



ARCHITECTURE
PLANNING
PRESERVATION

DATE: July 17, 2018

TO: IID Design Review Committee
c/o Carolyn Laurie, Principal Planner
Planning & Development Services
City of Tucson
201 N Stone Avenue
Tucson, AZ 85701

FROM: Corky Poster, Architect/Planner (AICP)
City of Tucson On-Call Design Professional

RE: IID-15-01, HPZ-14-11
Related Activity Numbers: DP-18-0067, T18PRE0006
Union on 6th
340 East 6th Street, Tucson, AZ
(includes 316 East 6th Street, and 49-424 North Herbert)

OWNER(S): Tigre Properties I, LLC; Honeybadger Happenings, LLC; Four Emeralds, LLC; Darlene Gaston; Wayne Hausknecht.

ARCHITECT: VFLA and a.23 Studios

PHASE OF REVIEW:

Comment:

I have reviewed the submittal for the Union on 6th, dated April, 2018, plus additional material described below, for compliance with the UDC Infill Incentive District (IID), UDC Section 5.12. This concurrent review with the first Infill Incentive District Design Review Committee is the third time I have formally reviewed elements of this proposal. On April 18, 2018, using the May 2015 Checklist for Design Professional Reviewer, I reviewed the Infill Incentive District Package for compliance with the submittal requirements #'s 1-14. On April 26, 2018, I reviewed the Development Package dated 3-18-18 and 3-20-18 (30 sheets). Prior to both of those meetings I met with the applicant or City representatives to discuss this submittal, as required by 5.12.5, J.1 ("Prior to the IID DRC meeting, applicants must meet with the Design Professional to discuss the project.....") We met on October 19, 2017 for the Pre-application meeting and then again on January 15, 2018 for a follow-up to the Pre-application meeting. My comments have been prepared in advance of an Infill Incentive District Design Review Committee meeting, scheduled for _____, 3rd Floor Large Conference Room, Planning & Development Services, 201 N. Stone Avenue; Tucson, AZ 85701.

MATERIAL REVIEWED:

- A. INFILL INCENTIVE DISTRICT DESIGN PACKAGE FOR UNION ON 6TH, submittal from applicant, dated April 2018. Materials as noted, following (8.5 x 11 Format):
- Infill Incentive District Application (4 pages)
 - Project Summary/Introduction to UNION ON 6TH (8 Pages)
 - Infill Incentive District Response/Modification Requests (6 pages)
 - Existing Photo Study (13 pages)

- Architectural Precedence/Analysis (8 pages)
- Historic Property Overview (2 pages)
- Stakeholder Outreach Summary (4 pages)
- Elevations (22 pages)

Appendix

- Neighborhood Meeting Documentation
- Historic Property Support Documentation
- Downtown Streetscape Interim Policy – Response Letter
- MS&R Setback Relief Narrative
- Parking Plan
- Development Plan – DP18-0067 1st Submittal
- DP18-0067 Review Comments

Addendum

Conditions of Approval

- B. May 23, 2018: Responses to the Design Package acceptance letter dated April 25, 2018 and the Design Professional Letter dated April 18, 2018 for the UNION ON 6TH
- C. Development Package for Union on 6th, June 22, 2018, 30 pages
- D. Drainage Statement for Union at 6th – 314 East 6th Street, March 15, 2018
- E. UNION ON 6TH TRAFFIC IMPACT ANALYSIS, June 19, 2018
- F. STORMWATER POLLUTION PREVENTION PLAN FOR UNION AT 6TH, March 15, 2018
- G. May 23, 2018 Responses to the Design Package acceptance letter dated April 25, 2018 and the Design Professional Letter dated April 18, 2018
- H. June 22, 2018, Response to Comments on DP18-0067, Landscape and Irrigation Plans.
- I. Three updated renderings, May 21, 2018
- J. Individual Parking Plan Material including:
 - IPP Application
 - IID-IPP Booklet, June 13, 2018 (31 pages)
 - IPP Public Comment Letter, June 27, 2018

IID STANDARDS APPLICABLE TO PROJECT:

- UDC Section 5.12.8 General IID Zoning Option Design Standards
- UDC Section 5.12.11 Downtown Links Subdistrict (DLS)
- UDC Section 5.12.13 Warehouse Triangle Area (WTA) AND
- UDC 5.12.14 Fourth Avenue Area (FAA)

Comment:

It should be noted that the project falls into two distinct Areas, the Warehouse Triangle Area (WTA) AND the Fourth Avenue Area (FAA) of the Downtown Links Subdistrict of the IID. The assessment utilized the standards for each section for those portions of the project falling into each.

