

CodeNEXT Draft Code Review
Administration and Procedures
Titles 23-1 and 23-2

Category	Description	Code Title	Comment	Status	Draft 2
Public Hearings	Notices for public hearings, applications, and appeals have been decreased in almost all cases.	23-2C-4 5010; 23-21-1030, 3020 (B&C); 23-2D-2030	Reduced public notice		
	Time to reply to notice to become an interested party for purposes of appeal have been decreased	23-2C-4 5010; 23-21-1030, 3020 (B&C); 23-2D-2030	Reduced public notice		
	Hearing location can be changed at time of scheduled hearing for 'good cause'.	23-D-2030	Reduced public notice		
	Hearings can proceed when errors in notice have been made.	23-2C-2010(B)	Erroneous public notice		
Administrative Relief	Administrative approval of up to 10% increase in entitlements (height, setback, building coverage) in case of "construction errors".	23-2C-2010 (B)	Increased administrative discretion		
	Noncompliant structure (if pre 2008 and in violation of zoning and technical codes..if not hazard to public health, safety or welfare) Administratively approve occupancy for residential (single family and multifamily (<9) structures	23-2F-2020	Increased administrative discretion		
Nonconforming Uses and Structures	Administrative approval of change from one nonconforming use to another	23-2G-1050(B)(4)	Increased administrative discretion		
	Allows iterative increases in setback nonconformances	23-2G-1050 (C)	Increased administrative discretion		
	Allows continued parking nonconformance once associated use is terminated	23-2G-2030	Increased administrative discretion		
	Limits missing if rebuilding after a fire (can increase intensity beyond nonconformance, no time limit to rebuild)	23-2G-1070(B)	Increased administrative discretion		
STR Type 2	termination of conformance in 2022 is omitted	various sections of the code	Omission		

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Category	Description	Code Title	Comment	Status	Draft 2
23-1A - General Provisions	Typo Remove initial "("	23-1A-1010(B)(1)(b)	Typo		
	Limits on Authority needs to explicitly apply to all city employees whether a "city official" or not. Not all city employees are city officials. See definition in 2-7-71. (Should say city representative.)	23-1A-2030(B)	Increased administrative discretion		
	Amendment to "text" of the code is a legislative action, mentioned here and elsewhere. Amendments to other items in the code (e.g., heading, caption, figure, illustration, table) should also be addressed legislatively, especially tables which may include regulations that don't exist elsewhere.	23-1A-3020 (A)(2)(a)	???		
	Inconsistent language. (A)(2)(b) Initial zoning under the new code is referred to here as "adopting the City's official zoning map." Elsewhere, it's referred to as the "original" zoning (e.g., 23-1B-3020(A) and 23-2A-1030(A)). Given that there have been recent questions about the allowable procedures for initial zonings, it would make sense to be consistent and intentional with the language.	23-1A-3020	Inconsistent language		
	Incomplete Provisions. This appears to be a new concept, giving authority to the director to create new standards if the code is incomplete. At a minimum the director should be required to raise the issue to the Council to initiate a process to amend the code to complete it, and ideally, to get Council guidance for how it should be completed in the instance at hand.	23-1A-5020©	Incomplete provision		
23-1B Responsibility for Administration	This section mentions amendments to adopted Small Area Plans as provided in Division 23-2E-2 but that section only mentions Neighborhood Plans. Amendments to other Small Area Plans, of which there are many, should also be addressed, at least generally, for completeness.	23-1B-1010(A)(2)	Amendments to Small Area Plan not addressed.		

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	"This Division establishes the sovereign boards and commissions..." (emphasis added) but in fact the City Code 2-1-3 does so: "Each board described in Article 2 (Boards) is established or continued in existence...". Need to align which part of the code "establishes" the boards and commissions. See also 23-1B-2010(B) which references "establishing" the boards.	23-1B-2010(A)	Misalignment with with other parts of city code.		
	This section creates an Appeals Panel, as a subset of the Board of Adjustments. While this may be meant to ease the work load of the Board, it is problematic in that not all Council Members/Council Districts would have a representative in the appeals process. In addition, will the Panel have a Chair? How would the members of the Panel be selected?	23-1B-2020 (D)(2)(b)	Creates Appeals Panel within Board of Adjustment		
	Regarding the authority to call a meeting, 'requested by the Board' needs to be defined or, if to be defined in the Rules, state that that is so.	23-1B-2-2020(E)(1)	Authority to call Board of Adjustment meeting not defined		
	Typo "old" should be "Old"	23-1B-2030(B)(1)(d)	Typo		
	Typo strike "Hearing"	23-1B-2030((C)(1)(d)	Typo		
23-1B-4 Neighborhood planning	TBD Need to compare to existing language	23-1B-4	Needs more research		
23-2 Administration and Procedures	Typo. "Table 23-1-B010.A" does not exist.	23-2A-1010(B)	Typo		
	Here and elsewhere explicit department names are referenced and in fact at least one is already out of date (23-2M-1030 mentions "Watershed Protection and Development Review Department"). This will be problematic in general.	23-2A-1030.A	Inconsistent reference to city departments		

