

Sunshine Mile Overlay Zone
Stakeholder Comments on June 2020 Draft

General Comments

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • general structure of the document is acceptable, though I find it very confusing to have Gateway north subarea to the south of Broadway and the Campbell north subarea go mostly south of Broadway • find some names that are better linked to where the subarea actually is? 	We have revised the names of the Subdistricts and Subareas. Gateway Subdistrict is now called Euclid/Park Subdistrict with two Subareas – Park and Euclid. Campbell Subdistrict is now Kino Subdistrict and the two Subareas are North and South. Bungalow and Midcentury have remained the same names with slight boundary modifications as shown in the updated document.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • put all land use additions and exclusions for one subdistrict together, instead of putting Gateway North additions, then Gateway south additions, then doing the same for exclusions 	All uses have been consolidated into a single section.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • found the diagram/tables for building placement, building height, common space and massing very instructive—helped to visualize what was in the table • adopt one standard for little blocks, darker borders, how far lines with letters go into the block or stay on edge and be CONSISTENT throughout the document—otherwise confusing Otherwise, I was getting confused; e.g. pg IV-41 color all dark pg IV-33 E into same area as F, H into light area? Rectangles showing height different from those on page IV-35 etc. 	Graphics revised.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • no mention of meeting ADA standards when new buildings are built. 	Overlay does not supersede these federal requirements. ADA, building codes and other City requirements still apply as they do in other overlay districts.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • “should” not appropriate in zoning document 	Overlay includes requirements as well as aspects that are encouraged. Have included both permissive and required language intentionally as we have created this optional overlay district and want to encourage its use.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • would be useful to have a map/chart showing base densities and heights for the various districts and areas within the SMD • would be helpful to have an existing zoning map for the area with an accompanying chart showing permitted densities, heights, and uses 	Zoning maps and other maps have been part of public meetings/hearings. After the adoption of the Overlay District, collateral material will be created using these maps.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • SMD could completely transform the character of the Broadway corridor and surrounding areas • may be acceptable in the areas south of Broadway along Tucson Blvd., along Broadway itself, this would be counter to what the community has consistently stated that it wants 	Goal of overlay is to allow new development compatible with existing neighborhoods. The public review process has permitted various perspectives to be shared (surrounding neighborhoods, landowners, architects, historic preservation advocates and developers) and reflects the desires from that outreach.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • development charts could be confusing to many people. You should consider providing additional materials that explain what is required and allowed (e.g., an appendix). 	Charts are included throughout the document as needed, and collateral material will be created after the Overlay District is adopted to help educate on its use.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • Are the building heights and densities base heights and densities prior to any bonuses or absolute bonuses? 	Building heights and densities within the Overlay District are the base with the ability to add bonuses as permitted. The only height bonuses are a 2-story (24-foot) bonus when structured parking is provided and 2-story (24-foot) bonus if a Mobility Hub is provided. The two height bonuses may not be used together (only one can be used per project). Density bonuses are available for affordable housing (25-35%) and the provision of a Mobility Hub (20%) within the height limits.

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Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> document groups R-2 zoning with districts that allow much more intense uses, whereas the R-2 zone allows a maximum density of 15 RAC and a height limit of 25 feet with few non-residential uses permitted. 	This is correct and occurs in limited areas. We will be reviewing parcels further from Broadway that are adjacent to residential neighborhoods. In many of these areas, the Overlay District is affording protection to contributing buildings while permitting flexibility in uses.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> be specific when referencing specific ordinances & standards—need to be cited 	Noted; Citations will be checked.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> bonuses cumulative? If yes, bonuses too high. 	Density bonuses are cumulative. There are only two height bonuses – one for parking structures and one for mobility hubs, and those cannot be used together. Subdistrict height (with only one bonus potentially available) and lot coverage will be a limit on development. All bonuses are available to provide flexibility in creating a bonus package, but with the limits of height and lot coverage. Not all will/can be used on sites.
Evren Sonmez	<ul style="list-style-type: none"> have a very hard time framing this highly controversial road widening project as an “improvement” and I know many people share the sentiment. Can we at least use a neutral word here, like “modifications” or something like that? 	Edit made. Note that the name of this project uses the word “Improvement,” so it may be referenced as the project name.
Evren Sonmez	<ul style="list-style-type: none"> I’m a big believer that every time we create a new policy document, a zoning code or any other piece of legislation, we have an opportunity to make it easy to understand for an average person who’s not trained to look at these types of docs. And yet, they’re the primary stakeholders because their lives will be impacted by the very thing they’re struggling to understand. Unfortunately, these graphics are not reader-friendly for most people. Can we look into incorporating some 3-D graphics? Doesn’t have to be fancy renderings like the IID, but even simple graphics that would convey these ideas more clearly would be great. Plan view is particularly challenging for folks, but the Section drawings in this document are also difficult to read. 	Collateral and supplemental materials have been and will be created for public.
Corky Poster	<ul style="list-style-type: none"> It would be good to see underlying zoning as a comparison in all Sub-districts. 	Existing zoning map has been part of public presentations and is available on the Rio Nuevo website for reference.
Les	<ul style="list-style-type: none"> Given the restrictions of The Current Situation, what can be done to allow people to use vacant, remnant, and other "empty" land for food trucks, community artwork, kids' activities (with masks and distancing), outdoor classrooms, and/or other ways for people to creatively (but safely) deal with the pandemic? Ideally I'd like to see a simple permit-free sign-up process (City? host neighborhood?) to minimize barriers to creative use. 	The City has recently adopted the Temporary Extension of Premises policies and there are other opportunities to fine-tune the permit processes related to food trucks and other ancillary amenities. The zoning within the Overlay District does not preclude this opportunity.
Les	<ul style="list-style-type: none"> Some see 'corridor' as a fighting word because it implies that Broadway's sole raison d'etre is to move cars between downtown and the suburbs. This is not true, else why bother with an overlay, Rio Nuevo's involvement, the Main Street business assistance program, and so on. Change to 'along Broadway' or 'along the street'. Ditto second paragraph this page, change to 'along and near Broadway'. “encourages” to “encouraging” Change 'Broadway Improvement Project' to 'Broadway Project' since "improvement" is a subjective assessment, and it is far from clear that this project improves anything. 	“Corridor” is intended to reflect all modes of transportation not just vehicles. Having said that, the word is limited in its use as requested. The Regional Transportation Authority has named the project “Broadway Improvement Project.” The term “Improvement” has been limited in the document other than when the proper name of the project is references.
Les	<ul style="list-style-type: none"> Parking infrastructure? How/where? Not disputing that it exists, just unsure where it is. Change 'improvements to the Sunshine Mile ...' to 'changes to the Sunshine Mile include widening Broadway to six lanes and improving the bike lanes'. 	The reference to parking infrastructure has been removed.

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Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Wants stronger design guidelines and review process than that for downtown, which has had poor results) 	The design guidelines within the Overlay District are much different than downtown and are even different within the subareas within the Overlay District.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Boundary should stop at alley in Sam Hughes 	The properties included north of the alley have been included because they are contributing to the Sunshine Mile Historic District, and the Overlay District is the only local zoning tool to offer protection if the property owner(s) choose to develop within the Overlay Zone. In balancing many stakeholder inputs, the historic preservation is a key purpose of the Overlay District.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Height and density increases are not supported into neighborhood 	For the properties adjacent to Sam Hughes and north of the alley, the densities and heights cannot be used because the property owners have to preserve the historic buildings in order to use the Overlay District.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Include a map that shows current zoning with allowed densities and heights. 	Included in presentation materials; not appropriate in overlay text
Craig Finrock	<ul style="list-style-type: none"> This area connects the downtown and U of A areas and is possibly the most appropriate area to create an urban environment in Tucson. If not here, then where? We all can agree that the resurgence of our downtown has been very positive for Tucson. Downtown Tucson is land locked. The natural direction for downtown to expand is to the east toward the residential areas of central and east Tucson. In order to create an opportunity for an urban district with a pedestrian environment to develop in this area, we need to have the ability for higher density residential and office space. In order to have higher density, we need to minimize the bungalow and strip retail concepts and expand the areas that allow for increased height limits. In this way we can take full advantage of this opportunity to establish a modern urban district and expand our downtown. An urban development of this type will do more to attract the tech companies and the younger creative people that work with these companies that our community desires. 	These comments are acknowledged. This Overlay District attempts to balance a strong desire for modern, urban and new architecture/forms of development with density along with the desire to preserve certain historic areas within the Overlay District. The goal is to attract the next generation to live/work/learn and play.

Process

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> Design Review seems to follow other overlay zones with one ad hoc neighborhood person added to the board it is at least one voice, but will need a strong person with some planning knowledge to be able to stand up to the professionals on the DRB 	The design review follows the other overlay zones as we did not want to create an entirely new process for this overlay. Experience is that the neighborhood representative is given significant voice by the other design review members during deliberations. Overlay District has been revised to permit a neighborhood alternate to ensure neighborhood is represented at the meetings.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> most of the standards and requirements can be modified or waived by the PDSO Director. This gives too much power to one individual and undercuts the credibility of the SMD with the public 	Option is needed to allow flexibility for unique site issues. Modifications must be justified through case studies/precedent and typically reviewed by the Design Professional and/or applicable design review board/committee. In addition, the Director decisions can be appealed.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Need to add a criterion that includes projects that include an eligible or listed historic property. unclear if each item listed under a. 2 (pg. 12) is considered a separate criterion 	Agree and this has been added/clarified to reflect the same approach as the other City IID requirements. All projects involving historic property are required to go through PRS. A project

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		involving a historic property would go through a Major Design Review if it meets two or more of the criteria listed in Section II.D.2.a.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Not all adaptive reuse projects should be exempted. Just because a project does not alter a building, the change in uses could have significant impacts. Need to modify this section 	The Overlay District needs to encourage adaptive re-use of buildings and even if the minor review is permitted, the adaptive re-use must meet the rest of the criteria in the Overlay District.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> should not be an exemption if the adjacent lot is a non-residential use as the majority of buildings along Broadway are non-residential would remove protection from those structures project needs to be reviewed for its impacts on non-adjacent properties as well If the adjacent lot is vacant, why should this affect the review of a project that includes an historic structure 	This language reflects the existing IID process, and is an option for applicants to request the waiver through the PDSO Director. The waiver is not automatic.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> criteria for the DRB to approve or deny a project? If the project does not meet suggested standards (for instance, standards that state they “should” be followed), can the DRB reject the project? How enforced legally? Does a project need to meet all applicable standards or only some? If the latter, how is this determined? 	DRB recommendation is based on the project meeting overlay standards. DRB makes a recommendation to PDSO Director to approve/deny. If a project does not meet a standard, the DRB must understand why for a recommendation. The PDSO approval is the zoning approval and enforced through zoning requirements. The properties within the Overlay District are each unique and flexibility in the standards is needed for the DRB to apply those standards.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> appeal must be made by a “party of record.” Who constitutes a party of record? Do nearby property owners, residents or the applicable neighborhood association count as a party of record? 	“Party of record” is a defined term in the UDC, and is very expansive. It includes the applicant, all persons who received notice of the application during a review process, all persons who provided a written statement of an interest in the project prior to the issuance of a decision, and all persons who gave testimony at a public hearing.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Appeals should not be made to the Board of Adjustment as they are not qualified to hear these types of appeals. They should go to Mayor and Council. 	The Design Review Board process is already outlined in the UDC and the appeals go to the Board of Adjustment who are qualified to hear these appeals.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> allows the PDSO Director to ignore the SMD to push for designs and practices that he/she likes. This undercuts the credibility of the district. 	The PDSO Director decision is based on the appropriate recommendations and must be based on the Overlay District purpose and standards.
Bill Mackey	<ul style="list-style-type: none"> recommend including a flow chart graphically describing the process. The chart should include other processes as well –like where an IPP would fit in, etc. 	Once the Overlay District is adopted, PDSO staff will be creating collateral material to help explain the process and the regulation.
Bill Mackey	<ul style="list-style-type: none"> Why have a SMC DRB? Why not let the DP and staff be in control? They are smart, they can handle this. DRBs are an added, unnecessary layer in the process. 	The DRB process was created for the other overlay processes and has proven to be a great opportunity to ensure conformance with the standards using professionals and neighborhood representatives.
Bill Mackey	<ul style="list-style-type: none"> definition of Major and Minor seem vaguely defined. 	The text of the Overlay District includes specific criteria to define when a major or minor process is required. The intent is to encourage use of the Overlay District.
Bill Mackey	<ul style="list-style-type: none"> Any project that is reviewed by PRS should NOT be reviewed by DRB. It is redundant. 	PRS reviews for historic standards; DRB reviews for all Sunshine Mile standards. Both are advisory to PDSO Director and do not make any final decision.
Bill Mackey	<ul style="list-style-type: none"> biggest suggestion is to remove DRB and PRS from this. Let staff (qualified planners) and the DP meet with the developers and discuss the project. 	Acknowledge this comment.

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Evren Sonmez	<ul style="list-style-type: none"> having one ad hoc member may be the usual practice in Tucson, but it'd be great to use this new UOD as an opportunity to improve that and have two ad hoc members from the neighborhood. Community members can feel a bit disenfranchised at these kinds of forums where the majority of the people are professionals familiar with the field and its jargon. Two ad hoc members might be able to better support each other and feel more comfortable speaking up when needed, for example to request clarification on project specs being discussed, etc. 	We have added an alternate neighborhood representative to the DRB to ensure the neighborhood has one voting representative at all meetings and two voices.
Corky Poster	<ul style="list-style-type: none"> Same as IID?? 	Yes.
Corky Poster	<ul style="list-style-type: none"> Design professional may recommend 	Yes. The Design Professional may make recommendations related to urban design best practice. This has been added to section II.E.
Les	<ul style="list-style-type: none"> As part of the requirements waiver request process, can it be required that applicant show where/how the waived requirement will be "made up" by going beyond requirements in another area (for example, installing twice as much bike parking if a landscape requirement is being waived)? Or is this assumed to be part of the PDSO Director's discretionary decision-making? 	This is assumed to be part of the interaction with the DRB and ultimately the decision of the PDSO Director.
Les	<ul style="list-style-type: none"> It sounds like major design review is required if a SMD project is adjacent to Affected Residential Property regardless of how tall the project is, so it is not clear (to me) why this adjacency is listed twice unless it is to "double protect" Affected Residential Property against tall things, e.g., not only is a proposed 30-foot high condo complex in a SMD residential area contemplated by 2.a.(1)(b) (tall things next to residential), it is also contemplated by 2.a.(2)(b)(1) (anything next to residential) and thus with two conditions being met, redundant though they may be, major design review is triggered. 	Criteria are cumulative and there may be redundancy based on specific facts of a particular property/proposal.
Les	<ul style="list-style-type: none"> For projects that are on arterials/ collectors, could notification be extended to include neighborhood associations within a larger radius? While n'hood leaders may not be concerned about what happens in the "interior" of other n'hoods, they may be interested in the "public face" of the Sunshine Mile. 	The notification criteria for a Major Design Review has been revised to include neighborhood associations within ¼ mile of the project.
Les	<ul style="list-style-type: none"> Since most buildings on the Sunshine Mile are non-residential, PDSO Director will be doing a lot of waiving. If part of the overlay's objective is to maintain the character of the Sunshine Mile's subdistricts and subareas, could this be re-worded so that requirements may be waived if a majority of buildings on the proposed project block* are NOT contributing, eligible, listed, or historic landmark? (* Not sure if "big block" bounded by "real" streets, or "small block" with an alley as a boundary, would be more appropriate. I'm partial to the big block.) Also, as you no doubt already know, Sunshine Mile Historic District was listed on the National Register 26-MAY-2020. /The/ adjacent lot? Should this be 'adjacent lots on either side are vacant'? Or 'where one of the two adjacent lots on either side is vacant'? Or are both clauses 1. and 2. required to get the waiver, i.e., if one adjacent lot is vacant and the other adjacent lot (I here assume these are the adjacent street-facing lots, and not a lot adjacent to the rear or across the street) does not contain a residential building, then the compatibility requirements may be waived? In which case I'd ask that the point above be considered, that requirements may be waived if a majority of buildings on the block are not contributing, eligible, listed, or historic landmark. 	This language reflects the existing IID process, and is an option for applicants to request the waiver through the PDSO Director. The waiver is not automatic.
Les	<ul style="list-style-type: none"> Is one neighborhood representative enough? I suspect some will think this is inadequate. (I think it depends on the rep, but that's beyond the scope of this document.) 	See above response. An alternate has been added to ensure the neighborhood representative has one voting presence at all meetings with two neighborhood representative voices.

