



**DATE:** October 11, 2019, *Revised April 24, 2020*

**TO:** Nick Ross, Maria Gayosso, Koren Manning  
City of Tucson Planning and Development Services

**FROM:** Corky Poster, Architect/Planner, Design Professional

**RE:** Hotel Congress, 311 East Congress Street, Tucson AZ  
**DP 19-0190**

**OWNER:** 311 East Congress LLC

**PHASE OF REVIEW:**

Comment:

*On Tuesday September 24, 2019, I met with a more formal Pre-Application meeting using the Pre-Application Design Standard Checklist.*

Comment:

*I have reviewed the submittal for the Hotel Congress, 311 East Congress Street, Tucson AZ DP 19-0190 dated April 3, 2020, for compliance with the UDC Infill Incentive District (IID), UDC Section 5.12.2, 5.12.8, and 5.12.10. 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.*

*This review is the second time I have reviewed elements of this proposal and the first formal review of a complete package prior to its review by the Design Review Committee of the IID. On Tuesday September 24, 2019, I attended an informal pre-application meeting to review items submitted by the development team for some initial feedback.*

**MATERIAL REVIEWED:**

INFILL INCENTIVE DISTRICT DESIGN PACKAGE FOR HOTEL CONGRESS, submittal from applicant, dated September 13, 2019. Materials as noted, following (8.5 x 11 Format):

- Infill Incentive District Application (1 page)
- Submittal Requirements
- Project Summary/Introduction to HOTEL CONGRESS, New Stage, Storage & Restrooms (1 Page)
- Permit Review Details (10 pages)
- Pima County Assessor's Record Parcel Detail & Map (9 pages)
- Existing Photo Study (5 pages)
- Development Package DP19-0018 – 1<sup>st</sup> Submittal (5 pages)
- Building Design Information (14 pages)

INFILL INCENTIVE DISTRICT FORMAL APPLICATION AND DESIGN PACKAGE FOR HOTEL CONGRESS, submittal from applicant, dated September 13, 2019. Materials as noted, following (8.5 x 11 Format):

- Infill Incentive District Application (2 pages) T20SA00092, ID-19-08, HPZ-20-XX
- Cover letter
- Authorization letter

- Site Plan
- Views diagram
- View photos (4 pages)
- Development Package (5 pages)
- Architectural design package (14 pages)
- Shade study (1 page)
- Design Professional (PMM) Initial comments (3 pages)
- Individual Parking Plan (IPP) (30 pages)
- Historic Design Review Fact Sheet (2 pages)
- Historic Preservation Review Application (3 pages)
- Previous Design Package (23 pages)
- National Register Nomination Inventory Form for Hotel Congress (11 pages)
- Design Professional (PMM) Initial comments (6 pages)
- 2004 Parking Lot (10<sup>th</sup> Street Parcel) Survey
- PRO Activity Review including GIS Parcel information, Assessor's Map (15 pages)

#### **IID STANDARDS APPLICABLE TO PROJECT:**

- UDC Section **5.12.8 General IID Zoning Option Design Standards**
- UDC Section **5.12.10 Downtown Core Sub-District (DCS)**
- UDC Section **5.12.2. Establishment**

C. Depending on the development choice of the owner, plans submitted for development of land in the IID must comply with the appropriate IID regulations and standards as follows:

1.b. If the property is located within the boundaries of RNA, all of the following regulations, standards, and review procedures apply:

- (1) The regulations and standards of the underlying zoning.
- (2) The RNA Standards in Section 5.12.7
- (3) **Section 5.12.6.E – IID Historic Preservation Review**

#### **2. Projects not in an HPZ** *[this project is not, but it is individually listed in the National Register of Historic Places]*

a. The Tucson-Pima County Historical Commission Plans Review Sub-Committee reviews all projects listed below:

(2) Projects proposing new development using IID zoning option that are either adjacent to the boundaries of an HPZ *[not applicable here]* or adjacent to a structure meeting any one or more of the following characteristics:

(a) Listed or eligible to be listed in the National Register of Historic Places, individually or as a contributing property. *[applicable here]*

d. The TPCHC Plans Review Subcommittee reviews for compliance with the design requirements of the applicable sub-district and for design compatibility of a proposed development project.

