



LAW OFFICES OF

Lazarus, Silvyn & Bangs, P.C.

A PROFESSIONAL CORPORATION

June 26, 2017

Via electronic mail

Mr. Scott Clark
Interim Director
Planning and Development Services
City of Tucson
201 N. Stone Ave.
Tucson, Arizona 85701

Re: Core Spaces, Hub at Tucson III – Best Practices Alternative Step-back Design

Dear Scott:

As you may know, Core Spaces (“Core”) is developing the southwest corner of Speedway Blvd. and Tyndall Ave. (the “Property”) in the City of Tucson (“City”).¹ The Property is zoned C-1 and in the optional Main Gate Overlay District (“MGO”), which Core will use to develop this project (“Project”). One purpose of the MGO design standards is to ensure that buildings on Speedway appear less imposing. Core’s initial design revealed that the MGO’s prescribed massing reduction requirements make the Speedway façade appear imposing from the pedestrian level, which contradicts the MGO massing provision’s intent. The MGO permits modifications to prescribed design standards to address design issues pursuant to the MGO’s Urban Design Best Practices option, § B-3. This letter is Core’s request to modify the Project’s Speedway step-back design.

A. Project & Property background.

The Property is an ideal location for a mixed-use student housing complex, as it is near the University of Arizona (“University”), the Main Gate entertainment district, and the modern streetcar. The Project’s four-stories will include ground-level retail on Speedway and residential on Tyndall, with residential on the three upper levels. The Project will also have one underground parking level, and rooftop residential amenities including a pool. The residential portion of the Project will include approximately 69 residential units and 213 beds. The Project is scheduled to open in Fall 2019.

B. MGO design step-back requirement and urban best practices design alternative.

The MGO requires buildings to “step-back” to provide a massing transition to the street. This step-back must occur above two stories (or 26 feet, whichever is less) and recess at least 12 ft. from the street-level façade.² The step-back must also cover at least 75 percent of the street

¹ The Property includes Pima County Assessor’s Parcel Nos. 115-04-4990, -498B, -500B, and -502B.

² MGO § C-17.c.

façade’s length. The intent of this massing reduction is to make buildings appear less imposing from the pedestrian level and provide additional building separation and air/light circulation.³

The MGO permits alternatives to its development regulations, including massing reductions, to accommodate creative solutions for design and development issues.⁴ An alternative regulation must be consistent with urban design best practices (“Best Practices”), which include adopted urban design standards for a comparable-sized American city. The Director of Planning and Development Services may approve an alternative regulation if it is consistent with a Best Practice.

C. Request for alternative Speedway step-back dimensions.

1. Strict adherence to the MGO step-back creates design and development issues.

By following the MGO’s Speedway step-back requirement, the Project will have a 12-foot step-back beginning at its third level and spanning 85 percent of the Speedway façade (the “MGO Design”).⁵ See **Enclosure 1**, MGO Design Renderings, p. 1-2. The MGO Design provides 70,395 sq. ft. of interior residential floor area.

As the enclosed renderings show, this design creates a Speedway façade that appears imposing and bulky from the pedestrian level. See Enclosure 1, pp. 5-6. In addition, the top three levels are imbalanced, as the third-level step-back creates an awkward separation within the residential floors. See Enclosure 1, p. 3. This imposing appearance and imbalanced design is contrary to the intent of the MGO massing provisions.

In addition, the MGO Design causes several interior development issues. First, the 12-foot step-back creates approximately 1,500 sq. ft. of outdoor occupiable area overlooking Speedway, which typically would be ideal for balconies. Because the MGO no longer permits balconies for Group Dwelling uses,⁶ the outdoor space created by step-back is unusable. Second, this design creates an inefficient interior layout. Residential multi-story buildings are most efficient when they have vertically aligned floorplans that stack restrooms, kitchens and living space. By pushing back the top two residential levels, the MGO Design eliminates this internal alignment and creates an inefficient interior design. Third, the 12-foot step-back pushes the residential units to the south, resulting in less open space for the Project’s interior circulation.

2. Alternative to Step-back Through Urban Design Best Practices.

To resolve the above issues, Core proposes two Best Practice alternatives for the Speedway step-back. First, the Project’s step-back will begin at the second level to visually separate the pedestrian level from the upper floors. According to Portland’s Central City Fundamental Design Guidelines, a building’s sidewalk level should be differentiated from its middle and top building levels, and step-backs are an effective way to create this separation. See **Enclosure 2**, § C-8. Stepping-back a building above its base level creates a visual stopping point along the vertical plain that reinforces the human-scale of the pedestrian level. This Best Practice is also found in the Emeryville (CA) Design Guidelines, which state that a building’s base should be distinguished

³ MGO § C-17.a.

⁴ MGO § B-3.

⁵ The MGO Design exceeds the 75 percent street frontage requirement because it includes a recessed areas for a walkway and a ground level transformer.

⁶ MGO § C-19.1 (amended in 2016 by Ord. No. 11394).

by using massing or façade articulation.⁷ See **Enclosure 3**, § D-6. The Emeryville guidelines recommend reducing a building's apparent bulk by breaking it up into smaller masses that correspond with the building's internal functions.

Second, the Project's step-back depth will be three-feet, which provides an effective separation distance. Portland's Eastbank Redevelopment Plan supports this step-back distance, as it requires step-backs between two-and-five feet. See **Enclosure 4**, p. 12. At this depth, a building's scale is preserved, which maintains the human scale at the street. This depth also allows sunlight at the ground level and reduces the canyon effect caused by high building walls.⁸

The enclosed renderings show that applying these step-back alternatives to the Project (the "Alternate Design") creates a pedestrian level with a comfortable, human scale, and less-imposing upper levels. See **Enclosure 5**, Alternate Design Renderings. Lowering the step-back emphasizes the street level, and makes the Speedway façade less imposing. The three-foot step-back creates a clear separation between the retail and residential areas, reducing the visual impact of the upper floors. By making the Project appear less imposing along Speedway, the Alternate Design meets the intent of the MGO step-back provisions.

Using the Alternate Design only reduces the residential floor area to 69,948 sq. ft., slightly less than the MGO Design. The Alternate Design also solves the other issues created by the MGO Design. The three-foot setback does not allow enough room for balconies, and instead allows this space to be usable interior space for the Project. This design aligns all three of the upper residential floors, allowing for an efficient floorplan. It also allows for more internal open space, improving the look and circulation of the Project's interior.

D. Conclusion.

Pursuant to the MGO Urban Design Best Practices option, Core requests your approval of its alternative step-back design that will allow the Project's Speedway step-back to begin at the second level and recess three feet from the first level façade. These adjustments significantly improve the Project's pedestrian level appearance and make the upper floors less imposing, thus complying with the intent of the MGO's step-back provisions. Please let me know if you need any additional information or have any questions. As always, thank you for your time and attention to our request.

Sincerely,



Rory Juneman
Lazarus, Silvyn & Bangs, P.C.