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Les	<ul style="list-style-type: none"> Will the neighborhood rep be apprised of requested amendments/ revisions and given a chance to opine? 	<p>The process is the same as with the IIDs. So the answer is:</p> <p>Major amendment – yes Minor amendment – no</p>
Professional Landscape Architect	<ul style="list-style-type: none"> What if it does not involve "modifications" to existing structure, (something like a new outdoor use/eating area that does not alter original structure). A new non-habitable structure like a shade canopy (would require building permit), but what about something that does not like a low plaza for seating? 	<p>Most should go through minor review based on the 6000 sq. foot criteria; If larger plaza, it might need to go through the major review.</p>
Professional Landscape Architect	<ul style="list-style-type: none"> American City: This could prove limiting. Many applicable and appropriate urban design standards begin outside of the USA currently. They tend to be adopted in the US relatively late unfortunately. Project for Public Spaces: Not likely needed. If one firm is listed, it may lend too much credence to what They have published as opposed to other publication over time. 	<p>This language has been changed to not limit to "American" cities. The reference to Project for Public Spaces was intended to reference the visioning work PPP did for this specific Overlay District.</p>
Steve Shell	<ul style="list-style-type: none"> SMD Zoning Option becomes effective upon the issuance of a Certificate of Occupancy (C of O). I SUGGEST THAT IT BECOMES EFFECTIVE UPON ISSUANCE OF A BUILDING PERMIT JUST LIKE OTHER PROCESSES. THERE ARE MANY TIMES A C OF O IS NOT ISSUED. (NO CHANGE IN USE, OR A SIMPLE "LETTER OF COMPLETION" IS ISSUED) COT doesn't issue a C of O for a change of use. Could be upon final inspection. 	<p>This language has been modified to include Certificate of Occupancy AND a final inspection (for residential.) If someone chooses the Overlay District and pulls a building permit but never develops, then at a later date, the existing or future owner should still have the same choice.</p>
Steve Shell	<ul style="list-style-type: none"> Why require historic preservation review if adjacent to a listed or contributing property? 	<p>The designation of a historic district is, in part, based on the context and surrounding buildings. Therefore, it is important for historic preservation to evaluate modifications to buildings that are adjacent to historic resources.</p>
Steve Shell	<ul style="list-style-type: none"> Why have the Design Professional review building plans? (professional reviewing professional— should only be for code review, not for design) 	<p>The Design Professional is only reviewing for compliance with the Overlay District decision. This occurs in other overlay districts to ensure any changes between design review and building plans do not affect the Overlay District design decisions.</p>
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Add a second neighborhood representative to the DRC. 	<p>We are including an alternate to ensure the neighborhood voice is at the DRB meetings.</p>

Definitions

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> regional transit stop? 	<p>This has been revised to remove "regional" from the term.</p>
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> regional transit & high frequency transit 	<p>See above.</p>
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> definition of "Affected Residential Property" needs to be amended to include properties in proximity to a SMD project (e.g., within 100 feet or across an alley or residential street). As written, most projects will not meet this criterion but can have significant impacts to nearby residences 	<p>While this is a new definition in the Overlay District, it is intended to capture residential properties that are Adjacent as that is defined in the UDC.</p>

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Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> affordable housing unit—must encompass less advantaged households 	The AMI is lowered to 80% pursuant to extensive input from those in the affordable housing industry in Tucson.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> common space – outdoor patios of restaurants should not count, as they are private—must be easily accessible and free 	The definitions of open space have been condensed to open space and public open space.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> lateral pedestrian connections 	This language permits access from side or rear frontage and to provide connectivity to neighborhoods.
Laura Tabili/Corky Poster	<ul style="list-style-type: none"> “adaptive reuse” also needs a clear definition: I daresay it is a definition that some would wish to stretch if it is not spelled out here 	Adaptive Reuse is defined in the Definition Section of the Overlay. Adaptive Reuse can apply to non-historic structures as well. The goal is to re-use existing structures.
Chris Leighton	<ul style="list-style-type: none"> common space definition confusing—need to be open to public? 	The definitions of open space have been revised to include both open space that is contemplated as open to the public, and semi-public/private open spaces.
Evren Sonmez	<ul style="list-style-type: none"> “On-Demand Rideshare”: If this definition is meant for services like Uber and Lyft, can we use the term ‘ride-hail’ instead of “rideshare”? 	Term modified.
Les	<ul style="list-style-type: none"> UDC has a specific definition of 'adjacent' (http://library.amlegal.com/nxt/gateway.dll/Arizona/tucson_az_udc/pop/adjacent) Is this how the term is used in this overlay? Or does this overlay only include as "adjacent" parcels that share a boundary? 	We are not intending to modify any UDC definitions unless expressly re-defined in the Overlay District document.
Les	<ul style="list-style-type: none"> Delete 'via phone, online, or through a mobile application' since these are not the only ways to pre-order. Mobile pick-up lanes would have to be designed to be safe for pedestrians, wheelchair-ers, and cyclists to use them. 	We have added catch-all language. This Overlay District does not supersede ADA requirements.
Les	<ul style="list-style-type: none"> While 'ride share' is the industry's preferred nom de commerce, these services are more "ride hail" than "ride share" since the drivers are seldom already driving past the summoner's house en route to the summoner's destination. 	Term modified.

Land Use

Who	What	Response
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Given the wide range of uses permitted, it seems that they should be constrained in the various sub-districts. Many of the uses may not be appropriate in many locations, especially along Broadway, particularly if one of the goals of the SMD is place making. 	There are uses permitted and restricted within the entire Overlay District and then uses permitted and restricted within each sub district. A table of uses has been added to make this more clear within the Overlay District.
Laura Tabili	<ul style="list-style-type: none"> No group dwellings-- Is there any other kind of group dwelling than a mini-dorm? Group dwellings ought to be forbidden throughout the SMD. They are the lowest common denominator of student housing, and are gradually making neighborhoods around the UA unlivable. 	During the public outreach, opinions were expressed to limit Group Dwellings and others expressed opinions to permit Group Dwelling (see below). As drafted, Group Dwellings (as defined in the UDC) are NOT permitted in the Bungalow or Mid-Century Modern subdistricts. They are permitted only in the Euclid/Park Avenue Subdistrict and the Kino North Subarea.

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Bill Mackey	<ul style="list-style-type: none"> Why are drive-thru's not wanted? I realize you have mobile pick up allowed . . . Are menu boards unsightly? Are microphones annoying? 	The limitation on drive-throughs was to encourage patrons to park and walk along Broadway. Mobile Pick-up takes up less space in the access lanes and parking lots to permit restaurant convenience to customers instead of drive-through.
Bill Mackey	<ul style="list-style-type: none"> Why no Single Family Homes allowed? This is limiting. What if someone wants to do an FLD . . . ? Or, is everyone assuming that if someone develops property for SFH, then they would not use the overlay? 	Single family residential is permitted under the existing UDC along with the FLD. This Overlay District is designed to promote mixed-use development and alternatives to the underlying zoning.
Bill Mackey	<ul style="list-style-type: none"> Why no Group Dwelling? This is limiting . . . I understand it is a reactionary move against student housing . . . but I think it limits developers, owners. 	See above; Group Dwelling is not permitted only in the Bungalow and Mid-Century modern Subdistricts.
Bill Mackey	<ul style="list-style-type: none"> I recommend listing all the uses allowed within each subdistrict instead of the current format of listing additional permitted/excluded uses. 	A table of uses has been created to better see what uses are permitted in which subareas.
Corky Poster	<ul style="list-style-type: none"> More use of ADUs? 	PDS staff is currently looking for a City-wide solution to ADUs. ADUs are accessory to single-family residential uses which are permitted in the underlying zoning and not in the overlay district along the Sunshine Mile. Therefore, the ADU concept would apply within the Sunshine Mile area pursuant to the City-wide solution.
Les	<ul style="list-style-type: none"> Can the Residential Use be made to include addition of guest/auxiliary dwelling units in any residential zone in the SMD where they are currently verboten by underlying zoning? Do we want to put design restrictions on vehicle rental lots such that the lots are behind the office, and the office is close to and easily accessed from the sidewalk? The typical field of rental cars with an office trailer at the back would not seem to be compatible with either pedestrian- oriented development or with the Sunshine Mile's predominant setbacks. 	See above relative to ADUs. The Overlay provides the flexibility needed for vehicle rental lots based on setbacks, etc.
Les	<ul style="list-style-type: none"> What was the community feedback about recreational marijuana, should the proposed ballot initiative pass? Current zoning restrictions prevent medical marijuana dispensaries on the Sunshine Mile (too many schools and churches), and while we don't yet know what zoning requirements City will enact for recreational marijuana, did anyone express any strong opinions about the matter during the feedback gathering sessions? 	City staff is watching this closely and a City-wide solution will need to be adopted that would apply within the Overlay District. The medical marijuana use is referenced as a permitted use subject to all existing regulations, and if recreational use of marijuana is adopted, that use would be permitted within the overlay subject to all City policies as those may be adopted in the future.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Allow increased height and commercial uses only on properties fronting Broadway 	The areas further from Broadway that are encouraged for increased height and commercial uses (without contributing properties) was targeted in areas with industrial zoning and away from neighborhoods on purpose. The goal is to increase density in and around Broadway while protecting existing neighborhoods.
Professional Landscape Architect	<ul style="list-style-type: none"> Would this include historic billboards or signage? something akin to what Cook & Co. Signs has been restoring? 	Only billboards would be excluded. The sign section is being revised to encourage historic context signs in the Mid-Century Modern subarea.

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Affordable Housing

Who	What	Response
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • goal of providing affordable housing is laudable (and necessary), what is provided in the document needs significant changes • target population needs to be those households earning between 40-80 percent of AMI. • proposed density bonus is too high, even if the target population changes • require a certain percentage of affordable housing; and/or lower the base densities • time that affordable units are to remain affordable is too short • Unanswered questions: <ol style="list-style-type: none"> 1. Who certifies applicants as qualified for the units and what information is necessary; 2. How are affordable units identified (i.e., on plat, development plans, deed restrictions, notes in Recorder’s Office records, etc.); 3. Are there design criteria for affordable units (i.e., can they be identified from the outside; can the interiors be different from market units, etc.); 4. What rules apply to the resale of affordable units before the expiration date (i.e, how are permissible sales prices determined, can the first buyer sell the unit at market rates before the expiration date, etc.); 5. Can affordable units be sublet or rented, and if so, are renters restricted to qualified households; 6. Restrictions need to be put into place to ensure that students are not allowed to acquire the affordable units; 7. How many bedrooms must the units have; and 8. What procedures exist in City government to implement and monitor the program, and have they been consulted. • given the 35% bonus density and lack of impact, it would be better to delete this entire section rather than go forward with it as written. It provides little to no community benefit while providing a major give-away to developers 	<p>The maximum AMI has been reduced to 80% after discussions with affordable housing experts and more detailed review of Tucson economics. The expectation is that the affordable housing bonuses will only be used in the areas of the Sunshine Mile that permit base heights and densities to support the affordable component. To determine whether the density bonuses work, a test-case using the density bonuses and affordable housing was accomplished, and the RAC is now lowered to 64 for the Park Subarea. The density bonus still works at 90 RAC in the Kino North and Euclid Subareas. The RAC is still 40 in the Bungalow and Midcentury, where we do not expect this bonus to be used. Residential is not permitted in Kino South. These base densities ensure that the bonuses are incentives that still work within the prescribed heights.</p> <p>The affordability terms have been extended to 50 years (rental)/30 years (ownership).</p> <p>Any affordable units will be certified by the City’s Department of Housing and Community Development. Once the procedures are in place to certify and monitor, those protocols will be available to the public. That will occur after the Overlay District is established. Subleases will not be permitted. The Ordinance is written to require incorporating the affordable units into the market units so there are no additional design criteria for affordable units.</p>
David Wohl/Corky Poster	<ul style="list-style-type: none"> • proposed definition of “affordable housing” as that for which total housing cost does not exceed 30% of income leads to results that are frankly, in the context of the Tucson market, absurd • Setting the ceiling at 80% of area median income, the HUD definition of “moderate income” for purposes of the Community Development Block Grant program, would be more in line with industry standards. 	<p>Ceiling has been modified to 80%.</p>
David Wohl	<ul style="list-style-type: none"> • 15% minimum to qualify for development incentives is also very low. I recommend that this be increased to 20%. 	<p>This is the first attempt to encourage and incentivize affordable housing. The goal is to start with a 15% incentive and if this incentive is used, then the City will consider increasing the percentage.</p>
David Wohl	<ul style="list-style-type: none"> • inter-play of incentives. A project with qualifying affordable housing is eligible for density bonuses of 25% in general and 35% if it “is located within 650 feet of a Micro-Mobility Hub or transit stop.” (Page III-6). Any project “that elects to incorporate a Micro-Mobility Hub into its design may take advantage of... Density increase of twenty (20) percent.” Can the developer of qualifying affordable housing located within 60 feet of a Micro- Mobility Hub get a combined density bonus of up to 62% (100% x 20% x 35% = 162%) or does that developer have to choose one or the other? 	<p>Density bonuses are cumulative. Height and other development regulations work as a cap on the density bonus structures within the Overlay District. There are only two height incentives – one for mobility hubs and one for parking – and they cannot be used together.</p>

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Evren Sonmez	<ul style="list-style-type: none"> • 120% AMI seems high. I believe 80-120% AMI is considered moderate income. I think it's a good idea to set the threshold high, considering that the cost of housing cost is going up in Tucson. That being said, I'd love to see a portion of that 15% to be affordable to people with much lower incomes (those earning 50% of AMI or less) in order for the development to be eligible for incentives. • Other than density bonuses (which are great), any additional incentives we can think of? If so, let's add them here to further incentivize affordable housing production. I'd prefer an affordable housing set-aside requirement (like inclusionary zoning) but is that now illegal in Arizona? • Can we come up with a mechanism so that these units remain "affordable" longer than 20 years, ideally indefinitely? • Affordability Terms: hoping you can look into best practices and figure out if there's a way to do this. I remember reading about a program in Chicago where property tax rebates were being offered in a way to "reward" property owners who keep rents stable. So, perhaps there are Incentive-based mechanisms of that nature if it's not otherwise legally possible to keep these units affordable in Arizona. 	See above related to AMI lowering to 80%. There is also a parking reduction of 62% for the affordable units. The required length of affordability has been extended – see above. The City's Department of Housing and Community Development are working to develop the criteria and requirements for these affordability measures. They are researching best-practices and reaching out to those in the affordable housing industry.
Les	<ul style="list-style-type: none"> • If the condominiums are for sale, and if covenants/ deed restrictions are in place to ensure that the first buyers of the affordable units only sell them for an "affordable" price (however this is determined) within the first ten years of C of O, who will be in charge of enforcing the covenants/ restrictions? 	The Department of Housing and Community Development will be administering these requirements.

