

Ms. Sally Stang, Director
Housing and Community Development
City of Tucson
310 North Commerce Park Loop
Tucson, Arizona 85726

Re. Formal Objection to the MOA for the Downtown Motor Hotel Project

Dear Ms Stang,

I am the owner of 417 and 419 South Stone Ave. in the same block as the proposed project and 2 doors south of the project.

Herein I am sending to you a **formal objection** to the **draft MOA in** regards to the proposed project that will demolish 90 percent of the Joesler Designed Downtown Motor Hotel, 383 S. Stone. I formally object to your findings of negative effect, and to your conduct of the 106 process. The current 106 Consultation Process is a breach of the public trust. The City of Tucson's conduct of the 106 Consultation process to date in both its present and prior iterations lacks integrity, honesty and transparency and does a grave disservice to the NEPA, the National Historic Preservation Act and the 106 Consultation process.

The 106 Consultation process was **never** conceived as a rubber stamp for cities, counties or developers. The City of Tucson is using the consultation process as a rubber stamp for development. You or your agency never went beyond the nonsense fed to you by the developer or city staff to independently evaluate the materials you were provided. The significance of the Downtown Motor Hotel building has never been independently evaluated. Your agency is remiss in its duties to provide a neutral evaluation and to impartially look at alternatives. The developer in the last 12 months has stonewalled all attempts at compromise and has not looked at alternatives in the context of neighborhood meetings or the consultation process. The **Draft MOA** shows a lack of integrity and codifies the developers attempt to buy off the historic communities they intend to do business with by meaningless, trivial and unsustainable tokens of the developers esteem.

The Draft MOA states 'no other historic properties will adversely affected beyond the historic Joesler designed Downtown Motor Hotel' and that "the project matches the height of an Armory Park contributing property behind the proposed project". **Remember I have property two doors away from this project. I know what the heights are. Where is the specific evidence to support this claim?**

In the case of my properties at 417 and 419 S. Stone the proposed four story building is **completely incompatible**. The proposed building is 79 times larger, 5 times taller than 417 S. Stone, and incompatible with the roof type, materials, windows, doors, site utilization, number of stories, details, proportions, size, scale, massing, character, rhythm, and streetscape. Your finding of negative effect said the proposed building was **"compatible with the surrounding historic building in size, scale, and massing"**. This indicates a gross ignorance of the surrounding properties and my building in particular. The proposed building is incompatible and damaging when **compared accurately** to the surrounding building by established fundamental criteria.

The building at 419 S. Stone, when accurately compared to the proposed building, again exposes a greater ignorance of the surrounding neighborhood and 419 in particular. The proposed building is 31 times bigger, 3 times taller, and completely incompatible in roof type, materials, windows, doors, parking, and character, number of stories, size, scale, massing, height, streetscape, proportions, and rhythm. Your findings of **"the proposed building is compatible with the surrounding historic buildings in "size, scale, and massing"** is absurd. This statement is false and misleading. The proposed building is out of scale. It completely changes the character, context, quality, fabric, and environment of my properties.

The City of Tucson-Developer driven "106 consultation process" has to date not seriously compared the proposed four story building to its historic neighbors. You, the City and AZ State staff have not provided credible information in any format to substantiate your "no adverse effect" to the downtown communities nor have you or other consulting agencies consulted in any meaningful way with the surrounding communities. The public meetings you have conducted have not provided concrete information or a presentation by the developer that was believable. No meaningful or honest dialogue has been had with the people directly affected. You have been provided reams of drawings, information from community groups, individuals, and architects in regards to this big box you are fast tracking for the developer at the expense of the surrounding community.

Where is the competent study of the effect of this proposed incompatible building on the character, fabric, context, and environment of the historic districts?

Where and at what public meeting did you or the developer show the public the proposed building in an accurate context or to explain that you think it is compatible in "size, scale, and massing" and other criteria which you seem to have ignored? In the context of the 106 Consultation process you have a good faith obligation to engage and inform the property owners and residents in good faith with accurate images and information. Neither you or the developers have done this. It is not only the letter of the law but the spirit of the codes and laws that should be adhered too.

The **Draft MOA** is unacceptable in its present state. Provide the evidence of your no adverse affect in a public forum, which has not been done to date. This is a consultation not a forum for the developer to stonewall and provide inconsequential sops to the community. For a change do your job. Do the studies, present evidence, and hold public meetings, and reach out with clear information to engage the surrounding property owners and residents. Quite trying to use the MOA to buy off the Barrio Historico and Amory Park Advisory Boards, the Neighborhood Associations for Armory Park and Barrio Viejo and the historic preservation community as a whole.

I formally object to your false and incomplete findings of negative effect, in an effort to avoid public engagement, and to what appears to be a preconceived plan to advance the building regardless of facts, codes, and the damage the proposed building causes to the surrounding historic buildings and the district itself.

I have owned and operated a minority run business for many years at these properties in Armory Park in the same block as the proposed four story building. I intend to protect these properties. The City of Tucson and its staff for a change needs to do their jobs, to objectively compare and evaluate the effect of the proposed building on the surrounding historic buildings and the district, to provide evidence for your conclusions, to engage the public in a reasonable manner with accurate information, and to stop the inappropriate conduct of the 106 process as a marketing strategy for the developer, and the premature MOA

Sincerely,

Mary Lou Heuett, Property Owner 417 and 419 South Stone
Principal, Cultural & Environmental Systems, Inc
Member, Barrio Historico Architectural Advisory Board (Consulting Party to the Section 106 Process)