⁷ Emeryville, California is located the densely populated area between Oakland and Berkley. While its size and population are relatively small, it is an urban area with densities similar to Tucson's Main Gate area.

⁸ The step-back length will not change, and will continue to span 85 percent of the Speedway façade.

Enclosures: 1 – MGO Design Renderings.
2 – Portland’s Central City Fundamental Design Guidelines, § C-8.
3 – Emeryville Design Guidelines, § D.
4 – Portland’s Eastbank Redevelopment Plan, Design Guidelines.
5 – Alternate Design Renderings.

cc: Eric Grimm, Core Spaces
Tom Harrington, Core Spaces
Jeff Zelisko, Antunovich Assoc.
Keri Silvyn, Lazarus, Silvyn & Bangs PC

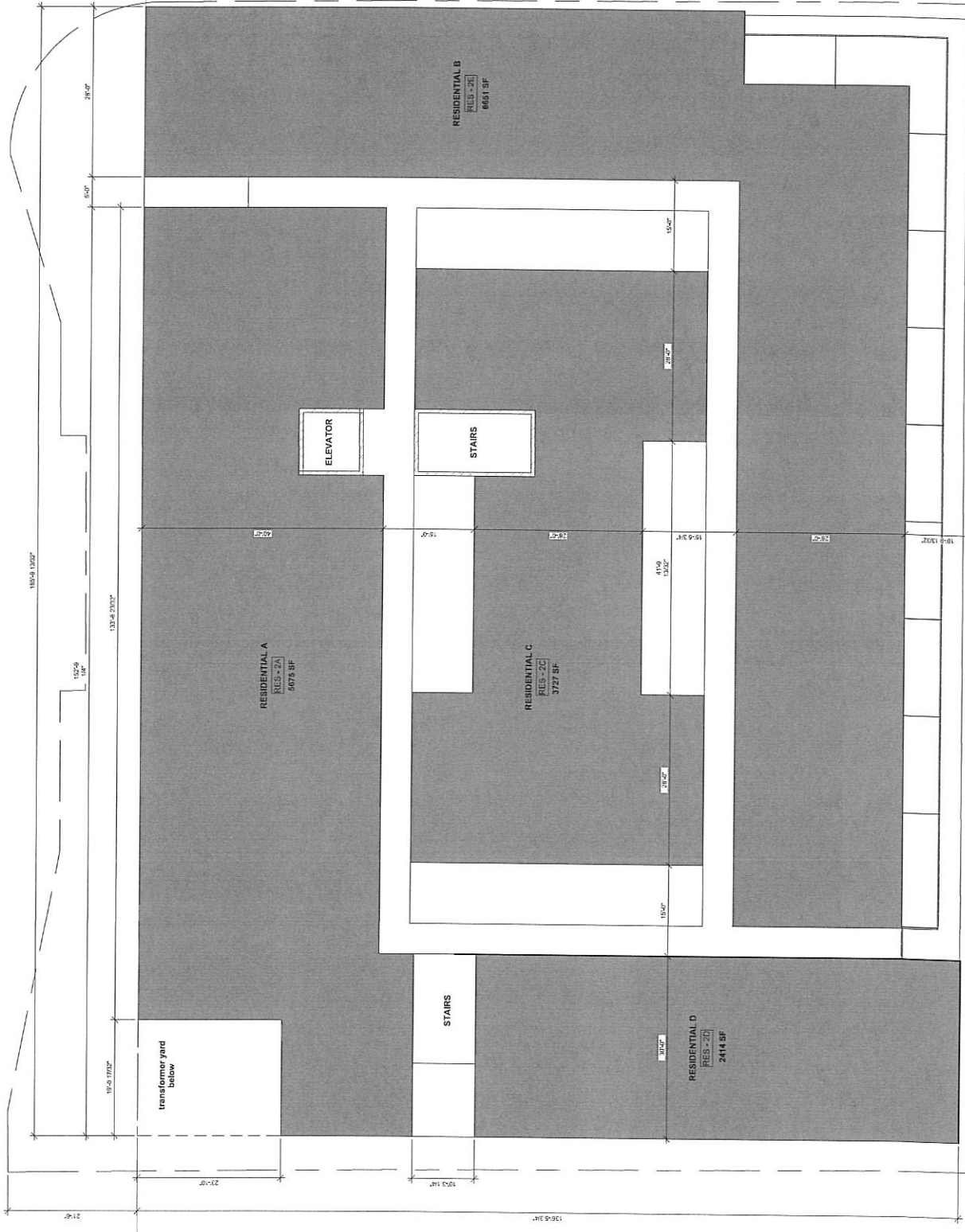


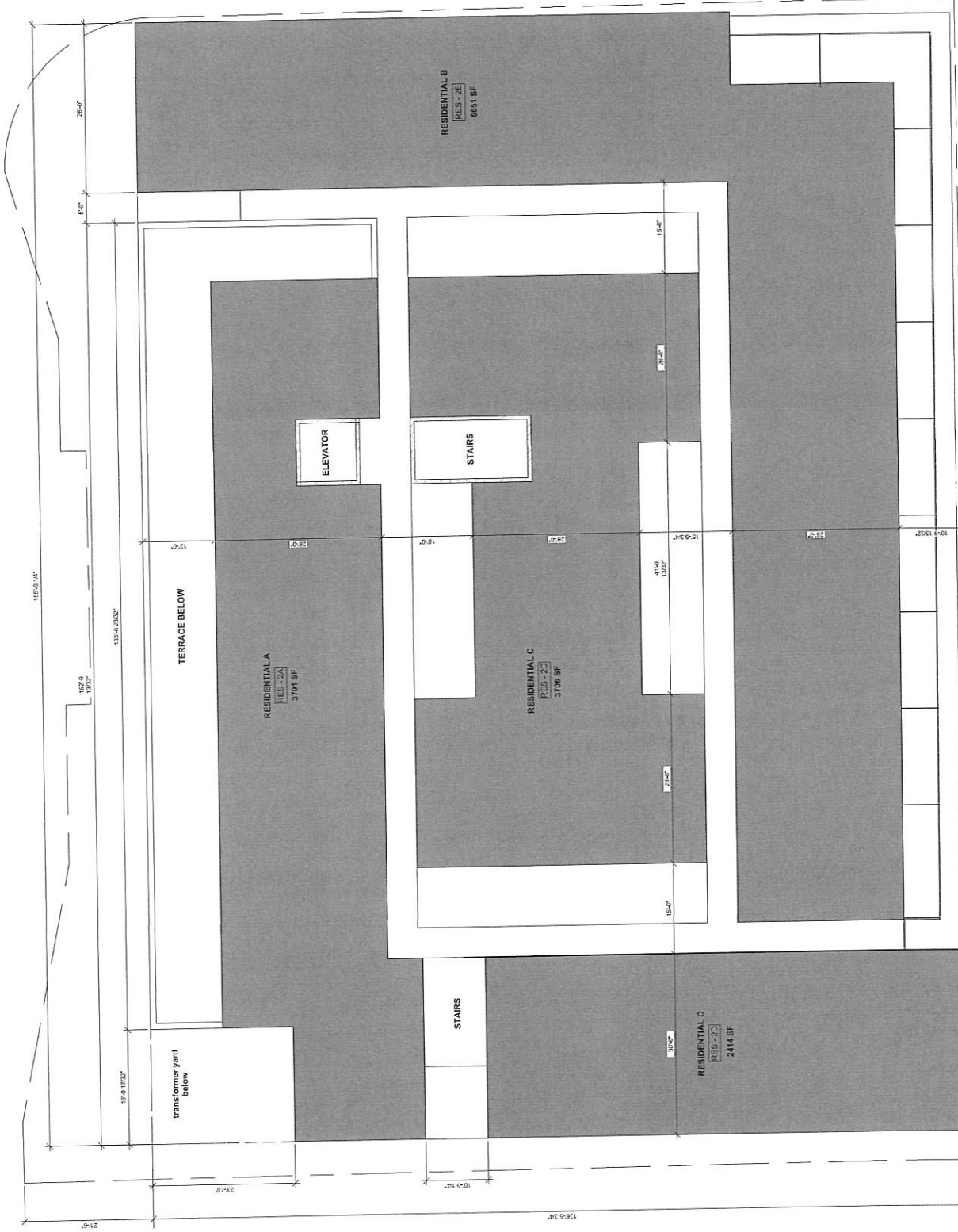
