

CAPITOL

NEIGHBORHOODS, INC.
MADISON, WISCONSIN

July 27, 2018

Heather Stouder
Planning Unit
City of Madison

Re: 122 State St. Hotel Proposal

Dear Ms. Stouder,

Capitol Neighborhoods has assembled a steering committee of interested residents to meet with the development team for the proposed hotel at 122 State St. We have met with the development team several times to discuss the proposal, provide feedback and consider their request for a change in the current zoning to a Planned Development.

There is consensus among the steering committee and neighborhood residents that a hotel of the type proposed on this site could be a positive addition to upper State St. and the downtown overall. There is a strong divide however both within the steering committee and neighborhood residents regarding whether this particular proposal is appropriate for the site in the 100 block of State St.

There are some who feel the proposal will bring new and exciting opportunities to upper State St. and that the proposed height complements the existing downtown skyline. There are others who feel that despite the positive attributes of the hotel the proposal does not meet the standards for approval of a Planned Development or Height in Excess of the Downtown Height Map.

To reflect this divergence of views within the neighborhood those views are presented here in two sections attached to this letter;

Attachment 1 The Case for Support of this Hotel Proposal

Attachment 2 The Case to Reject this Hotel Proposal because the Standards for Approval are not met

We encourage Alders, Commissioners and Staff to examine all of the information presented here during the City's review process.

Thank you for your consideration,

Capitol Neighborhood Steering Committee

Peter Ostlind –Chair

Maria Milsted

Dan Milsted

Samantha Negrin

Fred Mohs

Tim Kamps

Tim Harrington

John Palmer

Franny Ingebritson

Peggy LeMahieu

Mike Herring

Robert Lewin

Lucy Mulder

Attachment 1

The Case for Support of This Hotel Proposal

Conclusions: A group of members of this neighborhood steering committee recommends approval of the Ascendant Holdings Proposal as submitted. Further, we support their June 20 letter requesting a Planned Development Zoning Map and Height Map Amendment, as this variance will create a unique rooftop venue on the property, provide for sufficient rooms, and be more esthetically pleasing within the surrounding skyline.

Our position is based on our shared vision for an Upper State Street high density, walkable urban residential and arts neighborhood, and the multiple positive impacts provided by this hotel at this site for residents, businesses, visitors, and for the City more broadly. (See following Section) This project will also help to address the multiple problems that plague the 100 Block bordered by State, Dayton, and Carroll Streets.

We have listened respectfully to multiple objections for much of a year from those who oppose this development, but we disagree with them that this request does not meet “the standards”, as they assert in their “Considerations for Review of Approval Standards”. In fact, we understand that granting of a zoning variance for the height of this Planned Development would be consistent with the discretion included in the Downtown Plan for exceptional circumstances. We recognize that the City Commissions and Council are responsible for making this determination at the end of the day, and we urge that this be done in favor of the Project.

Finally, we have appreciated the support of the developer and architects for the steering committee process, and the positive changes to the proposal made in response to input from others and us. Finding a developer willing to spend \$40 million, or more, on what will likely begin a transformative of Upper State Street and replace several low-quality buildings is, in our opinion, an opportunity that we cannot afford to miss.

Positive Impacts of the Proposed 100 Block Hotel Project:

* **Architectural Enhancements:** The current design for the "122 State Street Project", shared with the Steering Committee at our June 14 meeting, is well-thought-out and attractive. In fact, its visual and vertical articulations actually complement the existing downtown skyline adjacent to the Dayton – Carroll Street intersection, as well as the established building height along its State Street aspect. (See Figure.)

That skyline, as seen from all directions approaching the Capitol Square (SQUARE), includes buildings, currently in place or proposed for redevelopment, located within or adjacent to the inner-ring roadway system, running parallel to the SQUARE (Dayton, Fairchild, Doty and Webster). Combined with the SQUARE itself, buildings located within this "inner-ring" form the center for high-density, urban core development. A similar Planned Development height zoning

variance has already been granted at the South Hamilton corner. Upper State Street has trailed other sides of the Square in this respect. More specifically, the Dayton – Carroll intersection would become a highly activated pedestrian “Hotel Corners” with successful mutually supportive hotels on three of the four corners.

