



MEMORANDUM

DATE: November 20, 2019
For December 5, 2019 Hearing

TO: John Iurino
Zoning Examiner

FROM: Scott Clark, Director
Planning & Development Services

SUBJECT: REZONING
PLANNING & DEVELOPMENT SERVICES REPORT
C9-19-21 375 S. Stone Ave. – Stone Avenue, HC-3 to C-3, & C-3 to HC-3
(Ward 6)

Issue – This is a request by Robin Large and Keri Silvyn of Lazarus, Silvyn, & Bangs, P.C., on behalf of the property owner, Dabdoub Acquisitions, LLC, to remove a relic “leg” of historic preservation zoning (HC-3) from a portion of their site, which is located on the southeast corner of S. Stone Avenue and E. 14th Street, more particularly Parcel Numbers 117-14-0860, -0870, and -0890 (see Case Location Map). The “leg” of the HC-3 extends west across a vacant parking lot that is not nor has ever protected any historic structure. The parking lot was accessory to a commercial building (most recently occupied by the Casa Vicente restaurant) that has been demolished. It appears that the “leg” of the HC-3 zoning was established only based on the irregular configuration of Parcel 117-14-0860. The parcel also includes the Brady Court Apartments, an 8-unit courtyard apartment complex that was recently renovated and is a contributor to the Armory Park Historic District. The HC-3 designation is proposed to remain and continue to protect the Brady Court buildings. The preliminary development plan proposes a new 4-story multi-family residential development with commercial uses on a portion of the first floor. This development would utilize the Infill Incentive District zoning option.

Additionally, the request by the applicant includes a small portion of C-3 to be rezoned to HC-3 around the Brady Court Apartments. This is to comply with development standards as part of the final parcel reconfiguration, which requires minimum setbacks between buildings.

These actions would amend the boundary of the Armory Park Historic Preservation Zone.

Planning & Development Services Recommendation – The Planning & Development Services Department recommends approval of C-3 and HC-3 zoning as requested, subject to the attached preliminary conditions, and the amendment to the Armory Park Historic Preservation Zone.

Background Information

Existing Land Uses: Multi-family residential (Brady Apartments), parking, adobe structure (garage)

Zoning Descriptions:

HC-3 – Historic Commercial Zone – This zone provides for mid-rise development of general commercial uses that serve the community and region, located downtown or in other major activity center areas. Residential and select other agriculture, civic, recreational, and utility uses may also be permitted that provide reasonable compatibility with adjoining residential uses. The HPZ designation is an overlay zone superimposed over underlying zoning where there is an individual historically important building, structure, site, or object; a group of surviving related historic resources in their original setting; or an archaeological site that gives a historic dimension to the City. To identify each HPZ on the City of Tucson Zoning Maps, the preface "H" is added to the assigned residential, office, commercial, or industrial zone designation, e.g., R-1 becomes HR-1.

C-3 – Commercial Zone – This zone provides for mid-rise development of general commercial uses that serve the community and region, located downtown or in other major activity center areas. Residential and select other agriculture, civic, recreational, and utility uses may also be permitted that provide reasonable compatibility with adjoining residential uses.

Surrounding Zones and Land Uses:

North: Zoned C-3 & HC-3; liquor store, single-family residential, Arizona Theater Company

South: Zoned C-3; Downtown Motor Hotel, multi-family residential

East: Zoned HC-3; behavioral health services, Academy Lofts (apartments)

West: Zoned HC-3; financial institution, office

Previous Cases on the Property: C9-74-19 Armory Park Historic Residential District. This was the rezoning case that established the APHD and attached the “H” to the zoning of every parcel within the zone.

Related Cases:

C9-18-02 The Baffert at 5 Points & 733 S. Stone Ave., HC-3 to C-3 and C-3 to HC-3 This was a rezoning request for the property located at 747 S. Stone Ave. from HC-3 to C-3 and to rezone the property located at 733 S. Stone Ave. from C-3 to HC-3 to allow the development of a 3-story mixed-used complex with retail space on the ground floor and 13 multi-generational units on the upper floors. On June 19, 2018, Mayor and Council adopted Ordinance No. 11561 and 30 days later the requested zoning became effectuated.

C9-16-12 West University HPZ Boundary Amendment – University Blvd and 4th Ave HC-3 and HR-3 to C-3 and R-3 zone. This was a request by Randi Dorman, R + R Develop, on behalf of the property owner, Trinity Presbyterian Church, to remove the Trinity Church properties from the West University Historic Preservation Zone (HPZ) and rezone the parcels from HC-3 and HR-3 to C-3 and R-3 zoning. The rezoning site is located at the southeast corner of University Boulevard and 4th Avenue.

Project Description: A portion of the project property, Parcel Number 117-14-0860, owned by Dabdoub Acquisitions, LLC, in partnership with Miramonte Homes, is located within the Armory

Park Neighborhood and contains a contributing structure in the Armory Park National Register District. The contributing structure is the Brady Court Apartments, a 5,868 SF 8-unit apartment complex dating from 1935. In 2018, the applicant renovated the Brady Court Apartments as approved by the Armory Park Historic Zone Advisory Board and the Tucson-Pima County Historical Commission Plans Review Subcommittee. Also, at the southeast corner of the project property (on parcel 117-14-0890) is an adobe structure originally constructed in the late 1800s. This structure was an accessory structure to a primary structure that no longer exists and has been heavily modified over time. A commercial property on this parcel was recently demolished. Parcel 117-14-0870, at the northwest corner of the site, is a parking lot that is currently unused.

These three parcels will be reconfigured to facilitate a new development. The applicant is proposing a new mixed-use development that will include a 4-story (69' 7" to roof terrace) building featuring 28 one-and two-bedroom residential condo units, a restaurant and office space. This proposed development would utilize the Downtown Area Infill Incentive District (IID) zoning option, subject to the IID review and approval process. The Brady Court Apartments, and the adobe structure at the southeast corner of the property will remain.

Historic Review

On October 1, 2019, the Armory Park Historic Zone Advisory Board voted 10-1 to approve the proposal of the rezoning to the new parcel configuration for Brady Court, removing the “leg” of HC-3 zoning from the HPZ, at 375 S. Stone Avenue. Discussion centered on the initial intent of including the “leg” in the HPZ; the potential “swap” of the “leg” of HC-3 zoning for the adobe structure outside the HPZ; and the reconfiguration of the parcel simplifying the design review process for the proposed project. The approval was made provided that a rezoning condition be included for the preservation of the historic, Armory Park Historic Neighborhood National Register District listed adobe structure; to be administered by the City’s Historic Preservation Officer (HPO) with HPO and APHZAB review in perpetuity and (that in the event that the IID overlay zoning sunsets) will require the full Mayor and Council demolition approval (for future development); and finally that all exterior details on the new IID project will be historically “compatible”, per the UDC Armory Park historic Design Guidelines. The Armory Park Historic Zone Advisory Board Legal Action Report is attached.

On November 4, 2019, the Tucson-Pima County Historical Commission Plans Review Subcommittee continued the item to the next meeting due to objections to the proposal. Objections to the proposal centered on the “swapping” of the “leg” of HC-3 zoning for the adobe structure into the HPZ; PRS not being a review authority in the rezoning conditions; and the parcel lines not depicting the final parcel configuration. The Tucson-Pima County Historical Commission Plans Review Subcommittee Legal Action Report is attached.

On November 14, 2019, the Tucson-Pima County Historical Commission Plans Review Subcommittee (PRS) voted 4 to 2 in approval of the rezoning to the new parcel configuration for Brady Court and the removing the “leg” of HC-3 zoning from the HPZ, at 375 S. Stone Avenue. Discussion centered on the potential “swap” of the “leg” for the adobe structure, the rezoning conditions regarding the adobe structure, and the parcel lines final reconfiguration. The applicant,

in response to the previous meeting, revised the rezoning conditions to include the PRS as a review authority for the adobe structure in perpetuity. Additionally, the UDC reference to require the full Mayor and Council demolition procedure was clarified in the rezoning conditions to include the “.e”, in order to follow the procedures for historic contributing properties or historic landmarks. Those that opposed the rezoning perceived the rezoning conditions to not be as protective as the HPZ and that adobe structure would be better protected if included in the HPZ despite the HPO’s concern that it could set precedent for moving structures in and out of the HPZ. The Tucson-Pima County Historical Commission Plans Review Subcommittee Legal Action Report is attached.

Initiation of Boundary Amendment

Section 5.8.4.C.2 of the Unified Development Code (UDC) states, “[T]he Mayor and Council shall make the decision whether to initiate the process to consider the establishment of, or amendment to, a HPZ.” On September 17, 2019, after consideration of the issue at a Study Session, the Mayor and Council voted 7-0 to initiate the boundary amendment.

Applicant’s Request – “The rezoning request is a modification of the zoning boundaries that involves removing the “leg” of HC-3 across the parking lot and narrowing the HC-3 around the Brady Court building footprint. The remaining area would be consolidated into a single parcel with C-3 zoning that will include both the proposed building, the existing adobe structure, and parking for the entire project.”

Planning Considerations – Land use policy direction for this area is provided by the *Old Pueblo South Community Plan (OPSCP)* and *Plan Tucson*. The *OPSCP* covers five neighborhoods, including Armory Park. The general purpose of the *OPSCP* is “...overall revitalization of the *OPSCP* neighborhoods.” The rezoning site is in the Armory Park Historic Neighborhood in the *OPSCP*, and adjacent to the “Minor Functional Zone: Strip Commercial”. The *OPSCP* supports the project’s mixed-use proposal, which includes for-sale residential condominiums, a restaurant to serve the neighborhood and protection of its historic resources.

The rezoning site is located within an Existing Neighborhoods building block as identified on the Future Growth Scenario Map of *Plan Tucson*. The Existing Neighborhoods building block are primarily developed and largely built-out residential neighborhoods and commercial districts in which minimal new development and redevelopment is expected in the next several decades. Within the Existing Neighborhoods building block, *Plan Tucson* calls for maintaining the character of these neighborhoods, while accommodating some new development and redevelopment and encouraging reinvestment and new services and amenities that contribute further to neighborhood stability.