Exhibit 1: MGO Design

2nd Level Design

12' SETBACK AS PER ZONING
 TOTAL AREA RES 1 = 18,487 sqft
 17.75% SETBACK ABOVE 20' RESULTS IN A BLANK
 MASSING REDUCTION OF 3,829 FEET CURBED
 12' setback, 139' 3" long required by zoning

3rd/4th Level Design

15' SETBACKS PER ZONING
TOTAL AREA RES 2 & 3 = 16,593 sqft

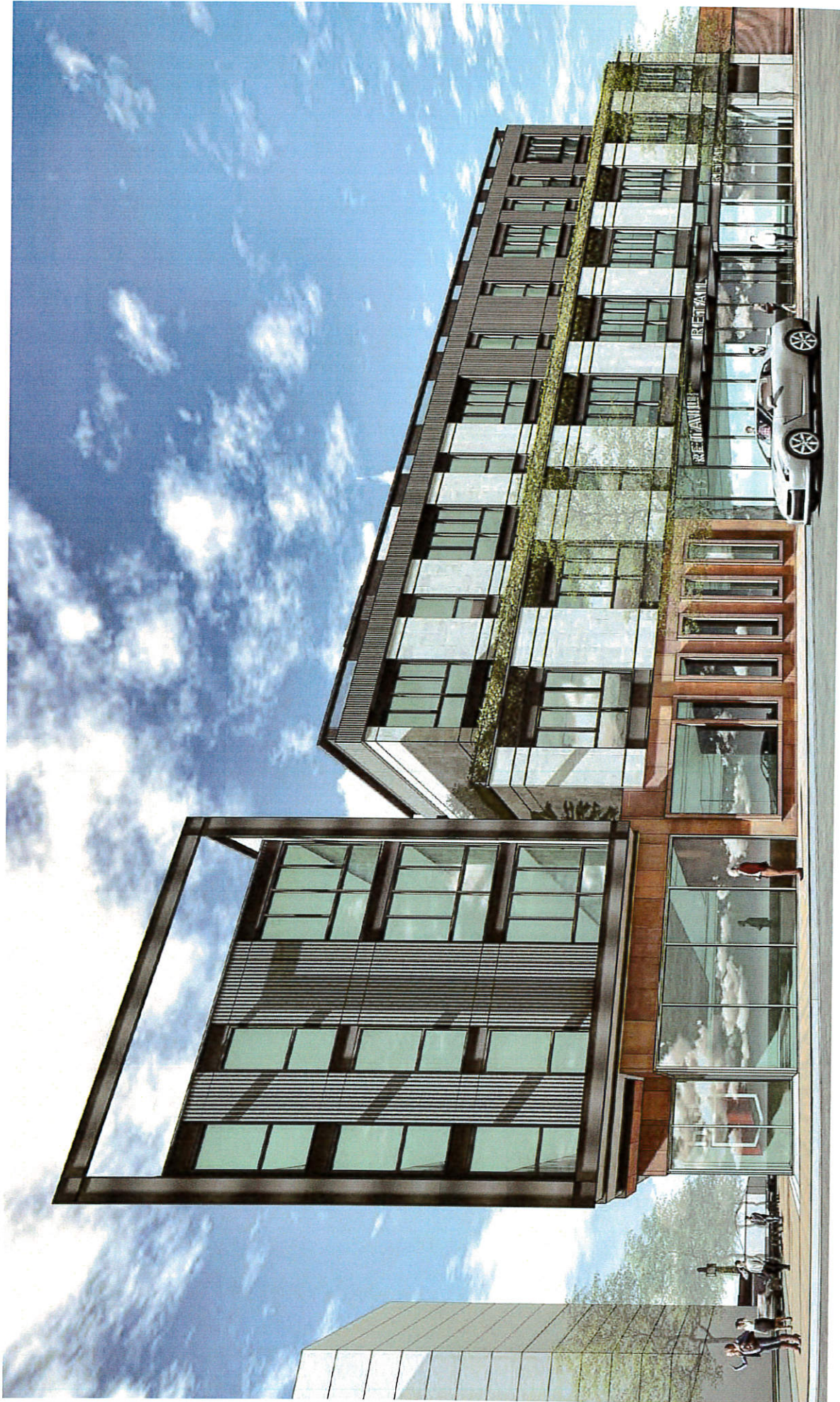


TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

BY RIGHT SETBACK OPTION 1 LEVEL 3&4 RESIDENTIAL PLAN

TUCSON, ARIZONA | June 7, 2017

Core Spaces Developer · Antunovich Associates Architecture, Planning, Interior Design



TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

Core Spaces Developer · Antonovich Associates Architecture, Planning, Interior Design[®]