Because this building, as proposed, so well complements the existing downtown skyline, we have NO PROBLEMS/CONCERNS regarding its height. This proposed hotel is positioned to be a shining beacon of culture and urbane energy on Upper State, so let it be higher than usual; it’s exactly the type of development that Madison should be emphasizing.

In contrast, the current buildings at the proposed hotel location are an eyesore, offering no appeal as people walk on upper State St. This is true of the Dayton, Carroll, and State Street facades. The proposed hotel would resolve these problems.

By acquiring additional property to expand the footprint of this proposed hotel, the developers have greatly enhanced/improved the overall appearance of all sides of the 100 State block, and the design changes that have been made will complement existing properties.

*** Positive Financial Impacts:** This proposed development is NOT SPECULATIVE; rather, it has a named tenant: Provenance Hotels (PROVENANCE), with a proven track record of successfully operating quality hotels that complement the amenities already in place in the cities they select. Several of us have actually stayed in Provenance Hotels in other cities, and we know from first-hand experience, that their business model includes encouraging their guests to explore the cities where they are located and to support local businesses. The adjacent retail businesses strongly support this project.

This developer has not requested TIF money for the project. For us, this represents their confidence that this hotel will succeed as designed on its own merits.

This project will employ a healthy mix of new white and blue-collar employees, as well as helping to reverse the business closings and job losses currently afflicting Upper State Street. The development itself and its positive impacts on surrounding businesses would generate additional tax revenues.

***Esthetics:** PROVENANCE hotels have a track record of creating a positive atmosphere within and around their hotels, especially by creating artistic programming and other activities that coordinate with the near-by environments. They enjoy 4-5 stars for Google reviews and empower their employees to bring their own creative energy to work. The hotelier and developer have a vision for an arts district hotel at this location, based on their experiences in multiple other cities that Madison wishes to emulate.

The fact that PROVENANCE would be aware of and want to do business in downtown Madison speaks volumes for how our city is currently viewed along with Madison’s potential for additional quality growth. We should do everything we can to encourage that perception!

Among the many opportunities associated with PROVENANCE is the potential social impact of integrating a company that empowers its workforce creatively into the Madison collective consciousness and, moreover, the positive impact on the surrounding businesses and residents.

* **Madison has a need for more hotels:** Madison finds itself in the enviable position of experiencing high demand for hotel rooms within its downtown core. This has been confirmed, not only by this project, but the proposed Drury Hotel project, as well. Adding rooms certainly bodes well for the Monona Terrace Convention Center, in terms of attracting additional meetings/conventions, and will allow tourism to continue to grow, as well as affording those doing business within the downtown core to stay in close proximity thereto. Moreover, the concentration of rooms at the Concourse, Drury Madison College, and Provenance hotels at the Carroll-Dayton intersection will create an additional convention/business venue on the Isthmus. Those coming to Madison for business are increasingly seeking an urbane boutique hotel at the epicenter of downtown, and then staying for additional nights to enjoy our unique community. All of this means revenue growth for our city, as well.

* **Advantages for neighborhood residents:** This hotel will provide multiple advantages for Upper State Street residents, including attractive public spaces and another downtown location where our family/friends can stay. It will provide another quality restaurant location and an extraordinary roof-top view of Lake Mendota and our beautiful Capitol, which will remind all of us how lucky we are to live in Madison. Additionally, hotel restaurants offer downtown residents a relaxed, almost remote workplace environment. PROVENANCE hotels' ground floors are planned as vibrant public spaces rather than typical hotel lobbies. These amenities hold special appeal for younger downtown residents, as well as retirees who are seeking a vibrant walkable urban lifestyle.

A hotel's operating hours are 24/7 with staff present at the well-lighted entrances. The greater foot traffic this will create on surrounding streets will contribute to a safer environment for residents and visitors that is lacking at present.