Plan Tucson supports the retention and expansion of existing businesses as well as infill and redevelopment projects that reflect sensitivity to site and neighborhood conditions and also adhere to relevant site and architectural design guidelines. *Plan Tucson* policies protect established residential neighborhoods by supporting compatible development, which may include other residential, mixed-use infill and appropriate nonresidential uses. *Plan Tucson* also supports the adaptive reuse of historic landmarks.

Plan Tucson policies also promote quality and safety in design, compatibility with and adequate buffering of surrounding development, the planting and management of healthy, attractive urban vegetation, and the conservation and enhancement of environmentally sensitive habitat. Urban heat island effects should be mitigated by expanding and maintaining a healthy drought-tolerant low-water use urban forest. New development should utilize solutions and strategies included in the Design Guidelines Manual to provide an improved level of community design.

Plan Tucson supports infill projects that are sensitive to the site and neighborhood conditions and also adhere to relevant site and architectural design guidelines and the use of Individual Parking Plans to address parking issues. *Plan Tucson* policies protect established residential neighborhoods by supporting compatible development, which may include other residential, mixed-use infill and appropriate nonresidential uses.

The subject site is relatively flat and has landscaping along the perimeter of the parking lot consisting primarily of palm trees and native desert plants. The subject site includes Brady Court, a historic courtyard apartment complex; a vacant site where Casa Vicente restaurant was previously located; an unused parking lot; and a historic garage building. To the east, across Russell Avenue, is a behavioral health service and Academy Lofts, zoned HC-3. North of the site, and across 14th Street, is a liquor store, a single-family residence, and Arizona Theater Company, zoned HC-3 and C-3. West of the site, across Stone Avenue is a financial institution and office, also zoned HC-3. To the South, is the Downtown Motor Hotel which functions as multi-family residential, zoned HC-3.

Field inspection by staff indicates there are currently no billboards on the rezoning site.

Design Considerations

Land Use Compatibility – The rezoning request from HC-3 to C-3 is intended to take advantage of the site’s proximity to downtown by providing quality workforce housing as well as commercial dining to the adjacent neighborhood. The proposed rezoning will facilitate a new mixed-use development that will include a 4-story building featuring 28 one-and two-bedroom residential condo units, a restaurant and office space. All of the uses, commercial and residential, are permitted under the existing zoning, and the project complies with *Plan Tucson* policies through its design and orientation.

The proposal follows the sustainable infill development model promoted by the IID that is necessary for supporting downtown neighborhoods. The proposed height of 4-stories is similar in scale to other structures in the immediate area, Downtown Motor Hotel to the south and Tucson Police Department to the northwest, and provides an appropriate transition to lower-intensity development within the interior of the neighborhood. The design elements will create an interesting pedestrian streetscape experience. Details include copper trim at drainpipes and eaves, wrought iron railing at the balconies and arched opening, and wood corbels painted in classic blue, burgundy and gold.

The project's impacts on and relationship to the adjacent Armory Park Historic District (APHD) has been review by the HPO and other review authorities. The removal of the relic "leg" of HC-3 zoning does not reduce the number of properties, or contributing structures within the APHD. The Brady Court building will still be designated HC-3 and within the APHD. The proposed boundary amendment does not appear to have any negative impacts on the integrity of the APHD. Additionally, the adobe structure that is not included in the historic zone will be protected by rezoning conditions (See Preliminary Conditions).

Drainage/Grading/Vegetation – There is vegetation along the perimeter of the parking lot consisting mostly of palm trees and native desert plants, and the property is relatively flat. Because the building is set to the north and west property lines, there is not enough room for a streetscape border, and modifications are being pursued through the IID process. All existing trees and scrubs in the right-of-way will be maintained, and where possible, shrubs will be planted between the sidewalk and the building. Water harvesting will be built into the project to provide irrigation for the landscaping.

Road Improvements/Vehicular Access/Circulation – S. Stone Avenue is classified as arterial roadways on the Major Streets & Routes (MS&R) Plan. E. 14th Street and S. Russell Street are local streets. No road improvements are anticipated with this project. On-site parking will be provided and include a total of 51 parking spaces. An Individual Parking Plan (IPP) has been submitted for review and approval. The UDC standards would require 91 parking spaces. The reduction is justified given its proximity to downtown, its proximity to alternative modes of transportation, and the availability of on-street parking. The existing sidewalks along both S. Stone Avenue and E. 14th Street will remain. The restaurant will be located at the corner of S. Stone Avenue and E. 14th Street on the first floor to encourage street level pedestrian activity.

Tucson Airport Authority (TAA) – The TAA reviewed the rezoning proposal and commented that the project is within the Tucson International Airport avigation easement and public disclosure area. The developer will be required to record FAA-mandated documents.

Conclusion – Land use policy direction for this area is provided by the *Old Pueblo South Community Plan (OPS)* and *Plan Tucson*. Both plans support mixed-use development at this site. Plan Tucson further provides for compatibility with surrounding neighborhoods. There will be no net loss of historic structures within the APHD. Subject to compliance with the attached preliminary conditions, approval of the requested C-3 and HC-3 zoning is appropriate.

PROCEDURAL

1. A development package in substantial compliance with the preliminary development plan, both dated October 18, 2019, and required reports, are to be submitted and approved in accordance with the *Administrative Manual*, Section 2-06.
2. The property owner shall execute a waiver of potential claims under A.R.S. Sec. 12-1134 for this zoning amendment as permitted by A.R.S. Sec. 12-1134 (I) in the form approved by the City Attorney and titled "Agreement to Waive Any Claims Against the City for Zoning Amendment". The fully executed Waiver must be received by the Planning & Development Services Department before the item is scheduled for Mayor and Council action.
3. Historic or prehistoric features or artifacts discovered during future ground disturbing activities should be reported to the City of Tucson Historic Preservation Officer. Pursuant to A.R.S. 41-865 the discovery of human remains and associated objects found on private lands in Arizona must be reported to the Director of Arizona State Museum.
4. Any relocation, modification, etc., of existing utilities and/or public improvements necessitated by the proposed development shall be at no expense to the public.
5. The owner/developer shall obtain written documentation from the Pima County Regional Wastewater Reclamation District (PCRWRD) that treatment and conveyance capacity is available for any new development within the rezoning area, no more than 90 days before submitting any tentative plat, development plan, sewer improvement plan or request for building permit for review. Should treatment and/or conveyance capacity not be available at that time, the owner/developer shall have the option of funding, designing and constructing the necessary improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.

LAND USE COMPATIBILITY

6. All perimeter screening walls visible from a public right-of-way and/or adjacent to existing residential development, are to be graffiti-resistant and incorporate one (1) or more visually appealing design treatments, such as the use of two (2) or more decorative materials like stucco, tile, stone, or brick; a visually interesting design on the wall surface; varied wall alignments, (jog, curve, notch, setback, etc.); and/or trees and shrubs in voids created by the wall variations.

7. Graffiti shall be removed within seventy-two (72) hours of discovery.

TUCSON AIRPORT AUTHORITY

8. According to the Federal Aviation Administration (FAA) Notice Criteria Tool, this project area is located in proximity to a navigation facility and could impact navigation signal reception. As the project site develops every project applicant shall file FAA Form 7460 with the FAA at least 45 days before construction activities begin for every proposed project unless FAA staff, with the Obstruction Evaluation / Airport Airspace Analysis (OE/AAA), provides the project applicant with written communication that filing FAA Form 7460 is not required. It is highly recommended that the applicant file earlier than 45 days to provide the applicant with sufficient time to respond to any concerns which are identified by the FAA. Any cranes which are used must also be identified with Form 7460. Please file Form 7460 at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>
9. Prior to the City's approval of this rezoning request, the property owner/developer/applicant shall record the Tucson Airport Authority approved Avigation Easement form which discloses the existence, and operational characteristics of the Tucson International Airport to future owners or tenants of the property and further conveys the right to the public to lawfully use the airspace above the property. The Avigation Easement shall be recorded in a manner with the Pima County recorder which shall document it as having title liability. The content of such documents shall be according to the form and instructions provided. The current property owner/developer/applicant or other person authorized to sign on behalf of the current property owner shall complete, sign, and record the Avigation Easement with the Pima County Recorder's Office. Once the Avigation Easement is recorded send a complete copy of the recorded easement document, which contains all pages which were recorded, to Tucson Airport Authority by either email (send to srobidoux@flytucson.com) or to the following mailing address: Senior Airport Planner, Tucson Airport Authority, 7250 South Tucson Boulevard Suite 300, Tucson, AZ 85756.
10. Applicable to residential uses only - The developer shall provide the Airport Disclosure Statement form, at time of sale, to the new property owners with all new unit purchases. In the event the development of any residential uses does not involve the sale of new units, but is instead offering rental residential units to the public, the new tenant of the rental unit shall be provided a copy of the Airport Disclosure Statement form. The intent of the Airport Disclosure Statement form is to educate and notify the new residents that they are living near an airport. The content of such documents shall be according to the form and instructions provided. The property owner (for itself or its tenants) shall forward a signed copy of the Airport Disclosure Statement form to the Tucson Airport Authority within ten (10) days of signature, using the following mailing address: Senior Airport Planner, Tucson Airport Authority, 7250 South Tucson Boulevard Suite 300, Tucson, AZ 85756

HISTORIC RESOURCES

11. Any modification to the structure in the southeast corner of the C-3 lot (which is a contributing structure to the Armory Park National Register Historic District) shall be

reviewed and approved by the City's Historic Preservation Officer ("HPO"). Applicant shall be required to submit a site plan, elevations, material palette and other pertinent information to the HPO for review. The HPO shall schedule meetings with both the Armory Park Historic Zone Advisory Board and the Tucson-Pima County Historical Commission Plans Review Subcommittee to review the submittal and provide recommendations. The HPO shall make the final decision.

12. Demolition of the structure on the southeast corner of the C-3 lot (which is a contributing structure to the Armory Park Historic Neighborhood District) shall require full approval pursuant to the Unified Development Code Section 5.8.10.E.
13. Exterior details on the proposed mixed-use building shall be historically compatible, per the UDC's Historic Preservation Zone Design Standards (Section 5.8.9).