(1) New development must be designed to complement and be compatible with the architecture of adjacent historic structures.

*It is the opinion of the Design Professional that this requirement is met.*

(2) Compatibility with adjacent historic structures is to be achieved through architectural elements such as building setbacks, building step-backs, textures, materials, forms, and landscaping.

*It is the opinion of the Design Professional that this requirement is met.*

(3) Exceptions. The PDS Director may waive the compatibility requirement of this section under the following circumstances:

- (a) Where the adjacent lot is vacant
- (b) If the property owner of the adjacent historic property waives the requirement; or
- (c) If the adjacent lot is developed with a non-residential building.

## **STANDARDS AND REVIEWER COMMENTS:**

### UDC Section 5.12.8. GENERAL IID ZONING OPTION DESIGN STANDARDS

An IID Plan under the IID zoning option design standards must demonstrate compliance with the following:

**A. Streetscape Design-** Streetscape design must comply with the street design standards in the Technical Manual and the Streetscape Design Policy.

1. Pedestrian-orientation: Projects shall be pedestrian-oriented and comply with all of the following standards:

- a. New construction shall have architectural elements/details at the first two floor levels;
- b. Buildings shall provide windows, window displays, or visible activity on the ground floor for at least 50 percent of frontage;
- c. A single plane of façade shall be no longer than fifty feet without architectural detail;
- d. Front doors shall be visible or identifiable from the street and visually highlighted by graphics, lighting, or similar features;
- e. Uses, such as Commercial Services or Retail Trade uses that encourage street level pedestrian activity are preferred on the first floor of a structure of a multistory building;
- f. Construction and maintenance of sidewalks must be done in compliance with the City's Streetscape Design Policy. Existing sidewalk widths shall be maintained so as to provide effective, accessible, connectivity to adjoining properties. Sidewalks may be widened to accommodate a project's design characteristics. Where no sidewalks exist, sidewalks shall be provided. Outdoor seating and dining areas and landscaping may be located in the sidewalk area where safe and effective sidewalk width around the design feature can be provided;
- g. To the extent practicable, bus pull-outs shall be provided where bus stops are currently located; and
- h. If drive-through service is proposed, it shall not interfere with pedestrian access to the site from the right-of-way.

*It is the opinion of the Design Professional that this requirement is met.*

2. Shade

a. Except as provided below, shade shall be provided for at least 50% of all sidewalks and pedestrian access paths as measured at 2:00 p.m. on June 21 when the sun is 82 degrees above the horizon. Shade may be provided by trees, arcades, canopies, or shade structures provided their location and design characteristics are compatible with the historic and design context of the street and the architectural integrity of the building. The use of plantings and shade structures in the City right-of-way is permitted to meet this standard with the approval of the Transportation Department. The shade provided by a building may serve to meet this standard.

*A satisfactory shade study has been submitted and this requirement is met.*

b. Exception- The PDSO Director may approve an IID Plan providing less than 50% shade where compliance is not feasible due to a project site's location and/or building orientation and the applicant has made a reasonable attempt to comply with this standard.

### **B. Development Transition Standards**

The purpose of the Development Transition Standards is to mitigate excessive visual, noise, odor, vibration intrusion, and other similar public health and safety concerns that may be created by the proposed project.

1. Applicability - Developing sites that abut an affected single family or duplex dwelling shall comply with this section. For purposes of the IID, the following terms and examples describe elements of applicable transitional areas:

- a. "Affected residential property" refers to an existing detached single-family or duplex dwelling that is adjacent to a developing site;
- b. "High density residential" refers to residential development that is neither existing single-family detached nor attached dwellings;

c. Examples of applicable transitional areas include a nonresidential developing site adjacent to existing single-family detached or attached dwellings within a subdivision, or a developing high-density residential site adjacent to existing single-family detached or attached dwellings within a subdivision; and,

d. For projects within the DCS, the Development Transition Standards apply only to those projects adjacent to affected residential properties outside the DCS boundaries.

