



POSTER  
FROST  
MIRTO

ARCHITECTURE  
PLANNING  
PRESERVATION

**DATE:** Final April 18, 2019. *Revised May 20, 2019*

**TO:** IID Design Review Committee  
c/o Carolyn Laurie, Principal Planner  
Planning & Development Services  
City of Tucson  
201 N Stone Avenue  
Tucson, AZ 85701

**FROM:** Corky Poster, Architect/Planner (AICP)  
City of Tucson On-Call Design Professional

**RE:** IID-18-08  
Related Activity Numbers: DP-19-0018, T18PRE0123  
141 South Stone Avenue, Tucson, AZ

**OWNER(S):** FHG DTN Tucson Owner LLC;  
FHG Dtn Tucson JV, LLC;  
Fayth Hospitality Group MM, LLC

**ARCHITECT:** Seaver Franks Architects, Inc. with Cypress Civil Development

**PHASE OF REVIEW:**

*Comment:*

*I have reviewed the submittal for the Hilton Dual Brand Hotel, dated February, 2019, for compliance with the UDC Infill Incentive District (IID), UDC Section 5.12.2, 5.12.8, and 5.12.10. My comments have been prepared in advance of an Infill Incentive District Design Review Committee meeting, scheduled for June 5th, 3rd Floor Large Conference Room, Planning & Development Services, 201 N. Stone Avenue; Tucson, AZ 85701.*

*This review is the third time I have reviewed elements of this proposal and the first formal review of a complete package prior to its review by the Design Review Committee of the IID. On Thursday November 15, 2018, I attended an informal pre-application meeting to informally review items submitted by the development team for some initial feedback. On Thursday December 6, 2018, I met with a more formal Pre-Application meeting using the Pre-Application Design Standard Checklist with responses to the requirements provided (in blue) by the applicant.*

*I have reviewed the additional seven renderings provided to me via email by Carolyn Laurie on Tuesday May 14, 2019. The comments below represent modifications to the red comments provided earlier.*

**MATERIAL REVIEWED:**

INFILL INCENTIVE DISTRICT DESIGN PACKAGE FOR HILTON DUAL BRAND HOTEL, submittal from applicant, dated February 2019. Materials as noted, following (8.5 x 11 Format):

- Infill Incentive District Application (6 pages)
- Project Summary/Introduction to HILTON DUAL BRAND HOTEL (10 Pages)

- Pima County Assessor’s Record Parcel Detail & Map (21 pages)
- Infill Incentive District Response/DCS Modification Requests/Rio Nuevo Area Responses (7pages)
- Stakeholder Outreach Summary (4 pages)
- Existing Photo Study (6 pages)
- Architectural Precedence/Analysis (16 pages)
- Historic Property Overview (6 pages)
- Building Design Information (9 pages)

Appendix

- Neighborhood Meeting Documentation (6 pages)
- Slide Presentation for January 8, 2019 Neighborhood Meeting (15 pages)
- Neighborhood Meeting Invitation and Mailing Documentation (36 pages)
- Neighborhood Meeting Sign-In Sheet (4 pages)
- Resident and Neighborhood Association Area Studies (12 pages)
- Downtown Streetscape Interim Policy – Response Letter )4 pages)
- MS&R Setback Relief Narrative (6 pages)
- City of Tucson CDRD Pre-Application Comments (4 pages)
- Development Package DP19-0018 – 1stSubmittal (14 pages)

**IID STANDARDS APPLICABLE TO PROJECT:**

- UDC Section **5.12.8 General IID Zoning Option Design Standards**
- UDC Section **5.12.10 Downtown Core Sub-District (DCS)**
- UDC Section **5.12.2. Establishment**

C. Depending on the development choice of the owner, plans submitted for development of land in the IID must comply with the appropriate IID regulations and standards as follows:

1.b. If the property is located within the boundaries of RNA, all of the following regulations, standards, and review procedures apply:

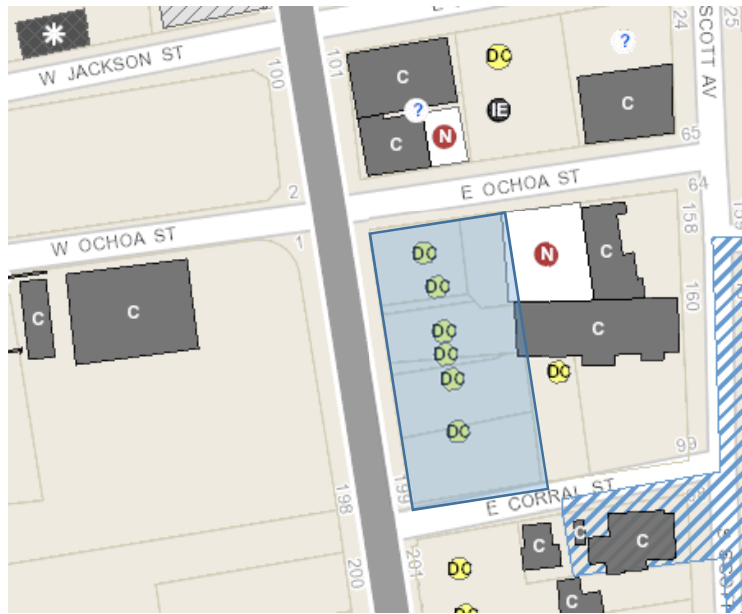
- (1) The regulations and standards of the underlying zoning.
- (2) The RNA Standards in Section 5.12.7
- (3) **Section 5.12.6.E – IID Historic Preservation Review**

**2. Projects not in an HPZ [this project is not]**

a. The Tucson-Pima County Historical Commission Plans Review Sub-Committee reviews all projects listed below:

(2) Projects proposing new development using IID zoning option that are either adjacent to the boundaries of an HPZ [*not applicable here*] or adjacent to a structure meeting any one or more of the following characteristics:

(a) Listed or eligible to be listed in the National Register of Historic Places, individually or as a contributing property [*applicable here. See map below “C”*]



d. The TPCHC Plans Review Subcommittee reviews for compliance with the design requirements of the applicable sub-district and for design compatibility of a proposed development project.

- (1) New development must be designed to complement and be compatible with the architecture of adjacent historic structures.
- (2) Compatibility with adjacent historic structures is to be achieved through architectural elements such as building setbacks, building step-backs, textures, materials, forms, and landscaping.
- (3) Exceptions. The PSDS Director may waive the compatibility requirement of this section under the following circumstances:
  - (a) Where the adjacent lot is vacant
  - (b) If the property owner of the adjacent historic property waives the requirement; or
  - (c) If the adjacent lot is developed with a non-residential building.

**STANDARDS AND REVIEWER COMMENTS:**

UDC Section 5.12.8. GENERAL IID ZONING OPTION DESIGN STANDARDS

An IID Plan under the IID zoning option design standards must demonstrate compliance with the following:

- A. Streetscape Design-** Streetscape design must comply with the street design standards in the Technical Manual and the Streetscape Design Policy.
  1. Pedestrian-orientation: Projects shall be pedestrian-oriented and comply with all of the following standards:
    - a. New construction shall have architectural elements/details at the first two floor levels; *The project in general is very weak in its response as a pedestrian-oriented architectural development. All but the northern 1/3 of the west elevation are either devoid of any pedestrian interest or dominated by automobile scale and use. The south elevation is stark. It is a monolithic two-story planar façade and makes no effort to meet this requirement. While it is true that the east elevation adjoins adjacent property and has no street frontage, the southern half of the east elevation could have made a greater effort at architectural interest. The west elevation is weakened by the decision to use the southern 2/3 for parking, and despite some effort here, the result leaves very little of interest of pedestrians. That is all the more disappointing in that it faces, but fails to respond to, the symmetrical iconic San Agustin Cathedral façade. Finally, the north elevation while allowing for some pedestrian interest, is dominated by the automobile*

