

Jennifer Burdick - Comments on EPS White Paper

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Subject: Comments on EPS White Paper

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Greetings,

Thank you for the opportunity to comment on the Draft White Paper “Broadway Boulevard Corridor Revitalization” of January 7, 2014. We have organized our comments in two parts. First some general comments as to tone and approach, and secondly some specific comments.

General Comments

1) Most importantly, the report does not recognize that the draft goals of the Broadway Boulevard Citizens’ Task Force (CTF) emphasize the retention and enhancement of the existing character and environment (i.e. local businesses and business incubator etc.). This is the key issue. Instead of looking at individual buildings and providing examples and case studies of chains, the report needs to focus more on what is needed to create and retain districts and corridors that promote place-making and provide opportunities for local businesses to thrive. In other words, what is needed is a holistic

approach that examines the entire two-mile stretch.

2) We are glad to find generally supportive comments about the economic vitality of the Broadway Boulevard as stated in the first of the key findings, “Today, Broadway Boulevard is an economically viable commercial corridor that supports a mix of retail, office and other uses;” and that, “Broadway Boulevard is an economically viable commercial corridor that has adapted over time to evolving physical and market conditions.” (Pages 1 and 2). We are delighted that you understand that; however the rest of the report tends to contradict this, and proposed actions that do not build upon the existing character of Broadway. An example occurred at the Citizens’ Task Force meeting on January 23 in the response to the CTF member who suggested that there was no major problem given the low vacancy rates, etc. The response implied that many of the existing businesses were not thriving and that over time the mix will change. While this may be true in some instances (and no one expects that all of the existing businesses, or even the current mix will remain), it seems that this not only contradicts the statements in the white paper, but that a more appropriate response would have been to suggest that the goal of future actions should be the **enhancement** of the corridor’s existing character so that overall vitality will occur.

3) The examples of new investment along the two-mile stretch mentioned in the white paper, are only those of new construction, mostly on the south side of the roadway, which according to the 1987 plan was to be spared any acquisitions. The real story of the viability of the corridor is the continuing investment and repurposing of existing buildings, historic and other, on the north side, as they come available despite over three years of active public discussion of the street widening and that the widening could result in a taking of most of the north side parcels. We ask that you document and call attention of the new (last five years) uses of existing buildings on the north side of Broadway. Here are some examples in in the last year on the north side of the street:

- Chanel 14 AZTECA at 1201 E. Broadway
- Flanagan’s Celtic Corner at 2719 E. Broadway
- Nonesuch Gift Shop that is in a remodeled house at 2801 E. Broadway
- Western Dentist and Orthodontic at 2901 E. Broadway

On the south side of the street, new businesses include:

- Russell’s Retro Furnishings at 1132 Broadway
- Fast Medical Urgent Care at 2500 E. Broadway
- Falora’s Pizza and Espresso at 3000 E. Broadway

As one can see from the above list, new businesses going in maintain the character of the corridor by

continuing the mix of businesses and services; mostly small, independent businesses. Your report could help this phenomenon by emphasizing how this could be enhanced. While there are turnovers for a variety of reasons, for instance Thomas Reprographics gave up its Tucson store on Broadway because of changes in the way governments and companies put buildings out to bid, in general new or existing businesses move into vacancies.

Specific Comments (The statement from the white paper is in italics, our comments are in regular font.)

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Page 2: *Major retailers need larger spaces (i.e., Safeway) than is currently available on Broadway.* The report needs to discuss the implications of this and how it affects what are feasible futures for the corridor.

Page 3: *Best practices include nodes, traffic calming, place-making, and pedestrian environment. These improvements can enhance economic vitality through creating a better “place.”* Firstly, the report needs to look at what is envisioned in the spaces between the nodes, where these nodes would occur (which does ignore the existing character to some degree), how to integrate nodes with the strip, and what can these nodes provide. Secondly, and more importantly, the idea that improvements will **enhance** the existing environment needs to be emphasized.