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Category	Description	Code Title	Comment	Status	Draft 2
23-2B Application Review and Fees	Adds option for director to establish application requirements by a "policy memo" rather than only by establishing rules as only option in current code. Using a policy memo does not allow for public feedback.	23-2B-1010(B) (and 23-2B-2010)	Increased administrative discretion		
Application Deadline Extension	Aligns with 25-1-88. The current code allows for an applicant to request an extension to the completion of their application and notice is required. It appears the draft code does not incorporate the extension request, which is an improvement, but if it is in the draft somewhere, need to ensure it comes with notice requirements.	23-2B-1040	Reduced public notice		
Application Deadline Extension	This allows an automatic extension of 1-year expiration period with no notice in case the staff review not complete. Need to include the current code (25-1-87) requirement for notice in this or any other case of extension.	23-2B-1050	Reduced public notice		
Development Assessment	This provides a 15-day turnaround required for staff to prepare Development Assessment, which seems extraordinarily short for the review of a 200+ acre residential project. The current code allows the turnaround time to be set by administrative rule (25-1-62(D)).	23-2B-2050(C)	Insufficient turnaround time for staff to review Development Assessment		
Vested Rights - Development Assessment	This is an addition to the Vested Rights code, stating that a Development Assessment (DA) can be submitted as part of a Fair Notice Application under Vested Rights. Given that a DA is preliminary and might suggest rights exist for a piece of property that in fact do not, including it in a Fair Notice application could cause significant problems in grandfathering discussions. Remove this subsection completely, or at a minimum, add a requirement to explicitly include strong caveats on the DA that it is not evidence of approval or compliance but only a preliminary courtesy review.		Potential grandfathering issue		
23-2C Notice	Typo "...apply to all notice..."	23-2C-1010(B)	Typo		

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	The draft reduces mailed notice requirement for public hearings from the current 11 days to just 7 days, and reduces posted notice from 16 days to 11 days. Given the vagaries of the postal system and residents' busy lives, this doesn't give much time to plan a response, register as an interested party or hire a babysitter to attend a hearing for a project that may substantially impact one's daily life. Strongly recommend retaining existing notice times.	23-2C-1020.	Reduced public notice		
	This section allows for the public process (e.g., hearings) to proceed even if errors in notice are made. There have been many cases of errors in the past and it would be a big problem for the public if the process had been allowed to proceed. Suggest striking this section.	23-2C-2010(B)	Erroneous public notice		
	This could use some clean up. It defines several criteria that make one an "interested party" but then in 23-2C-3020, identifies how to mail to some in that explicit list (which is, per 2020(B), interested parties) as well as '(6) an interested party.' Is there another way to be an interested party to qualify under (6) but not be listed in 2020? And it doesn't list how to mail to the "person who occupies a primary residence within 500 feet."	23-2C-2020(B)	Inconsistent and incomplete criteria		
	Mailed notice "deposited in a depository of the US Post Office." Need to clarify that this does not include just getting it in the City's mail room because it can take a long time to get through that, eating into the time the info is available to the public.	23-2C-3020	Inconsistent and incomplete criteria		