*scale and activity of the drop-off area. While it technically provides windows for pedestrians to look through, it is not a very pleasant place for pedestrians to be.*

*The changes provided in the May 14, 2019 modified renderings represent a substantial improvement to the earlier submission, particularly on the south and east. .*

*Specifically, I have the following additional comments:*

*West façade: In my view, the west façade still does not respond in a substantial enough way to the iconic symmetry of the east-facing façade of the San Augustine Cathedral. I would recommend:*

- 1. that the bump-out of the curb be symmetrical to the centerline of the Cathedral (as opposed to the asymmetry to the south).*
- 2. that the recess into the parking structure be significantly greater than the 4' recess currently proposed, even at the expense of a few parking spaces on the interior.*
- 3. that the applicant pursue farther up the TDOT hierarchy the possibility of a broad pedestrian table connecting the Cathedral to the new hotel. The traffic counts on Stone are extremely low and will continue to stay that way. This pedestrian table/cross-walk will provide significant traffic calming in a location that is certain to be an increased path for much greater numbers of pedestrians moving from the Cathedral to the hotel. .*

*South façade: This is improved. I would recommend that the planters proposed along this location be located against the building, rather than against the curb.*

*North automobile drop-off area: My comments are unchanged.*

*East façade: This is improved with the "window" recesses.*

- b. Buildings shall provide windows, window displays, or visible activity on the ground floor for at least 50 percent of frontage;  
*This standard is not met. My rough calculation puts the number at about 35%. (181/514). This standard would be much improved if the depth of the 4' pocket park were substantially increased.*
- c. A single plane of façade shall be no longer than fifty feet without architectural detail;  
*This standard is not met. The south façade is 116' long with no detail relief. The south half of the east façade similarly does not meet the standard. Much improved.*
- d. Front doors shall be visible or identifiable from the street and visually highlighted by graphics, lighting, or similar features;  
*The front door on the north meets this standard but is hampered by the dominance of the automobile drop-off. Same comment.*
- e. Uses, such as Commercial Services or Retail Trade uses that encourage street level pedestrian activity are preferred on the first floor of a structure of a multistory building; *The decision to use most of the prominent Cathedral-facing west façade to front the garage has severely hampered meeting this preferred standard. A stronger concept would have been to locate double-loaded parking north-south along the eastern property boundary at two levels OR to have parked on the entire second level, like 1 West Broadway has done. This standard would be much improved if the depth of the 4' pocket park were substantially increased.*
- f. Construction and maintenance of sidewalks must be done in compliance with the City's Streetscape Design Policy. Existing sidewalk widths shall be maintained so as to provide effective, accessible, connectivity to adjoining properties. Sidewalks may be widened to accommodate a project's design characteristics. Where no sidewalks exist, sidewalks shall be provided. Outdoor seating and dining areas and landscaping may be located in the sidewalk area where safe and effective sidewalk width around the design feature can be provided;

*This standard appears to have been met. A much deeper plaza facing the Cathedral would have allowed a more effective outdoor seating area. Same comment.*

- g. To the extent practicable, bus pull-outs shall be provided where bus stops are currently located; and

*Not applicable. Same comment.*

- h. If drive-through service is proposed, it shall not interfere with pedestrian access to the site from the right-of-way.

*The automobile drop-off for the hotel hampers pedestrian access to the frontage and the primary entrance. Same comment.*

2. Shade

- a. Except as provided below, shade shall be provided for at least 50% of all sidewalks and pedestrian access paths as measured at 2:00 p.m. on June 21 when the sun is 82 degrees above the horizon. Shade may be provided by trees, arcades, canopies, or shade structures provided their location and design characteristics are compatible with the historic and design context of the street and the architectural integrity of the building. The use of plantings and shade structures in the City right-of-way is permitted to meet this standard with the approval of the Transportation Department. The shade provided by a building may serve to meet this standard.

