



AUSTIN CITY LOFTS OWNERS ASSOCIATION
800 West 5TH Street
Austin, TX 78703

Dear City Council Members,

The Austin City Lofts (ACL) Owners Association objects to the approval of floodplain variances for the construction of a multi-family residential building at 506 West Avenue located wholly within the 25-year and 100-year floodplains of Shoal Creek. A public hearing to consider an ordinance regarding these variances is currently scheduled for discussion and possible action by City Council on July 18, 2024.

The proposed development would intensify the public safety threat for occupants and emergency response providers as there is no safe access (vehicular or pedestrian) in or out of the building during a 25-year or 100-year flood event. The distance from the garage entrance to an area that is outside of the 100-year floodplain is approximately 300 feet.

The Watershed Protection Department recommends that City Council deny the property owner's floodplain variance requests. Watershed's summary of findings notes that the depth of the 100-year floodplain at the garage entrance to this proposed building is nearly 9 feet with a velocity of 3 feet/second.

While density and height are naturally encouraged in the downtown area, this proposed development would be situated on the bank of Shoal Creek and is located mid-block with access only to West Avenue. The apartment tower as proposed includes 47 stories, 359 apartments and a 10-story above ground parking podium.

To be clear, ACL is not opposed to development of 506 West Avenue in a manner that is appropriate for land that is located wholly within Austin's 25-year and 100-year floodplain. However, this high-density residential development, as proposed, creates a threat to public safety.

In full disclosure, ACL's building is located on the corner of W 5th St and West Ave and was the recipient of a floodplain variance over 20 years ago. ACL is a condominium building with 14 stories, 82 residential units and a 4-story (1 story underground) parking garage. ACL has two building access points, one on W 5th St and the other on West Ave.

The National Oceanic and Atmospheric Administration's (NOAA) Atlas 14 rainfall study significantly changed the understanding of flood risk in the Austin area. Published in 2018, this study shows Central Texas (aka Flash Flood Alley) is more likely to experience larger storms with more intense rainfall than previously thought. This means severe flooding is also more likely.

It is fair to say that we know much more about climate change and flood risk now than we did over 20 years ago.

In 2020, the City of Austin and its regional partners began a \$15MM multi-year effort to update floodplain models and maps. The current completion date for the Floodplain Study Update is 2026. Updated models and maps will allow us to better understand our flood risk and help keep our residents safe. Why would City Council want to encourage high-density residential development in the floodplain while this study is still underway?

ACL respectfully requests that you deny these floodplain variances.

Thank you for your consideration of this request.

Ian Inglis
Board President
Austin City Lofts Owners Association