Mobility

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • Why is there no long-term bicycle parking required? 	The long-term bicycle parking has been modified to require long-term storage in residential developments per existing UDC standards. Because many of the sites are small and the goal is to encourage long-term storage for larger office uses, a modified standard has been added. Commercial is primarily short-term storage including for employees. Long-term bike storage is also encouraged within the mobility hubs.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> • concept of the Micro-Mobility Hub is an interesting one; a lot of actions avail to qualify for bonuses • could construct a Hub with minimum cost/effort by having bicycle share, on demand ride share pick-up, drop-off space, bicycle parking, food truck space and a weekly small farmer's market. • requiring 5 elements is not enough—should be 7-8 & include provision for at least 3 types of transportation 	The menu of options within the mobility hubs has been altered to focus more heavily on the mobility options than the amenities; however, the amenities are still important. Bike valet has been added to the options as well.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • document either requires, provides incentives for, or encourages actions within 650 feet (or in one instance, a ¼-mile) of transit stops. • virtually every property within project area is within 650 feet of a stop, as bus stops are approximately ¼-mile apart, which means that no property is further from a stop than 1/8-mile • either the document needs to refine these sections or eliminate them 	Modified to 650 feet. Even though ¼ mile is a typical distance for mobility, we reduced based on the conditions along the Sunshine Mile.

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Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> document needs to incorporate the recently-approved Sunshine Mile Historic District into its requirements document needs to incorporate the policies of the draft revised Sam Hughes Neighborhood Plan 	<p>The Sunshine Mile Historic District contributing properties are recognized within the Overlay District and given local regulatory significance where most of the historic contributors are located – within the Bungalow and Mid Century Modern Districts. Key and significant historic contributors in the other Subdistricts are also given regulatory strength in this Overlay District that they would not have otherwise. The key to this Overlay District is to balance the importance of preservation with new development opportunities.</p> <p>The Overlay District will be in substantial conformance with adopted General, Area and Neighborhood Plans.</p>
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Car Share spaces should be required. Who provides the car-share cars? Providing car-share spaces can be problematic, especially if people have packages. seems that the car-share resources should be for the use of the tenants of the project. why are “On Demand Ride Share” facilities not required? (It only says “should.”) 	<p>The City’s Department of Transportation and Mobility shares the community desire to encourage alternative modes of transportation and particularly transit. Experience has shown in other jurisdictions that prescribing car share to the private sector is not as effective as a City-wide system (like the City’s bike-share program). The car-share programs are effective in very high-density cities. Car Share is still offered as an incentive to reduce parking within the SMD.</p> <p>See below for response on how ride share/pick-up and drop-off areas has been revised.</p> <p>We have also revised the Electronic Vehicle (“EV”) program as well to acknowledge that EV stations do not actually reduce parking demand. So EV charging has been moved from Table III.H.2 to the environmentally conscious design practices.</p>
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> unclear what #6.a(3) means 	<p>Section has been deleted, as PDSD Director authority is covered in other sections.</p>
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> incentives to provide a MMH are way too high for what is being provided. Bicycle parking is required for most projects in the City; Ride Share and Car Share should be required, and so is common space. Scooter share is undefined, but right now, people leave scooters wherever their destination is. there are no parameters for farmers’ markets (how big, how often, what is included) and most such markets are extremely small and often fail. Plus, what is their relation to mobility? Similarly with food trucks (and again, how often, how many)? Further, food trucks compete against brick and mortar restaurants, which I think would be a detriment. Package delivery services needs to be defined better (and why should it contribute to a height and density bonus)? In general, this seems to be a concept that sounds good in theory, but is very problematic in practice. 	<p>This section has been revised to separate the mobility menu from amenities. The City’s Department of Transportation and Mobility has taken a closer look at this section and recommended the following changes. Parking reductions have been revised to include updated parking calculations for uses, some reductions that can be utilized by incorporating certain elements into the project, and then the ability to justify reductions through the Individual Parking Plan to include proposed reductions based on including a mobility hub, mixed use developments, etc. The reduction for projects within 650 feet of a micro-mobility hub has been revised to 20%.</p>
Chris Leighton	<ul style="list-style-type: none"> Micromobility hubs – encouraged close to transit – could be valuable further from transit as well 	<p>Acknowledged.</p>
Evren Sonmez	<ul style="list-style-type: none"> Replacing this with ride-hail would be great. I believe TNC companies don’t even offer an actual shared ride option in Tucson, and even in cities where they do, the majority of the rides are not shared. 	<p>Table III.H.2 has been revised to delete “On Demand Ride Share” and replace with “Pick-up/Drop-off Area.” This would include ride hailing services as well as drop-off for deliveries.</p>

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Evren Sonmez	<ul style="list-style-type: none"> Makes it sound like any project can “elect” to incorporate a mobility hub, but I feel like there are certain locations within this overlay that would work best for this. Require pre-application conference with DTM before any developer pursues that option to ensure that the site will work well for a mobility hub 	This issue would be discussed in the pre-application meeting as required by code.
Les	<ul style="list-style-type: none"> Insert 'or forty-eight inches' (or whatever is the ADA minimum) after 'existing sidewalk widths'. Insert 'with a minimum width of forty-eight inches' between 'sidewalks' and 'shall be provided'. No vehicle parking between sidewalks and buildings, yay! Bike and scooter parking are still allowed in this area (as long as they do not obstruct the sidewalk, the entrance(s), and other pedestrian travel), right? 	ADA will apply throughout the Sunshine Mile.
Les	<ul style="list-style-type: none"> Not sure if 'ridesharing' means "ride hailing" or "car-pooling" here, although either one could be applicable. 	Terms have been modified. See above.
Les	<ul style="list-style-type: none"> Is one car-share space for every hundred apartments (not residents, but units) enough? It seems low, but I have not seen the usage data on such services and will defer to those who have. 	This has been reviewed by Department of Transportation and Mobility and revised.
Les	<ul style="list-style-type: none"> Not sure if 'ride share' means "ride hail" or "car-pool" here; it seems like the former although either one could be applicable. 	This term has been changed to “ride hail”, which now falls under the “Pick-Up/Drop-Off Area” standards.
Les	<ul style="list-style-type: none"> Ask that the suggestion above for long-term bike parking ("bike lockers") be considered for parking structures, and perhaps elsewhere if/as warranted. 	Long-term bike storage and bike valet are encouraged in the mobility hubs.
Les	<ul style="list-style-type: none"> Will there be a requirement for "corrals" or other designated spaces for scooters (either rented/"shared" or private personal property)? 	Bike and scooter parking is encouraged within the mobility hubs; it will be up to the developer and DTM to determine how those will be accomplished.
Les	<ul style="list-style-type: none"> Will there be a requirement for short-term personal property storage (like bus-station lockers)? This might encourage people to stay and keep shopping/ eating/ recreating if there is a place people can stash their goodies (cyclists can not stow stuff in the trunk of a bike) instead of having to schlepp them around. 	Personal lockers have been added as an option to the Amenity Features for the mobility hubs.
Broad/Broad Neigh	<ul style="list-style-type: none"> El Parador would be a good site for a micro-mobility hub 	That site is privately owned at this time.
Steve Shell	<ul style="list-style-type: none"> No long-term bike parking = sensible. 	Long-term bike storage has been modified to be required for residential, encouraged in mobility hubs and required for office space.
Craig Finrock	<ul style="list-style-type: none"> The Broadway widening project was scaled back because of a very vocal minority. This was done at the last minute despite it being approved by the voters years earlier and was not what was recommended by transportation planners. This decision was short sighted and now there is no opportunity to expand the streetcar down Broadway. It has been well established that the streetcar has been a tremendous impetus for investment and development in the areas adjacent and near the line. 	Comment Acknowledged.

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Parking

Who	What	Response
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> • needs to be made clear that parking requirements <ol style="list-style-type: none"> 1. cannot be satisfied by on-street parking on residential streets. 2. How does the parking requirements listed in the table relate to existing regulations? • Parking reductions: <ol style="list-style-type: none"> 1. Why should projects doing adaptive reuse not have to provide any parking for uses such as food and beverage service and medical outpatient services? 2. The 50% reduction for projects within 650 feet of a transit stop applies to every property along Broadway. Therefore, there is no incentive or added benefit here. 3. The 75% reduction when a Micro-Mobility Hub is incorporated into the project is too high. It is not clear, based on the features listed for a MMH, that it would significantly reduce parking demand. 4. In relation to shared parking, is there any way to require shared parking within larger project or in other circumstances? This is particularly important given the significant parking reductions provided. 5. The height bonus for parking structures is too high and in general the issue of parking is complex, especially with the higher densities that are allowed (and with numerous bonuses). For example, by including parking in their structure, “The Mark” on Broadway became a considerably taller building. 	<p>For on-street parking (H.1), the following language has been added:</p> <ol style="list-style-type: none"> a. Parking may be provided by one or more of the following options: <ol style="list-style-type: none"> 1. On-site 2. Off-site within 650 feet of the project site located <ol style="list-style-type: none"> i. On adjacent public streets, excluding areas covered by the Neighborhood Parking Program and subject to approval by DTM. A parking study may be required. ii. On a nearby parking lot or structure through a Shared Parking agreement with the City or a third party. <p>Other changes that were made:</p> <ol style="list-style-type: none"> 1. Parking requirements were aligned with the most recent ITE manual on parking and with the City’s Department of Transportation and Mobility for the Sunshine Mile. 2. Incentives were modified to include some incentives available for certain uses/incorporating certain elements into the project, including incentivizing adaptive reuse. 3. For projects within proximity to a mobility hub, parking can be reduced by 15-20%. 4. The City’s Department of Transportation and Mobility has recommended that the IPP be the mechanism to work through reductions in parking related to incorporation of mobility hubs, for mixed use development and other elements of a project. <p>Shared parking is encouraged where possible by reducing parking requirements. Requiring shared parking is not feasible as this relies on private agreements. Certain sites may not be suitable and private parties may not agree to terms.</p> <p>Parking structures are encouraged on larger sites and need to additional height to be incentivized. All parking structures must be screened – projects go through design review process which provides an opportunity to review how various uses are integrated.</p>
Bill Mackey	<ul style="list-style-type: none"> • Residential parking should 0.75 per unit, not 1 per unit. 	Current requirement is reasonable given multiple options to reduce the requirement
Chris Leighton	<ul style="list-style-type: none"> • Increase the parking reduction allowed for providing pick-up/drop-off areas 	The term has been modified to reflect pick-up/drop-off areas include ride-hail passengers as well as goods. In addition, the required parking is reduced by 4 spaces for 25 linear feet of loading-designed pick-up and drop-off. (This incentive was increased from 2 to 4 spaces.)

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David Wohl	<ul style="list-style-type: none"> While, as a developer, I certainly encourage loosening of the City's often-excessive parking requirements, I am uncertain about the reduction to zero for any affordable housing units, particularly when the general parking requirement is one space per residential unit with a 25% reduction for proximity to a Micro-Mobility Hub and 75% reduction where such a Hub is incorporated into the site. 	Ordinance has been modified to include a 62% reduction for affordable housing based on feedback from DTM and data from other affordable housing.
Evren Sonmez	<ul style="list-style-type: none"> please add something about decoupling the price of parking from the price of housing? It'll be really challenging to negotiate this project-by-project down the road and I think we need a blanket provision here to resolve that once and for all. 	The City does not have the ability to enforce provisions within private lease agreements.
Evren Sonmez	<ul style="list-style-type: none"> personally like to see parking minimums to go away in these new overlay zones (especially one that's framed as TOD) and possibly be replaced with parking maximums. 	Parking requirements allow the code to include incentives to lower parking.
Evren Sonmez	<ul style="list-style-type: none"> how can we make sure that it's done properly so that we don't end up with another horrendous structure like the Marriott downtown? It's basically more of a parking garage than a hotel. I guess this is where design review comes in? 	<p>Parking standards are designed to be flexible so that each developer can determine parking needs based on proposed use.</p> <p>All parking must be screened at ground floor; design review is required.</p> <p>Language on page III-16 has been simplified and strengthened to state: "(1) Active uses are preferred on the ground floor of parking structures facing Broadway Boulevard."</p>
Corky Poster	<ul style="list-style-type: none"> would be useful to have a column that lists the parking requirement <u>without</u> the SMD for comparison Food Service parking too restrictive 	Collateral material will be prepared to help people understand how the Overlay District modified their underlying zoning. Food Service parking was modified to 1/300 square feet for up to 3,000 square feet of space.
Corky Poster	<ul style="list-style-type: none"> Affordable Housing parking reduction??? Proximity to transit—good 	Affordable housing parking reduction has been modified to 62% per above and parking reductions encourage proximity to transit.
Les	<ul style="list-style-type: none"> Why does research and product development require more parking (1 space/ 380 sqft) than professional office (1 space/ 500 sqft)? I assume professional office has lower requirements because employees tend to stay put all day and these businesses do not receive many visitors; would not research be similar? (I'm just curious, not picking a fight.) 	Parking has been revised for research and product development to 1:500.
Les	<ul style="list-style-type: none"> Not sure if 'ride share' means "ride hail" or "car-pool" here, although either one could be applicable. Thank you for proposing these significant reductions, the Sunshine Mile will be much better off if valuable real estate can be used for selling stuff instead of being squandered on car parking. 	Comments acknowledged and "ride hail" is the term now being used.
Les	<ul style="list-style-type: none"> Should parking structures be required to have long-term bicycle storage (e.g., lockers)? I'm thinking dwelling residents, business employees, and anyone who would use a garage but travels by bike. Portions visible from the R-O-W shall be 'screened with material'? Is there a missing adjective here or is "material" (as opposed to ... immaterial?) sufficient? 	Long-term bike storage is being required for residential pursuant to underlying code and required for larger office uses. Long-term bike storage is also encouraged in the micro-mobility hubs.
Steve Shell	<ul style="list-style-type: none"> Parking in Mixed-Use Developments: Should be better than 1:300 GFA as an incentive to join in (that is what is allowed by code now) 	Mixed use developments can submit an IPP to justify reductions based on the mix of uses if the parking requirements in the overlay district do not work.
Steve Shell	<ul style="list-style-type: none"> Why is perishable goods manufacturing 1:600 GFA when other industrial use groups are 1:1,500 GFA? Office and retail should be the same ratio. Suggest 1:500. Make a single parking ratio for the whole SMD?? 	The document has been revised to keep industrial uses at 1:1500 (UDC requires 1:1000); Office and retail have been aligned at 1:500.
Steve Shell	<ul style="list-style-type: none"> (Adaptive Reuse – no parking required for uses with parking ratio of 1:300 or fewer) suggest creating a larger ratio with a minimum number of spaces 	Adaptive reuse can vary as to new uses so our goal is to not waive all parking but acknowledge we don't want to burden the adaptive reuse with too much parking.