BY RIGHT SETBACK OPTION 1 - CONCEPT RENDERINGS

Tucson, Arizona | June 7, 2017

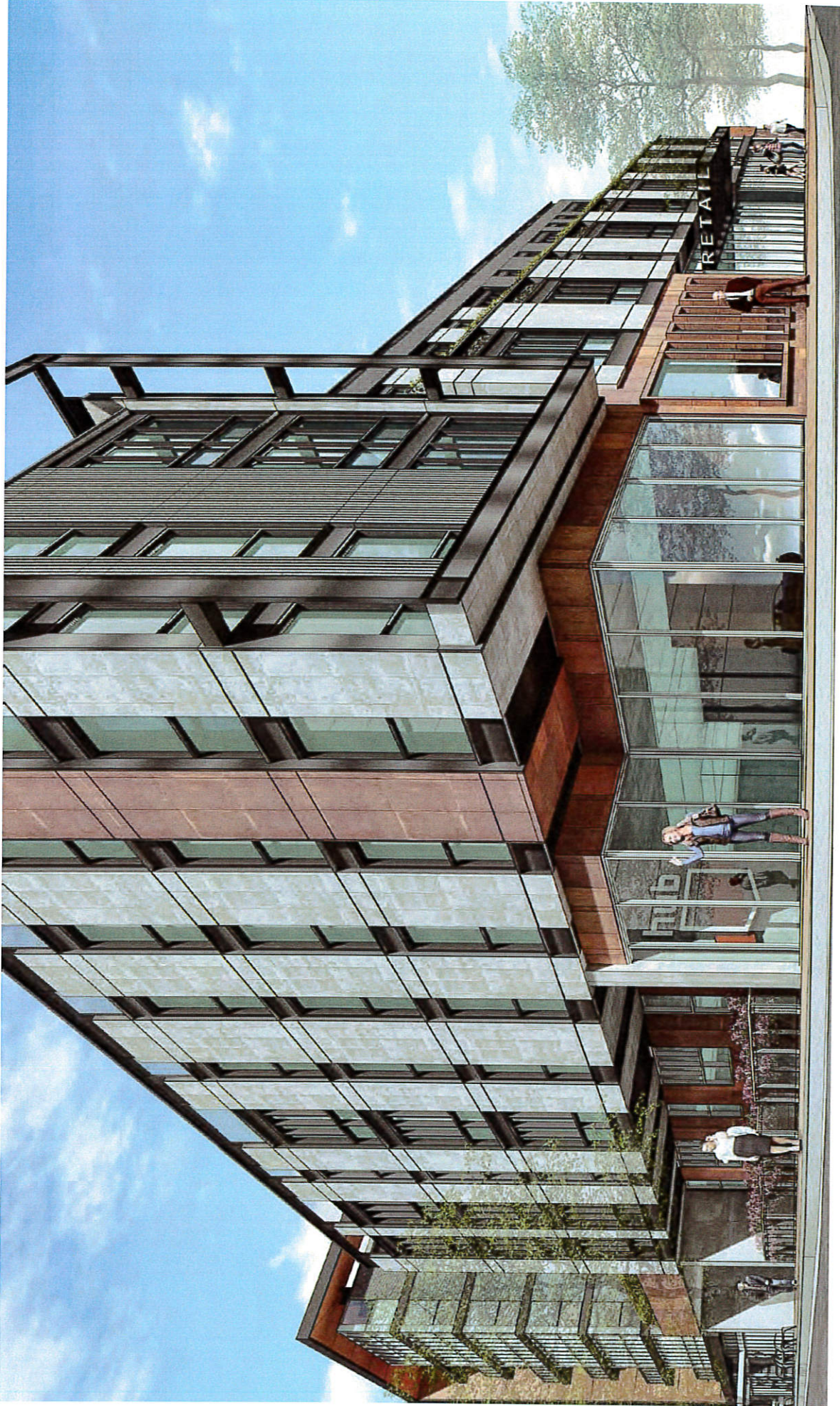


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BY RIGHT SETBACK OPTION 1 - CONCEPT RENDERINGS

Tucson, Arizona | June 7, 2017

Core Spaces													Tyndall & Speedway Mixed Use Residential Development, Tucson, AZ			June 7, 2017			(By Right Setback Option 1)		
PROJECT AREA ANALYSIS - 4-STORY 50 FT. - With Residential over Parking																					
LEVEL	FLOOR HEIGHT	OVERALL HEIGHT	RESIDENTIAL - APARTMENT						BUILDING COMMON		RETAIL		PARKING/LOADING		Total GSF/ FAR W/O PATIO	Total GSF	FAR area				
			COMMON	RSF	Open Circulation Paths	Amenity Terrace	Beds	UNITS	B.O.H.	RETAIL RSF	RETAIL COMMON LOADING	AREA	SPACES								
Elevator parapet	12'-0"	65'-9"																			
IMPH	5'-0"	53'-9"	500			3,400															
4	10'-9"	48'-9"	610	16,583	2,580		64	22								3,900	3,900	-			
3	10'-9"	38'-0"	610	16,583	2,580		64	22								17,193	17,193	17,193			
2	10'-9"	27'-3"	610	18,467	2,580		71	22								19,077	19,077	19,077			
1	16'-6"	16'-6"	4,700	3,665			15	3								23,427	23,427	12,767			
LL1			500	3,665												13,665	13,665	4,165			
BUILDING TOTAL			7,530	58,963	7,740	3,400	214	69	-	1,296	4,402	20,160	44	94,455	102,195	70,395					

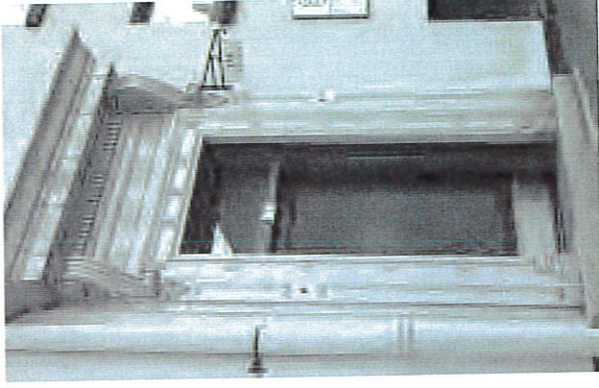
Site Area:	29,274	sf
Area per Unit	855	nsf (+/-)
Total Units:	69	units
Typ. Floor Efficiency:	89%	
Pkg. Space to Unit %:	57%	

TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

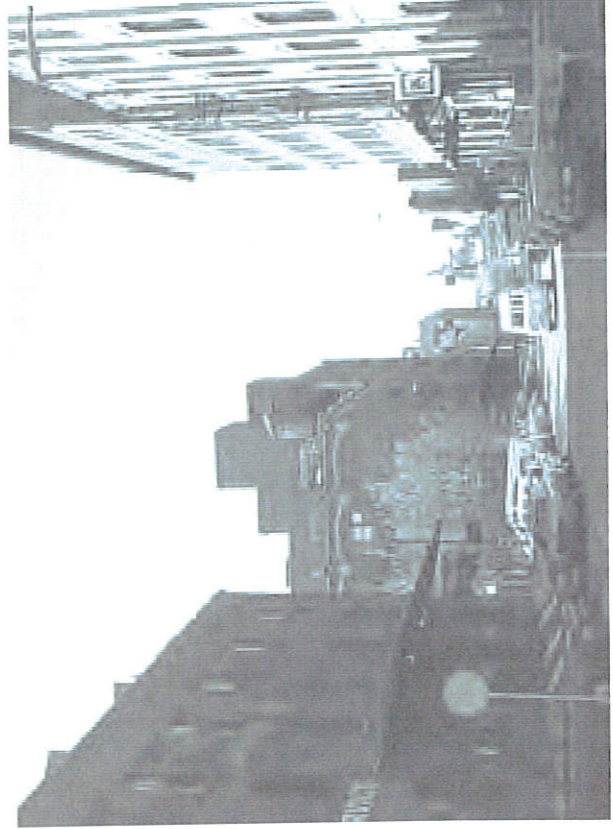
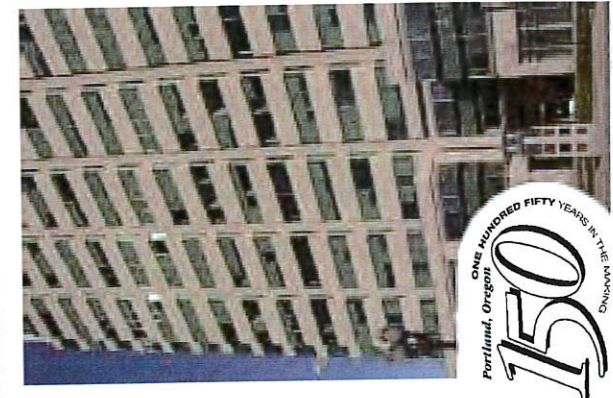
Core Spaces Developer • Antunovich Associates Architecture, Planning, Interior Design •

BY RIGHT SETBACK OPTION 1 AREA MATRIX

Tucson, Arizona | June 7, 2017



CENTRAL CITY FUNDAMENTAL DESIGN GUIDELINES



City of Portland
Bureau of Planning
Portland, Oregon
April 1, 2001
Updated November 8, 2003

C 8 DIFFERENTIATE THE SIDEWALK-LEVEL OF BUILDINGS

BACKGROUND

Many of Portland's buildings follow the tripartite architectural division of base (sidewalk-level), middle, and top. Expressing the sidewalk-level of buildings differently than the upper levels of the building is representative of the evolution of building design and the separation of building uses. This demarcation acknowledges the often varying uses in a building and reinforces the human-scale emphasis of the Central City's built environment.

Different building materials and facade elements, such as masonry belt-courses, large window openings, awnings, signs, and canopies are used to differentiate the sidewalk level of the building from the other building sections. These elements develop human scale on the street-wall and create a rhythm when coordinated with similar elements on adjacent buildings. Building facades that step back above the base of the building create visual stopping points along the vertical plane, and are most effective where the height of the typical street-wall is exceeded by the building's total height.



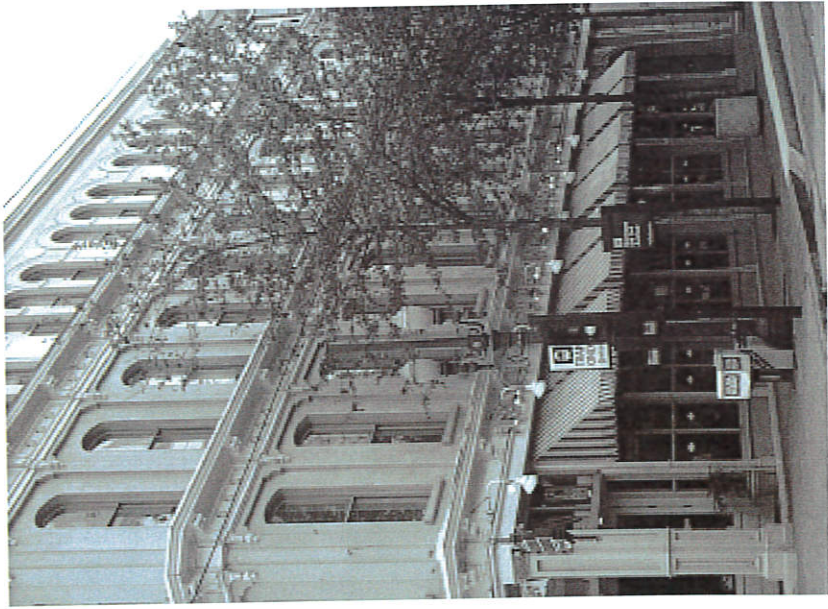
Differentiated sidewalk-levels along SE Grand and SE Stark Avenues

GUIDELINE

Differentiate the sidewalk-level of the building from the middle and top by using elements including, but not limited to, different exterior materials, awnings, signs, and large windows.

This guideline may be accomplished by:

1. Using building elements to create scale. The Rock Bottom Brewery, in the ground level of the Centennial Block at SW Morrison and 2nd Avenue, has integrated awning, sign, and lighting systems, in addition to large windows at the sidewalk-level of the building, to create a human scale for pedestrians on the adjacent sidewalk.

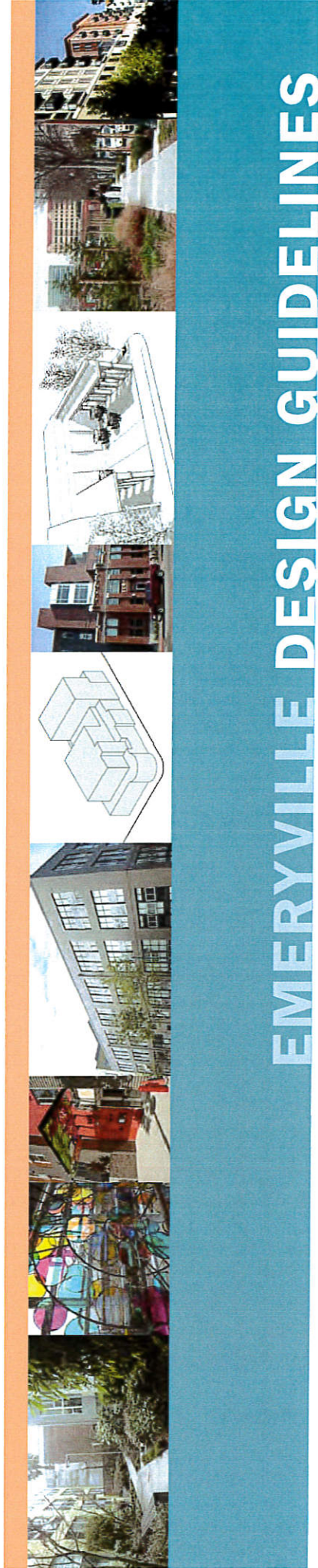


Central City Fundamental Design Guidelines

2. Differentiating the sidewalk-level while maintaining the exterior materials used at the upper sections of the building. The sidewalk-level of the Pacific Building, along SW Yamhill Street between 5th and 6th Avenues, uses larger pieces of the same stone cladding used on the rest of the building's exterior. The bays between the structural columns have been infilled with wood and glass to provide pedestrians with good views into the retail stores.