UDC Section 5.12.8 General IID Zoning Option Design Standards

A. Streetscape Design

1. Pedestrian Orientation

- a. Architectural details at first two floor levels.

Comment: The designers have done a good job of creating material and fenestration detail in the pedestrian zone of the first two floors. While the Project Renderings in the

April 2018 submission were somewhat sketchy, updated renderings #'s 4, 9, and 1 are much more detailed and much better. Those renderings create significant human scale detail in the running bond brick coursing, the vertical stack bond brick at doorways, the two different kinds of ceramic tile at windows and commercial store entries. The large amount of transparency with the commercial spaces and the steel overhead shading devices along 4th Avenue meet the spirit and intent of this standard. That level of detail is less successful on 6th Street, but that is a direct result of the developer's choice to place four units of residential use along 6th instead of the commercial use encouraged in 5.12.8.A.1.e. (discussed below in greater detail). The street level façade along 5th Avenue is admittedly problematic with the substantial presence of the parking garage along that elevation. The effort to include 42 linear feet of transparent commercial space in the center of that block helps a great deal and is much appreciated, as does the additional 20' of screening to the north and the 42' of steel shade structure on the floor above. The gated garage entries are unfortunate, but unavoidable at that pedestrian scale. The planters with vertical vegetation add supplemental detail. **For 4th Avenue and 5th Avenue, I recommend approval as submitted.**

- b. Windows and visible activity.

Comment: As described above in item a., the windows and other transparent and visible activity is excellent along all of 4th Avenue, poor along 6th Street, and understandably fair-to-good along 5th Avenue. **Except for comments below regarding 6th Avenue, this standard has been met.**

- c. No single plane of façade longer than 50'

Comment: **This requirement is met on all sides of the project,** but, as described above, with greater success on 4th and 5th Avenue and less success on 6th Street.

- d. Front doors visible from the street and highlighted.

Comment: **This standard has been met everywhere there are front doors.** It is especially well done on 4th Avenue.

- e. Uses such as Commercial Services and Retail Trade that encourage street level pedestrian activity are preferred.

Comment: This requirement has been a difficult problem from the outset and has been discussed in my two prior commentaries. In response to an earlier comment, the commercial square footage of the commercial corner of 4th Avenue and 6th Street was increased. That effort is appreciated. But nonetheless, the determination to locate four two-story residential uses with their entries from an internal courtyard on the south face of those units, diminishes the intent of the IID and forces the inadequacy of standards a, b, c, and d above. An effort had been made to increase the architectural variety of the fourth residential unit (on the eastern corner of Herbert and 6th Street), but it still does not meet this standard. I understand the desire of the developer to maximize the number of residential units, **but I recommend that the fourth residential unit at Herbert and 6th should be changed to a Retail Trade or Commercial Services.** This use would mitigate the street activity problem to a large extent. It would provide a symmetrical bilateral commercial entry to Herbert from 6th and anchor that corner of the site in a positive way. With that addition the rhythm of the pedestrian experience along 6th Street would be much improved. The developer has presented no information that would indicate why that change would be an economic hardship.

- f. Construction and maintenance of sidewalks:

Comment: **This requirement has been met very well by the developer.**

- g. Bus pull-outs.

Comment: Not applicable

- h. Drive-through.