*The shade provided exceeds the Standard. Same comment.*

- b. Exception- The PDSO Director may approve an IID Plan providing less than 50% shade where compliance is not feasible due to a project site's location and/or building orientation and the applicant has made a reasonable attempt to comply with this standard.

**B. Development Transition Standards**

The purpose of the Development Transition Standards is to mitigate excessive visual, noise, odor, vibration intrusion, and other similar public health and safety concerns that may be created by the proposed project.

- 1. Applicability - Developing sites that abut an affected single family or duplex dwelling shall comply with this section. For purposes of the IID, the following terms and examples describe elements of applicable transitional areas:

- a. "Affected residential property" refers to an existing detached single-family or duplex dwelling that is adjacent to a developing site;
- b. "High density residential" refers to residential development that is neither existing single-family detached nor attached dwellings;
- c. Examples of applicable transitional areas include a nonresidential developing site adjacent to existing single-family detached or attached dwellings within a subdivision, or a developing high-density residential site adjacent to existing single-family detached or attached dwellings within a subdivision; and,

- d. For projects within the DCS, the Development Transition Standards apply only to those projects adjacent to affected residential properties outside the DCS boundaries.

*As per d above, although there is a single-family detached residence immediately south of the project site, that residential property is also inside the DCS. Therefore, the Development Transitional Standards do not apply. Same comment.*

- 2. Mitigation of Taller Structures: Compliance with the following standards is required where the developing site has taller buildings than adjacent affected residential properties:

- a. Within the GIIS and DCS, the maximum building height is 25 feet within 30 feet of the property line adjacent to an affected residential property. Proposed buildings may be developed to the maximum height permitted by the underlying zone or as permitted by the IID Subdistrict, whichever is applicable, when the building is 30 feet or more from the property line adjacent to an affected residential property;

- b. Building Bulk Reduction

- c. If a building façade faces a property line adjacent to a single-family detached or duplex residential property, the PDSO Director may require bulk reduction. The Design Professional shall make a finding and recommendation, after consulting with the DRC and/or Historic Commission if applicable, that the proposed design provides an effective way of breaking up the mass, so the building mass of the façade is less imposing.
- d. Windows at or above the second story of a structure shall be located or treated to reduce views into adjacent affected residential property's buildings and yard areas;
- e. Balconies shall be oriented away from affected residential property or use a screening device to reduce views in to the rear or side yards of the affected residential property.
- f. The developing site's buildings shall be oriented so as to reduce views onto an affected residential property; and
- g. Buffers and/or screening consistent with the purpose of this section shall be provided between a developing site and affected residential properties and shall include features such as, but not limited to, landscaping, walls, and architecturally decorative features.

*N/A. as per B.1.d. above. Same comment.*

- 3. Mitigation of Service Areas- Potential nuisance or noisy areas shall be oriented away from affected residential property, such as by placing service areas for loading and garbage disposal between the developing site's buildings, behind opaque barriers, or by using architectural or landscaping treatments that effectively reduce nuisance impacts from service areas. The service area shall be mitigated to reduce the noise and view of the service features, reduce the emission of offensive odors to owners or occupants of adjacent properties or create a nuisance or hazard beyond the property lines of the project site, and prevent vibrations that are discernible beyond the property lines of the project site.

*N/A. as per B.1.d. above. Same comment.*

- 4. Mitigation of Parking Facilities and Other Areas- Where the site has parking areas or an area with noise and outdoor lighting features, the areas shall be screened from affected residential property by a combination of a wall or opaque non-chain link fence with a vegetative hedge or a row of trees that shall be dense enough to screen views onto the development site. An alternative treatment may be used, such as using architectural or landscaping treatments that effectively reduce nuisance impacts from parking facilities and other areas. Where there is a finding that the vegetative screen will be opaque, the requirement of a masonry wall may be waived by the PDSO Director.