PROVENANCE proposes valet parking; we strongly support this proposal. Those objecting to this plan have failed to consider that PROVENANCE has a track record of successful valet parking in other cities, and is highly invested in making this successful at this site. This plan is aligned with our vision of a walkable urban neighborhood on Upper State Street. It will serve the needs of hotel guests, as they come and go, throughout the day, especially if they are unfamiliar with downtown streets. Indications are that guests at this boutique hotel may not be driving and those guests are, by their very nature, rideshare-app-friendly. The relatively small number of projected autos involved will not have an appreciable negative impact on other downtown drivers, in our opinion.

***Enhancing Madison's Image:** The Visitors and Convention Bureau has emphasized that those who visit a location and enjoy their stay will return and might even decide to move there. PROVENANCE understands this, as evidenced by the way each of their locations encourages its guests to venture out and explore the surrounding city, because the city is what will bring guests back.

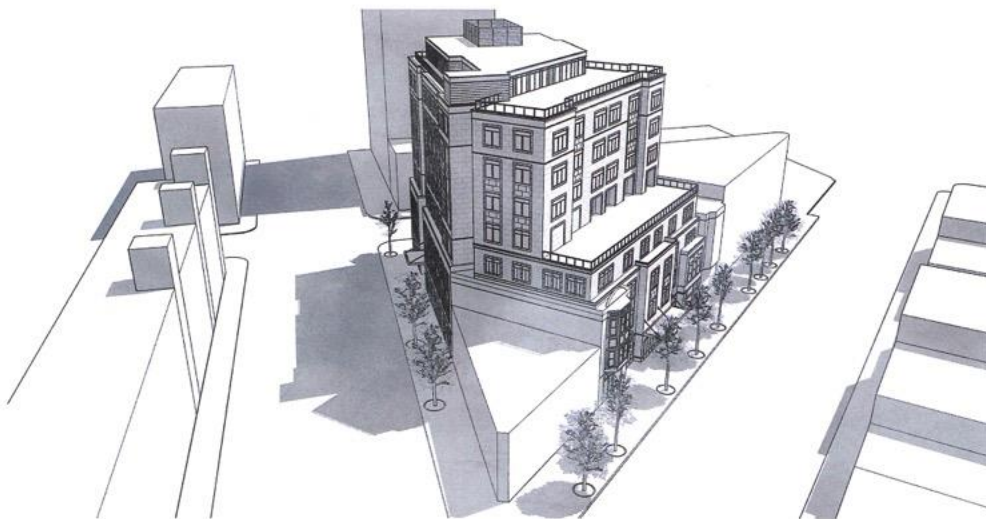
The current condition of Upper State, however, is reflective of “unrealized opportunities” to improve it. These feelings were shared in the July DMI presentation by Deb Archer, head of the Business and Convention Bureau. Ms. Archer pointed out that a vibrant downtown is critical to the success of outstanding cities. She suggested, however, that a reluctance to change and innovate has caused Madison to fall behind comparable urban areas. As a result, Madison has under-achieved relative to other comparable US cities, and only we can make it better. Recognizing this has stimulated Dane County leaders to adopt a new goal: **Greater Madison will be recognized as one of the world’s most vibrant and innovative places to live, work and visit.** This project is a precedent-setting step toward accomplishing this goal.

***Impacts on State Street beyond the 100 Block:** This proposed hotel development in this specific location, as a result of its unique nature and function, represents an opportunity for us to link the SQUARE with the rest of State Street. Estimates are that the intersection of State, Carroll, and Mifflin Streets at the SQUARE has the highest consistent pedestrian flows of any intersection in Wisconsin. Other developments being considered at this intersection will only increase this pedestrian traffic. This hotel project will give them a reason to venture down State Street, contributing to a renaissance of new tenants and complementary development. We envision a different type of businesses locating on Upper State Street to serve residents and visitors.

