

**Environmental Assessment  
Determinations and Compliance Findings  
for HUD-assisted Projects  
24 CFR Part 58**

**Project Information**

**Project Name:** South-10th-Ave-Phased-Aff-Hsg-Redev-Proj-CPF

**HEROS Number:** 900000010492763

**Start Date:** 08/25/2025

**Responsible Entity (RE):** TUCSON, PO Box 27210 Tucson AZ, 85726

**RE Preparer:** Rolanda Mazeika

**State / Local Identifier:**

**Certifying Officer:** Ann Chanecka

**Grant Recipient (if different than Responsible Entity):**

**Point of Contact:**

**Consultant (if applicable):**

**Point of Contact:**

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

**Project Location:** 1402 S 10th Ave, Tucson, AZ 85713

**Additional Location Information:**

The South 10th Avenue Affordable Housing Redevelopment project is located at 1402 S 10th Ave, 1480 S 10th Ave, 1445 S 11th Ave, and 425 W 23rd St, Tucson, Pima County, Arizona, 85713, Pima County Assessor Parcel Numbers 118-20-036A, 118-20-037A, 118-20-076A, 118-20-077A, 118-20-078A, and 118-20-0750. The project site is approximately 530 feet east of Interstate 10, south of West 22nd Street, in the Barrio Santa Rita Park-West Ochoa Neighborhood Association. The site encompasses six City-owned parcels bounded by West 23rd Street on the north, South 10th Avenue on the east, West 25th Street on the south, and South 11th Avenue on the west, and surrounding rights-of-way. The property descriptions are: NATIVE AMERICAN W66.17' E135' N150' BLK 3 EXC NELY SPNDRL ADDITION (RD 3418/153 RD 862/284), NATIVE AMERICAN ADDITION ALL OF BLK 3 & ABAN SACATON AVE & PAPAYO ST LYG WLY OF TENTH AVE EXC N150' E66.17' THEREOF (ABAN 3418/153 & RD 862/284), PTN S874.8' W214.34' E1259.49' NW4 NW4 EXC SLY 5' THEREOF LYG ELY & ADJ TO ELEVENTH AVE 4.20 AC SEC 24-14-13 (DRE 251/570 RD 3418/153), PTN S426.6' W612.39' E1102.39' NW4 NW4 EXC SLY 5' THEREOF 4.02 AC SEC 24-14-13 (DRE 251/570 RD 3418/153), W64.35' E490' S290.4' NW4 NW4 EXC SLY 5' THEREOF .43 MAC SEC 24-14-13 (RD 854/213 RD 3418/153), and N150' S406' W364.45' E784.4' EXC S34.4' E64.35' THEREOF 1.19 AC SEC 24-14-13 (DRE 251/570 RD 862/284).

**Direct Comments to:** E-mail: [rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov),  
OR Mail: City of Tucson Housing & Community Development  
Department, PO Box 27210, Tucson, Arizona 85726

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six City-owned parcels and rights-of-way comprising approximately 14.18 acres to support the development of 300 to 400, mixed-income, affordable housing units in Tucson, Pima County, Arizona. The property redevelopment is anticipated to consist of three phases and will be conducted by El Pueblo Housing Development, the City of Tucson's non-profit development arm, and a competitively procured co-developer. Phase 1 consists of infrastructure development activities such as planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), and construction of infrastructure improvements. Phase 1 activities are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas,

telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Downtown Airport Wash, and provide pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. Phases 2 and 3 are anticipated to include construction of the affordable housing units. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3). Redevelopment of two nearby vacant City-owned parcels, 118-20-0590 and 118-20-0600, located on the south side of West 23rd Street between South 11th and Osborne Avenues may also occur during Phases 2 and 3 of this redevelopment project. Total Current Funding: \$7,144,600 (estimated \$3,400,000 for Phase 1). Estimated Federal Funding: \$850,000 in Economic Development Initiative - Community Project Funding (EDI CPF) funds, grant number B-24-CP-AZ-068 and \$4,000,000 in EDI CPF funds, grant number B-24-CP-AZ-0061 through the City of Tucson. The State of Arizona Department of Housing has also allocated \$2,294,600 in State and Local Fiscal Recovery Funds of the American Rescue Plan Act to this project. The South 10th Avenue Affordable Housing Redevelopment project is located at 1402 S 10th Ave, 1480 S 10th Ave, 1445 S 11th Ave, and 425 W 23rd St, Tucson, Pima County, Arizona, 85713, Pima County Assessor Parcel Numbers 118-20-036A, 118-20-037A, 118-20-076A, 118-20-077A, 118-20-078A, and 118-20-0750. The project site is approximately 530 feet east of Interstate 10, south of West 22nd Street, in the Barrio Santa Rita Park-West Ochoa Neighborhood Association. The site encompasses six City-owned parcels bounded by West 23rd Street on the north, South 10th Avenue on the east, West 25th Street on the south, and South 11th Avenue on the west, and surrounding rights-of-way. The property descriptions are: NATIVE AMERICAN W66.17' E135' N150' BLK 3 EXC NELY SPNDRL ADDITION (RD 3418/153 RD 862/284), NATIVE AMERICAN ADDITION ALL OF BLK 3 & ABAN SACATON AVE & PAPAYO ST LYG WLY OF TENTH AVE EXC N150' E66.17' THEREOF (ABAN 3418/153 & RD 862/284), PTN S874.8' W214.34' E1259.49' NW4 NW4 EXC SLY 5' THEREOF LYG ELY & ADJ TO ELEVENTH AVE 4.20 AC SEC 24-14-13 (DRE 251/570 RD 3418/153), PTN S426.6' W612.39' E1102.39' NW4 NW4 EXC SLY 5' THEREOF 4.02 AC SEC 24-14-13 (DRE 251/570 RD 3418/153), W64.35' E490' S290.4' NW4 NW4 EXC SLY 5' THEREOF .43 MAC SEC 24-14-13 (RD 854/213 RD 3418/153), and N150' S406' W364.45' E784.4' EXC S34.4' E64.35' THEREOF 1.19 AC SEC 24-14-13 (DRE 251/570 RD 862/284).

**Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:**

In 2024, ECONorthwest presented the City of Tucson with the Tucson Housing Needs Final Results memo. The analysis showed 62,403 housing units need to be produced by 2045 to account for future needs. The analysis also demonstrated a high need for affordable housing serving households at or below 60% Area Median Income (AMI) and households with incomes greater than 120% AMI. This project supports the development of much needed affordable housing in the City of Tucson. The project also supports the goals of Plan Tucson, the 2013 City of Tucson General & Sustainability Plan, to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations (<https://www.tucsonaz.gov/Departments/Planning-DevelopmentServices/Development-Tools-Resources/Plans#section-2>) and initiatives such as prioritizing and facilitating affordable housing in areas of opportunity and

developing affordable and mixed-income housing on city-owned properties included in the City's Housing Affordability Strategy for Tucson (HAST) plan ([https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast\\_plan\\_document.pdf](https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast_plan_document.pdf)).

**Existing Conditions and Trends [24 CFR 58.40(a)]:**

The site consists of six, City-owned parcels and rights-of-way located east of Interstate 10, west of South 10th Avenue between West 23rd and West 25th Streets in the Barrio Santa Rita Park-West Ochoa Neighborhood Association and Barrio Ochoa. The site abuts the City of South Tucson's northern boundary to the south. West 22nd Street and South 10th Avenue are the nearest arterial roads, with 22nd Street serving as a primary access point to the site and with bicycle infrastructure and bus transit lines planned for 10th Avenue. The El Paso and Southwestern Greenway runs parallel to Interstate 10 west of the site and provides convenient pedestrian and bicycle access to Downtown Tucson, approximately one and a half a miles to the north. The project site is approximately 14.18 acres and contains six buildings slated for demolition. The site formerly supported commercial activities conducted by the City of Tucson's municipal refuse and water utilities. The Downtown Airport Wash bisects the project site, southeast to northwest, with the northern portion of the property mostly unpaved whereas the southern portion of the site is mostly paved and fenced. The eastern side of the site along 10th Avenue is bordered by improved rights-of-way with minimal landscaping and a sidewalk. Tucson's regional transit system including Sun Tran and Sun Van provide service to 10th Avenue, east of the site, and to 22nd and 29th Streets, north and south of the site. Bus stops are within walking distance. The bus lines connect to the Ronstadt and Laos Transit Centers, which serve as a hubs to multiple bus lines providing service and connections throughout Tucson. Amenities within walking distance or directly available via the transit system include medical providers and pharmacies; markets and groceries; restaurants; retail shopping; and recreation centers. The site is surrounded by a mix of commercial and residential properties. The site is a good choice for housing development based on the current affordable housing crisis as well as its proximity to transit, community and public services and facilities. The area is a mostly built-up urban area, with some potential for infill residential and some commercial development/improvements to continue in the area.

