



June 24, 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: Non Compatibility of the proposed Undertaking - Section 106 of the NHPA
Tucson Downtown Motor Hotel – Application for HOME Funds**

Dear Ms. Stang,

The Tucson Historic Preservation Foundation remains deeply troubled with the ongoing handling of the Downtown Motor Hotel Section 106 review, the City of Tucson finding of adverse effect/compatibility and the resulting MOA.

There have been a number of contradictory communications related to the assessment of adverse effect and compatibility, specifically:

- 1) The City of Tucson's "Revised Findings of Adverse Effects" of April 8, 2015 which contained the statement that the proposed undertaking is "compatible in size, scale and massing" with the surrounding historic contributing properties.
- 2) The Detailed Analysis of May 6 and May 16, 2015, prepared by Barrio Historico Advisory Board members Professional Planner Bill Balak and Professional Architect Jody Gibbs, comparing 22 surrounding historic contributing properties to the proposed undertaking with numeric, visual, and written evidence indicating that the proposed undertaking is, in fact, almost totally incompatible with the surrounding historic contributing properties including size, scale, and massing.
- 3) The letter prepared on June 12, 2015 by Ms. Ramona Williams, Executive Assistant to Ms. Sally Stang, City of Tucson, quoting Mr. Jonathan Mabry, City of Tucson Preservation Officer, "I confirm that the analysis of compatibility is the letter

from Sally to SHPO dated April 8, 2015. There are no other City documents or emails related to the analysis."

- 4) The letter of June 15 to Ms. Sally Stang from Barrio Historico Advisory Board member Architect Jody Gibbs pointing out that Mr. Mabry's quote, in the email of June 12 from Ms. Ramona Williams, confirms that the City has never prepared an Analysis of the proposed undertaking, has no basis for the statement in their April 8, 2015 findings that the undertaking is "compatible in size, scale, and massing" with the historic contributing properties, and has provided no basis for the AZ SHPO or the ACHP to "concur" with or find "reasonable" such an allegation.

Based on the above information it is clear the City of Tucson's April 8, 2015 "Revised Findings of Adverse Effects" letter is in error and the proposed undertaking is not compatible with the historic contributing properties in size, scale, and massing. There is clearly a direct adverse effect. Furthermore, the Detailed Analysis of May 6 and May 16 prepared by BHAB members Professional Planner Bill Balak and Professional Architect Jody Gibbs comparing the proposed undertaking to 22 surrounding historic contributing properties, clearly shows the proposed undertaking is overwhelmingly incompatible with the surrounding historic contributing properties and districts.

The Tucson Historic Preservation Foundation is deeply concerned that the City of Tucson has not provided any detailed analysis to measure the impact of the proposed undertaking on the surrounding historic contributing properties. It is troubling that the City of Tucson has never provided any evidence-based assessment for the AZ SHPO or the ACHP to "concur with" or "find reasonable" the unsubstantiated April 8, 2015 finding that the proposed undertaking is compatible in size, scale, and massing with the surrounding historic contributing properties.

Based on detailed analysis of May 6 and May 16 the proposed undertaking causes overwhelming Indirect and Direct Adverse Effects upon the surrounding historic contributing properties and both districts. It is the Tucson Historic Preservation Foundation's position that the undertaking will have significant direct and indirect adverse effects, causing irreparable harm to the surrounding historic properties and districts. We respectfully request the City of Tucson, the AZ SHPO, and ACHP not to sign the proposed Memorandum of Agreement.

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Suzy Gershman
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