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October 9, 2013

Jonathan Mabry, Ph.D.
Historic Preservation Officer
Department of Housing and Community Development
City of Tucson
310 North Commerce Park Loop [Santa Rita Building]
Tucson, AZ 85726

RE: Tucson Downtown Links Project
Cultural Resources Evaluation/Mitigation Review
SHPO-2012-114 (115120)

Dear Dr. Mabry:

Thank you for consulting with the Arizona State Historic Preservation Office (SHPO) regarding the Tucson Downtown Links Project and submitting the materials for review and comment following an earlier meeting this year in February and a tour by Bob Frankeberger and myself of the project area. We have reviewed the submitted materials and offer the following comments.

Although this project is locally funded, it involves the juncture of a number of efforts to [re]integrate the downtown area of the City of Tucson [COT], the location of several historic transportation activities [the appearance of the railroad in the late 1800s and the highway networks of the 1900s] that have significantly impacted the spatial integrity of the community. This project will resolve the traffic dilemmas found in and around the project area. For instance, historic buildings owned by the Arizona Department of Transportation in the project area have been demolished [e.g., 510 and 530 North Stone Avenue, 140 West 6th Street] separately, and helped create the land use circumstances for the Tucson Downtown Links Project to occur. The COT claims the current project will also allow, through improvements in drainage, the removal of the downtown from the 100-year floodplain and provide adequate flashflood drainage for existing and new roadway underpasses, structures mostly related to the historic railroad and highway routes through the COT.

There appears to be no feasible and prudent alternatives for this project given the current locations of the major rail and vehicular transportation routes and the placement of the commercial enterprises associated with these transportation routes as they exist in the COT. From our office's perspective, it becomes a matter [beyond the no build alternative] of how best to mitigate any **adverse effects**.

The current submittal included a report [Cultural Resources Evaluation of the Tucson Downtown Links Project, Tucson, Arizona] by Steely et al. [2013] with a minor archaeological dimension [adverse effect and treatment plan] and mostly inventory forms for the buildings and structures located within the project area, along with discussions of the project's direct and indirect effects upon the built environment. The archaeological aspects of the project are appropriate; the inventory documentation is also adequate, and the proposed new access route into the Warehouse District, as well as the change of access to 4th Avenue, 9th Avenue, and the abandonment of 6th Street are suitable to the spatial configuration of the area.

The COT, as a Certified Local Government [CLG] designated under a National Historic Preservation Act program, has **minimized the project's adverse effects to the extent possible**, and through planning can protect and enhance the downtown surviving historic fabric. The recommendations in Chapter 7 of the Steely et al. [2013] report are consistent with the project's impacts. The COT had already developed the Downtown Links District [DLD] Urban Overlay District to help accomplish the goal of preventing further loss of additional historic resources in the downtown area. An amendment to the 1999 Tucson Warehouse Historic District registration form is needed to reflect the demolitions and alterations since 1999.

We appreciate your cooperation with this office in considering the impacts of undertakings on important cultural resources situated in the State of Arizona. If you have any questions, please contact me at (602) 542-7140 or electronically at djacobs@azstateparks.gov.

Sincerely,



David Jacobs
Compliance Specialist/Archaeologist
State Historic Preservation Office