Exhibit 3



CITY OF EMERYVILLE | Adopted December 7, 2010

Amended August 7, 2012

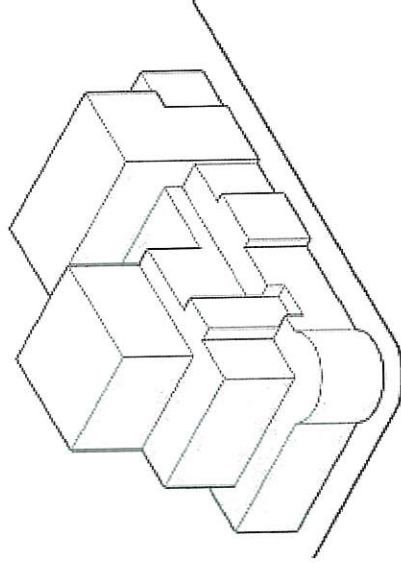
Amended May 19, 2015

D BUILDING MASSING

Massing refers to the bulkiness of buildings. A building or a series of buildings that is slender, tiered, or varied in height and shape permits light and air to pass through; allows views; and creates visually interesting skylines. Bulky buildings, on the other hand, can cast large shadows and obstruct sunlight and views. Building massing guidelines seek to define a skyline that supports pleasant, safe, and sunlit streets and sidewalks.

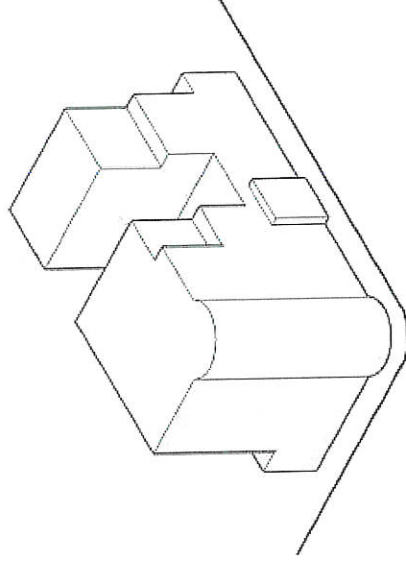
- D-1** In areas where building heights transition, step back upper levels of buildings to transition to adjacent lower building heights.
- D-2** Encourage variation and articulation through changes in height and massing.
- D-3** Create building openings that permit mid-block pedestrian connections, thereby breaking up “super blocks” and expanding the pedestrian network.
- D-4** Space towers to allow sunlight, air, breezes, and privacy for tenants, while maintaining views and natural light at the street-level.
- D-5** Towers should be slender in order to minimize the casting of large shadows. If large floorplates are necessary on lower floors, middle and upper floors should taper, step back or otherwise employ a reduction in massing.

DESIRABLE



Variation in massing and upper floor stepbacks add visual interest to the building and more sunlight onto the street.

UNDESIRABLE



Bulky buildings with long blank walls tend to appear oppressive and inhospitable to pedestrians at the ground level.

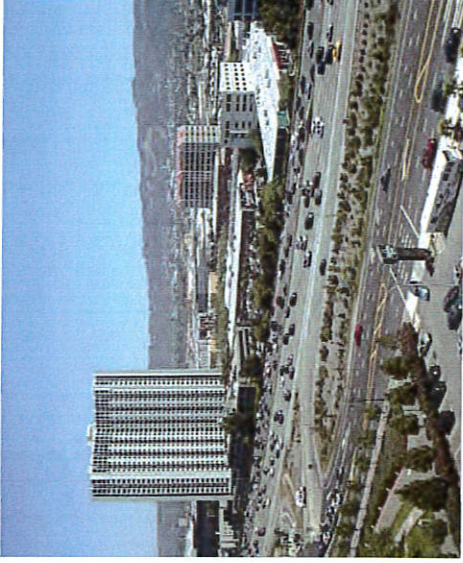
DESIRABLE



With 338 units in three towers, this San Francisco building is made more human-scale through its careful massing. The base, middle and top of the building are discernible through the use of color, height, window type, and architectural features. The building steps down to meet the lower height of an adjacent historic building.

© Dyett & Blaine

UNDESIRABLE



Lacking step backs, tapering, and a more slender appearance, Pacific Park Plaza's blocky design looks bulky and massive.

D-6

Incorporate a distinguishable base, middle, and top for all buildings of five stories or more:

- Distinguish the base of the building through the use of materials, massing, or articulation of the façade. The base of a building should address the street through entries, fenestration, articulation and building orientation.
- Step the middle of a building back from the base. The middle should be more slender and less bulky than the base and also differentiated through architectural elements and materials.
- Design buildings with a solid top or other distinguishing features to signify the end of the building; this does not require an actual stepback, but articulation through use of materials or façade rhythm. Reserve a portion of the top habitable floor and penthouse for mechanical and other equipment. Alternatively, shield equipment from view, from taller adjacent buildings, with a parapet and appropriate screening.
- Reduce the apparent bulk of a building by breaking it into smaller masses that correspond to the internal function of the building (e.g. through changes in materials, colors, or fenestration) and through changes in roof heights and vertical planes.

D-7

Design of new buildings should consider shadow impacts on surrounding areas. 3D modeling is recommended to test the effect of building heights and massing on sidewalks and streets, in terms of shadows.