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Common Space

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> While “common” in that more than just inhabitant can use them, hardly common space where anyone can wander in and use them Trespassing & homeless wording is problematic unless defined in greater detail in the definition section 	The Open Space definitions and construct have been modified to be more similar to the IID. We have defined Open Space and Public Open Space. Open Space includes public, semi-private and private areas required within a development. Public Open Space is truly open to the public, and is included within the Open Space requirements. The requirements for Open Space are found within each subdistrict and subarea regulations.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> public and private common space—what counts? How is pedestrian access required? 	The Ordinance has been revised to be clearer. Pedestrian access is handled through the DRB process to implement pedestrian connectivity and associated landscaped Open Space requirements.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Common space requirements should not be reduced just because the project enhances the pedestrian environment (the two are not equivalent), particularly given that an enhanced pedestrian environment is one of the goals of the SMD. It is difficult to imagine useful common space that is not on the ground floor of a project. And certainly, areas such as restaurant patio should not count as common space. In general, common space needs to be areas with easy and free access, easily discernable by the general public. Allowing common spaces of 300 square feet is too small to be of much use (unless that is the total required); it is the size of a small bedroom. Spaces that small do not meet the goals of Common Space as delineated in the definitions section. 	Every project will not be able to provide Public Open Space, and there is wisdom and good practice in providing other types of Open Space within a development. The approach to Open Space has been revised – see above. The term “Common” has been removed.
Evren Sonmez	<ul style="list-style-type: none"> Can we reconsider this? I’m struggling with the idea of counting semi-private places (like restaurant patios) towards the common space requirement. I think those are two separate things. If we’re asking large projects to create common space, I think it’s important to keep that truly public or at least free to access for the building occupants. 	These concepts have been aligned with the IID open space concepts. The goal is to provide pedestrian connectivity along the Sunshine Mile with landscape and other Public Open Space areas while also allowing private property owners to be able to secure their properties and have private/semi-private areas that can and do add Open Space elements.
Les	<ul style="list-style-type: none"> Can it be suggested that restaurant patios and other semi-public spaces be designed so that they can be used by the public during off hours? Or would this invite insurance concerns? 	The DRB can assist in influencing the design of the Open Space components of the project that are semi-private. However, mandating that private property be open to the public is problematic.

Design Regulations

Who	What	Response
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> What does “pedestrian-friendly” mean when providing direction for developments? What does it mean to “have architectural elements?” More specificity is needed. how do you enforce the “preference” for commercial uses in 1st floors? Similarly, how do you enforce the encouragement of outdoor seating? D.4 is unclear. Does the requirement refer to public sidewalks? If so, how could a property owner reduce their width? In addition, sidewalks will be provided along the entire length of Broadway Blvd. 	The purpose of the Design Process (including DRB with neighbors and other professionals, the Design Professional and planning staff/PDSD Director) is to work together to implement these standards throughout the overlay district. The types of projects will range from very small parcels that may not be able to meet all standards to larger projects with more land and flexibility to achieve these goals. How these are implemented has to be handled on a case by case basis with flexibility within the standards.

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	<ul style="list-style-type: none"> purpose of #D.6 (perimeter yards) is unclear. Why would perimeter yards be reduced? Isn't their purpose related to impacts to pedestrians and landscaping? 	
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Protections need to be provided to properties that are not adjacent, especially in regard to odors and noises. 	The process requires consideration of the effects to neighboring residential uses during the design process. This will be handled on a case by case basis.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Why can landscaping requirements be waived or reduced if shade is provided and there are no adverse effects on adjacent properties (what possible effects could occur)? It is unclear what the connection is between shade and landscaping, especially as landscaping has other purposes than shade. 	Landscape requirements could be modified on a case by case basis to accommodate the varying existing conditions that exist along the Sunshine Mile.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> reason for having all signs follow the requirements for business signs even if the project is residential or primarily residential? 	This concept provides more flexibility on signage and potentially allows more sign area.
Laura Tabili	<ul style="list-style-type: none"> alley seems to eliminate protections for "adjacent" properties, and the definition of "affected" property (iv-15 & elsewhere) is nowhere found in the document 	The overlay now defines "Affected Residential Property" and "adjacent" is the same definition as in the UDC.
Bill Mackey	<ul style="list-style-type: none"> What do you want the designers to design? The big moves are basically outlined by all the criteria. I think too much design is being done with this document. 	In drafting the ordinance, an attempt was made to balance strict criteria with form-based requirements. Neighbors have been pushing for more requirements. This is an attempt to balance the need for certainty and permit flexibility and creativity in design.
Bill Mackey	<ul style="list-style-type: none"> Where is it documented that having 50% of the streetscape indicating activity or having windows is beneficial to a streetscape. This is an example relating to number 6 above . . . I question some of these design "ideals." Like having a visible entry . . . Sometimes the DRB and PRS folks take these things too literally and have too literal interpretations. 	The goal is to create transparency along the streetscape. If a project cannot, due to site conditions, meet these criteria, justifications can be made based on best practices for urban design from other communities to achieve the same goal.
Chris Leighton	<ul style="list-style-type: none"> Adjust max height to allow 16' ground floor and 12' for upper floors 	Low-rise has been adjusted to permit height to 30 feet.
Chris Leighton	<ul style="list-style-type: none"> Setbacks adjacent to residential – differentiate between multifamily and SFR/duplex - reduce or eliminate setback next to MFR 	Affected Residential Property definition has been clarified to apply to SFR or duplex.
Evren Sonmez	<ul style="list-style-type: none"> "preferred" may not be good enough. Can this be required? 	This ordinance is an option for owners and a balance has been sought between requiring elements and encouraging.
Corky Poster	<ul style="list-style-type: none"> How about we exempt all properties from MS&R? We just widened Broadway. Or better yet, repeal the MS&R! 	There is an MS&R waiver available that can be used with the Overlay District.
Les	<ul style="list-style-type: none"> Remove period after 'local ordinances' and leave semicolon. Replace periods with semicolons at ends of items 5. and 6. 	This section has been revised.
Les	<ul style="list-style-type: none"> Insert 'or' between 'odor,' and 'vibration', or change to 'mitigate excessive noise, odor, vibration, or visual intrusion and other'. 	This section has been revised.
Les	<ul style="list-style-type: none"> Are the "generators" related to waterlines? Or are they power generators (like those used by food trucks)? If the latter, I personally would be more concerned about the noise than the visual appearance. No exterior speakers ("Joe, phone call line 2"), please. If a business can not keep its mobile pick-up lane traffic from blocking the sidewalk or bike lane, it will lose its pick-up lane for 30 days on the second offense (first offense gets a stern warning), and for much longer (a year?) on the third. I don't want to "punish success" (as it will no doubt be portrayed by some pro-business-at-all-cost types) but from those to whom much has been given, much is expected ... like courtesy and consideration for fellow street users. Relaxing any parking restrictions 	All projects must meet existing codes regarding noise, odor, etc. In addition, the design criteria now require consideration of that mitigation during the design of the project.

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	on nearby residential streets to accommodate park-and-grab customers could be offered as an alternative in such cases.	
Les	<ul style="list-style-type: none"> I strongly believe in seeing our alleys as pedestrian resources and not as the tolerated ugly stepchild of the mobility network, thank you for this. I would mention that given how many of our homeless neighbors use alleys for sleeping, resting, and less savory activity, there might be desire for alleys and pedestrian pass-throughs to be designed for maximum visibility (by pedestrians, by passing police cars) and to discourage "long lingering". Or maybe not, if enough people use these areas to move any unwanted activity elsewhere. 	Comment acknowledged, and the design process will require handling these issues.
Les	<ul style="list-style-type: none"> Can it be strongly recommended that trees alongside sidewalks, bike lanes, and other common areas NOT have thorns or spikes? Not all tree trimmers are careful in collecting the debris, and tyre punctures and doggie-paw owies are already a common enough hazard. That said, I can understand why property and business owners would want to plant ocotillos or other "natural barbed wire" in areas of potential unwanted activity. 	Types of trees is part of the discussion during design.
Les	<ul style="list-style-type: none"> Can we discourage the use of parapet rooflines that serve as de-facto mini-billboards, and fervently discourage the vertical extension of walls/ raising rooflines on historic contributing, eligible, listed, and landmark buildings for the purpose of signage? Suggest that if one MUST have signage at the roofline, install rooftop signage instead: the net effect will be the same (words high above the ground), but at least potentially historic rooflines and buildings' eligibility will be preserved. 	If a project is in Bungalow or Mid-Century Modern and is contributing, it must go through historic review. Language has been added to encourage signage match historic.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Design guidelines should be prescriptive; include design details 	The goal with the design guidelines is to provide flexibility along the 2-mile stretch with very differing sizes/shapes of properties while achieving the design goals. The approach is a form-based design with an inclusive process to work through site-specific issues.
Professional Landscape Architect	<ul style="list-style-type: none"> (UDC Technical Standards Manual) Move Tucson? LSA/Complete Street? guidelines? (Lateral pedestrian connections) Good idea to increase pedestrian connectivity . But neighbors will fight it when it's adjacent to their neighborhood. How can development teams, DRB, or City overcome this pushback? 	This section has been revised. The goal of the design process to include neighbors is to resolve these issues during design.
Professional Landscape Architect	<ul style="list-style-type: none"> (ped plazas located adjacent to/visible from ROW) Too restrictive. the best location (due to siting and microclimate/shade) may not be adjacent or viewable to/from ROW. encourage siting adjacent but require directional signage or some other incentive. 	This has been revised to be visible from sidewalks. Pedestrian sidewalks can be placed so as not to be visible from the ROW based on site conditions.
Professional Landscape Architect	<ul style="list-style-type: none"> Yes! (wayfinding signage shall be installed) 	Acknowledge.
Professional Landscape Architect	<ul style="list-style-type: none"> (AZ Dept Water Resources Plant List) this list is not always up to date with the latest cultivars in the industry. allow designers to submit requests to City landscape architect for review if not on list. Current City DOT LA is very informed on acceptable/appropriate species. (Water features only permitted in connection with active water harvesting) Too restrictive. some smaller fountain are appropriate (especially to reduce traffic noise in ped areas adjacent to roadway). if requiring "water harvesting" on site, do not restrict to "active" only. 	This section has been revised.
Steve Shell	<ul style="list-style-type: none"> Concrete not to exceed 50% total exterior area—may not be possible on certain sits, especially existing sites. 	This section has been revised.

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Historic Preservation

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> change to "...project utilizing the SMD Zoning Option SHALL not cause the property to be delisted or no longer eligible for listing (make a strong statement in the Mid-Century subdistrict) 	See revised Section L.1.c. and Section I.D. All registered eligible or Contributing Properties within the Bungalow and Mid-Century Subdistricts must meet Secretary of Interior Standards and may not be demolished if using the Overlay District.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> change should to shall "...these alterations SHALL occur in a manner that will not diminish the historic integrity of the property" 	Any alternations to a historic contributor must go through PRS and meet Secretary of Interior standards.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> map of historic structures would be very helpful 	Map available online through Map Tucson and provided with neighborhood meeting materials on Rio Nuevo website.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Relocation or demolition of a historic structure should not be permitted (unless relocated elsewhere on the property) to be able to use the SMD. And it is doubtful that a structure of any size beyond a small residence could be relocated; thereby increasing the likelihood of demolition. List the precise Secretary of the Interior standards (I am sure there are many covering many topics). Who determines economic feasibility? The standards regarding historic preservation should apply to all areas of the SMD equally; e.g., prohibition of demolition should not be restricted to only the Bungalow and Mid-Century districts. The section regarding demolitions in the Bungalow and Mid-Century districts is confused and contradictory. It states that demolition is prohibited except when it is economically infeasible to relocate (and if the existing building is economically infeasible, why would it be feasible in another location, especially given the costs of relocation?). The section does not state that an economic analysis has to be done to determine if the building is economically feasible in the present location, only that relocation be infeasible prior to demolition. Modifications that allow cantilevering over the historic structure or other similar actions should be prohibited. They detract from the historic character and perception of historic character of the subject building. Please provide what is meant by "openings" to the back and rear of buildings. In general, there needs to be standards and requirements stating that new development shall not adversely affect the viability and historic character of historic buildings in the SMD. Further, there needs to be standards protecting the viability of the recently created Sunshine Mile Historic District. These would include ensuring the viability of the district itself (e.g., ensuring that the number of contributing members does not decrease so that the District would no longer be listed), as well as maintaining the character of the District itself. Merely saving buildings, while allowing the character of the area to be greatly transformed, can do irreparable harm to the historic character of the area. In relation to the above, a section needs to be added, in accordance with suggestions by Demion Clinco, relating to the establishment of a Sunshine Mile Historic Preservation Zone. What he suggests is that such a zone be established and then actions be taken as follows: <ol style="list-style-type: none"> encourage property owners to opt-in to the zone to protect the historic resources on their properties 	<ul style="list-style-type: none"> Relocation is an option pursuant to the Ordinance. Secretary of Interior standards for redevelopment are readily available online. Economic feasibility would be determined by M&C through current process in the UDC; This section has been revised to be clear that any demolition after the date of the ordinance will not permit use of the ordinance (similar to the IID). Majority of contributing structures in district would be protected from demolition as those are located in the Bungalow and Mid-Century. Specific other buildings are also noted. The goal of this overlay is to balance historic preservation with opportunities for new development. The regulations have been revised to be clearer. Any demolition must conform with the City's current standards. The UDC section on demolition of historic structures is clear on how that process works; it will not be repeated (just referenced) in this ordinance. Cantilever – would need to be approved by PRS/HPO and in conformance with the Secretary of Interior standards. Openings – windows and doors Goal is to ensure compatibility and that new design enhances the area. Overlay will provide many of the same protections of an HPZ for those that opt-in. Right now, the contributing structures to the Sunshine Mile Historic District have no protections; property owners need to be enticed to opt-into this overlay in order to provide the protections.