Armory Park Historic Zone Advisory Board
Tuesday, October 1, 2019
Parish Hall, St. Andrew's Church
545 S. 5th Avenue
E. 16th Street and S. 5th Avenue
Tucson, Arizona

Legal Action Report/Meeting Minutes

1. Call to Order/Roll Call

The meeting was called to order at 6:33pm. A quorum was initially established with nine board members present: Ms. S. Bachman-Williams, Mr. J. Burr, Ms. P. Factor, Mr. G. Furnier, Mr. S. Grede, Ms. M. McClements, Mr. P. O'Brien, Mr. M. Roberts and Ms. G. Schau. (Mr. M. Crum joined the meeting at 6:44 pm, following item 2.) Absent: Mr. T. Beal.

2. Approval of Minutes

Action Taken: A motion was made by Ms. Factor to approve the meeting minutes as presented, seconded by Mr. Roberts. Nine votes in favor: Ms. S. Bachman-Williams, Mr. J. Burr, Ms. P. Factor, Mr. G. Furnier, Mr. S. Grede, Ms. M. McClements, Mr. P. O'Brien, Mr. M. Roberts and Ms. G. Schau.

3. Call to the Audience

None.

4. Reviews

a. HPZ 19-84, 375 S. Stone Avenue

Reconfiguration of the lot lines and rezoning to remove a portion of the lot zoned "H."

Full Review

Ms. Robin Large provided an overview of the rezoning of the parcels, and how the rezoning will take place concurrently with the IID review process for the proposed new building on the vacant parcel. Initially, it was not the developer's intention to rezone the parcels but the process has revealed that in fact a rezoning is required.

The Brady Court parcel currently has a "leg" that extends all the way to Stone Avenue, and cuts the C- zoned parking lot in two. A portion of the new building would need to be on that "leg" to be viable. Because it does not contain any historic resources, that area of the parcel doesn't protect anything. The current proposal reconfigures the remaining "H" parcel for Brady Court at 10' west and south of the building footprint to meet building code requirements. The remaining portions of all the lots will become a single new parcel with C-3 zoning. In

exchange for the reduction of the “H” parcel, the developer has agreed to place an historic preservation condition on the historic adobe building on the southeast corner of the lots, and ensure compatibility with the historic buildings.

Mr. Bill Mackey continued the presentation, by noting that the adobe building has been reviewed as a courtesy by the APHZAB to return it to its 1920’s (rehabilitated) look when the 1890’s stable was converted to parking uses. He expects it may come back for review if revised. He presented the Sanborn maps that show how the buildings were related in the past, and provided additional detail on the restoration of Brady Court.

He then presented the new mixed use IID project for a new 4 story building that has 28 new one and two bedroom condos, with an office and restaurant (hopefully Casa Vincente) on the first floor. A re-siting of the building means that streetscape plantings will be included, with two courtyard areas, and a parking lot that provides 51 spaces. The parking plan has already been addressed through an IPP. A brief overview of the design elements showed how the building relates to the historic buildings in the area.

The Board asked for clarification on its purview. Ms. Brown clarified that the review was specifically for the rezoning and its conditions, not specifically the new building design which would be reviewed by PRS and the IID-DRC, because after the rezoning, the building would not be in the HPZ. However, this is the opportunity to comment on the proposed building if there are concerns.

The Board was concerned about the appendage of the “H” parcel and what it may have been intended for. Ms. Brown clarified that it was merely a remnant parcel and had no historic relationship to Brady Court.

The Board suggested that an exchange of the historic adobe stable/ garage that is currently listed on the National Register, but not in the HPZ could be appropriate for the reconfiguration. Ms. Brown stated that she did not believe that was appropriate because it was an accessory structure that was unrelated to any of the remaining historic structures (it was built prior to Brady Court), and was not consistent with preservation standards. She noted that the zoning condition requiring historic review was the best compromise.

The Board noted that the proposed building did appear to be relatively compatible to the historic district. It thanked the architect for now using metal clad wood windows/ doors instead of the original vinyl clad windows which are inconsistent with UDC historic guidelines. The other exterior design elements appear to be related to and consistent with historic structures in the historic zone.

It was noted that the reconfigured parcel would simplify the design review process so that the advisory board would not need to be consulted for the parking lot and miscellaneous elements. Also, it was noted that the new building would be limited to 48’ total height if the parcels were not rezoned. The new proposed building, while taller than historic buildings in the district, is not inconsistent with other modern buildings in the vicinity.

Action Taken: The Board recommends the approval of the rezoning to the new parcel configuration for Brady Court, removing the “leg” and creating two new parcels (H zoning of Brady Court at 10’ West and South of the building footprint; existing North and East) provided that a rezoning condition be made for the preservation of the historic, APHNRD listed adobe structure (stable/ auto parking) located on the southeast corner of the new C-3 parcel; to be administered by the City’s HPO with HPO and APHZAB review in perpetuity and (that in the event that the IID overlay zoning sunsets) will require the full Mayor and Council demolition procedure (for future development); and finally that all exterior details on the new IID project will be historically “compatible”, per the UDC Armory Park historic Design Guidelines.

Motion made by Mr. Burr, seconded by Ms. Factor. Ten votes in favor: Ms. Bachman-Williams, Mr. Beal, Mr. Burr, Mr. Crum, Ms. Factor, Mr. Furnier, Mr. Grede, Ms. McClements, Mr. O’Brien and Ms. Schau. One vote against: Mr. Roberts.

a. HPZ 19-78, 524 S. Herbert Avenue

Rehabilitation of an existing building; new stucco, roof repairs and shingle replacement, fencing and gates; repair and restore windows and doors; new rear addition.

Courtesy Review/Contributing Resource

Mr. Gonzales provided a revised site plan for a new configuration of the proposed addition that was significantly smaller than the plan presented at the September 17 meeting. The addition has been reduced so that the rehabilitated building will now only have 52% lot coverage and both sides of the addition have been inset 4’ from the lot lines. The floor plan shows the original adobe 4 room structure, with reduced demolitions of the interior walls. He now suggests that all windows will be wood and that the replacements will be the original 2 over 2 configuration. He proposed reducing the new roofline to 13’ and setting it further back from the ridge-line, which will allow for the retention of the historic chimney.

The Board thanked Mr. Gonzales for his thoughtful revisions noting that the new setbacks will reinforce the hierarchy of the original historic structure and its relationship to the new addition, and will rectify the the issues of egress (door and window) and utility access. It was also suggested that the angled wall containing the door would be more compatible if it was consistent with the rectilinear elements of the building.

The Board suggested that a reconfigured roofline would perhaps be a better option. One possibility would be to add a gabled connection onto the original gabled roof to connect to a new parapeted addition. This would better retain the original design language of the historic structure. Mr. Gonzales noted that this might be an easier construction to build.

The Board noted that the original exterior adobe walls will now be retained, and that some original interior adobe walls will also be retained. However, it noted that the west wall appeared to show two new openings on either side of a filled in original opening and asked for clarification on replacement materials for the structural reconfigurations.

The Board also commented on the window and door schemes. It noted that the new windows were still shown as horizontal sliding windows and would be more appropriate as vertical openings similar to the existing windows. It was noted that transoms above the doors should be retained. It was also noted that stucco repair would be preferable on the historic structure to not compromise the adobe walls. Original trim pieces could then be retained.

The Board requested that elevations/ exterior elements be included in the next review, and that site context (adjacent historic buildings) be shown.

No action taken.

5. Design Guidelines Project

a. Update on the design guidelines

Martha provided an update on the first PRS review of the V 5.3 Design Guidelines at the meeting on 9-26-19. Martha, John and Ken were present. The review is moving on a line by line basis and only made it to page 10 during the meeting. It is scheduled to return to PRS on 10-24-19. Mr. Burr noted that while concerns were raised about several concepts and statements, that the PRS had been open to explanations of why they had been included. It is expected that another draft may be required after the review process.

6. Minor Review Update

a. Updates on recent Minor Reviews provided

Martha provided an update on the one minor review anticipated; a roof replacement at 245 S. 5th Ave.

7. Call to the Board

Mr. Burr noted that the Welcome Broadway PAD would be presented at the 10-7 Zoning Examiner public hearing. He also mentioned that there is an IID-DRC meeting on 10-15 that will look at the planned 13 story building that will replace Maloney's tavern on N. 4th Ave., as well as the new 5 story building proposed for 140 E. Broadway, next to the Julian Drew building.

8. Call to the Audience

Ms. Brown thanked the board for attending the mandatory annual training sessions in September. Staff is reviewing how they will be done for next year's required training.

Mr. Taylor thanked Mr. Burr for attending the 9-24 PRS meeting and defending the content of the design guidelines.

9. Future Agenda Items-Information Only

None discussed.

7. Adjournment

The meeting adjourned at 7:36pm.

2019

Tucson-Pima County Historical Commission
Plans Review Subcommittee

LEGAL ACTION REPORT

Monday, November 04, 2019

**3rd Floor Large Conference Room, Planning and Development Services
Department, Public Works Building, 201 N. Stone, Tucson, AZ 85701**

1. Call to Order and Roll Call

Meeting called to order at 1:30 P.M., and a quorum was established.

Commissioners Present: Terry Majewski (Chair), Helen Erickson, Jill Jenkins, Jim Sauer, Michael Becherer, Sharon Chadwick, and Jan Mulder.

Commissioners Absent/Excused: None.

Staff Members Present: Michael Taku, Jodie Brown, Nick Ross, and Michael Kat (PDSD), Crystal Dillahunty (Ward 6).

2. Approval of the Legal Action Report (LAR) from Meeting(s) of 10-24-19

It was moved by Commissioner Sauer, duly seconded by Commissioner Jenkins, and carried by a voice vote of 7-0 to postpone approval of the Legal Action Report from the meeting of 10-24-19 to the next scheduled meeting to allow members time to review the report submitted.

3. Historic Preservation Zone Review Cases

UDC Section 5.8/TSM 9-02.0.0/Historic District Design Guidelines/Revised Secretary of the Interior's Standards and Guidelines

HPZ 19-42 San Carlos Apartments, Building #1– Replace/Repair approximately 77 Windows on the 1st and 2nd Floors-79 E 13th Street-- (Armory Park Historic Preservation Zone).

Staff Taku summarized the project and read into the record the recommendation from the Armory Park Historic Zone Advisory Board (APHZAB) meeting of 10-15-19.

Property owner Alex Lee and project designer Gabriel from GGV Designs presented the project. Owner noted willingness to restore all the windows and retain as much of the historic fabric as possible, an action applauded by both APHZAB and PRS.

Discussion was held. Action was taken.