*N/A. as per B.1.d. above. Same comment.*

#### **C. Alternative Compliance**

- 1. The PDSO Director may approve an urban design best practice option for compliance with Section 5.12.8.A, Streetscape Design, and Section 5.12.8.B, Development Transition Standards.
- 2. For purposes of this section, urban design best practices may include urban design studies approved for the City of Tucson, adopted urban design standards for a downtown area in an Arizona city of comparable size or a city in the Southwest of comparable size, books written by urban design experts or endorsed by a professional organization, such as the American Institute of Architects, addressing downtown development, or any comparable report, study, or standards recommended by the City's Design Professional and approved by the PDSO Director.

*N/A. as per B.1.d. above. Same comment.*

- D. Utilities-** Plans shall include information on the layout and demonstrate availability of utilities such as water, wastewater, natural gas, electric, and telecommunication utilities.

*Beyond the scope of this reviewer. Same comment.*

#### **E. Parking**

- 1. Parking spaces may be located as follows:

- a. On site; or
  - b. Off-site within ¼ of a mile of the project site under a shared parking agreement that is approved by the City.
2. Required vehicle and bicycle parking may be reduced pursuant to an IID Parking Plan in accordance with Section 7.4.5.A, except as modified as follows:
- a. Section 7.4.5.A.3 in Permitted Uses and Types of Development does not apply. An IID Parking Plan may be used to reduce required residential parking.  
*The submission references a to-be-submitted Individual Parking Plan. The reviewer has not reviewed this plan. Same comment.*
  - b. Bike parking shall be provided when motor vehicle parking is provided. The PDSD Director may reduce the required number of bike parking spaces depending on the use, setting, and intensity of the proposal.  
*Will be provided as per UDC 7.4 requirements. Same comment.*
  - c. The neighborhood meeting that is required for under Section 7.4.5.A.6.a may be held concurrently with the neighborhood meeting required by Section 5.12.6.B.  
*N/A. Same comment.*
  - d. Section 7.4.5.B, Downtown Parking District, does not apply.
3. Where Parking is provided, the parking area must comply with the standards of Section 7.4.6.C and D.
4. Parking must be in a parking structure with the ground floor of the parking structure screened from view. *Project meets this Standard. Same comment.*
- a. Exception
  - b. Parking may be located on a surface parking lot if it is determined by the PDSD Director to be impracticable to be located elsewhere and other options are not available.
  - c. Parking may be located on a surface parking lot if it is determined by the PDSD Director to be impracticable to be located elsewhere and other options are not available. If located onsite, parking areas must be located at the rear or side of the building.
  - d. Changes of use and expansion of existing structures may use the site's current parking configuration.
  - e. Parking structures shall be designed so that parked vehicles are screened from view at street level through incorporation of design elements including, but not limited to, landscaping, pedestrian arcades, occupied space, or display space.
5. Special IID Parking Agreement- Where a developer can demonstrate to the satisfaction of the PDSD that the parking options provided for in this Section are not feasible, and the City makes a specific finding that the project will have significant economic development value for the IID Sub-District in which it will be located, the following parking options are allowed as follows:
- a. A percentage of long-term residential parking may be located in a City public parking garage by an agreement with Park Tucson if the project is of significant economic benefit to the City to allow this option.
  - b. The agreement must be reviewed by PDSD, the Design Professional, Park Tucson and approved by the City Manager.  
*The submission references a to-be-submitted Individual Parking Plan. The reviewer has not seen or reviewed this plan. Same comment.*
- F. Multi-zone Parcels-** Where a development parcel contains more than one zoning district, uses and building massing may be distributed across the zoning districts on the parcel , provided that the development complies with the design standards in Section 5.12.8.B to mitigate the impact of the new development on existing, less intensely developed adjacent parcels.  
*N/A. Same comment.*