The 100 block of State Street is currently dull, lifeless and uninviting, and it is getting worse. Existing businesses are struggling to hold on. These dead zones are a barrier to pedestrians venturing up and down State Street. It gives visitors a negative impression of our community. We have a choice to change this.

Thank you.

Figure: Hotel Skyline Rendering provided to the Steering Committee



Attachment 2

Considerations for Review of Approval Standards

The applicant provides their argument regarding exceeding the height map and the change to a Planned Development in a June 20 letter titled *Request for Zoning Map and Height Map Amendment*. This letter makes a number of misstatements and incorrect citations.

In the opening paragraph they state that the 'Height Map allows a maximum building height of 88 feet on the project site'. Actually the Height Map allows for a maximum of 6 stories on a portion of the project site which is a different statement. Using the maximum floor to floor heights allowed in the zoning code the tallest a 6 story building can be on this site is 88'.

The Downtown Plan is very clear on this distinction that the Height Map is based on the number of stories in a building not the actual height of the building. On page 36 of the Downtown Plan the intent of the height limit is detailed:

*For purposes of this plan, the Maximum Building Heights Map is intended to reflect recommended building heights based on typical story heights (floor to floor) of 14-18 feet for the first story, and 10-14 feet for the upper stories. **This should not be construed to allow additional stories for buildings with lower floor-to-floor heights, and buildings with taller floor-to-floor heights should reduce the number of stories accordingly.** (Emphasis added)*

The letter continues by suggesting that the proposal is consistent with the Downtown Plan which is not correct. The plan does allow for flexibility through the use of the planned development process but as noted above the plan specifically states that maximum heights are based on stories and minimizing floor-to-floor heights cannot be used to game the system.

Standards for Approval of Height in Excess of the Downtown Height Map

- 1. The excess height is compatible with the existing or planned character of the surrounding area, including the scale, mass, rhythm, and setbacks of buildings and relationships to street frontages and public spaces.** (MGO 28.098(2)(h)(1) Standard 1 Downtown Plan p. 122

In their 3rd bullet the applicant states that this is the only block on State St that backs into buildings with this type of additional mass and height, creating a unique context for their proposal. As the attached illustration *State St. Parcels Abutting Existing or Potential Taller Buildings* shows there are many other parcels that back into similar sized buildings or parcels with zoning for heights of either

12 stories or with Capital View height limitations. This includes the similar triangular block directly across the street from the subject parcel.

The subject parcel is not unique. Most of the parcels on State St. abut either parcels with buildings taller than the 4 and 6 story height limits on State St. or abut parcels with zoning allowing buildings of 8 or more stories. Since the Downtown Plan and the associated zoning code was adopted in 2012 no exceptions to the height map have been approved along State St. The relatively recent development of the Hub in the 500 block conforms to the limitations in the height map. Similarly the redevelopment of the opposite side of the 100 block of State St. conforms to the height limitations.

The 4 and 6 story height limits along State St. are intended to create a cohesive character along the entirety of all six blocks. This sets out directly to set the scale, mass, setbacks and relationship to the street frontage along all of State St. To deviate from the prescribed heights is directly contradictory to this approval standard with regard to State St.

At the Capitol end of State St. the area of the 6 story height limit broadens out to incorporate the entire triangular blocks on either side. This creates a visible definition to the node at this terminus of iconic State St.

Allowing this request for an exception to the height map is not compatible with the existing or the planned character of the surrounding area and would set a terrible precedent that could be cited for the numerous other parcels along State St. that similarly back up to parcels with zoning for taller buildings.

2 The excess height allows for a demonstrated higher quality building than could be achieved without the additional stories. MGO (28.098(2)(h)(2), Standard 2 Downtown Plan p. 122

The statement is made that the additional height allows utilization of higher quality building materials. The materials shown on the plans are in fact the types of materials that are common for buildings in the downtown and similar in composition with what recent construction has incorporated.

The applicant's discussion continues by suggesting that the construction economics of hotels results in building types using less permanent materials subject to premature failure. Among the materials noted in the lower quality group are metal panels. It's interesting to note that two of the elevations of the proposed building are fully clad in metal panels. These elevations are only seen in the background in the submittal materials. In the applicant's discussion of materials that will be incorporated into the proposed building glass and masonry are repeatedly brought up but the use of metal panels is conspicuously absent.

