

From: "Stephen "Mike" Rebro" <mikerebro@yahoo.com>
To: Carolyn Laurie <carolyn.laurie@tucsonaz.gov>
CC: Bob Freitas <bobf@sundialenergy.com>, Steve Arnquist <steve.arnquist@tuc...>
Date: 12/02/2014 3:29 PM
Subject: Fw: IID - EPNA Position Paper (final Draft)
Attachments: EPNA Position Paper on IID Revision Doc v11-14-14 - 2 Dec2014.doc

Please send the attached copy of our position paper to the commissioners.
We do not think that we will get any more comments from the neighbors.
Please let me know if anyone has problems accessing the report. Thank you. The email below included our position paper.

Sincerely, Stephen "Mike" Rebro President El Presidio Neighborhood Association

----- Forwarded Message -----

From: Bob Freitas <bobf@sundialenergy.com>
To: "Stephen "Mike" Rebro" <mikerebro@yahoo.com>

Sent: Tuesday, December 2, 2014 3:13 PM
Subject: Re: IID - EPNA Position Paper (final Draft)

Hello Mike,

I have attached the final copy of the Paper for you to transmit to the Commission, as planned.

See you at the Mayor and Council Chambers.

Best wishes,

Bob.

Robert J. Freitas
President
Sundial Energy, Inc.
P.O. Box 1309
Tucson, AZ 85702
520-256-2444
bobf@sundialenergy.com

Position Paper
El Presidio Neighborhood Association on
Downtown Links Infill Incentive District (IID) Revisions
December 2, 2014

We appreciate the effort that the IID Commission has made to modify the Incentive District language to include greater flexibility in the proposed overlay to existing zoning in the Downtown Links Area. As the El Presidio Neighborhood Association, we are not opposed to appropriate development and infill. However, we find that the current language of the IID document with proposed setbacks, heights, and massing for the El Presidio Sub-Area runs counter to our very mission as an historic district, and a neighborhood with historically significant structures. The following positions are based on the IID Document, 11-14-14 Draft, as available on 11-24-14, on the Planning & Zoning website, <http://pdsd.tucsonaz.gov/pdsd/planning-commission-infill-incentive-district-subcommittee>.

Concern One. Tucson Planning Department Criteria for preservation and development for Historic Districts mandate that “any new building ... take into account the collective character of the buildings in its immediate vicinity,” including height, setback, proportion, and massing, in order to “assure the retention of those qualities which make historic areas unique and identifiable” (Tucson Planning Department, *Tucson’s Historic Districts: Criteria for Preservation and Development*, 4th ed., 1977) The preamble language in the IID for the El Presidio Sub-Area does not even mention the priority for historic preservation (ref. IID, p. 52) as it does for the neighborhoods of Armory Park and Ironhorse (ref. IID, p. 68), even though El Presidio contains some of the oldest structures in Tucson and was one of the earliest historic districts established in Tucson in 1976, (http://oip.tucsonaz.gov/files/preservation/22x34_NRHDs_Zones_index.pdf).

Instead the preamble for the Toole Avenue Area, for the El Presidio Sub-Area states, “The intent of the El Presidio Area is to encourage development within the historic neighborhood of El Presidio. Specific building heights and setbacks have been mapped out to encourage density within the historic context. Other incentives include reductions in required parking and lot coverage” (ref. IID, p. 42). This language sets the tone for the inappropriate recommended heights and massing found later in the details.

Concern Two. The IID treats lots within and adjacent to El Presidio inconsistently in comparison to the other historic neighborhoods of Armory Park and Ironhorse with mixed use heights of maximum of 40’ (ref. IID, p.72), 4th Avenue maximum heights of 50’ (ref. IID, p.67). The document is even notably inconsistent in comparison to treatment of arterial thoroughfares, such as Stone Avenue and 6th Street. The Stone Avenue Area proposal treats very carefully, on a block by block basis, the step-downs and massing affecting adjacent structures and streets, having a maximum height of 90’ (ref. IID, p. 80), rather than the 160’ and 120’ maximum heights proposed for our neighborhoods’ lots that front the same arterials (ref IID, p. 53). The 6th Street Area proposal treats the streetscape look carefully, with a limitation of heights of 50’ directly onto 6th, and 25’ when fronting neighborhoods to a depth of 125’ (ref. IID, p.84), as does the proposal for Toole Ave with maximum heights of 75’, even when backing up to the railroad.

This careful treatment has not been accorded to the Platform site, height of 160’, nor to the Lots both directly to the south of the Platform site, height of 120’, and to the west, i.e. Block 175, height 120’ (ref. IID, p. 53-54). This document is planning for buildings that will loom over existing historic structures (such as the Gustav Hoff Residence, Steinfeld Warehouse, Stork’s Nest, “Z” or Zellweger Mansion,

Mountain Oyster Club/Maker House/Bates Mansion) and the newly renovated Presidio Museum and Trust Properties.