It was moved by Commissioner Erickson, duly seconded by Commissioner Sauer, and carried by a voice vote of 7-0 to recommend approval as presented, concurring with requirement recommended by APHZAB that the square corners around the window panes shall be retained.

HPZ 19-88 San Carlos Apartments, Building #2 – Repair existing windows and add screens. Upgrade the electrical service and add new AC units -71 E. 13th Street - (Armory Park Historic Preservation Zone).

Staff Taku summarized the project and read into the record the recommendation from the Armory Park Historic Zone Advisory Board (APHZAB) meeting of 10-15-19

Property owner Alex Lee and project designer Gabriel from GGV Designs presented the project. Owner noted willingness to restore all the windows and retain as much of the historic fabric as possible. Additionally, the new AC condensing units will be placed on the roof, concealed from view, or between buildings. The electric boxes will be upgraded to meet code.

Discussion was held. Action was taken.

It was moved by Commissioner Erickson, duly seconded by Commissioner Sauer, and carried by a voice vote of 7-0 to recommend approval as presented, on the condition that mechanical equipment not be visible from the public right of way, and that the square corners around the window panes shall be retained.

HPZ 19-72 Lee Residence- Demolish an existing rear detached accessory non-contributing building-419 S. 5th Avenue -- (Armory Park Historic Preservation Zone).

Staff Taku read into the record the recommendation from the Armory Park Historic Zone Advisory Board (APHZAB) meeting of 10-15-19. Historic Preservation Officer, Jodie Brown shared her findings from an on-site evaluation. She determined that there was no remaining historic fabric of the building, thus, no longer eligible to be considered historic.

Property owner Alex Lee and project designer Gabriel from GGV Designs presented the project

Discussion was held. Action was taken.

It was moved by Commissioner Chadwick, duly seconded by Commissioner Jenkins, and carried by a voice vote of 7-0 to recommend approval as presented, concurring with recommendations of APHZAB as follows: (1) approval of a future redevelopment package for the entire property, which may or may not include revised setbacks, prior to demolition; (2) that hand tools be used for the demolition to protect the adjoining historic structure; (3) monitoring of the demolition and repair process to be coordinated through the City of Tucson HPO to include a representative of APHZAB; (4) all costs for the required repairs/restoration after the demolition shall be borne by the property owner (not the adjoining property owner); and (5) there should be no encroachment within 3 ft. of the exposed adobe structure for drainage.

HPZ 19-89 Lane Residence- Replace asphalt shingle roof with metal roof and install water harvesting units-742 S. 5th Avenue - (Armory Park Historic Preservation Zone).

Staff Taku summarized the project and read into the record the recommendation from the Armory Park Historic Zone Advisory Board (APHZAB) meeting of 10-15-19.

Property owner Stacy Lane presented the project. Owner noted she was under the impression that the contractor had obtained required permits. Additionally, she noted not being aware that a permit was required for the water harvesting system.

Discussion was held. Action was taken.

It was moved by Commissioner Erickson, duly seconded by Commissioner Mulder, and carried by a voice vote of 7-0 to recommend approval as presented, recognizing the issues raised by APHZAB regarding the desire to not set precedent, and concern for taking action against the contractor who did not have the project reviewed before doing the work.

4. Infill Incentive District/Rio Nuevo Area Review Cases
UDC Sections 5.12.6.E.2; 5.12.7 & 5.12.10

RNA/DRB-19-02/HPZ-19-83 Central Block Rehabilitation –Façade Modification & Adaptive Reuse - [Revision to Approved Design: spacing of the vertical mullions (From 3 to 5 on west elevation) and (From 3 to 4 on north elevation) and tile from black to terra cotta color-work in progress]- 98, 100, 108 & 110 East Congress Street (Rio Nuevo Area /Downtown Core, Infill Incentive District).

*Commissioner Becherer recused from this case due to an ongoing business relationship with the owner of the property.

Staff Taku summarized the project and noted the recommendations from PRS from the meeting of 3-28-19 and the DRB meeting of 2-15-19.

Project Manager Chris Leighton from Peach Properties presented the project. Presenter discussed change on the spacing of the vertical mullions, from 3 to 5, on the west elevation; change on the spacing of the vertical mullions, from 3 to 4 on the north elevation; change in the tile color at the base of the storefront walls, from the approved 4X4 black tile to a terracotta-colored 4X4 tile; and change from clear glass glazing in the reconstructed clerestory windows, to clear glass with an amber-colored film

Discussion was held. Action was taken.

It was moved by Commissioner Sauer, duly seconded by Commissioner Jenkins, and carried by a voice vote of 6-0 (*Commissioner Becherer recused and did not vote) to recommend approval of the project as presented, noting t (1) that the clerestory glazing is to be clear glazing with an amber film on the inside (not clear as previously approved); and (2) the 4” by 4” glazed tile will be terra cotta in color (not black as previously approved).

C9-19-21/HPZ-19-84(b) Reconfiguration of the lot lines and rezoning (modification of zoning boundaries) to remove a relic “leg” of historic zoning (HC-3) from a portion of the site which is located on the southeast corner of South Stone Avenue and East 14th Street, more particularly Parcel Numbers 117-14-0860, -0870, and -0890 to standard C-3 zoning (HC-3 to C-3). The “leg” of the historic HC-3 zoning extends west across a vacant parking lot that is not nor has ever protected any historic structure. The historic HC-3 designation is proposed to remain and continue to protect the Brady Court buildings. No contributing structures will be removed from the HPZ as a result – 375 S. Stone Avenue-(Contributor, Armory Park Historic District)

*Note: At the request of applicants and concurred by PRS, this case was reviewed out of agenda sequence, (b) before (a) for ease of review..

Staff Brown summarized the project and discussed her determination on the removal of the relic “leg” of historic zoning (HC-3) from a portion of the site.

*Commissioner Becherer recused from this case due to an ongoing business relationship with the owner of the property.

Attorney Robin Large from Lazarus, Silvyn & Bangs, P.C and architect Bill Mackey from Worker, Inc. presented the project.

Discussion was held. Applicant proposed reduction of the land area protected by Historic zoning and the introduction of additional historic protection of the adobe structures in the southeast corner of the subject parcels. Several methods of this proposed additional historic protection were discussed, including (a) inclusion in the Armory Park HPZ, and (b) mandatory ("courtesy") review of any future changes by APHZAB and PRS with recommendations to the City of Tucson HPO for final decision. Opinions were offered by commissioners, the applicant, and the City of Tucson HPO, but a consensus was not reached. Commissioners requested that apparent inconsistencies in proposed property lines and zoning boundaries be corrected. Action was taken.

It was moved by Commissioner Chadwick, duly seconded by Commissioner Jenkins, and carried by a voice vote of 6-0 (*Commissioner Becherer was recused and did not vote) to recommend that the case be continued to a future meeting.

IID-18-06/HPZ-19-84(a) New Construction: Mixed-use 4-story building at the southwest corner of Stone Avenue and 14th Street, comprising 28 one and two bedroom condominiums, the relocated Casa Vicente restaurant, a parking lot, and a rehabilitated historic structure.

Concurrent rezoning (change of zoning) to remove a portion of the lot zoned “H. from the site.” [Contributor, Armory Park Historic District]. No contributing structures will be removed from the HPZ as a result.
– 375 S Stone Avenue-(Greater Infill Incentive District.)

*Commissioner Becherer recused from this case due to an ongoing business relationship with the owner of the property.

Attorney Robin Large from Lazarus, Silvyn & Bangs, P.C, architect Bill Mackey from Worker, Inc., and Gerrie Gray from Miramothe Homes presented the project.

Discussion was held. Concerns were raised regarding the height of the proposed building, the height calculation's omission of the structures on the roof of the proposed building, the lack of step-backs or other efforts to increase compatibility with lower contributing buildings to the east, the height relationship of the building to the historic bungalows to the east, the balconies overlooking the historic bungalows to the east, and the quality of the facade along 14th street. Action was taken.

It was moved by Commissioner Sauer, duly seconded by Commissioner Erickson, and carried by a voice vote of 6-0 (*Commissioner Becherer was recused and did not vote) to recommend that the case be continued to a future meeting.

6. Current Issues for Information/Discussion

*Commissioner Becherer rejoined review at 3:31 P.M

a. Minor Reviews

Staff provided an update on reviews conducted at 245 South 5th Avenue (roof replacement, wrong windows) and 516 S 5th Avenue-(Armory Park Historic Preservation Zone); 35 E Toole for modified ADA Ramp..

b. Appeals

None at this time.

c. Zoning Violations

Staff provided information on the pending case of double door added on west side at 746 S Osborne Ave. (Barrio Historico Historic Preservation Zone) during construction. Staff also provided information on construction at 508 E 18th Street (Osborne & 18th Street) where height of remaining historic wall was increased during construction. The height of the wall needs to be reduced to its original historic height, as any increases were never discussed or approved during the review process. Staff noted that an inappropriate door material violation in the Armory Park Historic Preservation Zone was discovered during an on-site review. Case has been opened with Code Enforcement. 1045 N 2nd Avenue, West University inappropriate windows. Contractor is working with staff to comply.

d. Review Process Issues/Discussions

None at this time.

7. **Call to the Audience (Information Only)**

John Burr mentioned IID Design Review Committee on 375 S Stone and requested comments on the pending Armory Park Revised Guidelines.

8. **Schedule and Future Items for Upcoming Meetings**

Staff provided information on upcoming items for PRS. Next PRS meeting is scheduled for 11-14-19

9. **Adjournment**

Meeting adjourned at 3:43 P.M.

2019

Tucson-Pima County Historical Commission
Plans Review Subcommittee

LEGAL ACTION REPORT

Monday, November 14, 2019

**Basement (Lower Meeting) Room, Joel D. Valdez Main Library, 101 N. Stone,
Tucson, AZ 85701**

1. Call to Order and Roll Call

Meeting called to order at 1:02 P.M., and a quorum was established.

Commissioners Present: Terry Majewski (Chair), Helen Erickson, Jill Jenkins, Jim Sauer, Michael Becherer, Sharon Chadwick, and Jan Mulder.

Commissioners Absent/Excused: None.