In support of a demonstrably higher quality building the roof top views of Lake Mendota is cited. This is clearly a specious argument in that if simply having a rooftop view of the lakes were sufficient to meet this standard every proposal could exceed height limits.

The statement goes on to suggest that the rooftop view of the lake furthers the Downtown Plan goal of increasing access to the lakes. This is a disingenuous claim as the Downtown Plan section on increasing lake access is all about getting directly to the edge of the water not about having a sightline from a third of a mile away.

3. The scale massing and design of new buildings complement and positively contribute to the setting of the adjacent landmark buildings within or adjacent to the project and create a pleasing visual relationship with them. MGO (28.098(2)(h)(3), Standard 3 Downtown Plan p. 122

The Landmarks Commission has recently weighed in on this topic using a different standard finding that the proposed building is not “so large or visually intrusive as to adversely affect the historic character and integrity of the adjacent landmark”. We respectfully disagree with the Landmarks Commission regarding the scale of the building along N. Carroll St. and feel that the proposal is over- bearing and out of context.

Along Carroll St. the additional height and mass dominates this side of the block and does not provide a respectful relationship to the landmark building at the Capitol end of the block. Further the virtually windowless and monolithic side of the building facing the landmark building does not create a pleasing backdrop to the more architecturally detailed adjacent building.

4. “...there are no negative impacts on viewshed and other views and vistas identified in the Downtown Plan as demonstrated by viewshed studies prepared by the applicant. MGO (28.098(2)(h)(4), Standard 4 Downtown Plan p. 122

The applicant’s series of long distance photos are unconvincing as a viewshed study. Views along this street are not only seen from either end of the street. The view up or down State St. from many points along the street are framed by the buildings along the street. The height limits along these blocks create an openness to sight lines towards the Capitol and the University that that contribute to the ambiance of the area.

The Downtown Plan recognizes the importance of both long and short views:

Key views, from both near and far, are important contributors to the character of Downtown and once they are diminished or destroyed it is unlikely that they will ever be reclaimed. (p. 32)

The applicant has requested an additional 3 stories, an increase of 50% over and above the height limit. The additional bulk of the proposed building closes off the viewshed at the Capitol end of the street. This is well illustrated by the State Street East-Facing Perspective in the submittal package.

Standards for Approval of a Planned Development District

The zoning ordinance for a Planned Development District states:

Because substantial flexibility is permitted in the base zoning districts, the PD option should rarely be used. It is intended that applicants use the PD option only for situations where none of the base zoning districts address the type of development or site planning proposed. Examples include redevelopment, large scale master planned developments, projects that create exceptional employment or economic development opportunities or development that include a variety of residential, commercial, and employment uses in a functionally integrated mixed use setting. MGO 28.098(1)

Planned Development Districts are intended to provide a framework to facilitate the unique development of land in an integrated and innovated fashion. In addition Planned Development Districts are intended to achieve one or more of 6 objectives listed in sub paragraphs a-f under the Statement of Purpose. The applicant suggests that the proposal meets only one of these objectives.

f. Facilitation of high-quality development that is consistent with the goals, objectives, policies and recommendations of the Comprehensive Plan and adopted neighborhood, corridor or special area plans. MGO (28.098(1)(f)

The assertion that the proposed height is consistent with the policy goals of the Downtown Plan is made and reference is made to Recommendation 49, though none of the excerpts quoted are from that recommendation. The applicant quotes the Downtown Plan noting that height limits are not intended to promote the status quo or unreasonably restrict redevelopment. That paragraph of the downtown plan goes on to state:

The proposed height limits are significantly higher than most existing development in most parts of the Downtown, and in fact, almost all of the development that occurred in Downtown over the past twenty years would be allowed under the proposed Maximum Building Height Map. Page 36

The plan objective to provide for a flexible framework to allow for exceptions is noted by the applicant though the plan clearly envisions that any such exceptions would be rare.