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Category	Description	Code Title	Comment	Status	Draft 2
	<p>Notice of Public Hearings The required amount of advance time for notice has been decreased. (See 25-1-132) Reinstate the current amount of time, or increase it. Boards and Commissions – currently 11 days; proposed 7 days Council – currently 16 days for mail and publication; proposed 12 days Note: See 23-1A-5020(G) for computation and meaning of time. Calendar days are used. Even if business days are used in the current code, these suggested numbers would in certain situations be a decrease.</p>	23-2C-4	Reduced public notice		
Notice of Applications	<p>Required amount of time for public to respond has been decreased. Reinstate the current amount of time, or increase it. Currently – within 14 days with no decision on application within 14 days. See 25-1-133 Proposed – within 10 days with no decision on application within 10 days</p>	23-2C-5010	Reduced public notice		
	TBD Along with differences in notice mechanics, will also need check that those actions requiring notice currently got carried over.				
23-2D Public Hearings	This requires permission to speak if signup is after the hearing begins. This is being discussed by council and should be left to the body.	23-2D-1020(C)	Restricted public input		

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	This section allows a change in the location of a public hearing (for 'good cause' as deemed by presiding officer) if the hearing is delayed a sufficient amount of time for people to get to the new venue. This assumes that getting from the original locale to the new one on the spot is always possible for a member of the public. While this language appears in the current code, it presents an onerous burden especially for those dependent on public transportation. Suggest removal.	23-2D-2030	Restricted public input		
23-2E Legislative Amendments	This section accounts for Neighborhood Plan amendments but not amendments for other small area plans. They also can have legislative amendments.	23-25-2	Incomplete provision		
	Neighborhood Plan Amendment TBD - Need to compare with existing language.	23-2E-2030			
23-2F Quasi-Judicial and Administrative Relief	Exempt Residential Uses and Structures. This exemption is new, and appears to be a significant expansion and loosening of a concept Council enacted in 2011 to address a problematic situation in a neighborhood where carports long ago had been erected an area prone to floods. The process was narrowly crafted (see http://www.austintexas.gov/edims/document.cfm?id=153423 and 25-2-476), limited to SF3 or more restrictive zoning, on properties where the noncompliance existed for more than 25 years and required a review by the BoA. This section opens the exemption to significantly more situations and without any BoA review (staff can administratively grant exemption), could be extremely subjective and problematic.	23-2F-2020	Increased administrative discretion to grant more exemptions		
	In fact the ordinance linked above mentions that state law gives the BoA the authority to grant exemptions to the code without the hardship criteria and so the question should be asked as to whether 23-2F-2020 (granting the authority to the Building Official) is valid under state law.		Potential conflict with state law		

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Category	Description	Code Title	Comment	Status	Draft 2
	This additional capability should be carefully scrutinized. (Check state law to see exemptions to LDC can be done by staff versus BoA or land commission.				
Minor Adjustments	This section allows an administrative approval of up to a 10% increase in certain entitlements (height, building coverage and setback)...if errors made 'inadvertently' in construction. There is a major concern of abuse of this section, allowing construction "errors" to increase entitlements across the city.	23-2F-2030	Increased administrative discretion to grant more entitlements.		
	As with 23-2F-2020, it needs to be explored whether this is even allowed under state law.		May not comport with state law		
	The tracking matrix states that 23-2F-2030 Minor Adjustments is 'carrying forward' 25-2 Subchapter E (Commercial Design Standards (CDS)) Section 1-4. This is a gross misstatement. That section allowed for adjustments to the CDS-specific design requirements such as minimum glazing area. It did not allow for increases to density, intensity or impervious cover. It had nothing to do with construction errors. Its purpose was to protect historic or natural features or unusual site conditions, without adverse effects on nearby properties. It was not an after-the-fact absolution.		Increased administrative discretion; Misapplication of Commercial Design Standards		
Alternative Equivalent Compliance	Alternative Equivalent Compliance in the current code was part of the Commercial Design Standards. Here applicability is broadened to General to Commercial Non-Transect zones, but it is significantly more expansive than in the CDS. TBD CAG Member Eleanor McKinney would be a good person to ask about these...many of the allowed modifications concern landscape and open space (decreasing much).	23-2F-2040	Increased administrative discretion		