**Maps, photographs, and other documentation of project location and description:**

[2025-8-25 10th Ave Google Map.pdf](#)

[2025-7-25 10th Ave Aerial Map.pdf](#)

[2025-3 10th Ave Comm Mtg Presentation.pdf](#)

[10th Ave Phase 1 Plans Cover Sheets.pdf](#)

[2025-1-23 10th Ave Site Recon.pdf](#)

**Determination:**



✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

**Approval Documents:**

[2025-8-28 10th Ave FONSI Signature Page.pdf](#)

**7015.15 certified by Certifying Officer  
on:**

**7015.16 certified by Authorizing Officer  
on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-24-CP-AZ-0061	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$4,000,000.00
B-24-CP-AZ-068	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$850,000.00

**Estimated Total HUD Funded,                      \$4,850,000.00  
Assisted or Insured Amount:**

**This project anticipates the use of funds or assistance from another federal agency  
in addition to HUD in the form of:**

**Estimated Total Project Cost [24 CFR 58.2 (a)                      \$7,144,600.00  
(5)]:**

**Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities**

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. FEMA Zone X, 04019C 2278L 6/16/2011. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in non-attainment status for the following: Particulate Matter, <10 microns (Rillito planning area, Pima County, AZ). The project's county or air quality management district is in maintenance status for the following: Carbon monoxide (Tucson, Pima County, AZ) and Particulate Matter <10 microns (Ajo planning area, Pima County, AZ). This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. Pima County Department of Environmental Quality

		(PDEQ) has reviewed the project and does not believe the project will trigger any requirements for a stationary source in regard to air quality, e-mail dated 1/24/2025. Control of dust and minimizing the release of asbestos containing material during construction is required under the PDEQ Fugitive Dust Permit and the PDEQ Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) permit. The project is in compliance with the Clean Air Act.
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not participate in the Coastal Zone Management Program. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, Terracon Consultants, Inc. (Terracon), 12/27/2022, ASTM Phase II ESA, Terracon, 7/18/2023, ASTM Phase I ESA & limited ASTM Phase II ESA, Civil & Environmental Consultants, Inc. (CEC), 4/8/2025, ASTM Vapor Encroachment Screening, Terracon, 12/21/2022, Asbestos and Lead Paint Survey, Terracon, 5/9/2023, 2/13/2024, 12/3/2024, and Soil Management Plan, Terracon, 7/17/2023. A Phase I ESA was conducted in 2022 by Terracon followed by a Phase II ESA in 2023 to investigate identified RECs. The Phase II ESA soil and soil vapor results did not exceed regulatory limits. Additional Phase I and Phase II assessments were conducted by Terracon and CEC in response to community concerns. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Additional assessment followed by remediation, if

		<p>needed, will be conducted during demolition and in anticipation of Phase 2/3 project activities. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Consideration of radon will occur following construction of housing units in Phases 2 &amp; 3. Mitigation of asbestos and lead paint hazards includes proper handling and work practices during demolition. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have No Effect on listed species because project activities (disturbance related to the three phases of this project) will occur on a site immediately surrounded by long-term developed and paved property, including homes, commercial property, parking lots, and roads, and no listed species or critical habitat is present or known to occur within the project area currently. E-mail from US Fish &amp; Wildlife Service, 2/27/2025. USFWS recommends using native plants for all landscaping activities. This project is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are current or planned stationary aboveground storage containers of concern within 1 mile of the project site. 14 ASTs were evaluated. The Separation Distances from the project are acceptable. The project is in compliance with explosive and flammable hazard requirements.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural</p>

1981, particularly sections 1504(b) and 1541; 7 CFR Part 658		use. The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 4/8/2025. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in the FFRMS floodplain. USGS site elevations are more than two feet above the closest BFE. The project is in compliance with Executive Orders 11988 and 13690.
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Based on Section 106 continuing consultation the project will have No Adverse Effect on historic properties. No Adverse Effect determination by the City of Tucson, 7/25/2025, concurrence by Arizona SHPO, 8/21/2025, concurrence by Gila River Indian Community, 8/13/2025, concurrence by Pascua Yaqui Tribe, 7/29/2025, defer consultation to Tohono O'odham Nation by Salt River Pima-Maricopa Indian Community, 7/28/2025, concurrence by White Mountain Apache Tribe, 8/12/2025, and no issues or concerns determination by the Yavapai-Apache Nation, 7/28/2025. Conditions: The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide

		<p>a copy of the draft post monitoring technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was normally unacceptable: 70.0 db. See noise analysis, Civil &amp; Environmental Consultants, Inc., 4/9/2025. The project is in compliance with HUD's Noise regulation with mitigation.</p>
<p><b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be</p>

		served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above." and Section II.B.2, "Acquisition, disposition, rehabilitation, reconstruction or modernization of existing projects, buildings, and public facilities."). The project will utilize and modernize existing municipal water and wastewater facilities and infrastructure. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. There are no NWSRS rivers in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Recent executive actions have resulted in the rescission of environmental justice initiatives.

**Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]**

**Impact Codes:** An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project consists of redevelopment activities on six City-owned parcels and rights-of-way comprising approximately 14.18 acres to support the development of 300 to 400, mixed-income, affordable housing units. Phase 1 of the redevelopment consists of infrastructure development activities, demolition of existing buildings and improvements, site preparation, and construction of infrastructure improvements. Planning for Phases 2 and 3 of the project, development of the residential units, will conform with the surrounding neighborhood in terms of overall scale, density, size, and massing. The site redevelopment will be permitted through the City of Tucson and Pima County. The site is consistent with local and regional planning efforts and will receive planning and zoning verification from the City of Tucson. The project site is zoned R-3. The project supports the goals of Plan Tucson, the City of Tucson General & Sustainability Plan to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations ( <a href="https://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-2">https://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-2</a> ). The project also supports the initiatives in the City's Housing Affordability Strategy for Tucson (HAST) plan ( <a href="https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast_plan_document.pdf">https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast_plan_document.pdf</a> ).	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Phase 1 of the redevelopment consists of infrastructure development activities, demolition of existing buildings and improvements, site preparation, and construction of infrastructure improvements. No evidence of erosion, drainage/storm water runoff observed during CEC site reconnaissance on 1/23/2025 and 1/24/2025. A geotechnical evaluation will be conducted to guide the proposed development and the designers,	A geotechnical evaluation will be conducted to guide the proposed development and the designers, contractors,