Staff Members Present: Michael Taku, Jodie Brown, Nick Ross, Sol Kohen, and Michael Kat (PDSD)

2. Approval of the Legal Action Reports (LARs) from the Meetings of 10-24-19 and 11-04-19

It was moved by Commissioner Sauer, duly seconded by Commissioner Jenkins, and carried by a voice vote of 7-0 to approve the Legal Action Reports from the meetings of 10-24-19 and 11-04-19 with a correction to Robin Large's title as Land Use Planner not Attorney as in item #4, C9-19-21/HPZ-19-84(b).

3. Infill Incentive District/Rio Nuevo Area Review Cases

UDC Sections 5.12.6.E.2; 5.12.7 & 5.12.10

C9-19-21/HPZ-19-84(a) Reconfiguration of the lot lines and rezoning (modification of zoning boundaries) to remove a relic "leg" of historic zoning (HC-3) from a portion of the site which is located on the southeast corner of South Stone Avenue and East 14th Street, more particularly Parcel Numbers 117-14-0860, -0870, and -0890 to standard C-3 zoning (HC-3 to C-3). The "leg" of the historic HC-3 zoning extends west across a

vacant parking lot that is not nor has ever protected any historic structure. The historic HC-3 designation is proposed to remain and continue to protect the Brady Court buildings. No contributing structures will be removed from the HPZ as a result – 375 S. Stone Avenue-(Contributor, Armory Park Historic District)

*Commissioner Becherer recused from this case due to an ongoing business relationship with the owner of the property.

Staff Taku introduced the project. Historic Preservation Officer, Jodie Brown restated her determination on the removal of the relic “leg” of historic zoning (HC-3) from a portion of the site.

Land Use Planner Robin Large from Lazarus, Silvyn & Bangs, P.C and architect Bill Mackey from Worker, Inc. presented the project.

Discussion was held. Applicant discussed the proposed property lines and zoning boundaries, proposed rezoning conditions to include APHZAB and PRS review with recommendations to the City of Tucson HPO for final decision. Additional focus was on additional historic protection of the adobe structures in the southeast corner of the subject parcels. Staff read into the record the Unified Development Code (UDC) Section 5.8.10.E and stated that the proposed rezoning condition (b) provided same protection to the structure as all contributing properties in the HPZ for any proposed demolition. Action was taken.

It was moved by Commissioner Erickson, duly seconded by Commissioner Jenkins, and passed by a voice vote of 4-2 (Commissioners, Majewski, Erickson, Jenkins, and Chadwick voted yes; Commissioners Sauer and Mulder (dissented); and *Commissioner Becherer was recused and did not vote) to recommend approval subject to adding “proposed” in front of rezoning condition (b) and add “.E” to UDC Section 5.8.10, to read as follows. “Proposed demolition of the adobe structure on the southeast corner of the C-3 (which is a contributing structure to the Armory Park National Register Historic District) shall be reviewed and require compliance and approval pursuant to UDC Section 5.8.10.E.”

IID-18-06/HPZ-19-84(b) New Construction: Mixed-use 4-story building at the southwest corner of Stone Avenue and 14th Street, comprising 28 one and two bedroom condominiums, the relocated Casa Vicente restaurant, a parking lot, and a rehabilitated historic structure. Concurrent rezoning (change of zoning) to remove a portion of the lot zoned “H. from the site.” [Contributor, Armory Park Historic District]. No contributing structures will be removed from the HPZ as a result. – 375 S Stone Avenue-(Greater Infill Incentive District.)

*Commissioner Becherer recused from this case due to an ongoing business relationship with the owner of the property.

Architect Bill Mackey from Worker, Inc., and Gerrie Gray from Miramonte Homes presented the project.

Discussion was held. Action was taken.

It was moved by Commissioner Erickson, duly seconded by Commissioner Jenkins, and passed by a voice vote of 6-0 (*Commissioner Becherer was recused and did not vote) to recommend approval of the project as presented.

IID-19-13/HPZ-19-96 Bawker Bawker Cider House—Change of land use from retail-bar services to taproom/perishable goods manufacturing as accessory. New ADA/Fire egress door; new dual pane, tempered glass set into mullions; new HVAC units; new glass block; and new dark sky light. IID for change of use, parking and landscaping- 400 N 4th Avenue- (Contributor, Fourth Avenue Commercial National Register District; Downtown Links Sub-District, IID)

*Commissioner Becherer rejoined review at 2:09 P.M.

Staff Ross introduced the project.

Business owner Don Rubino from Bawker Bawker Cider House presented the project.

Discussion was held. Action was taken.

It was moved by Commissioner Sauer, duly seconded by Commissioner Erickson, and passed by a voice vote of 7-0 (*Commissioner Becherer rejoined) to recommend approval of the project as presented, with the following conditions: (1) a steel door or steel and glass door is acceptable, and (2) we concur with the City Historic Preservation Officer's recommendation that the new door be offset to preserve one of the soldier courses of the existing opening.

4. **Historic Landmark Nomination (HL) Review Cases**

UDC Section 5.8.5 & 5.8.6

HL-19-03 –Proposed Historic Landmark (HL) Designation: “Tucson Origins.” PRS review to recommend approval or denial of the nomination

proposal to the PDSD Director - (Prepared by City of Tucson Historic Preservation Office.)

Presentation by Historic Preservation Office staff Jodie Brown, Marty McCune, and Allison Diehl.

Discussion was held. Diana Hadley spoke on the apache attack and suggested possible reconstruction of a bridge in future amendment. Bill DuPont spoke on the importance of the nomination in Tucson's culture, history, tourism, research, economy, and agricultural garden activities as factors for designation of Tucson as a City of Gastronomy by UNESCO. Commissioner Sauer questioned the omission from the landmark of the "early agricultural cemetery" site, believed to be on City of Tucson land and immediately adjacent to the proposed site.

It was moved by Commissioner Sauer, duly seconded by Commissioner Chadwick, and passed by a voice vote of 7-0 to (1) recommend approval of the project as presented, (2) recommend that the City of Tucson investigate the possibility of including the area represented on the proposed map as "early agricultural cemetery" within the landmark in order to recognize a more complete history of the site, and (3) recommend the future addition of the Carrillo House and Well site, and the "proto historic cemetery" site through an amendment process.

5. Current Issues for Information/Discussion

a. Minor Reviews

Staff provided an update on reviews conducted in West University, Armory Park, and Downtown.

b. Appeals

None at this time.

c. Zoning Violations

Staff provided information on ongoing and pending cases being worked on for compliance.

d. Review Process Issues/Discussions

Discussion on swapping property in HPZs.

5. Call to the Audience (Information Only)

John Burr mentioned IID Design Review Committee on 375 S. Stone, Baffert meeting, FLD review, and requested comments on the pending Armory Park Revised Guidelines.

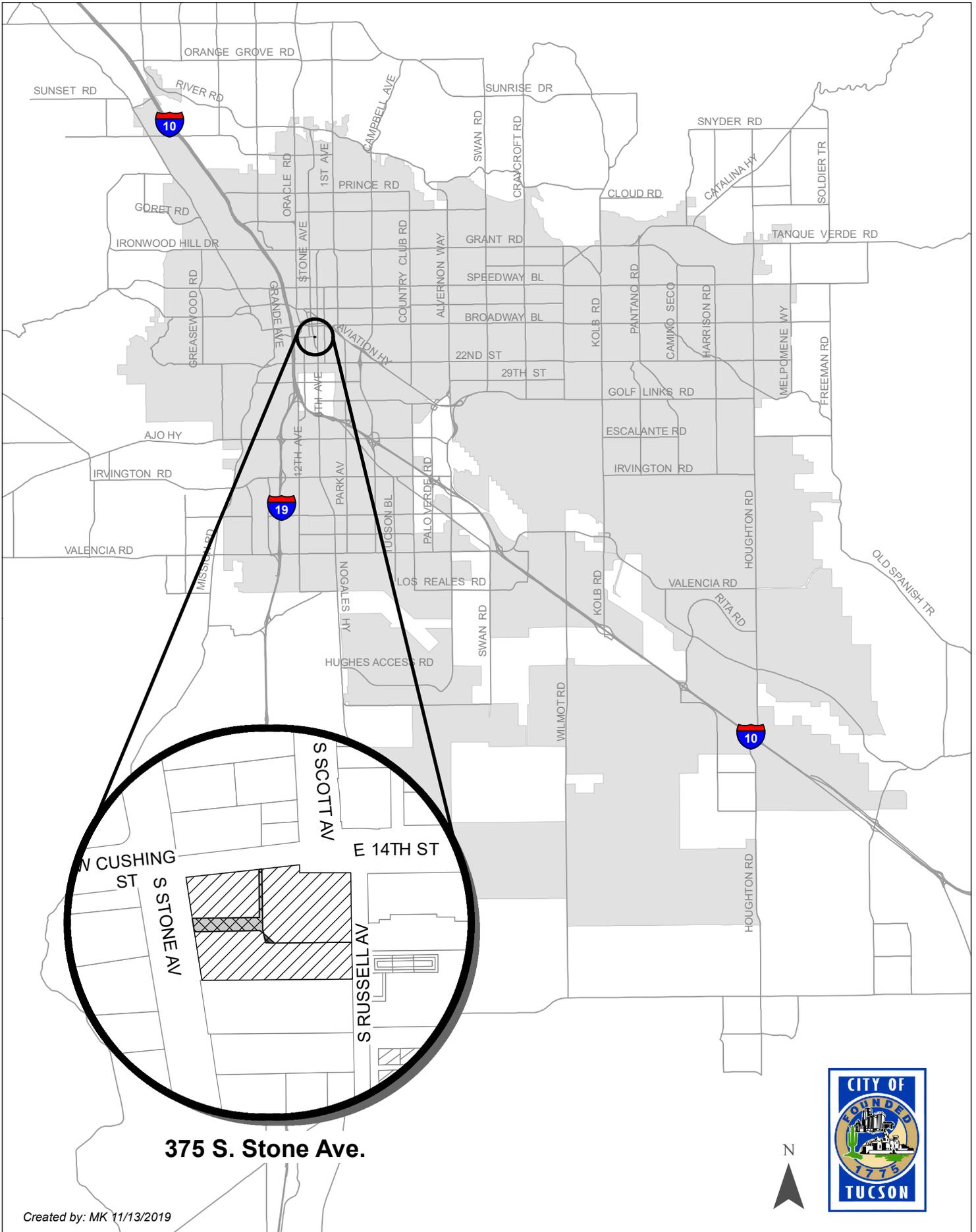
6. Schedule and Future Items for Upcoming Meetings

Staff provided information on upcoming items for PRS. Next PRS meeting is scheduled for 11-12-19 but other dates are also being considered.