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Limited Adjustments	Limited Adjustments is a new capability that allows adjustment of water quality requirements if there has been a court decision on them that is in conflict with US/State Constitution or a state/federal law that preempts city code or charter. Note that the SOS regulations include a similar capability (25-8-512 and 30-5-23, which are carried over in 23-3D-9080). The first question is why this addition is necessary. There is nothing that precludes Council for waiving water quality standards for a non-SOS property under the procedures that already exist.	23-2F-3010	Potential inconsistency		
	If this more general application remains, it should be made clear that it is only applicable if 23-3D-9080 is not applicable to the property because it has some differences from that section and so otherwise this would be effectively amending SOS which clearly should not be the intention and would require a supermajority vote. Additionally, the process here is inferior to the SOS process: i.e., once a determination is made that there is a conflict, the Council "shall" vs "may" (in SOS) approve an adjustment to the standards. This is an important distinction because the Council should have the prerogative to continue to pursue court action. Also, this version also does not allow public input on the determination that initiates the process.	23-2F-3010	Unclear scope for this section; Potentially bypass SOS process; Potential increased administrative discretion		
	Typo 23-2K-1 should be "23-2K"	23-2F-3010(B)	Typo		
23-2G Nonconformity	Typo reference to 23-2G-3010 should be 23-2G-1010.	23-2G page i	Typo		
	The organization is of this section is confusing and appears to have errors. Why are nonconforming uses, structures and lots considered as the 3 types of nonconformances under Section 1020, but then Section 1030 only discusses determination of nonconformance of uses and structures? It appears the section on nonconforming lots got erroneously put in 23-2G-2020 under "Order of Process."		Confusing and potential erroneous references		
	Is mis-titled as "Order of Process" but is about noncomplying lots (Repeats 25-2-943)	23-2G-2020	Mis-titled		

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Category	Description	Code Title	Comment	Status	Draft 2
	Is mis-titled as "Termination of Nonconforming Use" but it is about bulkheads etc (Repeats 25-2-963(D)). 23-2G-1060 is actually "Termination of Nonconforming Use" and was correctly titled as such.	23-2G-2040	Mis-titled		
	The draft code merges the concepts of conforming (for use) and complying (for development standards for structures and lots) under one term of 'conformance.' This is a positive move.	23-2G-2040	Merges "conforming" and "complying" into "conformance" (this is a positive change)		
	<i>23-2G: 25-2 Articles 7 & 8 (Current code) Elements not carried over</i>		Need to carry over current code regarding conforming / complying properties		
	<u>Two important sections of the current code, 25-2-942 and 25-2-962, are not carried forward. They state that 'conforming/complying as of 3/1/84 is still 'conforming'/'complying' after adoption of the 1984 code rewrite. These sections ensured that any nonconformance/noncompliance created by the adoption of the 1984 code would be deemed as conforming/complying under the 1984 code. This is an important clause.</u>		Need to carry over current code regarding conforming / complying properties		

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	CodeNext needs to add an analogous 'conforming as of <adoption date of CodeNext> is still conforming' (ditto 'complying'). Additionally, properties under development with permits that would no longer be valid with new development regs under CodeNext should be deemed conforming. Otherwise, overnight, a huge number of properties in the city will become nonconforming.		Potential increase in nonconforming properties		
	Completely does away with Nonconforming Use Table and Types. TBD unsure if that's important, but wanted to flag.	25-2-946	Eliminates Nonconforming Use Table and Types		
	TODs and references to tables is missing. TBD unsure if that's important, but wanted to flag.	25-2-949			
	Discontinuation of nonconforming STR Type 2 by April 1, 2022 is missing. It is critical that this be added back into CodeNext.	25-2-950	Nonconforming Type 2 STR by 4/1/2022 missing		
23-2G: Nonconformity clauses	Conversion of Nonconforming Uses in Residential Buildings – Director can allow change from one nonconforming use to another if it is less intense than the existing nonconforming use. While this could be a benefit to nearby properties of a problematic nonconforming use, it also sets the stage for a longer time that the use remains nonconforming if the original is no longer beneficial to the owner. In addition, the decision of what is a less intense nonconforming use is a subjective decision. This process should require approval of the Land Use Commission.	23-2G-1050(B)(4)	Increased administrative discretion		

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Category	Description	Code Title	Comment	Status	Draft 2
	<p>Conversion to Conditional Use – This process gives rights to a conditional use in a zone without the usual, public process for conditional use. The public process should be required. In addition, as written, it is not clear: Would this then technically be a conforming use or a nonconforming use? If it's conforming, then it's an abandonment of a nonconforming use; if it's nonconforming, then potentially under 23-2F-1060(B) the termination hasn't occurred, allowing a longer lifespan for the nonconforming use. This section also states a nonconforming use can be converted to an allowed use. Wouldn't that generally be the case and is this clause needed, or are there other unforeseen consequences?</p>	23-2G-1050(B)(5)	Reduced public input		
	<p>This section is carried over from the current code but it omitted an important clause, 25-2-963(H), that allows only 1 modification to height and setback noncompliances. This is important e.g., for setbacks, because without it, one could iteratively add to setback noncompliance with additional length. This clause should be added back in.</p>	23-2G-1050(C)	Omitted clause		