*Not applicable.*

2. Mitigation of Taller Structures: Compliance with the following standards is required where the developing site has taller buildings than adjacent affected residential properties:

a. Within the GIS and DCS, the maximum building height is 25 feet within 30 feet of the property line adjacent to an affected residential property. Proposed buildings may be developed to the maximum height permitted by the underlying zone or as permitted by the IID Subdistrict, whichever is applicable, when the building is 30 feet or more from the property line adjacent to an affected residential property;

b. Building Bulk Reduction

c. If a building façade faces a property line adjacent to a single-family detached or duplex residential property, the PDS Director may require bulk reduction. The Design Professional shall make a finding and recommendation, after consulting with the DRC and/or Historic Commission if applicable, that the proposed design provides an effective way of breaking up the mass, so the building mass of the façade is less imposing.

d. Windows at or above the second story of a structure shall be located or treated to reduce views into adjacent affected residential property's buildings and yard areas;

e. Balconies shall be oriented away from affected residential property or use a screening device to reduce views into the rear or side yards of the affected residential property.

f. The developing site's buildings shall be oriented so as to reduce views onto an affected residential property; and

g. Buffers and/or screening consistent with the purpose of this section shall be provided between a developing site and affected residential properties and shall include features such as, but not limited to, landscaping, walls, and architecturally decorative features.

*Not applicable.*

3. Mitigation of Service Areas- Potential nuisance or noisy areas shall be oriented away from affected residential property, such as by placing service areas for loading and garbage disposal between the developing site's buildings, behind opaque barriers, or by using architectural or landscaping treatments that effectively reduce nuisance impacts from service areas. The service area shall be mitigated to reduce the noise and view of the service features, reduce the emission of offensive odors to owners or occupants of adjacent properties or create a nuisance or hazard beyond the property lines of the project site, and prevent vibrations that are discernible beyond the property lines of the project site.

*It is the opinion of the Design Professional that this requirement is met.*

4. Mitigation of Parking Facilities and Other Areas- Where the site has parking areas or an area with noise and outdoor lighting features, the areas shall be screened from affected residential property by a combination of a wall or opaque non-chain link fence with a vegetative hedge or a row of trees that shall be dense enough to screen views onto the development site. An alternative treatment may be used, such as using architectural or landscaping treatments that effectively reduce nuisance impacts from parking facilities and other areas. Where there is a finding that the vegetative screen will be opaque, the requirement of a masonry wall may be waived by the PDS Director.

*Not applicable.*

### **C. Alternative Compliance**

1. The PDSO Director may approve an urban design best practice option for compliance with Section 5.12.8.A, Streetscape Design, and Section 5.12.8.B, Development Transition Standards.

2. For purposes of this section, urban design best practices may include urban design studies approved for the City of Tucson, adopted urban design standards for a downtown area in an Arizona city of comparable size or a city in the Southwest of comparable size, books written by urban design experts or endorsed by a professional organization, such as the American Institute of Architects, addressing downtown development, or any comparable report, study, or standards recommended by the City's Design Professional and approved by the PDSO Director.

**D. Utilities-** Plans shall include information on the layout and demonstrate availability of utilities such as water, wastewater, natural gas, electric, and telecommunication utilities.

### **E. Parking**

*The Design Professional has reviewed the entire Individual Parking Plan and supports its conclusions and requests.*

1. Parking spaces may be located as follows:

a. On site; or

b. Off-site within ¼ of a mile of the project site under a shared parking agreement that is approved by the City.

2. Required vehicle and bicycle parking may be reduced pursuant to an IID Parking Plan in accordance with Section 7.4.5.A, except as modified as follows:

a. Section 7.4.5.A.3 in Permitted Uses and Types of Development does not apply. An IID Parking Plan may be used to reduce required residential parking.

b. Bike parking shall be provided when motor vehicle parking is provided. The PDSO Director may reduce the required number of bike parking spaces depending on the use, setting, and intensity of the proposal.

c. The neighborhood meeting that is required for under Section 7.4.5.A.6.a may be held concurrently with the neighborhood meeting required by Section 5.12.6.B.

d. Section 7.4.5.B, Downtown Parking District, does not apply.

