



May 22, 2015

Sally Stang, Director  
Housing and Community Development Department, City of Tucson  
310 North Commerce Park Loop  
PO Box 27210,  
Tucson, Arizona 85726-7210

**RE: Draft Memorandum of Agreement Regarding the Downtown Motor  
Apartments 383 S Stone Avenue, Tucson, Arizona**

Ms. Stang,

The Tucson Historic Preservation Foundation (THPF) remains deeply disappointed by handling of this this section 106 process, the marginalization of interested parties, neighbors and residents, the exclusion of our mitigation recommendations, and the resulting MOA.

We remain highly concerned that despite formal requests by over 150 residents and property owners from within the APE to participate in the Section 106 process, your office chose to exclude them from any meaningful participation. Despite our numerous requests, that your office develop a formal public participation plan, to insure surrounding neighbors and residents remain informed of this evolving process and insure interested parties the opportunity to meaningfully comment on this undertaking, this did not happen. The extent of outreach efforts have been posting relevant documents on the Housing and Community Development website and placement sporadic news items on the city website. This has been wholly inadequate and has excluded interested parties that have no or limited internet access and for neighbors and residents who do not speak English or for who English is a second language. Our concerns are compounded by the fact that census track

where is undertaking is proposed, has a significantly higher minority population when compared to the population census of the state. We believe this area should be treated as an Environmental Justice area and that the ongoing exclusion of interested parties represents unfair treatment.

Additionally, we have experienced a highly subjective handling of this process specifically the continually presented opinions that favor the undertaking over historic preservation. This biased handling extends directly to the MOA. We remain deeply disappointed by the City of Tucson handling of this process and the marginalization of public participation and opinion.

THPF is deeply concerned that our mitigation recommendations were excluded from the MOA. We believe that the stipulated measures are inadequate to mitigate the loss of the historic resource and do not offset the significant cultural loss to our community.

Regarding section XII. THPF is deeply concerned that only signatory's to the MOA have the opportunity to object. This ability to object should be extended to any consulting party no just those who sign the MOA.

I look forward to discussing the specifics of the MOA during our next meeting.

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