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	2. require opt-in by property owners seeking rezonings, variances or other voluntary actions from the City. In the case of the SMD, this could entail a section stating that any project involving a historic structure shall opt-in to the preservation zone.	
Laura Tabili	<ul style="list-style-type: none"> wishy washy on historic preservation 	Right now, there are no protections under the current UDC for the Sunshine Mile Historic Contributing. Most of those buildings are located within Bungalow and Mid-Century Modern Subdistricts. This ordinance provides clear protection to those designations if the property owner opts into the overlay. In addition, certain other properties (1010 and south Park Ave) have been provided protection as well.
Laura Tabili	<ul style="list-style-type: none"> Pleased to see 2 out of 10 goals involved preserving historic properties, acknowledging their benefit 	Comment Acknowledged.
Laura Tabili	<ul style="list-style-type: none"> statement on historic preservation good, except replace “discourages” with “forbids,” and “encourages” with “requires.” 	This ordinance requires owners to opt-in to use. Clear requirements are articulated where appropriate.
Laura Tabili	<ul style="list-style-type: none"> Register-eligible properties need to be treated in the same way as already listed ones, for instance ii-5.b.1. The Feds consider Register-eligible properties to be just as valuable as registered ones, and any hoped-for Federal money will be contingent on protecting them. 	Those properties that have been decided as eligible as a contributor or other designation through the appropriate process are referenced.
Laura Tabili	<ul style="list-style-type: none"> replace “should” with “must not” or “may not” 	This ordinance balances prescriptive with permissive in order to encourage owners to opt-in.
Laura Tabili	<ul style="list-style-type: none"> SMD gives lip service to preserving all historic properties, especially bungalows, which would seem to ensure this. BUT a gigantic loophole appears on p.III-21, where conditions for demolishing historic properties appear vague “physically or economically infeasible”--what?? 	This section has been revised to reflect the same language in the IID wherein any property that demolished a historic contributor after the date of this ordinance cannot use the ordinance.
Laura Tabili	<ul style="list-style-type: none"> strike iii-21.3.b: “reasonable economic use”--who decides? Why would someone purchase a historic property otherwise? This simply creates a giant loophole for owners or purchasers of historic properties to demolish them. 	See above.
Laura Tabili	<ul style="list-style-type: none"> strike iii-21.3.b.2 as above: why would someone purchase the property if they could not make use of it in situ? 	See above.
Laura Tabili	<ul style="list-style-type: none"> strike iii-22 cantilevered over? This would destroy the setting, causing the property to be delisted. Later in this same section, ii.d.4 is invoked, with which all of these are incompatible. They need to be cut. urls for all documents cited (url for the Secretary of the Interior’s Standards for the Treatment of Historic Properties: https://www.nps.gov/tps/standards.htm) 	Any of these improvements must go through PRS, the City HPO and be in conformance with the Secretary of Interior standards. URLs change over time and therefore will not be cited in the ordinance.
Laura Tabili	<ul style="list-style-type: none"> documents referred to ought to be accompanied by their url, for instance the COT’s Major Streets & Routes Plan, etc. The lay person should not have to guess how to find them. iii-19.1.1 legible map of entire overlay, indicating historic properties 	Map Tucson online shows historic designations; URLs change over time so names of documents are referenced without URLs.
Laura Tabili	<ul style="list-style-type: none"> map of National Register and Register-Eligible properties ought to appear somewhere in this report a survey of Register-Eligible properties ought to be done: the Campbell/Kino South district and environs are rich in warehouses by named architects that ought to be protected in the same way as properties in registered historic districts. I attach a map of historic properties furnished to the Broadway Task Force as an example. 	Can be viewed in Map Tucson.
Laura Tabili	<ul style="list-style-type: none"> maps are extremely difficult to read. I had to plot outcross streets for each to make sense of it. Maps are most useful when in color 	Acknowledged. Map Tucson is the best source for existing mapping/conditions with the ability to turn on and off layers.

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Laura Tabili	<ul style="list-style-type: none"> overlay should be layered with a Historic Preservation Zone. Properties would need to opt-into the HPZ to be eligible for incentives. The legislation already exists, so no need to reinvent the wheel 	Map Tucson clearly shows properties; Almost all historic properties in Sunshine Mile are in Bungalow and Mid-Century Modern where limitation is clear.
Laura Tabili	<ul style="list-style-type: none"> PDSO Director's waiver power too broad & vague ii-2 and iii-20 K: a giant loophole giving PDSO Director sole discretion to waive any requirement? We need a stringent review process with meaningful and accountable public input. 	PDSO Director has no authority over historic demolition, and demolition is no longer permitted if using the district.
Laura Tabili	<ul style="list-style-type: none"> What is an Affected Residential Property? How does it differ from an Adjacent Property? How much protection do properties across an alley or across a street have compared to an adjacent property? 	See definition in ordinance. It is a SFR or duplex and "adjacent" as defined in the UDC.
Bill Mackey	<ul style="list-style-type: none"> "Eligible" can be pretty loose. Is the HPO going to say all of Park Avenue is "eligible?" It is not in a district, but it could be . . . I think there have been a few projects that have had to go through historic even though they are not in a district because the HPO deemed them eligible. 	"Eligible" is defined in federal and state law and is determined during the historic process.
Evren Sonmez	<ul style="list-style-type: none"> I'm wondering if we should consider extending this provision to some of the other areas. One that comes to mind is Park Avenue. The existing historic structures (such as the warehouses on the south side of Broadway and the remaining eclectic historic buildings on the north side) are the very things that grant these areas the potential for creating neighborhood-scaled commercial corridors. I'm thinking about the Lost Barrio. I'm also thinking about Park north of Broadway where Good Eye opened in the past couple of years and now expanding next door. Green Dolphin was a neat historic building that was lost to The Mark student housing which eliminated the possibility of anything interesting on that side of the block. I think it'd be absolutely worthwhile to retain the remaining historic buildings and to think about adaptive reuse while creating mechanisms for increasing density on some of the other parcels like the TUSD parking. 	Addition restrictions on height are being applied to Park Avenue Subarea south of Broadway to encourage preservation of the Lost Barrio since it has not been designated historic.
Corky Poster	<ul style="list-style-type: none"> What about "potentially eligible"? 	"Potentially eligible" is not included as there is not a clear mechanism for determining "potentially eligible" in historic preservation.
Corky Poster	<ul style="list-style-type: none"> What happens to Multiple-property listings like Joesler? 	If a contributor to a district, it is treated the same as single-property contributor.
Corky Poster	<ul style="list-style-type: none"> Relocation—to what district? SMD? Historic? After move? Or later? Reference Bungalows? They would not have qualified. 	This will be determined through the process outlined in the Sunshine Mile overlay, including City Historic Preservation Officer and Mayor and Council.
Les	<ul style="list-style-type: none"> Are City Historic Landmarks assumed to also be included wherever the document mentions 'eligible, individually listed, or Contributing Property'? This specific section is the first mention of City Landmarks in the document; should these designations also be noted as special-treatment properties throughout the document alongside Historic Register -eligible, -listed, and -contributing ones? 	City landmarks are protected.
Les	<ul style="list-style-type: none"> Will City Historic Landmark status also be given special consideration alongside State/National Register contributing, eligible, or listed statuses? If so, would alterations thereto (section III.L.1.c.) also be held to the U.S. Secretary of the Interior's standards? Or does City have other standards for alteration of Landmarks? 	City landmarks are protected and are reviewed under City and the US Secretary of Interior standards.
Les	<ul style="list-style-type: none"> This section starts with subitem d., not a. As part of the M&C review of proposed relocations, will residents adjacent to, and the "host" neighborhood association that includes, the destination relocation site also be notified? 	Yes. Public notice is required to all neighbors within 400 feet and all neighborhood associations within 1 mile.

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Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Make clear on maps which properties would be contributors where certain types of development may not occur 	Map Tucson has clear delineation of historic contributors. Once the overlay is adopted, those boundaries will also be on Map Tucson.
Steve Shell	<ul style="list-style-type: none"> Mid-Century Subdistrict does not allow a modification including alteration, addition or partial demolition. HOW DOES THIS IMPACT OUR PROPOSED FRONT PATIO ADDITION AND NEW REAR ENTRANCE? 	Alterations are permitted within the Secretary of Interior guidelines and through the PRS process.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> Establish the Sunshine Mile Historic Preservation Zone & require owners of historic properties seeking a rezoning, variance, etc. must become part of the HPZ. 	This would be a separate process; not part of the overlay. The overlay district does give regulatory requirements for historic contributors within Bungalow and Mid Century modern if the property owner opts into the overlay.
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> Our largest and most significant concern is the exclusion of sub areas: Kino South, Campbell North, Gateway South and Gateway North from compliance with the Historic Preservation Requirements. By excluding these areas the SMD incentivizes demolition of historic properties and compromises potential historic districts. This UOD was initiated with Historic Preservation and Redevelopment as shared goals but the current approach sacrifices un-surveyed districts of the city. This is antithetical to Plan Tucson, City public policy and all previous discussion prior to the release of the draft. In particular, we are deeply concerned about the impact of this policy language on listed buildings in the western section of the Sunshine Mile Historic District, the early 20th century warehouses and historic assets in the Lost Barrio, the impact of Pie Allen/Rincon Heights Historic Districts and Neighborhoods, the Roy Place/Joesler designed TUSD headquarters, and the array of potentially national register eligible mid-20th century warehouse buildings located in the district southeast of Broadway and Kino Parkway. <p>To remedy this issue we ask that 1. the Historic Preservation requirements be applied to all six subareas and 2. a "cultural resource clearance" or National Register eligibility assessment process be developed that provides definitive clarity for developers while protecting National Register listed and eligible buildings located within the UOD. We propose applicants complete a cultural review to certify that none of the buildings on a proposed development site are listed or eligible for listing on the National Register. An application with photographs and historic information would be submitted to the City Preservation Officer for review and an opinion letter from the Officer and the application submitted to the State Historic Preservation Office (SHPO) for determination of NRHP eligibility. (Embedded in this standard process is a pre-existing appeal process.) If listed or eligible, properties would follow the historic preservation requirements already detailed in the document.</p>	<p>The public process leading up to this overlay requires balancing historic preservation with opportunities for new development. Based on the recent Sunshine Mile Historic District, most of the historic preservation opportunities are in the Bungalow and Midcentury modern areas. Those boundaries have been extended as part of this most recent revision to include most of the historic resources.</p> <p>The only two other Subdistricts are Kino and Euclid-Park. There are only two small historic properties in the Kino Subdistrict due to the expansion of the Bungalow Subdistrict boundaries. Specific historic structures have been identified in the Euclid-Park Subdistrict (1010/TUSD and Lost Barrio which is not designated as historic) to be protected using height and other limitations along with incentives to protect those resources. The Volvo Site has its own protections through a site-specific PAD.</p> <p>As a voluntary overlay district where protections do not exist unless an owner opts into the District, protections for those buildings that have already been evaluated through the historic processes available is the approach. The City does not have a process to evaluate separately, and SHPO's process categorizes once a determination of eligibility is made.</p>
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> We are concerned that the SMD does not specifically exclude the "anticipatory demolition" loop hole i.e. NRHP listed or eligible historic properties could be demolished under the current UCD and then the vacant land can be used for the SMD. <p>We request that properties that demolish NRHP listed or eligible buildings outside of the SMD demolition process be excluded from the UOD.</p>	This loop has been closed with the language recently adopted for the IID. If demolition occurs after adoption of the overlay district within the Bungalow and Mid-Century Subdistricts, then the overlay district cannot be used. Demolition is also discouraged for the few historic properties located in the other two Subdistricts.
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> Signage was often a critical component of mid century commercial design. Many of these building designs were co-dependent on their mid century modern signage. For many of the listed commercial buildings located in the Sunshine Mile District the loss of the historic signage has diminished the design impact of the building. Business or aesthetic changes have caused removal of the original postwar signage and replaced it with neutral or incompatibly designed signage or no signage at all. 	Language has been added to encourage signage that is historically appropriate.

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	<p>New signs can usually be designed that work with the midcentury storefront and help revive the design aesthetic. This should be explicitly incentivized and required for Post WWII commercial buildings (1939 - 1975) located in the Mid-Century, Bungalow and Gateway North Subareas and for infill projects where “mid-century” inspired signage is part of the design composition. This should also be extended to post WWII warehouse buildings located in Gateway South and Gateway North Subareas.</p> <p>To promote and encourage the mid-century flavor of the District.</p> <ol style="list-style-type: none"> a. Signage should be reviewed as an architectural feature of the facade by the TPCHC PRSC. b. On contributing and eligible buildings original signage design should be emulated whenever possible regardless of, and exempt from, sign code restrictions including but not limited to: total sign area, exposed neon and above parapet design. c. Exposed neon signs are allowed on non residential buildings that dating from 1939 forward and located in the Mid-Century, Bungalow and Gateway North Subareas and facing away from residential property. d. When architecturally appropriate oversized “script signs” that are architectural features of the facade facing Broadway can be considered. e. Designated Historic Landmark Signs can be relocated into the Mid-Century Gateway North Subareas along Broadway and facing away from residential property. 	
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> • There are 13 buildings located in the Sunshine Mile Historic District that date from the period of significance but have undergone facade modification that have obfuscated the original design. Removal of the false facades or non-contributing elements would restore the integrity of these historic buildings and shift them to listed contributors to the historic district. Restoration and rehabilitation should be encouraged and incentivised. We recommend that these buildings be explicitly called out and subject to the Historic Preservation standards of the SMD until an architectural assessment has been completed and reviewed by the City of Tucson Historic Preservation Office and TPCHC PRSC to determine if restoration or rehabilitation is fisible. Feasibility would be defined as 50% of the original historic fabric, exclusive of windows. 	This is an optional ordinance and we want to encourage its use. Requiring property owners to restore a building that has been determined ineligible is beyond the scope of this ordinance and beyond the requirements of historic preservation generally.
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> • In addition to the issues outlined above there are general text changes we would request. <ol style="list-style-type: none"> a. Page I-4: The SMD Zoning Option is not available to a property within the Bungalow Subdistrict or the Mid-Century Subdistrict that would result in any of the following: b. Page III-20: Projects utilizing the SMD Zoning Option should will not cause the property to be delisted or no longer eligible for listing unless subject to Section L.3 c. Page III-20: Relocation: Relocation of eligible, individually listed or Contributing Property is preferred over demolition an alternative to demolition. d. Page III-21: Exceptions: HABS Level III e. Page III-22: Modifications to Eligible, Individually Listed or Contributing Properties: a New additions should be designed in such a manner that they maintain the character of the primary structure but are clearly identifiable as new. Eligibility and use of Federal Historic Tax Credits may require stricter standards. Applicants should contact the State Historic Preservation Office for details and requirements. b. These alterations should occur in a manner that will not diminish the historic integrity of the property and are reviewed for compliance. 	<p>These changes reflect the comments made above. See above for responses. Some have been incorporated.</p> <p>Appeals follow the City’s current appeal process for DRB.</p>

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	<ul style="list-style-type: none"> Page II-8: Appeals: For both Major and Minor Design Review: Appeals of the PDSO Director's decision for Projects reviewed pursuant to the Major/Minor Design Review process may be made by a party of record or by a neighborhood within one half mile of the development site and must be filed in writing with PDSO within ten (10) business days of the date of the decision. 	
Tucson Historic Preservation Foundation	<ul style="list-style-type: none"> As we have noted numerous times in all past engagements we would like to see an opt-in HPZ layer that could be connected to future incentives. The HPZ zone would be created as part of the overlay but would require owners to opt-in one by one. Once in, properties would require continual review by the TPCHC PRSC for subsequent changes and provide long-range protections. There is no reason not to include this as an option as it is a future choice not a requirement. 	This is outside the scope of the overlay district and would need to be handled through a separate Mayor and Council initiated action.

