

From: Sally Stang
To: Ramona Williams
Date: 04/13/2015 12:07 PM
Subject: Fwd: Re: Examples of Adverse Effect on Adjacent Historic Districts.

Sally Stang, Director
Housing & Community
Development Department
City of Tucson

310 North Commerce Park Loop
Santa Rita Building
520.791.4171 office
520.837.5395 direct

>>> Jonathan Mabry 4/13/2015 11:45 AM >>>
Mr. Clinco,

The finding of adverse effects for the Downtown Motor Apts. project explicitly acknowledged that it is possible for a project to have an adverse effect on an adjacent historic district if the project adversely affects one of the qualities that make the district eligible for listing in the National Register of Historic Places. However, in evaluating whether this project will adversely affect views from the Barrio Libre Historic District, it was found that the view of the Armory Park Historic District is not identified in the district National Register Form as a quality contributing to the National Register eligibility of the district, therefore this proposed project will not adversely affect any of the qualities that make the Barrio Libre Historic District eligible for listing in the National Register.

Thank you for doing research and sharing an example to support your different analysis, but the documents you cite do not identify any adverse effect on adjacent historic districts or other historic properties within the undertaking's Area of Potential Effect. Only the historic bridge being replaced is adversely affected.

From the Effects Evaluation, pages 57-58:

"...The preferred alternative will result in an adverse effect to the 14th Street Viaduct. The historic bridge will be replaced."

"...The proposed project will have no adverse effect on the Central Hoboken Historic District."

"...The proposed project will have no adverse effect on the Old Hillside Road Trolley Horseshoe Curve."

From the MOA, page 1:

"WHEREAS, the FHWA has determined in consultation with the NJSHPO and others that the construction of this project, as proposed, will have an adverse effect on the 14th Street Viaduct because it will result in the replacement of the historic structure, and that the project will not have an adverse effect on the Central Hoboken Historic District or the Old Hillside Road Trolley Horseshoe Curve; and..."

Regards,

Jonathan Mabry, Ph.D.
Historic Preservation Officer
City of Tucson
(520) 837-6968

Visit our updated website at <http://cms3.tucsonaz.gov/preservation>

>>> Demion Clinco <demion.clinco@preservetucson.org> 4/13/2015 10:22 AM >>>

Good morning Ms. Stang and Mr Mabry,

I spent some additional time this weekend on the phone and looking into examples of Findings of Adverse Effect of undertaking to Adjacent Historic Districts. I am still very concerned that the City of Tucson presented a finding of no Adverse Effect on Barrio Libre. As I stated in the Tucson Historic Preservation Foundation letter of March 31 and April 8, 2015 letters: the Tucson Historic Preservation Foundation is deeply concerned that Barrio Libre was excluded from the finding of Adverse Effect despite the fact the undertaking diminishes the qualities which make the district eligible for listing in the National Register.

This concern is amplified because we believe this district is eligible as a National Historic Landmark under the NPS American Latino Theme Study and as one of the largest concentration of Sonoran and Transformed Sonoran Adobe architecture in the American Southwest.

Pursuant to § 800.5 (1) Assessment of adverse effects:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Here is a relevant example from New Jersey of an Adverse Effect of an undertaking on an adjacent historic district:

http://www.14thstviaductreplacement.com/CR_Identification_and_Effects_Report_inparts/3-10.pdf
and the project section 106 MOA:

<http://www.14thstviaductreplacement.com/Executed%20Memorandum%20of%20Agreement.pdf>

There are examples from around the country where there are findings of Adverse Effects on adjacent historic districts. This situation is not unique and why adequate time is needed to properly proceed through the Section 106 process. By rushing this process there has been an inability to fully assess the Adverse Effect and fully evaluate alternatives. We remain hopeful your office will continue to accept input on these issues and with the addition of the above information and precedent - again revise the finding of Adverse Effect to include Barrio Libre.

Thank you in advance,

Demion Clinco

From: Sally Stang
To: LisaMele; Gary Patch
CC: Jonathan Mabry; Martha Durkin; Nicole Ewing-Gavin; Ryan Anderson; St...
BC Ramona Williams
Date: 04/10/2015 1:05 PM
Subject: Re: Downtown Motor Hotel

Dear Lisa,

Thank you for your correspondence regarding the Downtown Motor Apartments.

The project did not receive points in the Low Income Housing Tax Credit application for proximity to health care although the El Rio Center is 1.01 miles from the property. The Food Conspiracy Coop and Empire Market are grocery stores that accept food stamps. Also, the project is .3 miles from the Streetcar station at Broadway and Stone.

The need for more affordable housing in Tucson is undeniable, a thorough analysis of this need can be found in our draft Consolidated Plan that can be found at http://www.tucsonaz.gov/files/hcd/3-25-2015_CityofTucsonandPimaCounty5-yearHUDConsolidatedPlanPublicCommentDraft.pdf. This plan reports that 71,510 Tucson households are cost burdened and pay more than 30% of their income for housing and that according to the 2014 Point in Time Count, 3,116 people are homeless of which 714 are unsheltered.

In addition, I am not aware of any subsidized housing program that does not have an extensive waiting list.