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		contractors, and owners will follow the report recommendations. Phase I ESA & limited Phase II ESA, CEC, 4/8/2025.	and owners will follow the report recommendations.
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	<p>A Phase I ESA was conducted in 2022 by Terracon followed by a Phase II ESA in 2023 to investigate identified RECs. The Phase II ESA soil and soil vapor results did not exceed regulatory limits. Additional Phase I and Phase II assessments were conducted by Terracon and CEC in response to community concerns. Additional assessment followed by remediation, if needed, will be conducted during demolition and in anticipation of Phase 2/3 project activities. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Hazardous substances and containers (paint, flammable substances, compressed gas cylinders) associated with the site's former commercial activities were observed. These items will be removed and properly disposed of should no further use for them be identified. No other evidence of onsite hazards or nuisances including soil contamination; proximity to high pressure pipe lines or other volatile and explosive products; radio/TV transmission towers; excessive smoke, fumes, odors, subsidence, ground water, inadequate surface drainage, flood, etc. The site formerly supported commercial activities conducted by the City of Tucson's municipal refuse and water utilities. Six buildings associated with the former site activities are slated for demolition. Mitigation of asbestos and lead paint hazards will be conducted during demolition, including proper handling and work practices. There are no visible poisonous plants or animals on the site. No known natural hazards exist. The site has access to intersections with crosswalks for residents to cross nearby arterial streets, nearby street lighting, sidewalks, bike lanes and other safety features.</p>	<p>A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Hazardous substances and containers (paint, flammable substances, compressed gas cylinders) associated with the site's former commercial activities will be removed and properly disposed of should no further use for them be identified. Mitigation of asbestos and lead paint hazards will be</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Other than a brief period of construction, there should be no increase in noise levels during Phase 1. Additional identification and mitigation of hazards and nuisances related to Phase 2/3 project activities will be considered during redevelopment planning. Phase I ESA, Terracon, 12/27/2022, Phase II ESA, Terracon, 7/18/2023, Phase I ESA & limited Phase II ESA, CEC, 4/8/2025, and Asbestos and Lead Paint Survey, Terracon, 5/9/2023, 2/13/2024, 12/3/2024.	conducted during demolition, including proper handling and work practices. Additional identification and mitigation of hazards and nuisances related to Phase 2/3 project activities will be considered during redevelopment planning.
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	The City of Tucson anticipates sustaining jobs in the environmental, engineering, and construction industries as part of this phased project. The project will follow Section 3 requirements in all employment, construction, and subcontracting activities. The site is within walking distance or a short commute on public transit to numerous retail, restaurant, and service businesses.	
Demographic Character Changes / Displacement	2	The project site is in a moderate income area. The surrounding community is mostly built up with a mix of residential and commercial development and is zoned R-3, which allows for high-density, multiple-family residential development, such as apartments, townhouses, and other similar housing types. The area west of the site is zoned I-1, which allows for light industrial uses that do not have offensive characteristics in addition to land uses permitted in more restrictive nonresidential zones. The site is located within an Infill Incentive District and in the Greater Infill Incentive Subdistrict that	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		provides zoning flexibility to encourage high-quality, sustainable infill and transit-oriented development in designated downtown and commercial areas. The area has a 61.87% minority population with approximately 56% of housing units being renter-occupied. Displacement of residents or businesses is not projected.	
Environmental Justice EA Factor	2	Recent executive actions have resulted in the rescission of environmental justice initiatives.	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	Little to no impact is anticipated to area primary, middle, and high schools, daycares, and pre-schools during Phase 1 of the project. Impacts related to Phase 2/3 project activities will be considered during redevelopment planning. Neighborhood residents are served by five elementary, K-8, and K-12 schools and several daycares within walking distance and/or a six-minute driving distance. Educational and cultural enrichment opportunities are available at local community centers, cultural attractions and museums, libraries, and parks. The Santa Rosa Recreation Center is located within 0.4 miles from the project location and features youth, teen, and senior programming. Multi-modal access to educational and cultural facilities is available.	
Commercial Facilities (Access and Proximity)	2	The project will not adversely impact or displace commercial facilities. The site formerly supported commercial activities conducted by the City of Tucson's municipal refuse and water utilities, which were slated for relocation. The project site is within 2.5 miles of major grocery stores, food markets, discount stores, pharmacies, medical providers, restaurants, and thrift stores. Multi-modal access to these facilities is readily available.	
Health Care / Social Services (Access and Capacity)	2	The project site is within 4.5 miles of urgent care facilities and emergency rooms. Multiple medical facilities, clinics, and physician services are within an easy commute on public transit. Multi-modal access to local support and behavioral health	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		services, including La Frontera Center, is also available.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Waste disposal and recycling services are available through the City of Tucson Environmental & General Services Department. The City of Tucson provides extensive recycling options, including construction debris handling and recycling, landfill disposal, green waste recycling, and household hazardous waste disposal services.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	1	Pima County Wastewater provides wastewater and sewer service to the project site. Phase 1 activities include utility infrastructure improvements. Impacts related to Phase 2/3 project activities will be considered during redevelopment planning.	
Water Supply (Feasibility and Capacity)	1	The site is currently served by Tucson Water. Phase 1 activities include utility infrastructure improvements. Impacts related to Phase 2/3 project activities will be considered during redevelopment planning.	
Public Safety - Police, Fire and Emergency Medical	2	The project site is within two miles from two Tucson Fire Stations. The site is approximately 1.4 miles from the Tucson Police Department Headquarters. Response times vary depending on the type of call, but the average time for emergency response is nine minutes or less. The project site 4.5 miles from urgent care facilities and emergency rooms.	
Parks, Open Space and Recreation (Access and Capacity)	2	The site is within one mile of Ochoa, Santa Rosa, and Santa Rita Parks, which provide greenspace and recreational opportunities. The Santa Rosa Recreation Center is located within 0.4 miles from the project location and features youth, teen, and senior programming.	
Transportation and Accessibility (Access and Capacity)	2	The project is within one mile of two arterial roads with excellent bus access, crosswalks, sidewalks, and bicycle lanes. Tucson's regional transit system including Sun Tran and Sun Van provide service to 10th Avenue, east of the site, and 22nd and 29th Streets, north and south of the site, and bus stops are within walking distance of the site. The bus lines	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		connect to the Ronstadt and Laos Transit Centers, which serve as a hubs to multiple bus lines providing service and connections throughout Tucson. West of the site, the El Paso and Southwestern Greenway runs parallel to Interstate 10 and provides convenient pedestrian and bicycle access to Downtown Tucson, approximately one and a half a miles north.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	The Downtown Airport Wash bisects the project site, southeast to northwest and Phase 1 project activities include construction of a bridge over the wash. The project will be permitted by the City of Tucson and other Federal, State, and local entities as required.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The Downtown Airport Wash bisects the project site, southeast to northwest and Phase 1 project activities include construction of a bridge over the wash. The wash contains overgrown vegetation. There are no visible signs of wildlife at the project site.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	Recent executive actions have resulted in the rescission of climate change initiatives.	
Energy Efficiency	2	Energy use for construction activities, such as construction equipment, are temporary in nature. Phase 1 activities include utility infrastructure improvements. Impacts related to Phase 2/3 project activities will be considered during redevelopment planning.	