3. Where Parking is provided, the parking area must comply with the standards of Section 7.4.6.C and D.

4. Parking must be in a parking structure with the ground floor of the parking structure screened from view.

a. Exception

b. Parking may be located on a surface parking lot if it is determined by the PDSO Director to be impracticable to be located elsewhere and other options are not available.

c. Parking may be located on a surface parking lot if it is determined by the PDSO Director to be impracticable to be located elsewhere and other options are not available. If located onsite, parking areas must be located at the rear or side of the building.

d. Changes of use and expansion of existing structures may use the site's current parking configuration.

e. Parking structures shall be designed so that parked vehicles are screened from view at street level through incorporation of design elements including, but not limited to, landscaping, pedestrian arcades, occupied space, or display space.

5. Special IID Parking Agreement- Where a developer can demonstrate to the satisfaction of the PDSO that the parking options provided for in this Section are not feasible, and the City makes a specific finding that the project will have significant economic development value for the IID Sub-District in which it will be located, the following parking options are allowed as follows:

a. A percentage of long-term residential parking may be located in a City public parking garage by an agreement with Park Tucson if the project is of significant economic benefit to the City to allow this option.

b. The agreement must be reviewed by PDSO, the Design Professional, Park Tucson and approved by the City Manager.

**F. Multi-zone Parcels-** Where a development parcel contains more than one zoning district, uses and building massing may be distributed across the zoning districts on the parcel , provided that the development complies with the design standards in Section 5.12.8.B to mitigate the impact of the new development on existing, less intensely developed adjacent parcels.

*Not applicable.*

UDC 5.12.10. DOWNTOWN CORE SUBDISTRICT (DCS)

**A. Permitted Uses** - With the exception of detached single-family dwellings, which are not allowed, permitted uses in the DCS are those uses listed for the GIS, Section 5.12.9.A.

**B. Standards** - The following apply to all development within the DCS:

1. Maximum building height may be increased up to 60 feet unless the current zoning allows a greater height or where the approved IID Plan's Development Transition Standards requires less.

2. In the underlying I-1 and I-2 Zone, uses permitted in the DCS under Section 5.12.9.A above are limited to a maximum 75-foot building height.

3. When provided, landscaping shall be in accordance with the City's drought-tolerant plant list;

4. Bicycle parking shall be provided when motor vehicle parking is provided. The required number of bicycle parking spaces may be reduced pursuant to an IID Parking Plan, Section 5.12.6.M when bicycle parking is required per this section;

5. Where applicable, applicants are strongly encouraged to comply with Section 7.7, Native Plant Preservation; and,

6. All applications shall be in accordance with:

Section 5.12.7.C.6: Building façade design shall include pedestrian-scaled, down-shielded, and glare controlled exterior building and window lighting;

5.12.7.C.9: Buildings shall be designed to shield adjacent buildings and public rights-of-way from reflected heat and glare;

5.12.7.C.12: Colors may conform to the overall color palette and context of the Downtown area or may be used expressively to create visual interest, variety, and street rhythms. The rationale for an expressive or idiosyncratic use of color shall be described in the site plan submittal;

5.12.7.C.13: New buildings shall use materials, patterns, and elements that relate to the traditional context of the Downtown area;

5.12.7.C.14: Twenty-four-hour, street-level activity is encouraged by providing a mixture of retail, office, and residential uses within each building; and,

Section 5.12.7.D.3. Open space is defined in the DCS as stated in Section 5.12.11.B.6, Downtown Links Subdistrict. **Plazas and Open Space:** The fundamental objective of the design standards in this Section 5.12.7.D.3 is to encourage public and private investments to enhance the character and function of Downtown's pedestrian environment.

a. Five percent of the gross floor area of new construction shall be provided in public plazas or courtyards. Open space plazas, courtyards, and patios are landscaped outdoor areas designed to accommodate multiple uses, from large gatherings of the people for performing arts to smaller gatherings. The plazas and courtyards will be one of the ways that spaces and uses can be linked. The requirement of this section may be waived or reduced by the PDS Director upon a written finding during the review process that the development enhances the downtown pedestrian environment even with a smaller percent or elimination of the requirement.

b. Views of all historic properties and all-natural elements surrounding the Downtown should be considered during design. Plazas, courtyards, and open spaces shall be sited to include views to other public spaces, where feasible.

c. Neighborhood linkages shall be maintained throughout Downtown.