Sally Stang, Director
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>>> LisaMele <lisamele@aim.com> 4/5/2015 1:18 AM >>>
To whom it may concern,

In regards to information contained in the letters attached to the email that was sent to us, I have some questions I was hoping someone could enlighten me?

Regarding this large uninspired apartment building planning to be built to serve low income and veteran households, it is being claimed there is a long litany of amenities and supportive services all within one mile of this site.

Could someone inform me where the grocery store within a mile of this low income housing project exists? Especially a grocery store suited for someone on a (food stamp) budget?

I'm not aware of a neighborhood health care center that would accommodate the specific needs of the low income renters, within a mile. As well as the medical center for veterans? Within a mile? And the renters whom I would presume if they aren't the veterans, don't they require access to medical offices that accept their medical plan through AHCCCS? Is there a neighborhood medical center within a mile of the site that would accommodate a person on AHCCCS?

Remember this site will not accommodate enough parking for each apartment.

I also went online to see how scarce low income housing is, since that was said over and over again in the meetings. (so scarce, we need more!!). From what I could see, on the Tucson City government's

website, not only is low income housing not scarce in Tucson, there are plenty of vacancies throughout the city. With many low income homes and apartments waiting to be rented. Many vacancies. Check it out for yourselves.

And from where I live, I have multiple low income housing projects within 1/2 block of my home, and more beyond in every direction. Shortage of low income housing? I don't see it? What am I missing?? Why do the city officials keep insisting there is a shortage? That this building must be built to relieve the shortage of rentals.

I sincerely would like to know the answers to these questions.
Thank you. Lisa

On Apr 3, 2015, at 1:41 PM, Gary Patch <standuptall@gmail.com> wrote:

IMG 4369.MOV

Ms. Stang & Mr. Mabry,

I'm sending this small video clip from the opening of the Downtown Clifton last weekend.

This property, just one block south of the Downtown Motor Hotel, was refurbished, restored and has been put back into use. Similar in scale to the DMH, the neighborhoods of both Armory park and Barrio Libre are proud to see good development that honors its past and celebrates the distinct characteristics which make Tucson unique.

This is great adaptive reuse of an existing property.
Take a good look, this is what the DMH could become.

But, because of your continued position Ms. Stang - aligning yourself with the developer of the Downtown Motor Hotel property - the neighborhood residents, who were hoping for an objective and fair Section 106 review, are continually astonished by your biased mishandling of this project.

A year ago in April 2014, you, Ms. Stang, were the signatory representing the city and approved of the the demolition/development of this historic property. We were disheartened to find this information while searching through the hundreds of documents pertaining to this project. [see attachment]

Last December, when you called us into your office to find out our viewpoint, we were really enthused. We knew that even though we may not get the results we wanted with the Downtown Motor Hotel, at least we were doing our civic duty and participating in our local, democratic process. We believed in it and we care about the future of our city. You said you were objective in your goals, that

you wanted to consider all viewpoints so you could make an informed decision. The reality was that you had already committed, months ago, to a decision in writing and submitted it to the city and state.

You lied to our faces in a farcical fabrication of pretend justice. Your meeting was a sham and actions like yours are a disgrace to our democratic system.

The citizens of Tucson look to you Ms. Stang, as a city official, to provide us with quality development and preserve the unique characteristics of our town. What we have gotten instead is a gross miscarriage of power. Through the mishandling of the Section 106 process you repeatedly choose to align yourself with out of town developers who profit off the poor and care little about quality buildings and architectural history. This at the expense of doing what is balanced and fair for our city and its people.

You should recuse yourself immediately from heading this Section 106 as you cannot possibly lay claim to being fair and impartial.

That you, Mr. Mabry, as a historic preservation officer and a Section 106 representative with knowledge of the inner workings of city departments, have not brought this to the attention of city officials, only adds to the collusive and mendacious actions within both of your departments.

To add insult to injury, you claim the barrio will not be adversely effected?

Shame on both of you for selling our architectural heritage to the highest bidder, for misrepresenting yourselves as impartial civil servants, for not doing your jobs objectively and then running a deceitful 106 review.

In the future, both of your names will be connected to the destruction a historic Josias Joesler building. The residents of this area will remember you every time they see the garbitecture you championed and enabled to be built in our most historic of neighborhoods.

Is this really what you want?

Gary Patch
Darren Clark

P.S. This is also being BCC'd to the 200 neighborhood residents who asked to be included - or at least represented - in the Section 106 process. Citizens whom you chose to dismiss, ignore and silence through your actions.

<StangApprovalLetter4:2014.pdf>

From: Katalin Scherer <kscherer@neurology.arizona.edu>
To: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
Date: 04/09/2015 11:06 AM
Subject: downtown motor hotel 106 housing complex

i find it interesting that a building aimed at serving the poor, who most often walk to and from their home, is completely unapproachable on foot. the buildings bottom floor and street front seems entirely dedicated to automobile access.

i would recommend the architect visit places where people walk and incorporate appropriate human scale and pedestrian friendly access and street-building interface.

Please pardon my brevity. I'm typing with my thumbs.