



CITY OF TUCSON
HOUSING & COMMUNITY DEVELOPMENT DEPARTMENT
ADMINISTRATION DIVISION

May 7, 2015

Demion Clinco, President
Tucson Historic Preservation Foundation
P.O. Box 40008
Tucson, AZ 85717

Re: Downtown Motor Apartments – Section 106 Process

Dear Mr. Clinco:

I apologize for the length of time it has taken to respond to your email from 4/8/15; I enlisted the expertise of two Low Income Housing Tax Credit experts to ensure a thorough and complete analysis of the alternatives and concerns raised in your correspondence. I did not receive the final analysis until today. Please find attached the analyses and opinions from David Wohl of Sabino Community Development Resources and Julie Culver from Partners for Housing Solutions. Both experts have concluded that the proposed development of 19 units using LIHTCs is financially infeasible as previously indicated. Mr. Wohl also corroborates the required higher than average operational expenses associated with a small project due to regulatory requirements and loss of economies of scale. The alternative suggested to build tiny units and charge high rents does not meet the objectives of the HOME program.

The assertions that the Section 106 Process is flawed because of the “lack of a sequential process” as indicated in Ms. Erickson’s letter and reiterated in yours is contradictory to the spirit of the process. The fact that we’ve made determinations concerning the APE, consulting parties, and adverse effect and then subsequently altered them in response to input from the Public and Consulting Parties is the very essence of the process and shows that it is working.



May 7, 2015

Your objection to the adverse effect determination is noted as part of the record; the Advisory Council for Historic Preservation in its May 1, 2015 letter has provided that the determination is reasonable.

Finally, you've indicated concern that the Housing and Community Development Department has not sent notification via mail. Be assured that it is our standard practice to post notification of meetings on our website and/or through the City Clerk's Office and that project information is posted on our website. This practice is both environmentally and fiscally responsible and meets the notification requirements of the Section 106 Process. The hundreds of comments and continuous receipt of comments posted as part of the record demonstrate that the public is aware of this project and the Section 106 process.

Sincerely,



Sally Stang

Director

Housing and Community Development Dept.

Via email: demion.clinco@preservetucson.org & demionc@yahoo.com