Page 3: *Can create places on busy thoroughfares using CSS solutions.* The report cites Feast (on Speedway) as an example. However, Feast is an individual business and the improvements apply only to it; there is no identifiable district or place in the area Feast is located. People don't go to Feast to hang out or stroll along Speedway at that location. The emphasis should be on districts not individual buildings. Also, Feast has a similar depth (the building is over 120 feet deep) to buildings on Broadway. Further, Feast's parking solution is only for it and the model would not work for an entire corridor or district or even a block, i.e. each business providing its own parking to the side unless one is willing to significantly reduce the number of businesses.

Pages 3-4: *Significant widening will lead to significant acquisition and demolition on corridor that abuts lower intensity neighborhoods and currently exhibits shallow lot depths.* Demolition for widening will leave remnant parcels that will be shallower and increase impacts to neighborhoods. In addition, the report states that most major developers will not invest in such an area though possibly niche “micro developers” might come forward in the very long term. Large-scale development would require significant parcel consolidation and this would reduce the number of businesses, etc., which could have a negative impact on the ability of Broadway to accommodate local businesses. It will certainly significantly change the character of the corridor. More importantly, this touches one of the key issues; that the remnant parcels will not be deep enough to be viable either by themselves or as a corridor or district; and even if developed, would probably significantly alter Broadway's existing character.

Page 4: *Probably needs various development incentives.* Here would be the place to talk about in some detail what development incentives exist, and what other ones might help.

Page 4: *Some large underutilized sites could serve as catalysts to retaining and enhancing the existing historic and urban fabric of the corridor. These sites, especially at western end could be mixed-use developments.* Most likely the sites being referred to are the Volvo Site and City-owned site across the street. Most of the land in the project area is in small parcels, is developed, and there are few opportunities for large developments. Just look at the property maps and see the small lot sizes, though often the same person owns a number of them.

Pages 6-7: *In regards to chart of best practices steps, emphasize steps 5, 7, 8 (create nodes, create place, diversify character).* However, we would also state that calming traffic is important. There needs to be a better discussion of nodes and related development between them along corridor (especially from Campbell to Country Club that is primarily strip commercial).

Page 7: *Further, in relation to nodes, paper states that prime function of corridor is conveyance and nodes are the areas for "places."* This contradicts much of the current literature, including the book the ITE recently wrote in conjunction with the Congress of New Urbanism (Designing Walkable Urban Thoroughfares: A Context Sensitive Approach), which states that a street is combination of conveyance and place in at least equal importance. We fear that the paper's statement could otherwise degrade importance of the areas between nodes. The emphasis should be on the entire corridor being a destination (or a couple of destinations), not just the nodes.

Page 7: *Emphasizes the need for more diversity and development within an overall place concept.* However, the paper's reference to lifestyle centers (and upscale restaurants and retail with entertainment) seems to contradict the idea of diversity and would significantly change the character of the area. We do not need another La Encantada (located in the Foothills). Also, given the shallow lot depths, especially after widening, how could a lifestyle center be feasible without destroying a large section of housing in a neighborhood?

Suggestions

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For your white paper to be effective, it needs to provide guidance on what is feasible and what happens if widening impacts this corridor.

We would ask you to be clear on your terms – perhaps it is even necessary to define some of them since the audience for this paper is a citizen’s task force.

- What is shallow lot development? (The report needs to differentiate between development such as Feast, which has a depth similar to that for most of the buildings on Broadway, and what would occur on Broadway after widening in which lots would be significantly reduced.)
- What is a node?
- What do you mean by revitalization?
- What do you mean by viability?
- When you say new development, do you mean new construction or repurposing an existing building?
- How do you define lifestyle center?
- What do you mean by “real estate development opportunity”?

Thank you for this opportunity to comment on the report. We look forward to a new version that incorporates some of our suggestions and recognizes the unique and special area, a mix of retail, services, restaurants, and offices, many in historic post modern buildings that we have along Broadway for much of these two miles.

Sincerely,

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