**Supporting documentation**

[Sun Tran Route 23.pdf](#)

[Sun Tran Route 12.pdf](#)

[Sun Tran Route 2.pdf](#)

[2025-8-26 10th Ave Santa Rosa Ctr.pdf](#)  
[2025-8-26 10th Ave Google Maps Thrift Stores.pdf](#)  
[2025-8-26 10th Ave Google Maps Social Services.pdf](#)  
[2025-8-26 10th Ave Google Maps Schools.pdf](#)  
[2025-8-26 10th Ave Google Maps Restaurants.pdf](#)  
[2025-8-26 10th Ave Google Maps Police.pdf](#)  
[2025-8-26 10th Ave Google Maps Pharmacies.pdf](#)  
[2025-8-26 10th Ave Google Maps Museums.pdf](#)  
[2025-8-26 10th Ave Google Maps Medical.pdf](#)  
[2025-8-26 10th Ave Google Maps Libraries.pdf](#)  
[2025-8-26 10th Ave Google Maps Hospitals.pdf](#)  
[2025-8-26 10th Ave Google Maps Groceries.pdf](#)  
[2025-8-26 10th Ave Google Maps Fire.pdf](#)  
[2025-8-26 10th Ave Google Maps Daycare.pdf](#)  
[2025-8-26 10th Ave Google Maps Behavioral Health.pdf](#)  
[2025-8-25 10th Ave Zoning Map.pdf](#)  
[2025-8-25 10th Ave FFIEC Demographic.pdf](#)

**Additional Studies Performed:**

**Field Inspection [Optional]:** Date and completed  
by:

Chad Hancock

1/23/2025 12:00:00 AM

[2025-3 10th Ave Comm Mtg Presentation.pdf](#)  
[10th Ave Phase 1 Plans Cover Sheets.pdf](#)  
[2025-1-23 10th Ave Site Recon.pdf](#)

**List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:**

City of Tucson, Office of the Mayor-Mayor Regina Romero; City of Tucson, Housing and Community Development Department-Ann Chanecka, Johanna Hernandez, Andrew Paredes, Antonio Carranza; El Pueblo Housing Development; City of Tucson Planning and Development Services; City of Tucson, Department of Transportation and Mobility; Tucson Fire Department; Tucson Police Department; City of Tucson, Tucson Water Department; City of Tucson, Environmental & General Services Department; Arizona Department of Environmental Quality; Pima County Wastewater Management; Pima County Department of Environmental Quality; City of Tucson General & Sustainability and HAST Plans,  
<https://www.tucsonaz.gov/Departments/Planning-DevelopmentServices/Development-Tools-Resources/Plans#section-2> and

[https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast\\_plan\\_document.pdf](https://www.tucsonaz.gov/files/sharedassets/public/v/3/living-and-working/housing-community-development/documents/hast_plan_document.pdf)).

**List of Permits Obtained:**

The reviews that go into each project include but are not limited to: Planning, Zoning, Engineering, Landscape, Fire, ADA, Plumbing, Solid Waste, Right of Way Improvements, Structural, Mechanical and Plumbing, Electrical, Fire, Zoning Engineering, Wastewater, Water, Transportation. The City of Tucson Planning and Development Services Department reviews, approves, and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.

**Public Outreach [24 CFR 58.43]:**

Web publication of combined Notice of Intent to Request Release of Funds/Finding of No Significant Impacts (RROF/FONSI) in English and Spanish and portions of the Environmental Review Record on the City of Tucson's Housing & Community Development Environmental Review webpage at [www.tucsonaz.gov/Departments/HousingandCommunityDevelopment/Documents/Environmental-Review](http://www.tucsonaz.gov/Departments/HousingandCommunityDevelopment/Documents/Environmental-Review). The combined RROF/FONSI was posted at Tucson City Hall, 255 West Alameda, Tucson, AZ 85701 and the abbreviated ERR was available in-person at 310 North Commerce Park Loop, Tucson, Arizona 85745 on 8/29/2025. Interested parties contacted by e-mail. The complete ERR is also available and distributed on the HUD HEROS system at <https://cpd.hud.gov/cpd-public/environmental-reviews>. Representatives from the project's development team, including El Pueblo Housing Development, conducted outreach to community representatives between Fall 2024 and Summer 2025 (<https://www.elpueblohousing.org/home/south10th>).