Concern Three. The effect of the proposed El Presidio Sub-Area development language allows for a density that would overwhelm the neighborhood with vehicles for the new residents, service vehicles required for the proposed high rise buildings, and vehicles of the visitors to these buildings. The neighborhood streets, especially Franklin Street, are already seeing significant increases in traffic since the completion of the Downtown Links/Saint Mary's-6th Street Phase I road project. The IID's proposed parking allowances for the new buildings assume that new residents, visitors, and tourists will use alternative forms transportation and decrease required on-site parking.

However, public transportation, specifically the Streetcar, is not easily accessed from this area of north of downtown. It is four blocks away. Therefore, it is much more probable that vehicles in excess of available on-site parking will be seeking surface parking in and amongst the neighborhood streets. In addition to the act of finding a parking space, the vehicles will need the means of entering and leaving the neighborhood. It is both irresponsible and illogical to assume that the ingress/egress will be limited only to Stone, Toole or 6th Street, when current traffic patterns show this already not to be the case.

Concern Four. The proposed heights and massing are inconsistent with the very goal and title of Downtown Links. This is not the Core Downtown Area. This is the Gateway to downtown from the north, northwest and northeast, linking the surrounding areas to the downtown. What is proposed, however, is Downtown Core Area heights and massing, with structures of 160' and 120' having no setbacks, resulting in building corridors that will give a "canyon-like" feel to the area. The heights and massing will not promote the feeling of safe pedestrian access, encourage walking, cycling or other alternatives, nor even encourage visitors to seek the nearby galleries and studios. As currently written, the IID extends the Core Downtown massing and building heights to inappropriate lots, and does a very poor job of "linking" neighborhoods and the mixed use areas to the downtown.

Contrast the proposed treatment of the northern areas linking to downtown with the newly vibrant areas at the east end of the actual Downtown Core. The new Cadence and Centro developments have heights of one half or less than those being proposed for our northern gateway or link to downtown. On the western gateway into downtown, fronting W. Congress and next to the freeway, is the newly constructed Sentinel Plaza Building of 6 stories. Another example, at 12th Street and Herbert, within the Armory Park Area, is the newly renovated Herbert building having 8 stories, but each of lower height. Although the Herbert is an existing structure, it is not being used as an excuse to extend an inappropriate height and massing to the Armory Park neighborhood. Such is not the case for the lots adjacent to El Presidio, even though no existing structure within the neighborhood comes close to the Herbert's height.

For Block 175, what is proposed is a height equal to the City Hall Tower and only 10' less than the TransAmerica Building. The IID document is clearly inconsistent in its treatment of similar neighborhoods, and runs counter to the charge by the City Council to treat with sensitivity historic districts and neighborhoods.

Balance Sought. While the Commission has sought to weigh and balance competing objectives, and appears to have done so in other Links Areas, for the El Presidio Sub-Area it has failed to strike an equitable and appropriate balance between existing and new uses. The Commission has tilted too far in its proposed heights, sizes, and massing, by planning development of these lots that shows little to no

concern for the existing residents, historically significant structures, and historic districts found in this Area. This is a repeat of the lessons of the 60's and 70's, an era touted as urban renewal, which resulted in the destruction of history and the cohesiveness of neighborhoods. Instead, the Commission should look at current successful and sensitive models of development, such as the Mercado de San Augustin, rising on the west end of downtown. This is a true "linking development", not the high rises that the IID document plans for the historic El Presidio Sub-Area.

EPNA Proposal. We therefore propose changes in the IID Revision Document. The IID must be revised for the El Presidio Sub-Area, as follows:

- a) To give priority to historic properties, and to give contextual consideration of historic properties,
- b) To not go above planned heights for the arterial roadways of Stone Avenue and 6th Street Areas on any of the lots in the El Presidio Sub-Area,
- c) To step-down building heights relative to adjacent historic properties and Historic District so as to not loom above them, block visual sight lines, or block solar access,
- d) To step-down into the neighborhood to match adjacent building heights at each side, with sufficient depth, not simply to employ facades,
- e) To have Block 175 designated as mid-rise, not high rise, with maximum height at the current zoning height of 75' and stepping down to 25',
- f) To only allow relaxed on-site parking requirements if the associated traffic congestion, related to height and density, is placed into the actual context of lots not being adjacent to streetcar lines.

These proposed changes will reduce density of traffic, avoid detrimental impacts on the visual urban historic landscape, and better match the historic character of the neighborhood, while linking areas surrounding the El Presidio Sub-Area to the Downtown Core.

Concluding remarks. The City of Tucson Land Use Code (Article 2) on Overlay Zones (July 2, 2007) is directly relevant to our concerns. The Historic Preservation Zone Development Standards therein describe El Presidio as "Tucson's first neighborhood," containing nearly 80 historically important and architecturally significant" structures. The standards underscore the need "to balance residential and nonresidential land uses in the area and to ensure that both restoration and redevelopment are compatible with the neighborhood's unique historic setting." While it refers primarily to Historic Preservation Zones, it is obvious that HPZ's are directly affected by immediately adjoining areas, whether or not they are part of the HPZ. The document states that new structures "be designed and constructed to harmonize with structures located within the immediate vicinity, in order to preserve property values, provide for future development, and promote an awareness of the heritage of Tucson among both residents and visitors to the community." All these considerations will be threatened by high rise buildings as proposed in the IID which ignores the HPZ Development Standards.