Museum Park. We, more than anyone, would like better mass transit access to Museum Park, which should reduce vehicular traffic and thereby create more green space, pedestrian access, and reduce the need to use land for short-term vehicle storage. But at Metro’s current state of development, it’s a chicken and egg problem that will likely increase, not decrease, the issues we have with offsite street parking.

As defined in the H-GAC Museum Park Livable Center Study, we greatly value the character of and green space in this neighborhood and believe that it has priceless value in and of itself. Allowing green space for tall, broad shade trees is essential rather than having buildings so close to the public realm that they limit tree growth. The 2009 Transit Corridor Ordinance has not worked well in Museum Park, and in fact, has caused harm. The Southmore is a worthy example. Here’s why:

- Parking and access to buildings taking advantage of transit corridor and Type A streets are so diminished that the intended ground floor retail has proven not viable, resulting in dead space facing the transit corridor. Businesses that are immediately adjacent but not taking advantage of TOD are successful neighborhood gathering spots.
- “Windows” along the transit corridor are in fact masonry backed openings with no pedestrian interaction on the transit corridor, creating block-long dead space.
- The pedestrian realm of these developments is frequently shared with vehicular traffic (drop-off, garage entrance, valet, service entries, etc.) as developers maximize rentable square footage. The resulting pedestrian realm is in fact hazardous to pedestrians, who will cross the street to avoid these vehicular/pedestrian conflicts.

- Before encouraging additional high-rise, high-density development that has occurred due to the Transit Corridor ordinance, elements regarding flooding, residential and historic buffering, pedestrian and building lighting, garage sheathing and noise baffling, building mechanical operations and noise baffling, driveway access, fencing requirements, and wind impacts, simple construction safety, among others must be addressed.
- While the Transit Corridor Ordinance goals were forward- thinking, the Ordinance has not resulted in effective or desirable transit-oriented development. We find transit oriented development occurring organically without administrative or regulatory interference, though admittedly lacking the desired character standards as defined in the Museum Park Livable Center Study. We prefer a form-based code developed around scale for Museum Park to align with and elevate the collection of world class, low-scaled architecture and historical properties.

The TOD ordinance does not appear to address these problems. It potentially causes problems by furthering the harms created by the 2009 ordinance, and creating what we believe is unworkable market-based parking in this destination rich neighborhood.

The Museum Park Livable Center Study demonstrated how parks, cultural, residential district with local businesses could organically grow in our neighborhood, and this is happening. Witness the success of Lucille's, Java Lava, Barnaby's, and the growing number of professional services firms in our area. The Study noted the importance of the great lawns of Clayton Library, Asia Society, St. Pauls and Covenant Church, the historic homes, and the labyrinths of St. Pauls and Covenant. The contemplative walks at McGovern Centennial Garden reflect and reinforce this unique character. The widening of sidewalks is a laudable goal and feasible in some locations, but generally, our rights of way are narrow. For this reason, we believe accessibility for all is better attained (and less costly to taxpayers) by simply repairing the sidewalks in our area. We prefer trees and green space over concrete.

We respectfully request Museum Park be removed from the proposed TOD changes. We believe the ordinance will fundamentally alter the personality of the area, and not for the better. TOD effectively relocates onsite parking for cars (lots and garages) to off-site side streets. Metro needs to significantly expand its reach to indeed reduce the need for cars in a heavily residential neighborhood such as ours, and which contains so many of Houston's tourist premier destinations, education centers, and local businesses. We agree with the goals of the proposed ordinance, but at this point have little confidence that the methods are workable or positive for Museum Park.

As the Planning Dept. knows, MPSN has been working with City of Houston Parking Management on the Pilot Community Parking Plan (CPP) to equitably address the competing parking needs of our busy neighborhood. We would like to allow implementation of the CPP to understand better how this will change the use of public rights of way.

Again, we appreciate the work and intent of the Planning Department. We look forward to ongoing conversations and collaboration on this vital topic.

Best regards,  
Kathleen O'Reilly  
Kathleen O'Reilly, President  
Museum Park Super Neighborhood Council  
[www.museumparksn.org](http://www.museumparksn.org)