Comment: Not applicable

2. Shade: 50% of all sidewalks and pedestrian access paths at 2:00 PM on June 21
*Comment: I have verified that **the developers and designers have well-exceeded this shade requirement** by the combination of building-mounted shade structures and canopies, street trees, and the shade offered by the buildings themselves. The time and date in the standard assist them because of their advantageous location on the SW corner getting afternoon building shade on both the north and the east.*
- B. Development Transition Standards
1. Applicability
*Comment: **This standard is not applicable here.** The site does not abut single-family or duplex dwellings.*
 2. Mitigation of Taller Structures
*Comment: **This standard is not applicable here.** The site does not abut single-family or duplex dwellings.*
- C. Alternative Compliance
1. Best Practices options may be used for compliance
See comments under UDC Section 5.12.13 Warehouse Triangle Area (WTA) and UDC 5.12.14 Fourth Avenue Area (FAA)
- D. Utilities
No Comment:
- E. Parking
*Comment: The developer has submitted an Infill Incentive District Parking Plan for Union on 6th dated June 13, 2018. I have read that document, and its companion Traffic Impact Analysis, in its entirety and evaluated its methodology and conclusions. It is an excellent document, very well-prepared for this project and in accordance with the City of Tucson requirements. The parking requirements for the project as per the IID are as follows:
 “....one residential space per dwelling unit and no spaces for non-residential uses..... The Project will have 254 residential dwelling units for its multi-family use with approximately 7,500 square feet of commercial/retail space. Therefore the IID requires 254 vehicle parking spaces.”
 The project proposes 180 vehicle spaces, 74 less than the required number. The proposed ratio is .7 spaces per dwelling unit.
 The issue of parking in the downtown area of Tucson is a contentious one, often filled with neighbors’ concerns about overflow intrusion into residential neighborhoods, and businesses’ concerns of perceived shortages of parking spaces (and therefore customers) to support commercial business operations. “Parking” (storage) also needs to be evaluated in relation to “trips” (traffic). You can have “parking” without “trips” and “trips” without “parking.” In my view, if the Greater Downtown and Streetcar area increases its density (as in this project) without a shift in transportation mode, serious congestion will be the result. So it is the shift in mode, especially for trips, that is key to the solution, which in turn will alleviate the need for suburban style parking and head off increased congestion.
 In Donald Shoup’s book, The High Cost of Free Parking, a strong argument is made against requiring large amounts of off-street **downtown** parking:
 “Reform is not only adopting policies but also repealing bad policies. Charging performance prices for curb parking and dedicating the revenue to pay for local public services are two good policies that cities can adopt. In contrast, requiring all buildings to provide ample parking is a bad policy that cities can repeal.....cornucopia [overly ample] parking distorts transportation choices, debases urban design, damages the economy, and degrades the environment..... Some cities have begun to remove minimum parking requirements at least in their downtowns for two reasons. First parking requirements prevent infill development on small lots....and second, parking requirements prevent new uses for many older buildings.... A search of newspaper articles about minimum parking requirements found 129 reports of cities that have removed off-street parking requirements in their downtowns since 2005.”*

In support of Shoup's contention, Tucson's Downtown Links Area has already witnessed an amazing number of innovations that should lead to a reduced demand for parking and a diminution of automobile trips.

- Residents and especially area businesses have benefitted greatly from the investment of \$180 million of local and federal funds for the Modern Streetcar. The proximity of the Streetcar is a principal agent for increased development in the area in which the Union on 6th is proposed. What was the point of the Streetcar, if not to substitute transit trips for automobile trips?*
- The new Tugo Bikeshare program provides another convenient choice for a mode other than the automobile.*
- The area of the Union on 6th provides a quality pedestrian environment that promotes walking.*
- City policies, augmented by efforts of organizations like the Living Streets Alliance has promoted bicycle, pedestrian, and transit trips as replacement for automobile trips.*
- The growth of the ride-share industry (Uber, Lyft, etc.) does not reduce automobile trips and the resulting congestion, but does reduce or eliminate the need for parking (automobile storage) associated with those trips.*
- The growth of the short-term rental car market (Zipcar, etc.) has given an option to those who occasionally need the convenience of a car without owning one. Again, this does not reduce automobile trips and the resulting congestion, but does reduce the need for parking (automobile storage) associated with those trips.*
- Parking meters in the Union on 6th area have asked drivers to pay their fair share for the storage of their automobile on public land with time limits that have encouraged the turnover of the use of those spaces for multiple customers. The income from those meters is a source able to write down publicly-accessible parking.*
- And finally, the unbundling of rents and car parking rental has made it so that there is a financial incentive to reduce or eliminate one or more automobiles in rental housing.*

Three other mitigating factors also bolster the argument for the developer's request:

- As described in the Parking Plan submitted, The adjacent West University neighborhood is well-protected by the current NPP neighborhood parking program from the spill-over parking that might possibly be caused by the Union on 6th. (That program could be expanded to include other currently-vulnerable on-street parking areas, like 6th Avenue north of 6th Street that is currently neither part of the Neighborhood Parking Program nor metered.)*
- On page 10 of the Parking Plan the developer states that "In the event that this Plan request is not fully approved, EdR owns the District at 550 N. 5th Avenue, directly adjacent to the Project, where there are 100 vehicle parking spaces that are currently unused." I am not sure why the developer stated that in this way. It seems more logical to me that the additional spaces in the District provides a safety valve for leased parking if this Plan IS approved. If the demand for the 180 spaces provided by EdR exceeds the supply (as many people apparently fear to be the case), it is logical that EdR can lease additional spaces at the District to Union on 6th occupants.*
- The biggest concern about parking appears to be coming from businesses along 4th Avenue, concerned that a parking shortage at the Union would put pressure on spaces serving 4th Avenue customers. But residential parking is inconsistent with the metered spaces in the area. The 2-hour metering of all spaces near the site make it nearly impossible for those spaces to be used as residential storage spaces. Perhaps additional assurance could be provided by making sure that overnight parking is not allowed after the 5:00 expiration of metered parking. Finally, the construction of a public-access ParkTucson parking garage has*