DESIRABLE



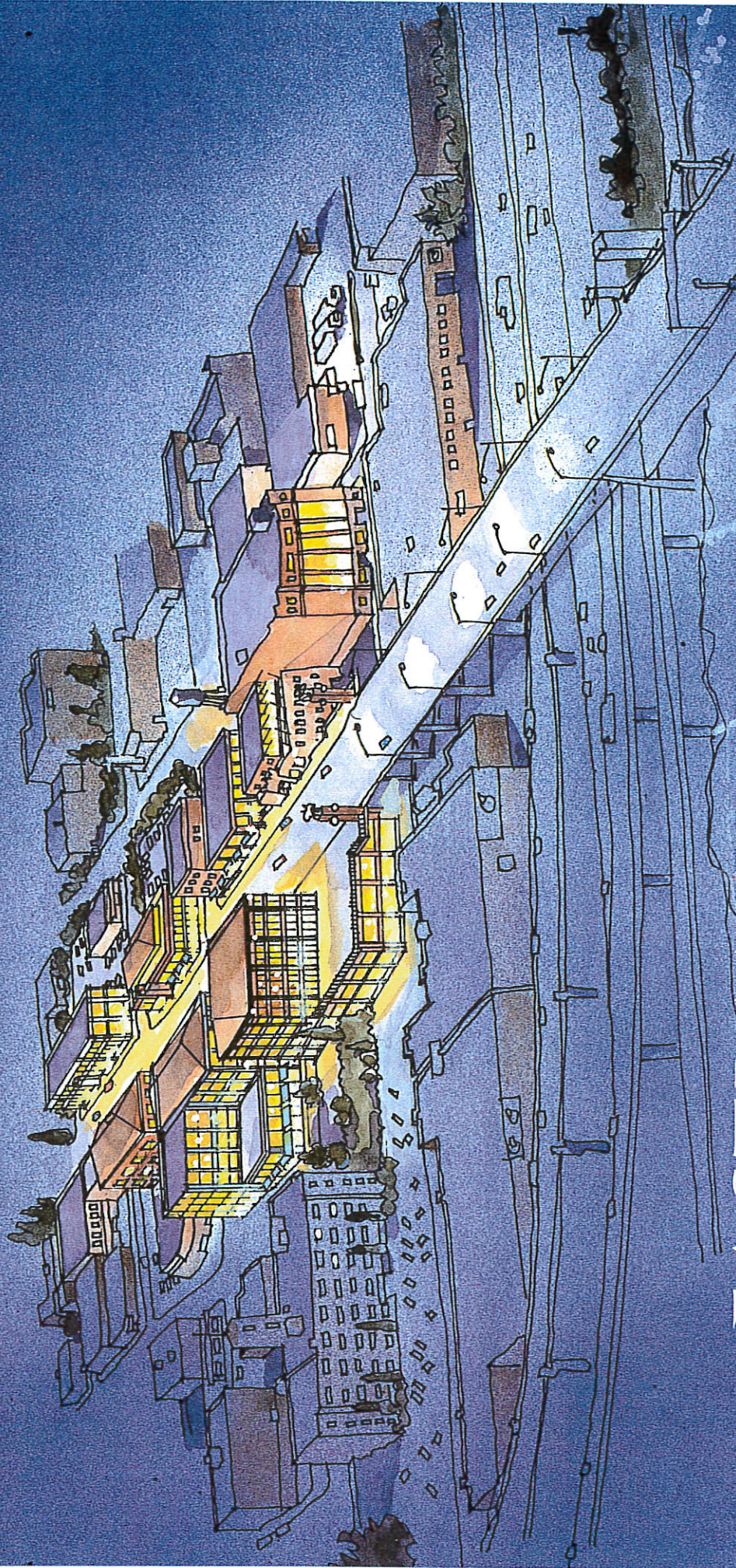
This 595-unit building in San Francisco appears smaller through massing and design. The corner is accentuated, the ceiling heights of the grocery store are raised, and the change of colors and fenestration reduce the apparent building mass. The portion of the building on the right side of the photo employs a step-back, revealing a landscaped terrace. A mid-block pedestrian connection (far right in the photo) allows pedestrian circulation between public streets on this otherwise large block.

UNDESIRABLE



All of the office buildings on Emeryville's peninsula have a blocky appearance, inhibit sunlight and the views from street level and other buildings.

General Plan Guiding Principle #10. An imageable and memorable city. The City will foster high-quality new construction of exceptional design while preserving and enhancing the best of existing buildings and neighborhoods. The City will foster a dramatic skyline of slender and elegant high rise buildings stepping down to low-rise buildings in the older residential neighborhoods. Enhance the experience of entering Emeryville with attractive and appropriate streetscape improvements along major regional and city arterials. Collectively, these elements serve to foster Emeryville's character as a vibrant, connected, livable community, and a rising signature city from afar and within.



EASTBANK AT BURNSIDE

LOWER EAST BURNSIDE REDEVELOPMENT PLAN

EASTBANK AT BURNSIDE

PORTLAND DEVELOPMENT COMMISSION

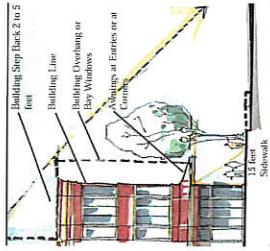
LOWER EAST BURNSIDE REDEVELOPMENT PLAN

February 10, 1999

Adopted by the Portland Development Commission, February 17, 1999
Resolution No. 5228

Adopted by City Council, April 8, 1999
Resolution No. 35784

GUIDELINES



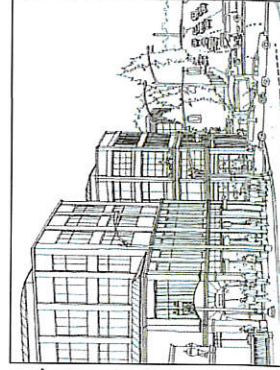
Proposed design guidelines.

Special design guidelines for the Central Eastside District are part of the *Central City Plan* and *The Central City's Fundamental Design Guidelines*. This Plan and Vision are consistent with the adopted *Special Design Guidelines* for the Design Zone of the *Central Eastside District* of the *Central City Plan* with two exceptions.

The *Eastbank at Burnside Redevelopment Plan* would change the emphasis of "A5-1 REINFORCE THE EFFECT OF ARCADED BUILDINGS FRONTING ON EAST BURNSIDE STREET." The Vision and supportive building design guidelines ask that a continuous building line along both sides of Burnside be created. Ground-level floor to ceiling heights shall be 15 feet minimum.

Because of restricted on-street parking on Burnside and lack of public parking along the corridor, Special Design Guidelines "B3-1 REDUCE WIDTH OF PEDESTRIAN CROSSINGS", should be applied on a case-by-case basis.

The top priority for the Eastbank at Burnside Redevelopment Plan is to attract commercial and employment uses to new developments and rehabilitated existing buildings. An ideal first phase redevelopment project would have a corporate signature building on Block 76 with other complementary adjacent developments on blocks 67 and 106. The redevelopment strategy also includes rehabilitation and expansion of blocks 66 and 67. Support uses include ground floor retail and market rate housing.



The concept sketch of development on Block 76, shown in the foreground, illustrates the effect of new development on Burnside and Martin Luther King, Jr. Boulevard. New development and rehabilitation on adjacent blocks will add to the vitality and help change the character of the area.

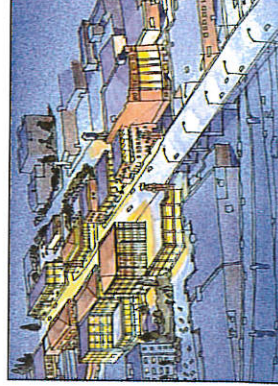
Building step-backs set the main shaft of multi story buildings back from the building line above the second or third floor. By stepping the building, the building scale is preserved which maintains the human scale of the street. It also allows sunlight at the ground level and reduces the "canyon" effect.

Bay windows and overhangs are encouraged to extend over the sidewalk area up to 5 feet. New developments are required to provide a 15 foot wide sidewalk measured from the face of curb. Bay windows and overhangs above the ground floor level allow greater developable gross square footage and provide weather protection.

Awnings are encouraged at building entries and corners. Continuous awnings are not required; however, weather protection should be integrated into the building architecture.

Building facade lighting is encouraged and should highlight or accent architectural features such as pilasters, columns, cornices and entry porticos. Window display lighting enlivens the street level and pedestrian environment. Specialty display lighting is encouraged at all storefront locations.