Recommendation 21 is cited in support of replacing an out of context building. This recommendation actually speaks to replacing a building with one of the same height not with a taller building:

Allow existing buildings that are taller than the proposed height limits to be redeveloped at the same height provided that the new building is of superior architectural design. Page 23

The Downtown Plan notes that “The vibrancy and intimacy of State St is largely attributable to the rhythm of its buildings, with their typically narrow, small first floor commercial spaces that accommodate a wide variety of small businesses; and it is essential that both the scale and rhythm of the buildings and uses be retained.”(Pages 43-44) Recommendation 71 further emphasizes this:

Provide retail spaces suitable for the wide variety of unique, relatively small businesses and business start-ups that are an essential element of the district’s character.

The Downtown Plan does acknowledge that some larger scale redevelopment might occur but notes a specific concern:

The critical consideration is not to break up either the “look” or the vibrant activity along the street by introducing large uses or large buildings that dominate a block.

The proposal is immediately at odds with the Downtown Plan in the request for additional height which negatively impacts the openness and consistent character intended for the six blocks of State St. as discussed above. Further the proposal removes several small scale retail spaces. The proposal fills half of the north side of the 100 block with a single large use which will dominate that block.

The applicant includes a section to justify a Planned Development titled - *3. The Unique Conditions of this Site Support a Planned Development District*. None of the approval standards for a Planned Development talk about unique site conditions.

The applicant suggests that there are conditions unique to this site that support a request for additional height. Among the conditions cited is that the parcel is a thru lot on State St. and has frontage on three streets. There are numerous thru lots on State St. with multiple frontages. Having frontages on three streets would seem to offer a site greater flexibility in design to achieve a proposal’s goals without the need for additional height. No argument is made that multiple street frontages somehow restrict opportunities on this site.

The irregular shape of the parcel is cited as challenging in achieving the ‘required minimum program’. Irregular lots are the norm along State St. The applicant has assembled this site from multiple parcels and brought their program to a site of their choosing. If an irregular lot were sufficient cause to exceed height limits along State St. there would be few parcels that would not qualify.

Standards for approval of a Zoning Map Amendment in a Planned Development District MGO (28.098(2))

- a. **“The applicant shall demonstrate that no other base zoning district can be used to achieve a substantially similar pattern of development. Planned Developments shall not be allowed simply for the purpose of increasing overall density ... “ MGO(28.098(2))(a)**

The site for this proposal is in the Downtown Core zoning district. This is the most intensive of all the zoning districts in the downtown. The proposal does not require relief from any of the standards of the Downtown Core district. The relief sought is from the Maximum Building Height Map.

The main assertion put forward by the applicant is that the additional height is required to allow for some minimum number of rooms which they believe are required to operate the type of hotel they have chosen to operate. The request for a Planned Development stems from the economics of their desired use and simply for the purpose of increasing the overall density to a level that suits their financial desires.

- b. **The PD District plan shall facilitate the development or redevelopment goals of the Comprehensive Plan and of adopted neighborhood, corridor or special area plans. MGO(28.098(2))(b)**

This standard is fully discussed above.

- c. **The PD District plan shall not adversely affect the economic health of the City or the area of the City where the development is proposed. MGO(28.098(2))(c)**

As the applicant notes the proposal will be served by existing municipal infrastructure and would result in an increase in the tax base.

- d. **The PD District plan shall not create traffic or parking demands disproportionate to the facilities and improvements designed to meet those demands. MGO(28.098(2))(d)**

The letter suggests that “arrivals and departures can be accommodated without using traffic lanes on either Carroll St. or Dayton St.” In fact the traffic study prepared by the applicant shows two options for the proposed valet parking program requiring a minimum of 7-8 parking stalls and each option shows a double parking configuration on Carroll St. Such a use of a traffic lane is specifically prohibited under State statute.