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Category	Description	Code Title	Comment	Status	Draft 2
	Rebuilding a noncomplying structure that has been destroyed by fire etc. This section needs to add the current protections and constraints: It omits any time limit to rebuild as current code does (12 months). It allows for significant increase in square footage over current code, because it only limits it to the same footprint, height and # units of the original structure vs. the current limits to footprint, gross floor area and interior volume. It needs to add the omitted 25-2-964(B)(2) "noncomplying portion of the structure may be restored only in the same location and to the same degree of noncompliance as the damaged or destroyed structure." Without it, it appears that the proposed code would not limit the expansion of a height noncompliance to cover the whole footprint, unless 23-2F-1050(B)(2) is meant to preclude that. Buckingham – Jolene K.	23-2G-1070(B)	Increased administrative discretion to grant more entitlements.		
	This provides an allowance for continued nonconformance with parking requirements after the noncompliance is terminated. This is problematic, as it allows a difficult parking situation to continue rather than be phased out like other noncompliances.	23-2G-2030	Increased administrative discretion to grant more entitlements.		
23-2I Appeals	Deadlines for appeals of administrative decisions have been shortened (see 25-1-182) from 20 days after decision to 14 or 7 depending on whether notice of decision is required. This greatly reduces the window for affected residents to appeal decisions that may significantly affect them - the time should not be shortened.	23-2I-1030	Reduced time to appeal administrative decisions		
	The meeting to resolve issues has changed from a requirement for staff to host one if requested, and include all parties, to 'may' do one if requested and can meet separately. The current requirements should be reinstated to ensure a fair process.	23-2I-2030	Reduced public input		

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Category	Description	Code Title	Comment	Status	Draft 2
	Expiration period "tolled" while under appeal. TBD Believe this is new. Check with CAG Member Lauren Ice or other SOS rep.	23-21-2040			
Ex Parte Contacts Prohibited	Ex Parte Contacts Prohibited. Is this currently a requirement for appeals to boards other than the Board of Adjustment? It is not a requirement for the Council. If this is a requirement, shouldn't the ex parte prohibition also apply to the applicant, applicant's agent or others representing the applicant?	23-21-2050	Potential conflict of interest		
	Notice time decreased to 7 days for a board, 12 days for council hearing, from to 11 days for board, or 16 days for council hearing (25-1-132(A) & (B)). Currently timelines should be reinstated.	23-21-3020(B) & (C)	Reduced public notice		
	Does not address special section on appeal concerning Technical Codes as does 25-1-189(C). Is that no longer needed?	23-21-3020	Incomplete provision		
	This states that the case file for an appeal is only provided to the chair of the board that will hear the appeal. All board members will need this information.	23-21-3040(A)	Incomplete provision		
	Why has the requirement to consider any issues of standing prior to conducting the hearing on an appeal been removed? (See 25-1-181(B).)	23-21-3050(A)	Incomplete provision		
	Why has a rebuttal by the appellant changed from a right (25-1-191(B)) to only at the discretion of chair?	23-21-3050(E)	Reduced public input		
	Typo remove "The"	23-21-4010(A)	Typo		
	TBD. Ask Chair of Building and Standards Commission about this. Changes from current code increase burden of proof on appellant/ city for enforcement. From 25-1-190 "The appellant must establish that the decision being appealed is contrary to applicable law or regulations" (A) Adding "by clear and convincing evidence" Except for (B) appeal of an enforcement order by the city, the director must prove violation "by clear and convincing evidence."	23-21-4020	Increase burden of proof for appellant		