- A. Permitted Uses** - With the exception of detached single-family dwellings, which are not allowed, permitted uses in the DCS are those uses listed for the GIIS, Section 5.12.9.A.
- B. Standards** - The following apply to all development within the DCS:
1. Maximum building height may be increased up to 60 feet unless the current zoning allows a greater height or where the approved IID Plan's Development Transition Standards requires less. *N/A. Same comment.*
  2. In the underlying I-1 and I-2 Zone, uses permitted in the DCS under Section 5.12.9.A above are limited to a maximum 75-foot building height. *N/A. Same comment.*
  3. When provided, landscaping shall be in accordance with the City's drought-tolerant plant list; *Proposal meets this Standard. Same comment.*
  4. Bicycle parking shall be provided when motor vehicle parking is provided. The required number of bicycle parking spaces may be reduced pursuant to an IID Parking Plan, Section 5.12.6.M when bicycle parking is required per this section; *Discussed earlier. Same comment.*
  5. Where applicable, applicants are strongly encouraged to comply with Section 7.7, Native Plant Preservation; and, *N/A. Site is a vacant parking lot. Same comment.*
  6. All applications shall be in accordance with:
    - 5.12.7.C.6: Building façade design shall include pedestrian-scaled, down-shielded, and glare controlled exterior building and window lighting; *The applications states that this Standard will be met, but there is not sufficient information to evaluate the applicant's compliance with this Standard. Same comment.*
    - 5.12.7.C.9: Buildings shall be designed to shield adjacent buildings and public rights-of-way from reflected heat and glare; *There will be significant west-sun glare from the northern portion of the first level of the west façade to pedestrians along Stone Avenue, especially in March and September afternoons. There may be some glare from the south elevation to the single-family residence to the south. I would have expected substantial "eyebrows" over these south-facing windows to screen out the high summer sun, but the elevations do not indicate as such. This comment remains. No change has been made in the revised renderings.*
    - 5.12.7.C.12: Colors may conform to the overall color palette and context of the Downtown area or may be used expressively to create visual interest, variety, and street rhythms. The rationale for an expressive or idiosyncratic use of color shall be described in the site plan submittal; *The color palette provided on Page 87 expresses a harmonious set of neutral colors. But it is surprising that the extensive yellowish/cream color brick facades of the Scottish Rite Cathedral to the east and 123 South Stone to the north did not play a more important role in the color selection. This comment remains. The new renderings provided do not seem to respond to this yellowish/cream color comment.*
    - 5.12.7.C.13: New buildings shall use materials, patterns, and elements that relate to the traditional context of the Downtown area; *There is no evidence that this Standard is met. See above. This comment remains. The new renderings provided do not seem to respond to this yellowish/cream color comment nor the potential use of cream-colored brick.*
    - 5.12.7.C.14: Twenty-four-hour, street-level activity is encouraged by providing a mixture of retail, office, and residential uses within each building; and, *This Standard is met by the mix of uses on the project. Same comment.*
- Section 5.12.7.D.3. Open space is defined in the DCS as stated in Section 5.12.11.B.6, Downtown Links Subdistrict. **Plazas and Open Space:** The fundamental objective of the design standards in this Section 5.12.7.D.3 is to encourage public and private investments to enhance the character and function of Downtown's pedestrian environment.
- a. Five percent of the gross floor area of new construction shall be provided in public plazas or courtyards. Open space plazas, courtyards, and patios are landscaped outdoor



areas designed to accommodate multiple uses, from large gatherings of the people for performing arts to smaller gatherings. The plazas and courtyards will be one of the ways that spaces and uses can be linked. The requirement of this section may be waived or reduced by the PDSO Director upon a written finding during the review process that the development enhances the downtown pedestrian environment even with a smaller percent or elimination of the requirement.