7. Adjournment

Meeting adjourned at 3:12 P.M.

C9-19-21 375 S. Stone Ave.
Rezoning Request: From HC-3 to C-3, and C-3 to HC-3



375 S. Stone Ave.



C9-19-21 375 S. Stone Ave.
Rezoning Request: From HC-3 to C-3, and C-3 to HC-3



-  Area of Rezoning: HC-3 to C-3
-  Area of Rezoning: C-3 to HC-3
-  Subject Property: Zoning to remain

Address: 375 S. Stone Ave.
Base Maps: Twp.14S Range 13E Sec. 13
Ward: 6

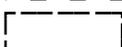
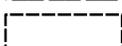


0 100 200 Feet
1 inch = 208.333333 feet

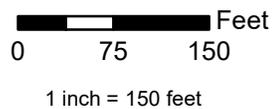


C9-19-21 375 S. Stone Ave.
 Rezoning Request: From HC-3 to C-3, and C-3 to HC-3



-  Area of Rezoning: HC-3 to C-3
-  Area of Rezoning: C-3 to HC-3
-  Subject Property: Zoning to remain
-  Zone Boundaries
-  Notification Area (300 foot radius)
-  Protest Area (150 foot radius)
-  Properties Notified

Address: 375 S. Stone Ave.
 Base Maps: Twp. 14S R. 13E Sec. 13
 Ward: 6



**PUBLIC FACILITIES AND SERVICES REPORT FOR DECEMBER 5,
2019 (as of 11/19/19)**

C9-19-21 375 S. Stone Ave., HC-3 to C-3

CITY AGENCIES: No Objections Noted

**Environmental Services
PDSB – Engineering
PDSB – Historic Preservation Officer
PDSB – Landscape
PDSB – Sign Code
PDSB – Zoning Review:
TDOT – Engineering
TDOT – Traffic Engineering
Tucson Parks and Recreation
Tucson Police Department
Tucson Fire Department
Tucson Water Department**

Objections or Conditions Noted

None

NON-CITY AGENCIES: No Objections Noted

**Arizona Department of Transportation
Davis-Monthan Air Force Base
PAG-TPD: Estimated traffic generation of proposed development: 200 vehicle trips per day.
Pima County Transportation and Flood Control
Pima County Parks and Recreation
Tucson Electric Power
Tucson Unified School District**

Objections or Conditions Noted

Tucson Airport Authority: See attached dated Nov. 8, 2019.
Pima County Wastewater: See attached dated Nov. 14, 2019.

Additional information about this project, including the staff report to the Zoning Examiner and the Preliminary Development Plan, will be posted on the web by 5:00 PM, Wednesday November 20, 2019 at <https://www.tucsonaz.gov/pdsd/public-hearing-agenda-materials-rezoning-special-exceptions-original-city-zoning>

CDRC Transmittal

To: Development Service Department, Rezoning Division

From: Elisa Hamblin, AICP, Principal Planner

341, 345, 375 S Stone Av; 40 E 14th St

117-14-0870, 0860, 0890

HC-3 to HC-3 and C-3

C9-19-21

Zoning Examiner

TRANSMITTAL: November 1, 2019

The proposed residential use falls under UDC Article 4.8.6, Table 4.8-4: Permitted Uses - Commercial and Mixed Use Zones. Residential Land Use Group with Land Use Class/Type: Multifamily Development.

The proposed commercial use falls under UDC Article 4.8.6, Table 4.8-4: Permitted Uses - Commercial and Mixed Use Zones. Commercial Land Use Group with Land Use Class/Type: Food Service.

The proposed residential use falls under UDC Article 4.8.6, Table 4.8-4: Permitted Uses - Commercial and Mixed Use Zones. Commercial Land Use Group with Land Use Class/Type: Administrative and Professional Office.

Vehicular Access: Vehicular access appears to be adequate

Vehicle Parking Required: 91 spaces

Vehicle Parking Provided: 51 spaces (to be modified thru IID)

Short Term Bicycle Required: 8 spaces

Short Term Bicycle Provided: 8 spaces

Long Term Bicycle Required: 22 spaces

Long Term Bicycle Provided: 22 spaces

Off-Street Loading Required: None

Off-Street Loading Provided: None

Pedestrian Access: Pedestrian access appears to be adequate

Allowed Building Height: 75 ft

Proposed Building Height: Approximately 70 ft

Should you have questions, contact me at Elisa.Hamblin@tucsonaz.gov or (520) 837-4966.

From: Heather Thrall
To: TucsonRezoning
CC: Heather Thrall; Susan Montes
Date: 11/14/2019 8:51 AM
Subject: Fwd: C9-19-21- Rezoning Memorandum (signs review)

C9-19-21 - Rezoning

The property addressed 375 S Stone Avenue has a sign located at the corner of Cushing and Stone for the former Casa Vicente restaurant that should be painted over or removed, as the restaurant has been demolished. (No billboards present.)

As the property will be multi-use, it will be reviewed under commercial allowances of the Sign Standards, including any applicable historic review.

Regards,

Heather Thrall, Lead Planner
Signs Division
Planning & Development Services
City of Tucson
520-837-4975 (sign code & permit info)
<http://pdsd.tucsonaz.gov/pdsd/sign-permits>
Property Research Online (permits / zoning) <https://www.tucsonaz.gov/PRO/pdsd/>

>>> Michael Kat 10/29/2019 12:30 PM >>>

C9-19-21- Rezoning Memorandum

DATE: October 29, 2019

FROM: Michael Kat, Entitlements Section

SUBJECT: New Rezoning

CASE: C9-19-21 375 S. Stone Ave.

WARD: 6

PROPOSED USE: Mixed Use with Residential and Commercial

PLEASE RESPOND BY: **November 14, 2019**

****Please send comments to:** TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov

****Please respond with new e-mail and copy case number and name in subject line.**

The above referenced request is being analyzed for a staff report and recommendation to the Zoning Examiner. Please advise of any considerations involving your jurisdiction including adopted policy, existing capacities, or planned improvements that should be evaluated in relation to this proposal. Relate specific information, such as design criteria, actual traffic counts, water demand impact, sewer capacities, lack of park facilities, etc. Also indicate facilities or services available for the proposed project, and give your opinion as to the adequacy of such services for the proposal.

It is particularly important to have specific data available if services are inadequate and you believe the proposal should be denied. If no response is received from your office, it will be so indicated in the communications to the Zoning Examiner and Mayor and Council. For further information contact Michael Kat at 837-6971.

See link for Rezoning documents. Click on activity search and type in C9-19-21.

<https://www.tucsonaz.gov/PRO/pdsd/>

Attachments: Preliminary Development Plan

This e-mail is being sent to the following agencies:

- ADOT
- Arizona State Land Department
- COUNCIL WARD 1 2 3 4 5 6
- DAVIS MONTHAN AFB
- DSD – Zoning Review, Landscape, Information Technology, Sign Code Review, Zoning Administration, Engineering Review



CITY OF TUCSON

October 28, 2019

ACTIVITY NUMBER: C9-19-21
PROJECT NAME: 375 S Stone Avenue rezoning
PROJECT ADDRESS: 1834 N Craycroft
PROJECT REVIEWER: Zelin Canchola TDOT

The Transportation Engineering Division has reviewed the subject item and offers the following comments/conditions/requirements:

Comments:

Transportation has no objections to the proposed rezoning plan.

Technical standard requirements will apply during the development plan process.

Any relocation, modification, etc., of existing utilities and/or public improvements necessitated by the proposed development will be at no expense to the Public.

Dedication of right of way according to the City of Tucson MS&R (major streets and routes) Along Stone Avenue is required.

A traffic impact analysis will be required.

If you have any questions, I can be reached at 837-6659 or zelin.canchola@tucsonaz.gov

From: Howard Dutt
To: Kat, Michael; TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov
Date: 11/14/2019 7:42 AM
Subject: Re: C9-19-21– Rezoning Memorandum

The Tucson Parks and Recreation Department has no issues or concerns regarding this rezoning.

Howard B. Dutt, RLA
Landscape Architect
Tucson Parks & Recreation
(520) 837-8040
Howard.Dutt@tucsonaz.gov

>>> Michael Kat 10/29/2019 12:30 PM >>>

C9-19-21– Rezoning Memorandum

DATE: October 29, 2019

FROM: Michael Kat, Entitlements Section

SUBJECT: New Rezoning

CASE: C9-19-21 375 S. Stone Ave.

WARD: 6

PROPOSED USE: Mixed Use with Residential and Commercial

PLEASE RESPOND BY: **November 14, 2019**

****Please send comments to:** TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov

****Please respond with new e-mail and copy case number and name in subject line.**

The above referenced request is being analyzed for a staff report and recommendation to the Zoning Examiner. Please advise of any considerations involving your jurisdiction including adopted policy, existing capacities, or planned improvements that should be evaluated in relation to this proposal. Relate specific information, such as design criteria, actual traffic counts, water demand impact, sewer capacities, lack of park facilities, etc. Also indicate facilities or services available for the proposed project, and give your opinion as to the adequacy of such services for the proposal.

It is particularly important to have specific data available if services are inadequate and you believe the proposal should be denied. If no response is received from your office, it will be so indicated in the communications to the Zoning Examiner and Mayor and Council. For further information contact Michael Kat at 837-6971.

See link for Rezoning documents. Click on activity search and type in C9-19-21.

<https://www.tucsonaz.gov/PRO/pdsd/>

Attachments: Preliminary Development Plan

This e-mail is being sent to the following agencies:

- ADOT
- Arizona State Land Department
- COUNCIL WARD 1 2 3 4 5 6
- DAVIS MONTHAN AFB
- DSD – Zoning Review, Landscape, Information Technology, Sign Code Review, Zoning Administration, Engineering Review
- ENVIRONMENTAL SVCS
- MAYOR
- OFFICE OF CONSERVATION & SUSTAINABLE DEVELOPMENT
- PARKS & RECREATION
- PAG-TPD
- PIMA CO. ASSESSORS
- PIMA CO. DEVELOPMENT REVIEW
- PIMA CO. FLOOD PLAIN

From: Michael Mourreale
To: TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov
Date: 11/12/2019 9:37 AM
Subject: C9-19-21- 375 S. Stone Ave
Attachments: Site Plan.pdf

Good morning,

Tucson Water does not take exception to nor has any comments pertaining to the proposed rezoning of the subject properties.

