



Preserving America's Heritage

May 1, 2015

Ms. Sally Stang
Director
Housing and Community Development Department
310 North Commerce Park Loop
Tucson, AZ 85726

Ref: *Proposed Partial Demolition of the Downtown Motor Hotel
City of Tucson, Arizona*

Dear Ms. Stang:

On April 16, 2015, the City of Tucson (City) requested that the Advisory Council on Historic Preservation (ACHP) provide our advisory opinion to resolve the dispute regarding the application of the adverse effect criteria for the referenced undertaking in accordance with Section 800.5(c)(2)(i) of our regulations, "Protection of Historic Properties" (36 CFR Part 800). The Tucson Historic Preservation Foundation (THPF), a consulting party for this undertaking, has objected to the City's finding that there is no adverse effect to the Barrio Libre Historic District. The THPF believes that there is an adverse effect to the Barrio Libre Historic District due to visual intrusions caused by the partial demolition of the Downtown Motor Hotel, located adjacent to the historic district.

We have reviewed the background information and found the City's consideration of the adverse effect to be thorough. The National Register nominations for the Barrio Libre and Armory Park Historic Districts informed the evaluation of the Area of Potential Effect (APE) for this undertaking. Although the nominations are somewhat dated, they provided relevant information regarding the boundaries of the historic districts and their contributing features.

The nomination for the Barrio Libre Historic District emphasizes the district's architecture. The district is also significant for its culture and heritage within Tucson. While there is a mention of horizontality and building heights, it is not referenced as a critical character-defining feature, nor is it characterized as significant to the integrity of the historic district. Accordingly, while the project's new construction will be visible to the Barrio Libre Historic District, its overall integrity remains and its significance is not compromised. The City's finding of no adverse effect to the Barrio Libre Historic District, with which the Arizona State Historic Preservation Officer (SHPO) has concurred, is therefore reasonable.

The consultation currently underway is addressing the major issues related to the project's APE; therefore, it does not need to be expanded. However, given the consulting parties' concerns and the high level of public interest in this project, the City should consider the feasibility of supporting future preservation efforts not directly tied to this project. Given the age of the nomination forms for the Barrio

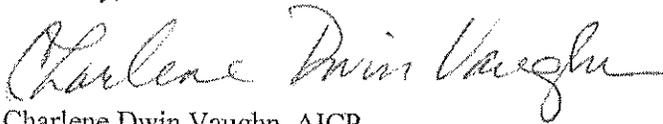
ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

Libre and Armory Park Historic Districts, a commitment by the City to update these forms would have long-term benefits for the communities. We further believe that through the local administrative review process, the concerned public will have the greatest opportunity to manage alterations to the Barrio Libre Historic District. Specifically, we believe that zoning, construction management, and public participation could address many of these issues. The Section 106 review process is not meant to manage local administrative reviews. Rather, its focus is on balancing the effects on historic properties with program goals.

In accordance with 36 CFR Part 800.5(c)(3)(ii)(B), the City will need to prepare a summary that evidences how it has considered our comments and either revise or re-affirm its original finding. That summary should be shared with the ACHP, SHPO and other consulting parties. If you have any questions regarding our comments, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at jloichinger@achp.gov.

Sincerely,



Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section