been discussed in the area south of 6th Street and west of 4th Avenue. This would alleviate the long-term parking concerns of businesses in the area in a far more serious way than more parking for residents at Union on 6th.

In this context, the project proposal and **the reduction of the required parking spaces from 254 to 180 is conditionally supported by this reviewer.** The arguments made on pages 3-7 are well-documented and persuasive and consistent with my narrative above. Specifically, the project proposes:

- **Leasing on-site parking spaces separately from residential unit leases. (Required for support from this reviewer):**
- **The project will offer a transit pass discount of up to 20-percent on a full-fare, annual pass for each of its units. (This reviewer recommends that this amount be increased to 50%).**

In addition to these efforts, this reviewer recommends:

- **The project will offer a BikeShare discount of up to 50-percent on an \$80 annual pass for each of its units.**
- **The ZipCar program at the District will be affirmatively promoted within the Union on 6th.**
- **That the developer commits, for the next five years, to an annual review meeting with the Fourth Avenue Merchants Association and the West University Neighborhood to address issues and concerns around parking and traffic with a commitment to address those concerns in a serious way.**
- **If the demand for the 180 spaces provided by EdR at Union on 6th exceeds the supply, EdR will lease additional spaces at the District to Union on 6th occupants.**

UDC Section 5.12.11 Downtown Links Subdistrict (DLS)

- A. Sub-Areas: **Comment: No action required.**
- B. Required Use and Development Standards; **Comment: No action required.**
- C. Permitted Uses: **Comment: This Standard as per table 5.12-DLS-1 has been met.**
- D. Use Specific Standards: **Comment: Note that as per note 28, Group dwelling, not proposed here, requires Mayor and Council Special Exception approval.**
- E. Downtown Links Roadway: **Comment: No action required.**
- F. Historic Preservation: **Comment: The project complies with the Historic Preservation requirements by proposing to retain and preserve the one building on the site that is a "Contributing" structure to the "Historic Warehouse National Register" listing. It has been determined that the Flycatcher (to be demolished as part of this project) is a "Non-contributor" to the recently-listed "Fourth Avenue Commercial (National Register) Historic District".**
- G. Loading, Solid Waste, Landscaping, and Screening: **Comment: The Development Package submitted appears to comply with the Development Standards of this site. That determination is being made by other Planning & Development Services Department staff.**
- H. Solar Exposure: **Comment: The project meets the solar exposure requirements as described in Table 5.12-DLS-3.**
- I. Parking: **Comment: See E. Parking discussion above. With the variances described in the Parking Plan submitted, the parking provided meets the requirements of Table 5.12-DLS-5.**
- J. Alleyways and Pedestrian Access Lanes: **Comment: The treatment of Herbert Street (alley) is a challenging prospect for this project. Looking at the west elevation of the east building, a nice effort has been made to provide interest at the north end. The art shown on the rendering/elevation looking southeast down Herbert from 6th Street is attractive and meets the intent of this section. Access to the interior courtyard of the east building provides additional interest. As one moves south, the elevation becomes much less interesting, only relieved by a change in color and perhaps material at the pedestrian level.**



EAST BUILDING - WEST ELEVATION

UNION ON 6TH | 04.02.18

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The east elevation of the west building along Herbert is much more problematic. The northern corner and stretching down Herbert is good and filled with detail and pedestrian interest. However the southern 85% of the east elevation of the west building is grim, with unrelieved concrete and no change in material or architectural detail.



WEST BUILDING - EAST ELEVATION

UNION ON 6TH | 04.02.18

It is recommended that the designers offer improvements to this area, perhaps with art, or landscaping or more varied architectural elements. .