**Cumulative Impact Analysis [24 CFR 58.32]:**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six City-owned parcels and rights-of-way to support the development of 300 to 400, mixed-income, affordable housing units in in the Barrio Santa Rita Park-West Ochoa Neighborhood Association and Barrio Ochoa in Tucson, Pima County, Arizona. The project is located in a moderate income area. The surrounding community is mostly built up with a mix of residential and commercial development and is zoned R-3. The site is located within an Infill Incentive District and in the Greater Infill Incentive Subdistrict that provides zoning flexibility to encourage high-quality, sustainable infill and transit-oriented development in designated

downtown and commercial areas. The project will be a contributor to the projected increase in traffic and energy usage anticipated in the area. The property redevelopment is anticipated to consist of three phases and will be conducted by El Pueblo Housing Development, the City's non-profit development arm, and a competitively procured co-developer. Phase 1 consists of infrastructure development activities, demolition of existing buildings and improvements, site preparation, and construction of infrastructure improvements. These activities are anticipated to impact streets and rights-of-ways. Phases 2 and 3 are anticipated to include construction of the affordable housing units. The project will use existing roadways, sewer systems, municipal water, and other utilities. The site formerly supported commercial activities conducted by the City of Tucson's municipal refuse and water utilities, which were slated for relocation. No significant cumulative impacts on the environment are anticipated from the Proposed Phase 1 Actions in conjunction with other activities.

**Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]**

No alternatives other than the No Action Alternative were considered.

**No Action Alternative [24 CFR 58.40(e)]**

Redevelopment activities to support the development of 300 to 400, mixed-income, affordable housing units would not occur. Goals and initiatives of the City of Tucson General & Sustainability Plan, Plan Tucson, and HAST Plans to develop affordable housing would not be fulfilled. Development of additional affordable housing would not occur.

**Summary of Findings and Conclusions:**

The South 10th Avenue Phased Affordable Housing Redevelopment activities will not adversely affect the environment or the neighborhood. The activity is compatible with existing residential and commercial development in the R-3 zoned neighborhood. The site is located within an Infill Incentive District and in the Greater Infill Incentive Subdistrict that provides zoning flexibility to encourage high-quality, sustainable infill and transit-oriented development in designated downtown and commercial areas. There will be little to no impact on existing resources or services in the area. The project site plans will be reviewed and approved through the City of Tucson Planning and Development Services Department. The project is a positive step in meeting City of Tucson goals for encouraging appropriate growth and development in the area. The project is a positive step in meeting City of Tucson goals for addressing the housing shortage and housing affordability needs in the community.

**Mitigation Measures and Conditions [CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be



incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
Historic Preservation	The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post monitoring technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of	N/A	The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post monitoring	

	<p>inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.</p>		<p>technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and</p>	
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			community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.	
Contamination and Toxic Substances	Additional assessment followed by remediation, if needed, will be conducted during the demolition and Phase 2/3 project activities. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Consideration of radon will occur following construction of housing units in Phases 2 & 3.	N/A	Additional Phase II ESAs will be conducted to investigate RECs identified in the 2025 Phase I and Phase II ESA conducted by CEC and during demolition activities as part of closure of the interceptor and sump. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered.	
Noise Abatement and Control	No mitigation for Phase 1 activities is required, however, a noise abatement plan will be developed and implemented to mitigate noise for the planned Phase 2/3 residential development.	N/A	No mitigation for Phase 1 activities is required, however, a noise abatement plan will be developed and implemented to mitigate noise for the planned Phase 2/3 residential development.	

Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	A geotechnical evaluation will be conducted to guide the proposed development and the designers, contractors, and owners will follow the report recommendations.	N/A	A geotechnical evaluation will be conducted to guide the proposed development and the designers, contractors, and owners will follow the report recommendations.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Hazardous substances and containers (paint, flammable substances, compressed gas cylinders) associated with the site's former commercial activities will be removed and properly disposed of should no further use for them be identified. Mitigation of asbestos and lead paint hazards will be conducted during demolition, including proper handling and work practices. Additional identification and mitigation of hazards and nuisances related to Phase 2/3 project activities will be considered during redevelopment planning.	N/A	A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Hazardous substances and containers (paint, flammable substances, compressed gas cylinders) associated with the site's former commercial activities will be removed and properly disposed of should no further use for them be identified. Mitigation of asbestos and lead paint hazards will be conducted during demolition, including proper handling and work practices. Additional	

			identification and mitigation of hazards and nuisances related to Phase 2/3 project activities will be considered during redevelopment planning.	
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### **Project Mitigation Plan**

El Pueblo Housing Development and its co-developer shall conduct the following mitigation:

**Contamination and Toxic Substances:** Additional Phase II ESAs will be conducted to investigate RECs identified in the 2025 Phase I and Phase II ESA conducted by CEC and during demolition activities as part of closure of the interceptor and sump. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered.

**Consideration of radon** will occur following construction of housing units in Phases 2 & 3.

**Historic Preservation:** The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post monitoring technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

**Noise Abatement and Control:** No mitigation for Phase 1 activities is required, however, a noise abatement plan will be developed and implemented to mitigate noise for the planned Phase 2/3 residential development.