Green Regulations

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> little attention paid to rainwater harvesting and green infrastructure. only two references to rainwater harvesting no recognition of the Arroyo Chico Wash structures and the potential still for flooding from that waterway environmental standards for this overlay district are very slim 	Overlay District does not supersede commercial water harvesting or floodplain regulations; those still apply and do not need to be cross-referenced in the Overlay District. These regulations will be applied during the development process.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> first mention of water harvesting; "Water features are only permitted in connection with active water harvesting." water harvesting should be promoted throughout the document why connected to water features? 	The City's existing drainage and water harvesting requirements apply and are robust particularly for commercial development.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> Environmental Conscious Design Practices very weak only 3 of the 14 deal with water (1 using reclaimed water, 1 passive landscape water harvesting system, 1 reduction in water as an item in a list of items) no acknowledgement of green storm water infrastructure nothing about managing storm water on site, except maybe #5 that mentions cool pavements or pervious materials as part of a passive landscape water harvesting system Where is the other part of the passive landscape water harvesting system mentioned? In having to do 5 of 14 actions, opportunity for double counting with the same actions counting for density bonuses (pg III-6), micro mobility hub (pg III-18) where there are bonuses for on-site bicycle sharing or repair services, on-site car sharing services? number required should be at least 7 actions, preferably 10, or a caveat that if you count an action in another part of the overlay, you can't count it again here no recognition of the Arroyo Chico Corps of Engineers engineered flood control which is only good to a certain level storm 	<p>See above relative to water harvesting and stormwater infrastructure. In addition, City drainage requirements still apply. This section is meant to encourage environmental conscious design practices that complement the already existing requirements in the Code.</p> <p>The Overlay District has been clarified as follows:</p> <p>Item 9: Solar panels need to be able to generate equal to or greater than 20% of average demand. Item 10: Cool roof meeting current ENERGY STAR specifications (https://www.energystar.gov/products/building_products/roof_products/key_product_criteria)</p>

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	<ul style="list-style-type: none"> global climate change & projected more intense rainfall—needs to be acknowledgement of potential flooding water from Arroyo Chico goes underground in a pipe at 12thSt & Fremont and goes under Broadway at Park. If there is a large amount of water, or the pipe entrance blocked, could be flooding. Discuss & provide mitigation. 	
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> It seems that if one wants an environmentally conscious development, more stringent requirements would be provided (e.g., LEED equivalent development, better insulation, windows, heating and cooling, building materials, etc.). Some of the items (e.g. ride share, bike share) are listed in other sections. So, for instance, car and bike share help gets a project a density bonus for a MMH, and can apply here to meet this requirement. The transit item applies to every property along Broadway, therefore delete it. Why does adaptive reuse (counts as 3, and if a historic structure cannot be demolished) and water harvesting (counts as 2, and should be required) provide extra benefits in meeting this requirement? Providing shade essentially gets three credits; if one is shading parking lots, bike areas will be shaded and probably pedestrian areas. 	See above for most of the responses. As stated above, many of the environmentally conscious design standards have been strengthened. All existing codes will also be enforced. As an optional overlay over a two-mile stretch with many types of buildings and properties, the goal is to provide sufficient options that will work throughout the two miles and encourage owners to opt in. Encouraging adaptive re-use is a significant goal of the overlay, and reusing existing buildings can make it difficult to integrate the newer sustainable options into an existing building.
Chris Leighton	<ul style="list-style-type: none"> Environmentally conscious design practices – typo 7 (5) 	Fixed.
Evren Sonmez	<ul style="list-style-type: none"> Or greywater? Wouldn't it potentially be a more reliable source of water than active water harvesting? 	Active water harvesting is the best source at this time due to lack of greywater lines along Broadway. Use of reclaimed water is included as a future potential.
Evren Sonmez	<ul style="list-style-type: none"> haven't actually measured the distance between the existing bus stops on Broadway, so I could be wrong, but isn't this basically the case pretty much for any site on Broadway? And if so, should anyone be getting points for this? 	Most of the stops are ¼ mile or further apart. From a mobility perspective, ¼ mile is deemed walkable in about 10 minutes. This incentive encourages a 650-foot distance which is about a 5-minute walk and is further encouragement.
Corky Poster	<ul style="list-style-type: none"> How many panels? One ok? 	See above - Solar panels need to be able to generate equal to or greater than 20% of average demand.
Les	<ul style="list-style-type: none"> Does City have reclaimed water lines along Sunshine Mile? If so, great, I was not aware. It is said at the top of the section that 'five (5) or more' of the subsequently listed practices must be included. Items 1. and 2. are counted as more than one 'of the seven (5) required'. Are there five or seven items required? (I'd prefer Lucky 7.) 	While there is no reclaiming water line along the Sunshine Mile, this concept is now included. The ordinance is revised to require 7 criteria.
Professional Landscape Architect	<ul style="list-style-type: none"> (N.2) Include incentive for passive water harvesting. it is THE most environmentally conscious irrigation design (saves energy, chemicals, and \$ over "active systems" (N.5) As worded this would require an underground catchment and direction system to get the water to the landscape in almost all instances. 	Passive water harvesting is now included. Language has been revised related to use of water harvesting.

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Gateway Subdistrict

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> change the names so that they represent geographical ties to north and south 	Names have been changed. Gateway is now Euclid/Park Subdistrict with two Subareas – Park and Euclid; Campbell is now Kino Subdistrict with North and South Subareas.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> numbers in the specific requirements have no call out in the table 	The intent is to keep the graphics and numbers in the tables consistent throughout the document and only reference appropriate numbers in each subarea that apply. So there will be numbers that exist but do not apply in certain areas.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> 30 ft at frontage along Park Ave—map page IV-3 does not show Gateway South as touching Park – covered by Gateway North part that is south of Broadway 	Subdistrict terminology has been revised and this has been rectified.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> 14 stories is one hecka of a building on the “wrong” side of the tracks 	This is the area within the Sunshine Mile most appropriate for the larger buildings based on public outreach.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> explain what is being thought about re common space at non-residential 	The goal within Sunshine Mile is to ensure open space is provided that can be public, semi-private and private. Open Space now aligns with the IID definitions to be “Open Space” within which there is “Public Open Space.” There is greater opportunity for Public Open Space in larger projects with more land.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> high rise height is 10 stories, in the previous table it was 14 inconsistency in low rise not to exceed 3 stories, table before it is 2 stories; midrise is consistent at 6 stories 	Each Subdistrict and Subarea has slightly different standards related to definitions of low-rise, midrise and high rise. These differences reflect much of the public outreach and surveys which indicated the Subdistricts and Subareas justified discreet and different standards.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Gateway North: Permitted densities are too high for much of the area, especially for those areas north of Broadway (especially if developers can then achieve density and height bonuses, which could push densities to 135 RAC and heights over 100 feet). The neighborhoods affected are primarily single-family or lower intensity multi-family and the development that would be permitted here is way out of scale to that which exists (again, the SMD should not go farther north than the alley). In addition, such high-intensity development on the south side of Broadway, in addition to what may occur on the Broadway Volvo site will also have adverse impacts on neighborhoods such as Barrio San Antonio and could overwhelm the character of the Lost Barrio area. 	This area has been re-named the Euclid-Park Subdistrict/Park SubArea. Mid-rise is the highest building height at 6 stories/75 feet, with most buildings capped at 4 stories north of Broadway based on the size of the sites and step-back requirements. Near the Lost Barrio, height is limited to two-stories. The only height bonus permitted is two stories if either parking is vertically integrated OR there is a mobility hub (these can no longer be used together). The additional height is intended to provide housing and mix of uses; setbacks intended to mitigate and ensure compatibility.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> Gateway South: Heights could outstrip those permitted in the Gateway North, and the same concerns over the Gateway North apply here as well. Also, given the range of uses, some further protections might be necessary. 	The maximum height is higher in south subdistrict (now called Euclid Subarea of Euclid-Park Subdistrict) based on context and existing zoning.
Laura Tabili	<ul style="list-style-type: none"> Gateway North proposes high density development incl student housing from Park to Mountain and north on Park to 8th. This takes in TUSD HQ as well as parking lot, and block north of that, which were excluded from RH Historic District as too much had been lost or altered. protect owner-occupiers and historic homes on 10th Street 	The Bungalow District boundary has been moved west to Freemont. One TUSD building is part of Sunshine Mile District, and we have revised the Overlay District to protect that building but also to permit additional development in the parking lot. Part of the DRB consideration is privacy for existing homes anyplace along the Sunshine Mile. 1100 block –

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	<ul style="list-style-type: none"> Somewhere it needs to be acknowledged that most of 10th Street (across the alley from Broadway) is lined by single-family one-story homes. Development on the Broadway side needs to be sensitive so as not to dislodge owner-occupiers. <p>1100 block</p> <ul style="list-style-type: none"> Development east on Broadway itself from Park to Mountain: 1100 block has been largely demo'd on the Broadway side (ex-El Rio health center) leaving a nice big mouthwatering parcel to develop. There is no acknowledgment that across the alley to the north lie a block of intact historic bungalows. we need to make sure the 1100 block development on Broadway does not adversely affect the residents or historic properties on the 10th Street side--including sun shed for solar array. That means no "mid-rise" buildings (6 stories/75 feet) on this block, noise buffering, etc. 	<p>This parcel will be significantly narrowed after widening, and the bungalows have been purposefully excluded from district.</p> <p>Definition of Affected Residential Property is now in the ordinance.</p>
Chris Leighton	<ul style="list-style-type: none"> Gateway South Subarea – inconsistency in diagram with setbacks 	<p>This has been remedied and this area is now called Euclid-Park SubDistrict with two subareas – Park and Euclid. The regulations are purposefully different in the two subareas.</p>
Evren Sonmez	<ul style="list-style-type: none"> I'm wondering if some of the outdoor commercial recreation uses could potentially be a nuisance here? Can we collectively chat about this? 	<p>These uses have been removed from the Euclid-Park Subdistrict/Park Subarea.</p>
Evren Sonmez	<ul style="list-style-type: none"> Instead of this building height setback requirement, why don't we just go with a single neighborhood-friendly height that would also create nice human scale and forget about the setback? I think this would be appropriate especially along Park Avenue where we'd like to create some definition considering how wide that street currently is Check out these four-story buildings lining up Portland's SE Division Street. I think this would be an appropriate height to consider (45'). Keep traveling east on Google Streetview and you'll see how well they work alongside one or two-story historic buildings: https://www.google.com/maps/@45.5047916,-122.6340598,3a,75y,100.11h,82.07t/data=!3m6!1e1!3m4!1s-5VTnNKEQl26qpe5s87pyw!2e0!7i16384!8i8192 More info on this from Portland's zoning website is at this link (it's their CM2 zone): https://www.portlandmaps.com/bps/zoning/#/zones/base/CM2 I'm inclined to think that we need the opposite of what's proposed here, i.e. taller buildings along Park (45') and perhaps shorter buildings on adjacent streets and/or a height step-down on the back side of the building where it's abutting a single-story residential building. 	<p>The goal here was to look at each Subdistrict/Subarea for context and encourage design accordingly. The setbacks are purposefully different between the Park and Euclid Subareas. One of the goals is to protect the Lost Barrio in the Park Subarea.</p>
Evren Sonmez	<ul style="list-style-type: none"> Are these numbers supposed to go with some of the specs on the left-hand side of the table? I think so, but maybe somebody forgot to link them? 	<p>The numbers are independent requirements and only apply in certain Subdistricts/Subareas as referenced.</p>
Evren Sonmez	<ul style="list-style-type: none"> Does this mean that high rise buildings need two height setbacks? If so, I have really mixed feelings about prescribing that. There may be ways to get it right, but I can't stop picturing the atrocious building that was constructed in the Main Gate area in an attempt to do bulk reduction. Vancouver has a podium and tower prototype that might be worth exploring for areas where high-rise buildings are proposed. They wrap tall slender towers with a lower-rise "base" which would also create an opportunity for town homes, a housing type we don't have much of in Tucson, at least in an urban form. Here's a link with some visuals: https://urbantoronto.ca/news/2011/10/vancouverism-part-5-public-realm-pedestrian-experience-design 	<p>High Rise Setback has been removed.</p>