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23-2L Miscellaneous Provisions	Notice of proposed Interlocal Agreements (Areawide)This section removes the currently required notice to organizations; the notice required for an area-wide Interlocal only requires published notice. Current code (25-1-903(B)(2)) requires mail notice to registered organizations as well as published notice (25-1-132(C)) on 11/16 day timeline. Changes to this are troublesome. Council added this in 2008/2009 because they'd been processed behind the scenes with no input before (20081208-070) and it was very problematic.	23-2L-1050(A)(2)	Reduced public notice; Reduce public input		
23-2L-2 Development Agreements.	This creates a new mechanism for council to modify regulations and create agreements (including for a land use plan) on a piece of property in the ETJ. Clear criteria for approval of this mechanism should be specified rather the general "whether the terms further the goals of the Comp Plan, including those related to ..." as has been done for e.g., PIDs and PUDs. A statement should be included that notes that any Development Agreement that conflicts with SOS regulations for the property requires a ¾ majority vote of the Council for approval.	23-2L-2	Incomplete provision		
23-2H Construction Management and Certificates	TBD				
23-2J Enforcement	TBD				
23-2K Vested Rights	TBD The following issues have been identified, but there may be more to come.				
	Added word "statutory"	23-2K-1010(E)			
	Dropped "as determined under this article"	23-2K-1020(A)			
	Dropped "of this section"	23-2K-1040(A)			

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	Has been revised with a change to the meaning from "...with a project for which vested rights have been conclusively established by a court order, or by a settlement agreement or project consent agreement approved by the city council" (25-1-534(B)) to "...with a project for which vested rights have been conclusively established by a court order, settlement agreement, or Project Consent Agreement approved by the Council."The revised language allows for settlement agreements not approved by the Council.	23-2K-1040(B)	Increased administrative discretion; Reduced Council oversight		
	23-2K-1060 References 23-2B-1 regarding "completeness review and expiration" which is sections 1030 and 1040, compared to 25-1-82. There are a few differences. Should check that they aren't substantive or impact vesting section assumptions.	23-2K-1060			
	gives director 14 instead of 10 days to make determination.	23-2K-2010(A)	Insufficient turnaround time for director decision on settlement agreements		
	Changes "decision" to "determination"	23-2K-2010(C)(2)			
	Reconsideration of determination tolls expiration date here but not in current code. Should check that they aren't substantive or impact vesting section assumptions.	23-2K-2010(D)			
	Omits original language "but requesting a variance is not required to exhaust administrative remedies for purposes of challenging a determination by the director that a project is not entitled to vested rights."	23-2K-2010(E)			

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	Changed director making items available on city's website to director shall post	23-2K-2010(G)			
	Small rewording	23-2K-2020(A)(2)(a)			
	Typo 23-2L-3 should be 23-2K-3	23-2K-2030	Typo		
	dropped language from current code "and before the application expires under Section 25-1-82 (Application Requirements and Expiration)..." Should check that they aren't substantive or impact vesting section assumptions.	23-2K-2040(B)			
	Error in reference to environmental regs (that were 25-8). Should be Articles (not Chapter) 23-3C and 23-3D as per 23-2K-3030 assuming that is adequate. Need to check if any other chapter reference needs to be included with this two.	23-2K-2040(C)(2)(C)	Erroneous reference to other city codes		
	Hearing notice is decreased from 16 to 11 days	23-2K-2040(D)	Reduced public notice		
	Need to check that 23-6C-1 (Expiration for Site Plans) is equivalent to 25-5-81. Should check that they aren't substantive or impact vesting section assumptions.	23-2K-2040(G)(2)(a)			
	23-2K-2050(A) Changes reference from Vested Rights Petition Required to Vested Rights Determination section. I think that might be appropriate.				
	To be consistent, these items should be numbered and not listed with small letters.	23-2K-2050(B)	Inconsistent format in code titles		
	Here they have kept the parenthetical (new project) whereas elsewhere (above) they dropped it. And under (2), omitted "except that the project expiration period shall be deemed to run from the date of the fair notice application"	23-2K-3020(C)			

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Category	Description	Code Title	Comment	Status	Draft 2
	What is a 'planned development center'? It is carried over from existing code.	23-2K-3030(A)			
	has dropped reference to Section 25-5-2 for exemption from Site Plans. See also 3030(B)(2)(b) which does have that reference included as 23-6A-2010.	23-2K-3030(B)(1)(b)			
	Check that 23-6A-2010 reference is equivalent to 25-5-2.	23-2K-3030(B)(2)(b)			
	Public hearing notice time is decreased as elsewhere.	23-2K-3030(C)	Reduced public notice		
	(b) Changes reference from Imagine Austin Comp Plan to Austin Comp Plan (c) Translates 25-8 reference to Articles 23-3C and 23-3D. Need to check that that actually cover everything in 25-8.	23-2K-3030(C)			

Yellow color indicates more analysis is needed for the item.