If you have any further comments or questions regarding this topic, please let us know.

Sincerely,

Michael Mourreale, PE
Engineering Manager
New Development
Tucson Water
Office: (520) 837-2233

From: Tom Martinez <tmartinez@azdot.gov>
To: TucsonRezoning TucsonRezoning <TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov>
Date: 11/06/2019 5:51 AM
Subject: [EXTERNAL]C9-19-21 375 S. Stone Ave.

Regional Traffic Engineering has no comments on this submittal and supports the rezoning. The development will not impact any ADOT facilities.
Thank you

--

Tom J. Martinez

From: "CARTER, BONNIE K CIV USAF ACC 355 CES/CENPP" <bonnie.carter@us.af.mil>
To: "TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov" <TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov>
CC: "TORIELLO, MICHAEL R GS-14 USAF ACC 355 WG/CPD" <michael.toriello@us.af.mil>
Date: 10/30/2019 5:26 PM
Subject: [EXTERNAL]CASE: C9-19-21 375 S. Stone Ave.

Sir/Ma'am

DMAFB has reviewed the proposed City of Tucson rezoning for Mixed Use and Residential on 375 Stone and find this request will not have negative impact to the base and our mission as it is outside of the Airport Environ Zone and Approach Departure Corridor for DMAFB

B. Kacey Carter, Civ USAF ☰☑☰
Base Community Planner
355th Civil Engineer Squadron/CENPP
Davis-Monthan AFB AZ
520-228-3291
bonnie.carter@us.af.mil

From: Eric Kramer <EKramer@pagregion.com >
To: "TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov" <TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov>
Date: 11/19/2019 11:08 AM
Subject: [EXTERNAL]C9-19-21 375 S Stone Rezoning
Attachments: C9-19-21 375 S Stone Ave Rezoning.pdf

No objections/adverse comments. See attached.

Disclaimer: This report and/or data was funded in part through grant[s] from the Federal Highway Administration and/or Federal Transit Administration, U.S. Department of Transportation. The contents of this report and/or data reflect the views and opinions of the author(s) who is responsible for the facts and accuracy of the data presented herein. The contents do not necessarily state or reflect the official views or policies of the U.S. Department of Transportation, the Arizona Department of Transportation, or any other State or Federal Agency. This report and/or data does not constitute a standard, specification or regulation. The information in this publication is provided on an "as is" basis, and there are no warranties, express or implied, including, but not limited to, any warranties of merchantability or fitness for a particular purpose. In no event shall PAG be liable for any damages resulting from the use of the information. PAG provides the information in good faith and has endeavored to create and maintain accurate data. The users of this report and/or data are advised to use the information with caution and to independently verify accuracy.

Eric W. Kramer, Ph.D., AICP
Senior Land-Use Modeler

Your Regional Metropolitan Planning Organization



1 E. Broadway Blvd, Ste. 401
Tucson, AZ 85701
(520) 495-1455 (tel)
(520) 620-6981 (fax)
www.pagregion.com
ekramer@pagregion.com

C9-19-21 375 S Stone Ave Rezoning

Description/ITE Code	Units	Expected Units	Expected Daily Trips	PM Peak Trips - Total	PM In	PM Out
Truck Terminal 030	Acres					
General Light Industrial 110	TSF Gross					
Manufacturing 140	Acres					
Warehouse 150	TSF Gross					
Mini Warehouse 151	TSF Gross					
Single Family Homes 210	DU					
Apartments 220	DU	28.0		17	11	6
Condo, Townhouse 230	DU					
Mobile Home Park 240	DU					
Assisted Living 254	Beds					
Hotel 310	Rooms					
Motel 320	Rooms					
Health/Fitness Club 492	TSF Gross					
High School 530	TSF Gross					
Daycare Center 565	TSF Gross					
Hospital 610	TSF Gross					
Clinic 630	TSF Gross				Not Available	Not Available
General Office 710	TSF Gross	1.8	20	3	0	2
Single Tenant Office Building 715	TSF Gross					
Medical Dental Office 720	TSF Gross					
Specialty Retail Center 814	TSF Gross					
Free-Standing Discount Store 815	TSF Gross					
Nursery (Garden Center) 817	TSF Gross				Not Available	Not Available
Shopping Center 820 (Rate)	TSF Gross					
New Car Sales 841	TSF Gross					
Supermarket 850 (stand alone stores)	TSF Gross					
Convenien. Mkt. (Open 24 hrs) 851	TSF Gross					
Convenien. Mkt. (Open 16 Hrs) 852	TSF Gross		Not Available			
Discount Supermarket 854	TSF Gross					
Discount Club 857	TSF Gross					
Home Improvement Superstore 862	TSF Gross					
Pharmacy/Drugstore w/ Drive-thru 881	TSF Gross					
Furniture Store 890	TSF Gross					
Arts and Crafts Store 897	TSF Gross		Not Available			
Drive-in Bank 912	Drive-in Lanes					
Quality Restaurant 931	TSF Gross	2.0	180	15	10	5
High Turnover/Sit Down Rest. 932	TSF Gross					
Fast Food w/o Drive Thru 933	TSF Gross					
Fast Food with Drive Thru 934	TSF Gross					
Fast Food w Drive Thru Only, No Seating 935	TSF Gross		Not Available			
Automobile Parts and Service Center 943	TSF Gross		Not Available			
Serv.Station w/ Conven.Mkt 945	Fuel Position					
Serv.Station w/ Conven.Mkt w/ Car Wash 946	Fuel Position					
Church 560	TSF Gross					
TOTAL			200	35	22	13
			Expected Daily Trips	PM Peak Trips - Total	PM In	PM Out

19-Nov-19

Vehicle Trip Generation:

Daily:

200 PM Peak:

35

Here are my comments -

DATE: 11/19/2019

CASE: C9-19-21 375 S Stone
Ave Rezoning

COMMENT: **No objections or adverse comments**

	Daily	PM Peak
Vehicle Trip Generation:	200	35

Thanks,
-Eric

Additional notes: Did not see precise breakdown of restaurant and office SQFT. The allotted space for each land use is an estimate.

From: Nicholas Jordan <Nicholas.Jordan@pima.gov>
To: ""tucsonrezoning.dspo2.chdom2@tucsonaz.gov"" <tucsonrezoning.dspo2.chdom2@tucsonaz.gov>
Date: 10/29/2019 1:52 PM
Subject: [EXTERNAL]CASE: C9-19-21 375 S. Stone Ave.

Good afternoon,

Pima County Addressing does not have comments on **CASE:** C9-19-21 375 S. Stone Ave.

Thank you

Nicholas Jordan

Addressing Specialist
Pima County Development Services Department
201 N Stone AV
Tucson, AZ 85701
(520) 724-9623

[Click here to search for Projects and Permits or to make a Payment](#)

From: <AUtzinger@tep.com >
To: <TucsonRezoning.DSPO2.CHDOM2@tucsonaz.gov>
Date: 11/18/2019 4:01 PM
Subject: [EXTERNAL]C9-19-21 375 S. Stone Ave.
Attachments: C9-19-21 Response.pdf

Hello Mr. Kat

Please see attached TEP Response to rezoning memo C9-19-21, 375 S. Stone Ave

TEP has no comments at this time.

Thank you,

Alex Utzinger

Environmental and Land Use Planning Intern

Phone: 520-918-8245

Email: autzinger@tep.com



October 31, 2019

SENT VIA EMAIL

Michael Kat
Entitlements Section,
Planning and Development Services Department
City of Tucson
Tucson, AZ 85701

Subject: C9-19-21 - 375 E. S. Stone Rezoning

Dear Michael:

Thank you for the opportunity to review and comment on City of Tucson C9-19-21 - 375 S. Stone Avenue rezoning from HC-3 to C-3 on approx. 2400 square feet located at the southeast corner of the intersection of S. Stone Ave. and E. 14th Street.

The larger site proposed for development is a former restaurant and parking lot zoned C-3. An adjacent structure to the east is zoned HC-3, with a remnant of that zoning crossing the development site westward to Stone Avenue (currently parking lot). The new proposed 4-story mixed-use structure would be developed atop that zone.

There appear to be no individual historically important buildings, structures, sites or objects currently located on the HC-3 area identified for rezoning, and the historic preservation overlay on this portion of the site would appear moot. However, staff should research why the historic preservation overlay was enacted over the entire site to ensure no contributing characteristic for the adjacent identified structure is being impacted.

Pima County Development Services Department, Planning Division has no opposition to the proposed rezoning.

Sincerely,

A handwritten signature in blue ink that reads "Mark Holden". The signature is fluid and cursive, written over a light blue horizontal line.

Mark Holden, AICP
Principal Planner
Pima County Development Services Department, Planning Division

November 8, 2019

Michael Kat
Entitlements Section
City of Tucson
Public Works Buildings – 201 North Stone Avenue
Tucson, AZ. 85701

RE: C9-19-21 Rezoning Memorandum, 375 S. Stone Ave, WARD: 6, Received October 29, 2019

Dear Mr. Kat,

Thank you for the opportunity to comment on C9-19-21, Rezoning Memorandum, 375 S. Stone Ave. This is a rezoning application for an approximately 1.08 acre site which is located southeast of the intersection of South Stone Avenue and East 14th Street. This project proposes to change the zoning from Historic Commercial Zone 3 (HC-3) to Commercial Zone 3 (C-3) and from Commercial Zone 3 (C-3) to Commercial Zone 3 (C-3) to support the future development of a mix use building, containing both commercial and residential uses.

This site is within the Tucson International Airport aviation easement requirements and public disclosure area, FAA traffic pattern airspace, and FAA Part 77 airspace.

The Tucson Airport Authority conditionally approves the subject request contingent upon the following conditions of approval, as noted below. These conditions shall be identified in the rezoning memorandum and the general notes section of all future plans submitted to the City of Tucson for review, which specifically pertains to all projects contained within the area of this particular rezoning request.