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	<ul style="list-style-type: none"> • And another one: https://www.strongtowns.org/journal/2018/1/11/lessons-learned-in-meeting- 	
Evren Sonmez	<ul style="list-style-type: none"> • What about standards for the adjacent streets? (On-street parking, traffic calming, streetscape, etc.) DTM is working on new Design Guidelines so perhaps there's an opportunity to tie in 	Text has been revised to tie into Complete Streets guidelines, and the City's Department of Transportation and Mobility will be consulted on these items during the process.
Corky Poster	<ul style="list-style-type: none"> • Is there any historic protection for Lost Barrio? 	Lost Barrio was not included in Sunshine Mile Historic district application and has not been designated a Landmark or other historic protection. Eighteen-foot height limits have been added to this area to discourage demolition of the existing building, thereby protecting through design standards. There may be a separate effort to designate this for historic status through the appropriate channels.
Corky Poster	<ul style="list-style-type: none"> • A blunt instrument. 90 RAC with 4 bedroom units is a lot of density. 	Some density maximums have been lowered based on examples run in the Subdistricts to ensure the Affordable Housing density bonus will work. For this Subdistrict, it has been lowered to 64 RAC.
Les	<ul style="list-style-type: none"> • This Gateway South section should be IV.A.2.b. to balance IV.A.2.a. Gateway North, no? 	Formatting has been corrected.
Les	<ul style="list-style-type: none"> • Aviation does not intersect with 15th Street or anything else between Broadway and 22d. Delete 'its intersection with' from the sentence. 	Text has been deleted.
Les	<ul style="list-style-type: none"> • Does the prohibition against 'salvaging of motorized vehicles' forbid recycling of car (truck, airplane, tractor, whatever) parts into other things (artwork, furniture, fence/ landscape stuff)? If one has a car-cass delivered to ones premises, half its weight in parts/pieces is pulled off to be turned into artwork and the rest is sold for scrap, does this count as motor vehicle salvage (verboten) or as salvage/recycling and craftwork/ manufacturing (permitted)? 	Craftwork is permitted if the materials are being used for that purpose; However, salvage and recycling as a primary use is prohibited. Depending on the extent of the storage of materials and how much craftwork is happening, this would require interpretation based on individual facts.
Les	<ul style="list-style-type: none"> • Consider adding something to the effect of 'In addition to the uses excluded from the entire SMD listed in section III.B.2.*, these uses are also excluded from the Gateway North subarea.' to make it clear that these are not the only forbidden fruits. • Why are technical services verboten in Gateway North? I understand that some businesses (like screenprinting) may cause odors and may use unhealthy chemicals, but could there not be requirements that only technical service providers that do not intrude (light, vibration, odor, fumes, etcetera) onto adjacent properties be allowed? Ditto for research and product development. Not, I hasten to add, that I would arrogate to tell Iron Horse, Pie Allen, and/or Rincon Heights how to run their neighborhoods. 	There is now a singular use table in the document. The thought is that the Park Ave Subarea (previously Gateway North) would have lesser intense uses.
Les	<ul style="list-style-type: none"> • Could one have a wide arcade, pergola, or other "covered open space" within the 20-foot setback required on non-Broadway street frontages? Not sure if these would count as a "building" for setback purposes. 	Yes. This has been clarified within the Open Space/Public Open Space requirements.
Les	<ul style="list-style-type: none"> • If distance 'A' in the illustration is ~50 feet, then should distance 'C' be three times as wide as 'A' if it is supposed to depict 150 feet? It could be that the illo is intended to depict how a facade of ~150 feet could be broken up with a required low-rise segment, but this is not obvious. Also, it might be helpful to depict the maximum 150-foot span to give folks an idea of what is the maximum allowed height and facade width. 	The diagrams are not to-scale drawings.
Les	<ul style="list-style-type: none"> • If there are no setback requirements for low-rise buildings, it might be helpful to state this in the table. 	That is the intent and we believe it is clear.
Les	<ul style="list-style-type: none"> • Did Barrio San Antonio or any other Gateway neighborhood express concern about rooftop common area? I seem to recall concerns about this and balconies vis-a-vis the student housing at Tyndall/Speedway and was curious if similar concerns were expressed for tall buildings here. 	While it has not come up during the Overlay District public outreach, a criteria as part of the DRB design review has been added to address privacy mitigation, which would address these issues/concerns.

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Les	<ul style="list-style-type: none"> The text says that the maximum allowed unbroken high-rise facade is 100 feet (denoted as 'D' in the illustration), and that the maximum allowed unbroken mid-rise facade is 150 feet (denoted as 'C'). The distances denoted by 'C' and 'D' are the same (~15/16ths inch on my monitor), should 'C' be half again as wide as 'D'? As with the Gateway North massing illustration above, it might be helpful to see depicted the full maximum allowed heights and unbroken facade widths. Also, there is a typo in the 'Low-Rise Height' item (missing an 'R'). Also, change 'no wider that 50 ft.' to 'no wider than 50 ft.' in the Specific Requirements item (1). 	Diagrams are not to-scale drawings.
Les	<ul style="list-style-type: none"> Should this be 'protect the neighborhoods' (plural)? Or are we all, in solidarity, one neighborhood for the purpose of this exercise? Where/when will these transition standards apply? For any project requesting SMD benefits? For new construction or "substantial" (however this is defined) remodel/reuse? How much updating can an existing property owner do before any "grandfathering" of current loading/ service areas is lost? 	If a property owner uses this ordinance, then these regulations apply for any new construction. Any site-specific issues related to existing conditions will be handled through the design review process and PDSO director. Overall, the ordinance provides more flexibility in uses and design standards.
Rincon Heights/Laura Tabili	<ul style="list-style-type: none"> We are proposing that the Gateway North Subarea be divided into two subareas – one including the parcels along the north side of Broadway, and a second containing the parcels along the Park Ave retail district and the TUSD parcels. We believe the Park Ave and TUSD parcels (Park Ave Subarea – figure below) warrant a more detailed approach given their location extending in between two historic residential districts. Because this subarea contains a mix of neighborhood scale retail, residential, office, and a single large undeveloped parcel within a small area, we believe it needs a fine-grain approach to achieve the best results. We have three main goals for this subarea: <ol style="list-style-type: none"> revitalized neighborhood-scale retail affordable housing appropriate transitions between existing single-family residential and future development. 	This Subdistrict has been re-labelled with slight boundary changes to include the Park Subarea and the Euclid Subarea. Within the Park Subarea, which now includes the TUSD parcel and the Lost Barrio (both sides of Broadway), setbacks, heights and mass reductions have been revised to achieve these goals. Heights on the south side of Broadway are limited to 2-story with the intent to protect the Lost Barrio; heights along Park north of Broadway are permitted at 4 stories. Height for the TUSD parking lot is able to achieve 6 stories in order to incentive Affordable Housing. Only permitting 4 stories for Affordable Housing on the TUSD parking lot has called into question the ability for any developer to accommodate Affordable Housing based on construction costs and low market rents overall in the Tucson market.
Rincon Heights/Laura Tabili	<ul style="list-style-type: none"> In looking at the underlying zoning, we believe that the allowable building heights are appropriate on many of the parcels and should stay as they are. This presents a challenge for offering incentives. In other areas, particularly the TUSD parcels, the building height allowances could reasonably be expanded. 	Setbacks and property sizes will limit the height through geometry. This section has been revised. As noted, the balance is to offer incentives so that owners elect the overlay district.
Rincon Heights/Laura Tabili	<p>NW corner of Park & 9th St – Current zoning is C-1 & R-3.</p> <ol style="list-style-type: none"> Recommended uses = Civic, Commercial, Residential, Retail services listed in SMD III-2B; Recommended max height of 4 stories/48ft – how do we transition to adjacent residential if R-3 already allows 40'? Incentive = small additional height in C-1; additional uses permitted in R-3; parking relief? 	The additional uses are part of the enticement for owners to use the overlay without sacrificing quality of life for those in the area. Setbacks and property sizes will limit the height through geometry. DRB needs to consider adjacent residential properties through transition during the design review process.
Rincon Heights/Laura Tabili	<p>North side of 9th St – Current zoning is C-1, R-3, & R-2.</p> <ol style="list-style-type: none"> Recommended uses = Residential as listed in SMD III-2B; Recommended max height of 4 stories/48ft stepping down to 2 stories at Fremont St (this area backs up to the existing 4 story Wildcat Canyon Apts) Incentive – additional height, primarily on east half of block; parking relief 	See answer above. In addition, a step from 4 stories at wildcat canyon to six creates the scale transition to the TUSD property
Rincon Heights/Laura Tabili	<p>West side of Park Ave between 8th & 9th St – Current zoning is C-1 & C-2.</p> <ol style="list-style-type: none"> Recommended uses = Civic, Commercial, Residential, Retail services listed in SMD III-2B; Recommended max height =. Keep existing 	See responses above. In addition, the ordinance has incentives for adaptive reuse, parcel sizes will limit development potential, and parking relief is in the overlay.

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	<p>c. Incentives = parking relief – the southern end of this area is already revitalizing on its own; would like to incentivize adaptive reuse of 1923 fire house (East Coast Subs). Not looking for big changes in this area but will need some creativity for incentives.</p>	
Rincon Heights/Laura Tabili	<p>TUSD Parking Lot – Current zoning is C-1, C-2, & R-2</p> <p>a. Recommended uses = See Opportunities/Challenges below</p> <p>b. Recommended max height = 4 stories/48ft on Park Ave (retail/live-work), 4 stories/48ft on middle third (market rate apts) with ht step down to 2 stories on eastern third (see figures below)</p> <p>c. Incentives –additional height across much of existing R-2</p> <p><u>Opportunities:</u> This is a chance to create something really unique and a place that could serve as a social and retail anchor between these two historic neighborhoods and the Sunshine Mile. We envision neighborhood-scale local retail space on west side (live-work/residential over retail), a mix of Market-rate & affordable housing on the remainder, and a substantial requirement for common space such a public plaza or a courtyard, similar to Mercado. Additionally, we believe “Missing Middle” housing is appropriate on the east side as a transition into the more residential blocks. This would include duplexes, townhomes etc. See examples below.</p> <p><u>Challenges:</u> Because of the large size of this parcel, it would likely attract development interest from national firms with the financial capacity to develop the entire site, but who would be looking to maximize profit. We are concerned that a single development of the entire site may not be able to reflect the desire for finer grain variations and amenities or foster the smaller spaces amenable to local businesses. However, allowing the lot to be developed in smaller separate chunks could make it more feasible for small and midsize local firms who may be more responsive to community input, are more likely to keep profits local. We realize that incentivizing this incremental development approach may be beyond what the SMD is capable of, but we would like to have the conversation about what possibilities exist.</p>	<p>See response above. Height for the TUSD parking lot is set in the current draft to achieve 6 stories to incentive Affordable Housing. The scale of the building is required to be a 2-story building along the edges to encourage scaling to the 6-story element. Only permitting 4 stories on the TUSD parking lot has called into question the ability for any developer to accommodate Affordable Housing on that site based on construction costs and low market rents overall in the Tucson market. This is one of the sites within the SMD that could accomplish Affordable Housing, so the desire is to maintain this incentive if possible.</p>
Rincon Heights/Laura Tabili	<p>TUSD Office Block</p> <p>a. Recommended uses = Civic, Commercial, Residential, Retail services listed in SMD III-2B;</p> <p>b. Recommended max 6 stories allowed on east half stepped down to 2 at Fremont only if adaptive reuse of contributing 1010 TUSD office (Roy Place)</p> <p>c. Incentives = additional height and uses in R-2</p>	<p>The goal for the TUSD office at 1010 is to encourage preservation of the existing building. Therefore, the goal is to limit height to the existing structure and incentivize based on expanded uses. Encouraging additional height on the TUSD parking lot will help a single developer of the TUSD site – including parking lot and existing building – be incentivized to maintain the 1010 building.</p>

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Bungalow Subdistrict

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> more clarification of group dwelling being excluded from this subarea. means no mini-dorms, or group homes? 	UDC definition of group dwelling applies.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> style of the diagrams has changed (instead of light and dark areas on “block”, have a dark area then white space surrounding to indicate setback (be consistent) 	Diagram is correct.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> reason for putting in the High-Rise building height at 10 stories & then say it is not allowed? recommend removing statement & indicate on previous page with general statements about subarea there will be no high rise, no buildings over 3 stories drawings for building height are different from earlier drawings 	High rise has been removed from this diagram.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> how is pedestrian access required for common space which is on a roof top (s part of the private space)? Or contrasting it is pedestrian access rather than vehicle access? 	Open Space definition and requirements have been revised to clarify this issue.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> in the table, High-Rise shows up twice & is indicated not allowed. Just remove these lines. 	High rise has been removed (see above).
Laura Tabili	<ul style="list-style-type: none"> no "group dwellings" (minidorms) allowed, which is good news --BUT--"opportunities for development" include whole blocks north to 10th Street where zoned R2, R3,C1 and C2. This includes 1200, 1300, and 1500 blocks. 1200 and 1500 blocks are already occupied by 2-story student apartments on the 10th Street side, so intense development on Broadway, particularly on the 1500 block (ex-Madaras) where almost everything has been demo'd, would not seem to harm anyone. <p>1300 block</p> <ul style="list-style-type: none"> BUT 1300 block is also a row of historic bungalows on the 10th Street side, except for 2minidorms at west end. These too need protecting, as do the row of (almost) intact historic bungalows on the Broadway side. <p>1200 & 1500 blocks</p> <ul style="list-style-type: none"> Treating these whole blocks as “development opportunities” must not adversely affect the historic properties on either the Broadway or 10th Street sides, nor their current, longtime neighborhood residents. we need protection for the whole 1300 block, both Broadway and 10th Street facing, in spite of enticing zoning. Further, development of the 1200 and 1500 Broadway facing parcels is fine. But any development on the 10th Street side must be controlled so that single family homeowners on the north side of 10th Street (or their historic homes) are not adversely affected. 	Height restrictions and setback requirements accommodate, and the goal is to have property owners elect this overlay district to protect the historic integrity. Without expansion of uses (with the protections in place), the concern is that owners will not elect this overlay.
Evren Sonmez	<ul style="list-style-type: none"> Parking lots are not uses that enhance the “public space” value of streets. In fact, it’s quite the opposite. I know that we’re looking at that as a solution in this particular area, but I think it’d be nice to avoid using language that suggests that. 	Language revised.

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Evren Sonmez	<ul style="list-style-type: none"> purpose of the height setback on the facade facing the street frontage here? You're not proposing something very tall anyway and in some instances the underlying zone (C-1) already allows for 30'. Is the setback necessary? I get the setback adjacent to residential property, but that wouldn't be on the back side of the building. Maybe I'm missing something here... Would love to chat collectively about these height setback proposed throughout the doc. I think these footnote references for (1) and (2) may be missing on the left-hand side of the table. 	Foot notes have been added. The setbacks are dependent on what is existing next door.
Corky Poster	<ul style="list-style-type: none"> Why (include area south of 12th)? 	Revised.
Corky Poster	<ul style="list-style-type: none"> Existing buildings? Bungalows don't meet this. (windows—75%) 	This has been clarified to apply to new construction only.
Corky Poster	<ul style="list-style-type: none"> E/W street: 20' Rear Yard & alley: 0' 	Revised.
Corky Poster	<ul style="list-style-type: none"> E/W Street: Already 30' above 	This is now 25 feet.
Les	<ul style="list-style-type: none"> If this district comprises "frontage on Broadway Boulevard ... avoiding adjacent single-family properties", then we are not using the UDC definition of 'adjacent', which includes properties north across the alley "behind" the bungalows? Fine by me either way, but if we are not using the UDC definition this should probably be spelled out somewhere. 	Adjacent is defined by the UDC. We believe the statement in the definitions section of the Overlay now makes that clear - If the term is not separately defined, then the UDC definition applies.
Les	<ul style="list-style-type: none"> Craftwork is an allowed use if 'all products manufactured on site shall be sold at retail within the Project'. I infer this to mean that if I make widgets of various colours, I must offer for sale, somewhere in the project, each style/colour of widget and I may also sell my widgets elsewhere (and not that I may only sell my widgets within the project), and that the intent is to disallow "export manufacturers" from setting up shop. 	This use has been clarified to require sales on-site in the Bungalow and Midcentury and permit off-site sales as well as ancillary. In the other Subdistricts where this is a permitted use, the sales can be off-site only.
Les	<ul style="list-style-type: none"> Are City Historic Landmarks included for special consideration alongside Register District-contributing, eligible, and listed properties? 	City landmarks are already protected by UDC and this ordinance does not supersede those requirements.
Les	<ul style="list-style-type: none"> The text states that the low-rise building height limit is eighteen (18) feet, which is less than the UDC's R-1 height of twenty-five (25) feet. I assume that the average building height in the Bungalow district is eighteen (18) feet? Also, change '1 stories' to '1 storey' (or '1 story'). 	Spelling error has been fixed. The low-rise is still 18 feet as it is only for a portion of the site with the ability to have increased height internal site.
Les	<ul style="list-style-type: none"> The illustration could be confusing because it appears to depict a building built lotline-to-lotline (with a light gray common area carved out), which is not allowed in the Bungalow district (building placement can not be up to any lot line as in the Gateway district). Consider revising the illustration to incorporate the Bungalow 'building placement' illustration as a base or, perhaps better, to depict a building footprint that covers 50% of the lot in accordance with Bungalow maximum coverage limits. 	Diagrams are illustrative.
Les	<ul style="list-style-type: none"> If distance 'A' in the illustration is ~35 feet, then should distance 'C' be a bit more than four times as wide as 'A' if it is supposed to depict 150 feet? It might be helpful to depict the maximum 150-foot span to give folks an idea of what is the maximum allowed height and facade width. 	Illustrations are not to scale.

