



TUCSON
HISTORIC
PRESERVATION
FOUNDATION

April 15, 2015

Re: Objection to the Downtown Motor Hotel Project Finding of Adverse Effect

Dear Ms. Stang,

The Tucson Historic Preservation Foundation (THPF) pursuant to 36 CFR Part 800.5(c)(2) formally objects to the City of Tucson finding of adverse effect the Downtown Motor Hotel Project.

During the February 12, 2015 Section 106 meeting, the project developers, the city preservation office, and Arizona SHPO all asserted that the Downtown Motor Hotel undertaking had no significant adverse effect on surrounding historic districts, nor on adjacent and neighboring contributing historic properties. The Advisory Council on Historic Preservation sent a letter to the City of Tucson contradicting that finding. As result on April 8, 2015 your office issued a "Revision of Findings of Adverse Effects of HUD-funded Project at 383 South Stone Avenue, Tucson, Arizona."

THPF objects to the exclusion of Barrio Libre. We believe that the demolition of the contributing (individually eligible) property and the proposed highly intrusive incompatible undertaking directly adjacent to the Barrio Libre will have an indirect Adverse Effect on the Historic District. Our concerns are heightened because we believe Barrio Libre is eligible for designation as a National Historic Landmark under the American Latino Theme Study and as one of largest concentrations of Sonoran and Transform Sonoran Adobe architecture in the United States.

36 CFR PART 800 -- PROTECTION OF HISTORIC PROPERTIES § 800.5 Assessment of adverse effects. Provides detailed criteria for assessing adverse effect, specifically:

- (1) *Criteria of adverse effect.* 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. (i) Physical destruction of or damage to all or part of the property; (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines; (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

Per section (v) the four-story undertaking introduces a visual element that will diminish and negatively impact the integrity of the Barrio Libre. Scale is a character defining feature of the Barrio Libre District documented in the National Register Nomination:

Scale of the buildings throughout the district remains small and color is primarily an earth tone stucco, broken only by the occasional red brick of painted Queen Ann. Decoration consists of wood trim, white, or a now-faded Victorian green, There is a horizontality to the district resulting from the contiguous row houses, broken in profile only by existing voids.

The adjacent proximity of the undertaking to the Barrio Libre and its enormous non-compatible scale will dramatically adversely effect and diminish the district's "horizontal quality." The proposed intrusive undertaking overpowers the historic form, changes the scale, competes in size, scale and design with the nearby historic building and the Barrio Libre district as a whole. Furthermore the undertaking bears no relationship to the proportions and massing of the adjacent historic buildings or the Barrio Libre district. Additionally, the national register nomination cites the sense of place created by street flush front adobe facades as distinguishing quality:

Barrio Libre is readily distinguished from the neighborhoods that surround it. Within the district, especially along the portions of Meyer and Convent Avenues, row houses are contiguous, with flush facades, and are built to the front property lines. This tradition of urban site emplacement creates an enclosed and well defined street space not found in later residential neighborhoods...

The proposed undertaking will adversely effect this quality by intruding into the sightlines of the district's streetscapes and permanently eroding the sense of place. The Barrio Libre National Register Nomination identified Armory Park as a "buttress" to it's eastern edge and part of it's sense of place:

The eastern boundary is Stone Avenue, and alongside it lies Armory Park Historic District, a residential district of turn-of-the-century Anglo types. The districts complement one another and act as a buttresses, each for the other.

The proposed project diminishes this relationship and the erosion of the "buttress," is another clear adverse effect on Barrio Libre. Based on these facts, the undertaking has an

obvious indirect adverse effect to Barrio Libre Historic District. To date, despite our requests, we have not seen any formal analysis to contradict this evaluation.

Since your office provided no opportunity for meaningful consultation beyond the submission of our March 31, 2015 letter before sending your revised finding to the State Historic Preservation Office for concurrence; we respectfully ask pursuant to 36 CFR Part 800.5(c)(2) that as the agency official you request that the Advisory Council on Historic Preservation (ACHP) review the finding.

Thank you for your ongoing attention to this matter.

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