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August 29, 2022

To: Historic Landmarks Commission

Re: 932 De La Vina (HLC August 31, 2022 Agenda, Item #5)

Chair Grumbine and Commissioners,

Allied Neighborhoods Association appreciates the opportunity to provide comment on the project. Our comments are based on architectural plans and agenda information provided online over the past weekend.

1) 36-unit project?

Some important information appears to be missing from the plan set and/or agenda information. First page of the plan set says the site is .35 acre, and Priority Overlay (37-63 DU/acre). The math comes out to 22 housing units for the site. How is it that the proposed project has 36 housing units? Lot area modification? State and/or local bonus density?

Three weeks ago at ABR, a pre-app consultation lacked streetscape photos and ABR made comment to that effect. Last week at ABR, a pre-app consultation for a very large project had no photos at all; at the meeting the applicant presented plans with photos and a PowerPoint and additional information not on the plans provided online in advance of the meeting. The point is - this kind of information (including how this project before HLC now is proposed to be 36 units) needs to be available to everyone at the time the agenda is posted online and the plans are available - and not have substitute plans at a meeting and/or providing missing information at the meeting.

HLC, neighbors, and the public need adequate information in advance. Design review staff needs to do a better job of making sure critical information is included before agenizing a project. (this was also conveyed to staff by ABR three weeks ago)

2) No mention on the plans (or project description in the agenda) of the required 15% inclusionary units for an ownership housing project. These required inclusionary units would need to be included within the 22 units.

3) USS? The setback section of the plans mentions Medium-High Density designation within the USS (Upper State Street). This project site is not in the USS.

4) Plan set is lacking in context photo information. For example, no photo of the two-story residential annex building on the Hotel de Riveria property (mentioned in the Historic Significance Report), showing the relationship to the proposed project.

When a proposed mixed-use project is adjacent to residential uses, particular attention needs to be paid. Particular attention also needs to be paid when a proposed project is adjacent to a designated historic resource.

5) The proposed project is very large.

A pre-application consultation is the opportunity for HLC to comment on the overall project and how it fits on the site and with adjacent properties. Now is the time to express your opinion if you think the project is too big for the location. And thinking ahead, about how you would be able to make Project Compatibility Findings later in the process:

- Consistency with design guidelines
- Appropriate size, mass, bulk, height, and scale
- Compatibility
- Appropriately sensitive to adjacent designated City historic resources
- Appropriate amount of open space and landscaping
- Public views of the mountains

6) 2nd Floor Plan (Office Alternative). We recommend “no” on this option as we need housing, not more office space.

7) Pre-App Consultation

Relatively new State housing law talks about not reducing density; this applies to projects which have submitted a completed application (called Preliminary Application by the State). As this consultation is prior to submittal of this application, this State housing law does not apply to the project at this early state.

8) Five meeting limit. As this consultation is prior to formal application, the consultation is not counted as one of these meetings.

Thank you for your consideration of our comments.

We’d also like to thank you for your service to the community.

Sincerely,
Allied Neighborhood Association

Cc: Ellen Kokinda, Renee Brooke, Elias Isaacson