It is desired that building materials should include steel, glass and brick. Brick should be used as an element of continuity, reflecting the history of Burnside while allowing flexibility for design creativity.



Concept sketch showing the west gateway at night.



Building lighting in storefronts and on facades helps enliven the night and implies that people are present.



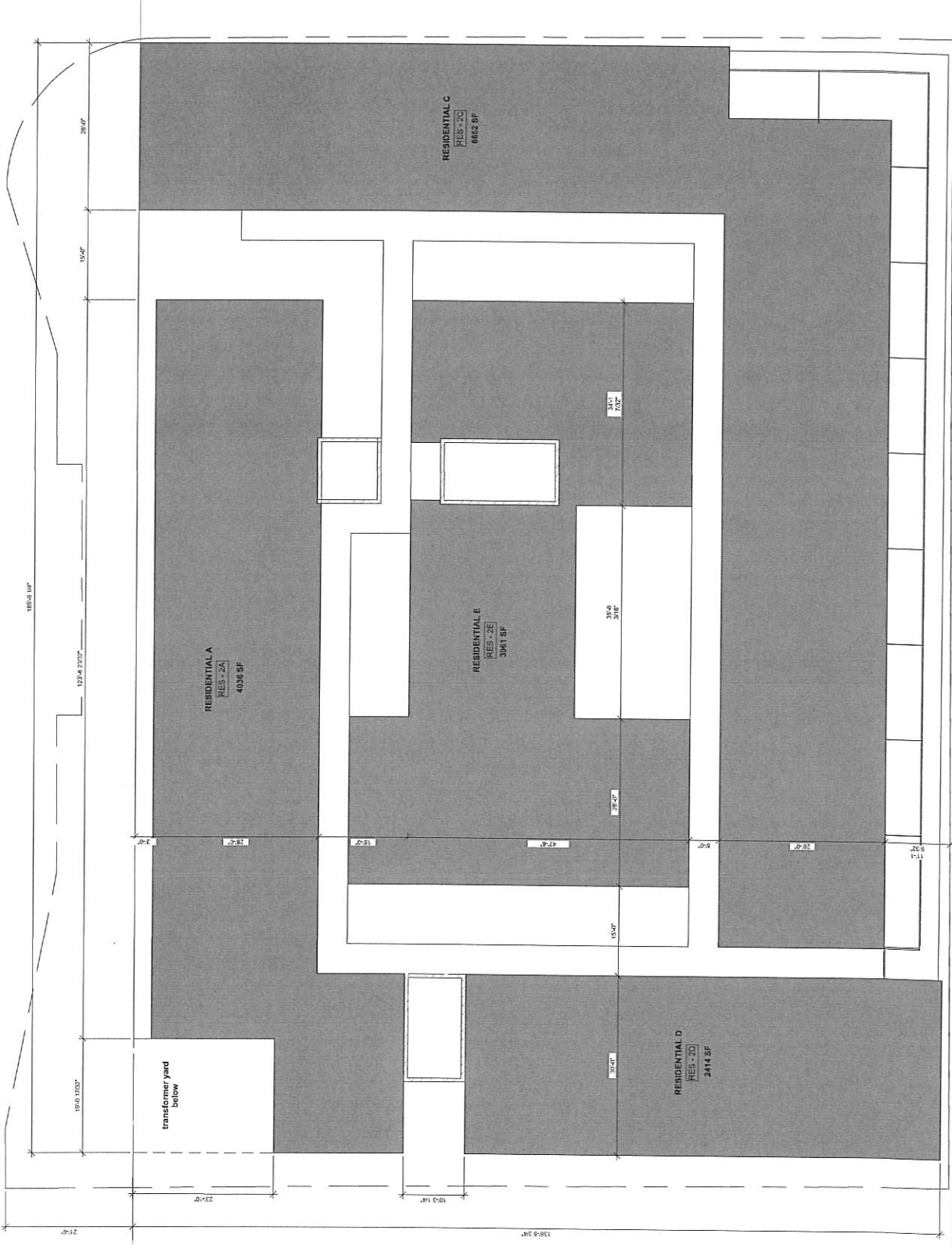
West gateway concept sketch.

Exhibit 5 - Alternate Design

SETBACK OPTION

3' SETBACK VARIANT
 TOTAL AREA TYPICAL RES = 17,082 sqft
 12' 75% SETBACK ABOVE 2ND RESULTS IN A BULK MASSING REDUCTION OF 35,008 FEET CUBED

SETBACK PROPOSED BELOW RESULTS IN A BULK MASSING REDUCTION OF 24,885 FEET CUBED
 12' setback, 139' 3" long required by zoning



TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

Core Spaces Developer • Antunovich Associates Architecture, Planning, Interior Design

SETBACK OPTION 2 TYPICAL RESIDENTIAL PLAN

Tucson, Arizona | June 7, 2017



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SETBACK OPTION 2 - CONCEPT RENDERINGS

Tucson, Arizona | June 7, 2017



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SETBACK OPTION 2 - CONCEPT RENDERINGS

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SETBACK OPTION 2 - CONCEPT RENDERINGS

Tucson, Arizona | June 7, 2017



TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

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SETBACK OPTION 2 - CONCEPT RENDERINGS

Tucson, Arizona

June 7, 2017

Core Spaces													June 7, 2017			(Setback Option 2)		
PROJECT AREA ANALYSIS - 4-STORY 50 FT. - With Residential over Parking																		
LEVEL	FLOOR HEIGHT	OVERALL HEIGHT	RESIDENTIAL - APARTMENT					BUILDING COMMON		RETAIL		PARKING/LOADING		Total GSF/ FAR W/O PATIO	Total GSF	FAR area		
			COMMON	RSF	Open Circulation Paths	Amenity Terrace	Beds	UNITS	B.O.H.	RETAIL RSF	RETAIL COMMON LOADING	AREA	SPACES					
Elevator parapet	12'-0"	65'-9"																
MPH	5'-0"	53'-9"	500			3,400								3,900	3,900	-		
4	10'-9"	48'-9"	610	17,062	2,580		66	22						17,672	20,252	17,672		
3	10'-9"	38'-0"	610	17,062	2,580		66	22						17,672	20,252	17,672		
2	10'-9"	27'-3"	610	17,062	2,580		66	22						17,672	20,252	17,672		
1	16'-6"	16'-6"	4,700	3,665			15	3			4,402	1,296		23,427	23,427	12,767		
LL1			500	3,665										13,665	13,665	4,165		
BUILDING TOTAL			7,530	58,516	7,740	3,400	213	69	-	4,402	1,296	20,160	44	94,003	101,748	69,948		

Site Area:	25,274	sf
Area per Unit	848	nsf (+/-)
Total Units:	69	units
Typ. Floor Efficiency:	92%	
Pkg. Space to Unit %:	57%	

TUCSON III - RETAIL AND RESIDENTIAL DEVELOPMENT

Core Spaces Developer · Antunovich Associates Architecture, Planning, Interior Design