In considering the proposed valet parking program in their traffic study Strand Associates monitored the valet parking at the AC Hotel on Webster St. Both the AC Hotel and this proposal would have 100 percent valet parking for arriving guests and customers. While the two hotels are noted to be similar the study somehow predicts that the new proposal will require less parking as a percentage of total rooms than what the AC Hotel is currently experiencing.

The study monitored the amount of time that cars were parked in the queue finding the average to be 2 minutes 18 seconds. The study makes no mention of the fact that the AC hotel has 79 onsite parking stalls for use in their valet program. This is enough to cover most if not all of their stated average overnight parking of 75-100 vehicles. The proposed hotel will have no onsite parking. In fact the location for this parking remains unknown and will likely be some distance from the hotel.

From this analysis of the AC hotel the study proposes two options which indicate that a capacity to temporarily park 7-8 vehicles is required. (pgs. 8 & 9) Both options require a double parking layout to accommodate the anticipated demand.

The traffic study concludes that there are “manageable vehicle storage needs for the valet service”. (p. 11) Yet the only options to provide the 7-8 vehicle spaces the study indicates will be required is an illegal double parking layout.

Plan Sheet C302 illustrates the typical maneuvering path for a 30’ truck entering the cul-de-sac on N. Carroll St. to use the loading dock of the proposed hotel. This drawing shows that a truck of this size requires virtually the entire roadway between Dayton St. and the loading dock for ingress and egress at the loading dock. Any vehicles parked for loading or unloading would appear to preclude truck movement.

The applicant notes that larger delivery vehicles and trucks used for trash removal will need to park in the street. This will add to the already heavy use of the cul-du-sac.

The proposal requests that the 8 public parking stalls currently along the west side of Carroll St. be removed to facilitate the loading zone which will in essence be used to support one private entity.

- e. The PD District plan shall coordinate architectural styles and building forms to achieve greater compatibility with the surrounding land uses and create an environment of**

sustained aesthetic desirability compatible with the existing or intended character of the area and the statement of purpose of the PD District. MGO(28.098(2)(e))

The applicant states that the “proposal will replace the existing non-conforming building” which is true. However, the proposal replaces the existing non-conforming building with a larger non-conforming building.

The applicant’s submittal includes an image titled Downtown Building Height Diagram. The image shows buildings within a block or two of the proposed hotel noting the height of the tallest buildings compared to the proposed hotel. Each of the existing buildings in this image conforms to the current zoning for height at its location.

f. The PD District plan shall include open space suitable to the type and character of development proposed. MGO(28.098(2)(f))

Open space is provided at the roof top terraces for hotel guests and customers.

Building Elevations

There appear to be some inconsistencies in the drawings provided in the submittal package.

The State Street East-Facing Perspective and the Dayton St. Perspective both show what appear to be windows at the 3rd and 4th floors of the narrow elevation which overlooks the two story building at the State / Dayton corner. Plan sheets for these floors, A-2.2 & A-2.3, do not show windows in these locations. The elevation plan sheets do not identify the cladding materials at this location.

On these same perspective drawings the cladding for the 5th - 8th floors may appear to be windows in a shadow but apparently are metal panels in a pattern to match the glass. The elevation plan sheet for State St., one of several different elevations labeled A-9.0, has tags for both metal panels and glass pointing to this type of cladding.

Likewise on the Carroll Street Perspective what might appear to be windows are apparently metal panels. The floor plans show a pair of recessed decks along this side of the building at floors 2 – 8 (A-2.2 to A-2.5) which are not shown on the perspective.

The submittal narrative references the high quality materials being proposed: “limestone masonry and a distinctive glass façade”. The metal panels which dominate two quite visible facades of the building are not mentioned or described. In the applicant’s case for how this proposal meets the demonstrated higher quality building standard for additional height metal panels are among the lower cost less permanent materials that the additional height supposedly allows the proposal to avoid.

Conclusion:

Based on this analysis of the standards for approval of height in excess of that allowed by the Downtown Height Map and the standards for approval of a Planned Development District we do not believe that the proposal has met the criteria for approval.