UDC Section 5.12.13 Warehouse Triangle Area (WTA)

1. Building Placement: *Comment: The required building placement for the portion of the site west of Herbert is a required 0' Build-to line. The project meets that standard. **No additional action required.***
2. Building Heights, Floor Uses: As per Table 5.12-WTA-2:
 - *The maximum building height is 160' or 14 stories. The proposed structure is well below that height. **Comment: No action required.***
 - *The first floor ceiling height is prescribed to be 12'-0". The proposed project exceeds that height. **Comment: No action required.***
 - *The minimum building height at build-to line is 25'. The project meets that requirement. **Comment: No action required.***
 - *A 20' setback above two stories is required for the high-rise portion of the building on the Streets (6th Street and 5th Avenue). **Comment: That has been provided. No action required.***
 - *Ground floor uses: **Comment: Retail Trade and Commercial Services uses at street level are encouraged and preferred if supported by market demand. In the WTA portion of the site, west of Herbert, the Project has made a good faith effort in the context of the garage requirements of the project. The only frontage on the north is all Retail Trade and Commercial Services. The garage frontage is difficult but the Project's addition of 42' of commercial uses has helped a lot. No action required.***
3. Lot coverage, Open Space, Pedestrian Access: *Comment: As per Section 5.12-WTA-3, 8, K of the IID, the required pedestrian 30' pedestrian easement going from 5th Avenue to Herbert is not provided. It is the opinion of the reviewer that the circumstances created by the parking structure and the preserved historic structure makes the satisfaction of that provision to be undesirable. A Best Practice solution would be to delete this pedestrian easement. The Project has deleted this element so: **No action required.** The Lot Coverage, Open Space and Landscape requirements of Section 5.12-WTA-3 have all been met. **Comment: No action required.***

4. Building Massing Standards: Comment: *The Standards listed in Table 5.12-WTA-4 have been met by the massing of the building west of Herbert. **No action required.***

UDC 5.12.14 Fourth Avenue Area (FAS)

1. Building Placement: As per Table 5.12-FAS-2, *the required building placement for the portion of the site east of Herbert is a required 0' Build-to line. Comment: The project meets that standard. **No additional action required.***
2. Building Heights, Floor Uses: As per Table 5.12-FAS-2 and Figure 5.12-FAS-B
 - *The maximum building height is 60' with a setback of 50' from the Street property along 4th Avenue and 6th Street. Comment: The 6th Street frontage and the 4th Avenue frontage are limited to 30' and the corner is limited to 40'. The building heights along 4th Avenue and 6th Street meet all of those requirements. **No action required.***
 - *A 50' setback above 40' is required for the mid-rise portion of the building along Herbert, according to Note 3, Dimension E on Table 5.12-FAS-2. Comment: The building is 60' tall. It is the opinion of the reviewer that this standard was included with the assumption that two different owners developed property across the alley (Herbert, in this case). With a single project on either side of Herbert, the loss of the top 20' of developable density serves no purpose. The orientation of the Herbert as north south, still allows mid-day sun into Herbert with no discernable difference provided by the setback for the last 20' of height. It is the opinion of this reviewer that, in this circumstance, the Best Practice would be to allow the mid-rise to proceed with no addition setback from Herbert on the top 20'*
 - *Ground floor uses: Comment: This requirement has been a difficult problem from the outset and has been discussed in my two prior commentaries. In response to an earlier comment, the commercial square footage of the commercial corner of 4th Avenue and 6th Street was increased. That effort is appreciated. But nonetheless, the determination to locate four two-story residential uses with their entries from an internal courtyard on the south face of those units, diminishes the intent of the IID and forces the inadequacy of standards a, b, c, and d above. An effort had been made to increase the architectural variety of the fourth residential unit (on the eastern corner of Herbert and 6th Street), but it still does not meet this standard. I understand the desire of the developer to maximize the number of residential units, **but I recommend that the fourth residential unit at Herbert and 6th should be changed to a Retail Trade or Commercial Services.** This use would mitigate the street activity problem to a large extent. It would provide a symmetrical bilateral commercial entry to Herbert from 6h and anchor that corner of the site in a positive way. With that addition the rhythm of the pedestrian experience along 6th Street would be much improved. The developer has presented no information that would indicate why that change would be an economic hardship.*
3. Lot coverage, Open Space, Pedestrian Access: Comment: *The Lot Coverage, Open Space and Landscape requirements of Section 5.12-FAS-3 have all been met. **No action required.***
5. Building Massing Standards: Comment: *The Standards listed in Table 5.12-FAS-4 have been met by the massing of the building west of Herbert. **No action required.***

Submitted by:



Corky Poster, Architect/Planner, Poster Frost Mirto
City of Tucson Design Professional