Conditions of approval:

1. "According to the Federal Aviation Administration (FAA) Notice Criteria Tool, this project area is located in proximity to a navigation facility and could impact navigation signal reception. As the project site develops every project applicant shall file FAA Form 7460 with the FAA at least 45 days before construction activities begin for every proposed project unless FAA staff, with the Obstruction Evaluation / Airport Airspace Analysis (OE/AAA), provides the project applicant with written communication that filing FAA Form 7460 is not required. It is highly recommended that the applicant file earlier than 45 days to provide the applicant with sufficient time to respond to any concerns which are identified by the FAA. Any cranes which are used must also be identified with Form 7460. Please file Form 7460 at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>"
2. "Prior to the City's approval of this rezoning request, the property owner/developer/applicant shall record the TAA approved Aviation Easement form which discloses the existence, and operational characteristics of the Tucson International Airport to future owners or tenants of the property and further conveys the

right to the public to lawfully use the airspace above the property. The Avigation Easement shall be recorded in a manner with the Pima County recorder which shall document it as having title liability. The content of such documents shall be according to the form and instructions provided.

The current property owner/developer/applicant or other person authorized to sign on behalf of the current property owner shall complete, sign, and record the Avigation Easement with the Pima County Recorder's Office. Once the Avigation Easement is recorded send a complete copy of the recorded easement document, which contains all pages which were recorded, to Tucson Airport Authority by either email (send to srobidoux@flytucson.com) or to the mailing address provided below.

Scott Robidoux
Senior Airport Planner
Tucson Airport Authority
7250 South Tucson Boulevard
Suite 300
Tucson, AZ 85756"

3. "Applicable to residential uses only

- a. The developer shall provide the Airport Disclosure Statement form, at time of sale, to the new property owners with all new unit purchases. In the event the development of any residential uses does not involve the sale of new units, but is instead offering rental residential units to the public, the new tenant of the rental unit shall be provided a copy of the Airport Disclosure Statement form. The intent of the Airport Disclosure Statement form is to educate and notify the new residents that they are living near an airport. The content of such documents shall be according to the form and instructions provided.

The property owner (for itself or its tenants) shall forward a signed copy of the Airport Disclosure Statement form to the Tucson Airport Authority within ten (10) days of signature, using the mailing address provided below.

Scott Robidoux
Senior Airport Planner
Tucson Airport Authority
7250 South Tucson Boulevard
Suite 300
Tucson, AZ 85756"

Please do not hesitate to contact me if you have any questions or concerns regarding this comment letter. I can be reached by email at srobidoux@flytucson.com or by telephone at 520-573-4811.

Respectfully,



Scott Robidoux,
Senior Airport Planner

cc file



PIMA COUNTY
WASTEWATER RECLAMATION

JACKSON JENKINS
DIRECTOR

201 NORTH STONE AVENUE
TUCSON, ARIZONA 85701-1207

PH: (520) 724-6500
FAX: (520) 724-9635

November 14, 2019

TO: **Michael Kat**
Entitlements Section
City of Tucson Planning and Development Services



FROM: Mirela Hromatka, Sr. Planner
Planning Section
Technical Services and Engineering Division

SUBJECT: **C9-19-21 – 375 S. Stone Ave Rezoning**
HC-3 to C-3, Development Plan (1st submittal)
Tax Parcels #117-14-0860, 0870 & 0890; 1.08 acre

The Planning Section of the Pima County Regional Wastewater Reclamation Department (PCRWRD) has reviewed the above referenced request and offers the following comments for your use. The rezoning request is for a mixed-use development that will include condo units, a restaurant, and office space. The existing apartment building and structure at the southeast corner of the property will remain.

The rezoning area is within the PCRWRD service area and is tributary to the Agua Nueva Water Reclamation Facility via the Santa Cruz Interceptor. Capacity for this development is currently available in the 8" public sewer G-003, downstream from manhole 6374-01 (Type II 2019-234, dated October 10, 2019).

PCRWRD has no objection to the proposed rezoning request, but offers the following conditions:

REZONING CONDITIONS

Should the City of Tucson Mayor and Council be inclined to approve this rezoning, the Pima County Regional Wastewater Reclamation Department (PCRWRD) recommends the following rezoning conditions:

1. The owner(s) shall not construe any action by Pima County as a commitment to provide sewer service to any new development within the boundaries of the rezoning area until Pima County executes an agreement with the owner(s) to that effect.
2. The owner(s) shall obtain written documentation from the Pima County Regional Wastewater Reclamation Department (PCRWRD) that treatment and conveyance capacity is available for any new development within the boundaries of the rezoning area, no more than 90 days before submitting any tentative plat, development plan,

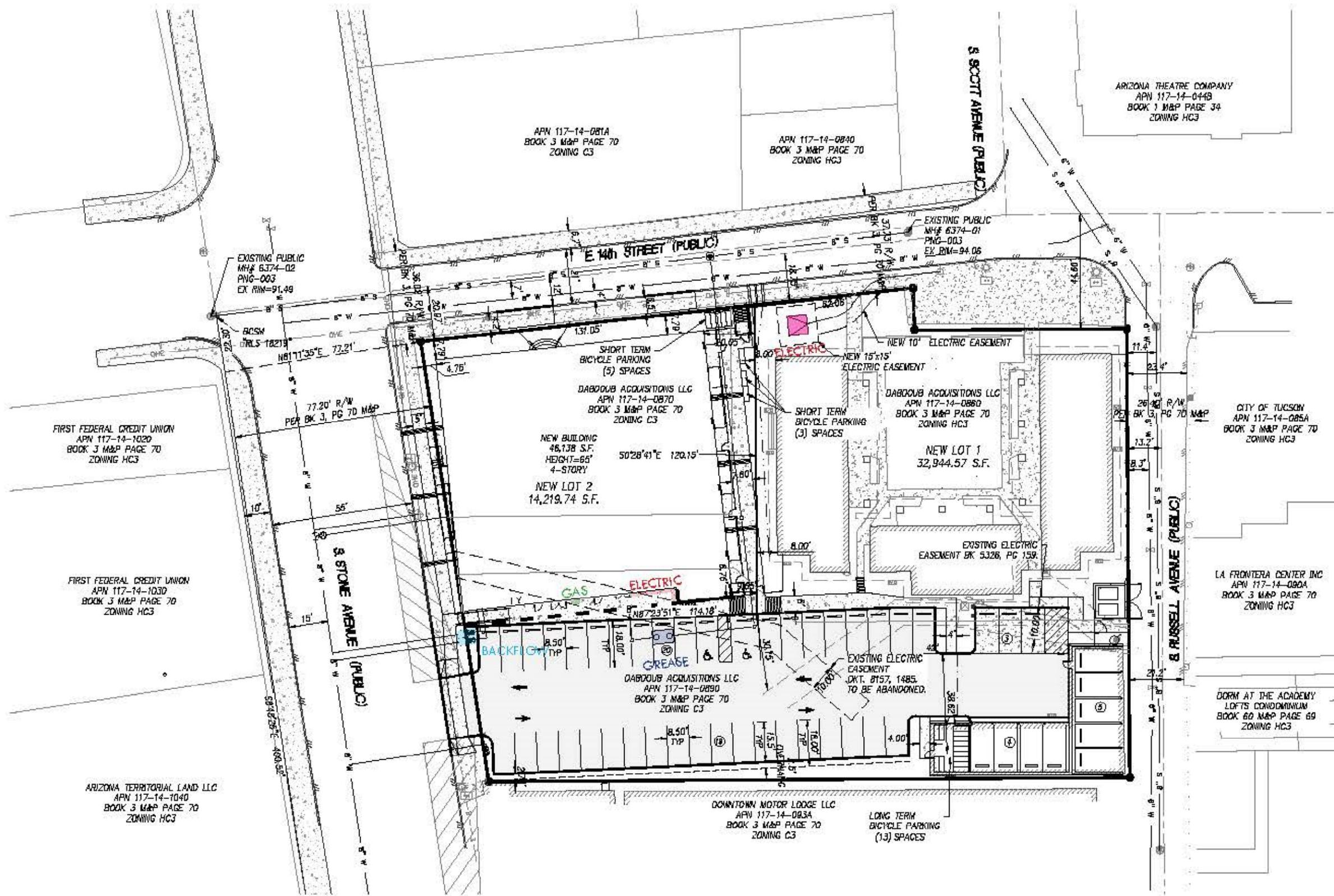
preliminary sewer layout, sewer improvement plan, or request for building permit for review. Should treatment and/or conveyance capacity not be available at that time, the owner(s) shall enter into a written agreement addressing the option of funding, designing and constructing the necessary improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.

3. The owner(s) shall time all new development within the boundaries of the rezoning area to coincide with the availability of treatment and conveyance capacity in the downstream public sewerage system.
4. The owner(s) shall connect all development within the boundaries of the rezoning area to Pima County's public sewer system at the location and in the manner specified by the PCRWRD in its capacity response letter and as specified by PCRWRD at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan, or request for building permit.
5. The owner(s) shall fund, design and construct all off-site and on-site sewers necessary to serve the rezoning area, in the manner specified at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan or request for building permit.
6. The owner(s) shall complete the construction of all necessary public and/or private sewerage facilities as required by all applicable agreements with Pima County, and all applicable regulations, including the Clean Water Act and those promulgated by ADEQ, before treatment and conveyance capacity in the downstream public sewerage system will be permanently committed for any new development within the boundaries of the rezoning area.

If you wish to discuss the above conditions, please contact me at 724-6488. *N.H.*

MH

Copy: Project



SITE PLAN - PROPOSED

1:40



WORRIS, INC.
 ARCHITECTURE INC.
 330 S. 14TH ST.
 TUCSON, AZ 85701

24 JAN 2019
 13 SEP 2019

375 SOUTH STONE
 I.I.D. PACKAGE
 PROPOSED SITE PLAN - CIVIL

G27
 REVISED

Place
Stamp
Here

City of Tucson
Planning and Development Services Department
Entitlements Section
201 N. Stone
P.O. Box 27210
Tucson, Arizona 85726-7210

C9-19-21

Expose this flap - Affix stamp and return



City of Tucson
Planning and Development Services
Department - Entitlements Section
201 N. Stone Avenue
P.O. BOX 27210
Tucson, Arizona 85726-7210

C9-19-21
IMPORTANT LAND USE CHANGE NOTICE ENCLOSED