**C. Exemptions** - Except as provided in this section, development within the DCS is exempt from the following standards unless the PDS Director makes a finding that public safety and health would be jeopardized:

1. Section 5.4, Major Streets and Routes Setback Zone;
2. Minimum perimeter yard standard as provided in Section 6.3, except when required by Section *It is the opinion of the Design Professional that all of the above requirements are met.*

**5.12.8.B, Development Transition Standards**

3. Maximum lot coverage standard as provided in Section 6.3;
4. Minimum lot size standard as provided in Section 6.3,
5. Section 7.4, Motor Vehicle and Bicycle Parking, except as provided in Section 5.12. 8.E;
6. Section 7.5, Off-Street Loading;
7. Section 7.6, Landscaping and Screening Standards, except as required by Section 5.12.8.B, Development Transition Standards; and,
8. Section 7.7, Native Plant Preservation, except when the property includes a drainage corridor where native plants are present or when the property is adjacent to a drainage corridor and remnant native plants are present on the project site.

**D. Other Permitted Modifications**

1. Pedestrian Access
2. Alternative pedestrian access that creates connectivity between public entrances to the project and abutting sidewalks may be allowed as long as no safety hazard is created. All pedestrian access shall conform to the City's adopted Building Code.
3. Solid Waste Collection
4. On-site refuse collection container standards governing access, type, and location may be modified if the Environmental Services Department determines that no public health or traffic safety issue is created.

*It is the opinion of the Design Professional that all of the above requirements are met.*

**Section 5.12.6.E – IID Historic Preservation Review**

d. The TPCHC Plans Review Subcommittee reviews for compliance with the design requirements of the applicable sub-district and for design compatibility of a proposed development project.

(1) New development must be designed to complement and be compatible with the architecture of adjacent historic structures.

(2) Compatibility with adjacent historic structures is to be achieved through architectural elements such as building setbacks, building step-backs, textures, materials, forms, and landscaping.

*It is the opinion of the Design Professional that the design complements and is compatible with the Hotel Congress. It does not imitate the design but respectfully builds a contemporary structure that achieves compatibility as described above in item (2).*

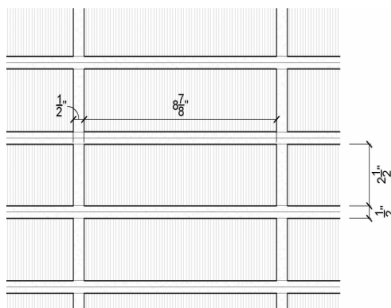
**Response to earlier Reviewer Comments:**

**1. Perhaps use same brick but with stack-bond on the bathroom to avoid historic imitation.**

*The project proposes to use a stack-bond as suggested. Thank you.*



EXISTING HOTEL CONGRESS BRICK RUNNING BOND



BRICK DIMENSIONS & MATCHING MORTAR JOINTS STACK BOND AT NEW WORK – DIFFERENTIATED FROM EXISTING HOTEL CONGRESS RUNNING BOND



CUSTOM WIRE FACE BRICK & COLOR FROM SUMMIT BRICK (WIRE FACE NO SHOWN)

**2. Recommend raising current parking lot grade to match height of existing pedestrian paved area.**  
*The project proposes to comply with this suggestion as an Additive Alternate to the plans. This Design Professional strongly urges the acceptance of this Alternate.*

## ADD ALTERNATE

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### ADD ALTERNATE #1

REMOVE EXISTING ASPHALT AT PREVIOUS PARKING AREA AS NECESSARY TO ALLOW FOR NEW BRICK PAVERS ON SAND. BRICK PAVERS SHALL MATCH EXISTING BRICK PAVERS AND PATTERN. SLOPE BRICK PAVERS FROM TOP OF EXISTING 6" CURB TO BASE OF NEW STAGE / STORM DRAIN. EXISTING CURBS SHALL BE REMOVED INCLUDING CONCRETE CURB RAMP, FEATHER NEW BRICK PAVERS INTO EXISTING BRICK PAVERS FOR SEAMLESS TRANSITION.

**3. Maybe delineate historic 10<sup>th</sup> Street alignment in paving pattern.**  
*Recommendation withdrawn.*