*The third-floor hotel pool and community space exceed the 5% requirement as per the definition in 5.12.11.B.6, which allows public or private space to meet this Standard. But reading the objective of this Standard above, I believe there was a missed opportunity to provide a reciprocal outdoor plaza space, with some real depth, opposite the San Augustin Cathedral entry. This standard would be much improved if the depth of the 4' pocket park were substantially increased.*

- b. Views of all historic properties and all natural elements surrounding the Downtown should be considered during design. Plazas, courtyards, and open spaces shall be sited to include views to other public spaces, where feasible.

*There is no analysis of viewsheds presented, but the project appears to meet this Standard. Same comment.*

- c. Neighborhood linkages shall be maintained throughout Downtown.

*The grid of existing streets has been maintained. Same comment.*

**C. Exemptions** - Except as provided in this section, development within the DCS is exempt from the following standards unless the PDSO Director makes a finding that public safety and health would be jeopardized:

1. Section 5.4, Major Streets and Routes Setback Zone;
2. Minimum perimeter yard standard as provided in Section 6.3, except when required by Section 5.12.8.B, Development Transition Standards;
3. Maximum lot coverage standard as provided in Section 6.3;
4. Minimum lot size standard as provided in Section 6.3,
5. Section 7.4, Motor Vehicle and Bicycle Parking, except as provided in Section 5.12. 8.E;
6. Section 7.5, Off-Street Loading;
7. Section 7.6, Landscaping and Screening Standards, except as required by Section 5.12.8.B, Development Transition Standards; and,
8. Section 7.7, Native Plant Preservation, except when the property includes a drainage corridor where native plants are present or when the property is adjacent to a drainage corridor and remnant native plants are present on the project site.

**D. Other Permitted Modifications**

1. Pedestrian Access
2. Alternative pedestrian access that creates connectivity between public entrances to the project and abutting sidewalks may be allowed as long as no safety hazard is created. All pedestrian access shall conform to the City's adopted Building Code.
3. Solid Waste Collection
4. On-site refuse collection container standards governing access, type, and location may be modified if the Environmental Services Department determines that no public health or traffic safety issue is created.

**Section 5.12.6.E – IID Historic Preservation Review**

d. The TPCHC Plans Review Subcommittee reviews for compliance with the design requirements of the applicable sub-district and for design compatibility of a proposed development project.

(1) New development must be designed to complement and be compatible with the architecture of adjacent historic structures.

(2) Compatibility with adjacent historic structures is to be achieved through architectural elements such as building setbacks, building step-backs, textures, materials, forms, and landscaping.

*Ultimately, the Tucson Pima County Plans Review Sub-Committee will tender their own opinion regarding items (1) and (2) above, but this reviewer has concluded, based on the submitted materials, that compliance with this Standard seems very weak. The setting of this site is unique, bounded by the iconic and historic (eligible) San Augustin Cathedral, the very high-profile Scottish Rite Cathedral (on the National Register), the contextual 123 South Stone Office Building (on the National Register), and the small Banovitz House (on the National Register). The form and material of the proposed Hilton Dual Brand Hotel appears to be more of an off-the-shelf national product and less like a project designed for this unique Tucson historic environment.*

*The detailed elements listed above appear bland when compared to the texture and detail of its neighbors. The absence of building detail, stepbacks, textures, overhangs, window detail, solar-shading (especially on the south and west elevations) on levels 3, 4, 5 and 6 is disappointing. The lack of interest on the lower two levels, especially on the south and east, (this has been improved) has been discussed elsewhere. The revised renderings still fail to provide the window shading and detail that would provide much more architectural interest. This reviewer strongly recommends eyebrow sunshades on the south, and vertical and horizontal shading on the east and west façades to provide protection against the sun and much more shade and shadow architectural interest. I would recommend the enlargement of the current small building cornice around the entire top of the building. This would help the building respond to its historic neighbors. (see below)*



Submitted by:

A handwritten signature in blue ink, appearing to read "C. Poster".

Corky Poster, Architect/Planner, Poster Frost Mirto  
City of Tucson Design Professional