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Campbell Subdistrict

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> Naming the subarea Campbell north when at least 95% of it is south of Broadway is very confusing 	This area has been re-named as Kino Subdistrict; with Subareas - Kino North and Kino South
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> Greyhound Bus station is in Campbell North. Shouldn't transportation Service – Land carrier be added to Campbell North? It has been added to Kino South 	Greyhound is in the Euclid-Park Subdistrict. Transportation Service – Land Carrier is permitted in the Euclid Subarea, Kino North and Kino South.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> intent of the specific requirements to have building fronts close to the street; e.g. no parking in front. Correct? 	Yes, that is the intent. Because the parcels along this 2 miles vary greatly, it is an option. Developers may choose other options within the design guidelines.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> Diagram: half the letters don't have a line to drawing table says High Rise, P rear yard is 40 feet, but for mid-rise the rear yard setback is 20 feet Diagram shows P and H next to each other with only 1 line. Needs to be cleaned up and consistent. says Broadway frontage is not applicable but map shows two blocks on both north and south sides of Broadway are in this subarea. Why did you remove the requirements for them? mention of low-rise building heights, but no setback numbers High-rise building height alley has no number and no letter 	Diagrams have been revised and updated. There are no requirements for Broadway; there is no midrise setback; low rise setback is established by building placement.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> High rise façade not allowed & letter D missing in diagram High-Rise Height not allowed & G missing in diagram. previous Figure IV.C.4.a(2)(b) shows High-rise Building Height of 12 stories & diagram has a C. What is the correct information? 	These have been revised and clarified.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> all loading and unloading areas, docks and platforms shall be entirely enclosed on all sides. Why isn't this requirement put on the other sub-districts? 	Industrial uses not allowed in other subdistricts, and this standard would not work on smaller lots which is the predominant feature in this area. Design Review must consider adjacent uses and mitigate; other mitigation measures may be instituted.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> mention of Broadway Frontage and Broadway Frontage is also shown in the diagram. map of Kino South subarea shows no frontage on Broadway 	This has been revised.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> common space standards: maximum lot coverage is 100%. If total lot is covered with impervious services, buildings, drives or parking, where is the area for common space? If on terrace or roof, how is pedestrian access required? if multi-unit dwelling there must be 20 square feet per dwelling unit (a hallway 2ft by 10 ft?) diagram needs to be revised—labels one side as Broadway frontage, but this subarea has no Broadway frontage 	Open Space and Public Open Space have been re-defined and establish requirements. Hallways are not considered Open Space and never have been counted as such in any City ordinance.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> High Rise buildings are not allowed. Table for building massing standards has line for High-Rise Façade & one for High-Rise Height. diagram carries drawings of High-rise height G and Façade D. Specific Requirement 4 relating to high-rise facades. Please explain. Are there high-rise buildings (12 stories) or not allowed in this subarea? 	High rise not allowed; diagrams have been revised.

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Evren Sonmez	<ul style="list-style-type: none"> map can use some legible street labels to help the reader understand where the overlay boundaries are. 	Acknowledged.
Evren Sonmez	<ul style="list-style-type: none"> Same comment about height setbacks as in other subdistricts highly encourage looking into that podium & tower model I mentioned above. there's no adjacent residential anywhere in this area? 	Revised. There are residential uses in this area
Evren Sonmez	<ul style="list-style-type: none"> wondering about the height setbacks here which is basically an industrial area. What's the concern with the street frontages? Honestly four-story buildings may work here, too. The streets are around 40 ft wide curb to curb. 	Adjusted low rise heights to 4 stories.
Evren Sonmez	<ul style="list-style-type: none"> building height section stated that high rise buildings are not allowed here. Can you double-check? Maybe I'm getting cross-eyed after all 	This is correct in the Kino South area.
Corky Poster	<ul style="list-style-type: none"> Thought area in south was to be a future phase?? 	Outreach occurred in this area and the owners/businesses asked that it be included at this time.
Les	<ul style="list-style-type: none"> Yay, makerspace! Thanks for including so much of what I think would make a great part of town even better! I see that the south border of Kino South was drawn through the Saint Ambrose property (APN 129-01-036B, 300 and 390 South Tucson Blvd) to exclude the existing church and school, leaving the rest of the property incentivized for development (so far, so good), but I am confused about why the boundary between Campbell North and Kino South was drawn through the northwest corner of the Saint Ambrose property instead of along the property line. Since Kino South allows group dwellings (like senior housing), might it make more sense to include all of Saint Ambrose's property inside Kino South? Since the properties abutting Saint Ambrose to the north are a self-storage facility and an apartment complex, I don't think either one would be "hurt" by Saint Ambrose building lotline-to-lotline (as Kino South would allow) should the church avail itself of the option. Also, how would the SMD work if a parcel straddles two subdistricts? Like how split-zoned parcels are currently dealt with? Or are there more options in overlay zones? 	Boundary has been revised to include all of Saint Ambrose property in the Midcentury Subdistrict.
Les	<ul style="list-style-type: none"> Same as for Gateway South, does the prohibition against 'salvaging of motorized vehicles' forbid recycling of car (truck, airplane, tractor, whatever) parts into other things (artwork, furniture, fence/ landscape stuff)? 	See response above.
Les	<ul style="list-style-type: none"> The illustration could be confusing because it appears to depict a building built lotline-to-lotline (with a light gray common area carved out) and not, as I infer, the limits of where on the property a building can be placed (as I read it, a building can be built up to any of the four lotlines, but can only cover 50% of the lot). Since this illo accompanies text stating 50% maximum lot coverage, perhaps depicting a building footprint that covers only 50% (or thereabouts, not to scale) of the lot might be more helpful? 	Building lot line to lot line is permitted. Open Space can be on the interior of the site.
Les	<ul style="list-style-type: none"> The Campbell building height figure (IV.C.4.a.(2)(b)) gives a high-rise building height limit of twelve (12) storeys/ 144 feet. However, the massing figure says that high-rise is not allowed in Campbell North (with maximum height being mid-rise six (6) storeys/ 75 feet). Since most of Campbell North and Kino South is already I-1 (75-foot building height limit), I assume high-rise is not allowed in the Campbell subareas? If distance 'A' in the illustration is ~50 feet, then should distance 'C' be three times as wide as 'A' if it is supposed to depict 150 feet? It could be that the illo is intended to depict how a facade of ~150 could be broken up with a required low-rise segment, but this is not obvious. Also, it might be helpful to 	Revised to permit high rise in Kino North, but not Kino South. Diagrams are illustrative and not to scale.

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	depict the maximum 150-foot span to give folks an idea of what is the maximum allowed height and facade width.	
Les	<ul style="list-style-type: none"> There is no Broadway frontage in Kino South. 	Revised.
Les	<ul style="list-style-type: none"> The Kino South building height figure (IV.C.4.b.(2)(b)) states that high-rise height (fourteen (14) storeys/ 175 feet) is not allowed. However, the massing figure says that high-rise facades may run unbroken for 100 feet at a maximum height of twelve (12) storeys/ 144 feet. Since most of Campbell North and Kino South is already I-1 (75-foot building height limit), I assume high-rise is not allowed in the Campbell subdistrict? I would really like to see something exceptional on the "triangle" between Kino, Campbell, 14th, and the arroyo, but I don't think allowing additional height would be helpful given the floodplain setback and other existing constraints. 	Revised.

Mid-Century Subdistrict

Who	What	Response
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> delighted to see Character Description acknowledgement of mid-century buildings in area have the smaller footprints that lend themselves to local businesses & incubator spaces & adaptive reuse is strongly encouraged glad to see extended subarea up Plumer to pick up the old Jewish Community Center & south to get the smaller buildings there 	Comment Acknowledged.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> happy with statement "SMD zoning option is not available to any project within the Mid-Century subdistrict that proposes demolition of a contributing property." 	Comment Acknowledged.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> glad to see low-rise building height at 1 story—believe diagram shows two stories. glad no high-rise (here defined as 10 stories) is allowed. Remove the line from the table. Why are there no setback standards for the low-rise buildings? curious how standards apply to the frontage road that exists on several blocks north of Broadway—no mention of this situation 	Diagrams have been updated; Setbacks and other standards are defined based on building placement.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> 100% coverage of the lot, but still the requirement for common space issue of pedestrian access to common space wherever it is located (wheelchair accessible?) 	Open Space is within the lot coverage.
Margot Garcia, PhD, FAICP	<ul style="list-style-type: none"> reference to High-Rise Façade & Height in table, though shown as not allowed, even down to putting the letters there--no G or D shown specific standards mention low-rise is 2 stories (#2 and #3), while the table on IV-40 says low-rise is 1 story. Which is it?. diagram is misleading in it shows the low rise at two stories 	Diagrams have been coordinated; low-rise is 1-story.
Sam Hughes Neighborhood Association/Marc Fink	<ul style="list-style-type: none"> In general, The SMD should not go farther north than the alley north of Broadway. the interior of Sam Hughes is primarily R-1, with some R-2 developed at R-1 densities. The smatterings of higher densities are in developments of relatively lower density (e.g., the apartments, condos and townhouses in the neighborhood, especially along 6th Street and in a few other locations are two-stories and the units are often fairly large, with lower densities than many multi-family 	The primary reason the SMD goes north of the alley is to protect the historic contributing properties within the Sunshine Mile Historic District. As currently designated, there are no protections within the UDC. To encourage use of the SMD, owners need to be able to expand the uses available in those buildings. The requirements to maintain the historic integrity of the buildings to use the SMD will

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	<p>projects). The densities that the SMD allows are not in character with this development. Further, the higher density uses permitted along Broadway conflict with the existing development and would completely alter the character of the area.</p> <ul style="list-style-type: none"> • Three-story buildings can be acceptable, and such development can provide urban amenities in many locations, provided that they are developed sensitively. • It appears that the SMD has been applied to any parcel with zoning greater than R-1 without looking at the context of the individual parcels. • The proposed SMD includes Emanu-el Synagogue, its southern parking lot and another church to the south of the synagogue (and even if the synagogue is a historic structure, the parking lot could still be developed under the SMD). The synagogue is adjacent to single-family homes to the north and west. The proposed standards would allow development similar to that at the Benedictine Monastery on Country Club Rd., which the neighborhood opposed and which would be counter to the character of the neighborhood (and counter to the draft Sam Hughes Neighborhood Plan). • Further, it is problematic that Country Club Rd. can handle the increased traffic that such developments would generate. • The office properties along 10th Street east of Tucson Blvd. are single story. Further, if the old Thomas Davis clinic is a historic property it cannot utilize the SMD. Further, it is adjacent to lower-density condos/townhouses to the north and east and these are adjacent to single-family development. • Properties north of the alley west of Tucson Blvd included within the SMD also abut lower density development. 	<p>limit the uses. In addition, all design guidelines must be met, including mitigating privacy and other issues for adjacent neighbors. Without the extension of the SMD to the north, those historic structures are not protected. As such, the entire Temple Emanuel property has now been included.</p>
Evren Sonmez	<ul style="list-style-type: none"> • Similar question here with height setbacks. As I advance through the doc, I'm getting more convinced that we may be better off finding an appropriate height for each of these areas rather than resorting to height setbacks. I feel like these setbacks will create a strange building prototype across the overlay area. It seems really odd to provide a height setback for a building that only goes to four stories. 	<p>See response above.</p>
Les	<ul style="list-style-type: none"> • If distance 'A' in the illustration is ~35 feet, then should distance 'C' be a bit more than four times as wide as 'A' if it is supposed to depict 150 feet? It might be helpful to depict the maximum 150-foot span to give folks an idea of what is the maximum allowed height and facade width. 	<p>These diagrams are not to-scale.</p>
Broadmoor/Broadway Village Neighborhood Association	<ul style="list-style-type: none"> • Some in neighborhood feel 4 stories is appropriate; others are concerned about this height 	<p>Comment acknowledged.</p>
Broadmoor/Broadway Village Neighborhood Association	<ul style="list-style-type: none"> • Some underutilized properties in neighborhood; encourage neighborhood-level uses that are accessible by walking in neighborhood 	<p>The hope and goal is to have property owners use this ordinance and meet the design guidelines.</p>
Broadmoor/Broadway Village Neighborhood Association	<ul style="list-style-type: none"> • Trees/landscaping high priority in neighborhood 	<p>Comment acknowledged. Landscaping is required.</p>
Steve Shell	<ul style="list-style-type: none"> • Window on ground floor shall be 75% of frontage – existing buildings exempt/only applies to new buildings 	<p>This is correct and has been clarified.</p>
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> • Reduce maximum building height from 52 feet/4 stories to 40 feet/3 stories. 	<p>Based on context, public outreach for the last 2 years and desire to entice owners to use the ordinance, the maximum height was set at 4 stories.</p>

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Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> • Move Subdistrict boundary so the two residences on the west side of Smith Ave. are outside the District. • Move the Subdistrict boundary so it does not extend north of 10th St. immediately west of Country Club (move the Temple and its parking lots outside the District.) • Block access to Smith Ave. at Broadway Blvd. 	See response above related to desire to protect historic contributors which requires inclusion in the Ordinance. Boundaries have remained the same and Temple Emanuel is now included in its entirety.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> • Clarify that Contributing Structures do NOT qualify for density or height bonuses 	Contributing structures must be maintained for historic integrity to use the SMD; clarification is not needed.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> • Building Massing: Under No. 2, the façade requirement applies only to one street, presumably Broadway. It seems that the façade requirement should also be on the adjacent north/south street and the adjacent east/west residential street, if that applies. 	The single-street notation is only for corner lots, which permits design flexibility for corner lots.
Sam Hughes Neighborhood Plan Committee	<ul style="list-style-type: none"> • The “Casitas on Broadway” are an excellent model for multi-family housing in the District – well-built, two-stories, nicely landscaped (as soon as the huge gravel piles disappear), attractive, a nice-looking wall that serves as the northern boundary to the property, affordable, with neighborhood input during construction. This is the type of construction we’d be happy to see. 	Comment acknowledged.