**Soil Suitability/Slope/Erosion/Drainage and Storm Water Runoff:** A geotechnical evaluation will be conducted to guide the proposed development and the designers, contractors, and owners will follow the report recommendations.

**Hazards and Nuisances including Site Safety and Site-Generated Noise:** A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Hazardous substances and containers (paint, flammable substances, compressed gas cylinders) associated with the site's former commercial activities will be removed and properly disposed should no further use for them be identified. Mitigation of asbestos and lead paint hazards will be conducted during demolition, including proper handling and work practices. Additional identification and mitigation of hazards and nuisances related to Phase 2/3 project activities will be considered during redevelopment planning.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

### Screen Summary

#### Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[2025-8-6 10th Ave Airport Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No



### Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

**This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.**

#### Compliance Determination

This project is located in a state that does not contain CBRS units. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

#### Supporting documentation

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

**1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?**

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

**2. Upload a FEMA/FIRM map showing the site here:**

[2025-8-6 10th Ave FIRMette.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

**Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

✓ No

Based on the response, the review is in compliance with this section.

Yes

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

Yes

✓ No

**Screen Summary**

**Compliance Determination**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. FEMA Zone X, 04019C 2278L 6/16/2011. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

**1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

☒ Yes

☐ No

### Air Quality Attainment Status of Project's County or Air Quality Management District

**2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

No, project's county or air quality management district is in attainment status for all criteria pollutants.

☒ Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

☒ Carbon Monoxide

☐ Lead

☐ Nitrogen dioxide

☐ Sulfur dioxide

Ozone

Particulate Matter, <2.5 microns

✓ Particulate Matter, <10 microns

**3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above**

Carbon monoxide	ppm (parts per million)
Particulate Matter, <10 microns	µg/m3 (micrograms per cubic meter of air)

**Provide your source used to determine levels here:**  
Pima County Department of Environmental Quality (PDEQ)

**4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

**Enter the estimate emission levels:**

Carbon monoxide	ppm (parts per million)
Particulate Matter, <10 microns	µg/m3 (micrograms per cubic meter of air)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in non-attainment status for the following: Particulate Matter, <10 microns (Rillito planning area, Pima County, AZ). The project's county or air quality management district is in maintenance status for the following: Carbon monoxide (Tucson, Pima County, AZ) and Particulate Matter

<10 microns (Ajo planning area, Pima County, AZ). This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. Pima County Department of Environmental Quality (PDEQ) has reviewed the project and does not believe the project will trigger any requirements for a stationary source in regard to air quality, e-mail dated 1/24/2025. Control of dust and minimizing the release of asbestos containing material during construction is required under the PDEQ Fugitive Dust Permit and the PDEQ Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) permit. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[2025-1-24 10th PDEQ AQ No Reg Req.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

### Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

**This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.**

#### Screen Summary

##### **Compliance Determination**

This project is located in a state that does not participate in the Coastal Zone Management Program. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.

##### **Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

**1. How was site contamination evaluated?\* Select all that apply.**

☒ ASTM Phase I ESA

☒ ASTM Phase II ESA

Remediation or clean-up plan

☒ ASTM Vapor Encroachment Screening.

None of the above

\* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances\* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

Provide a map or other documentation of absence or presence of contamination\*\* and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.



No

Explain:

✓ Yes

\* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

\*\* Utilize EPA's EnviroMapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

**3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions\* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?**

Yes

Explain:

✓ No

\* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

**4. Is the proposed project new construction or substantial rehabilitation where testing will**

**be conducted but cannot yet occur because building construction has not been completed?**

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

## **8. Mitigation**

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan\*.

**Can all adverse environmental impacts be mitigated?**

No, all adverse environmental impacts cannot feasibly be mitigated.  
Project cannot proceed at this location.

✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.  
Provide all mitigation requirements\*\* and documents in the Screen Summary at the bottom of this screen.

\* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

\*\* Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

**9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls\*, or use of institutional controls\*\*.**

Additional assessment followed by remediation, if needed, will be conducted

during the demolition and Phase 2/3 project activities. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Consideration of radon will occur following construction of housing units in Phases 2 & 3.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

Other

\* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

\*\* Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

### **Screen Summary**

#### **Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, Terracon Consultants, Inc. (Terracon), 12/27/2022, ASTM Phase II ESA, Terracon, 7/18/2023, ASTM Phase I ESA & limited ASTM Phase II ESA, Civil & Environmental Consultants, Inc. (CEC), 4/8/2025, ASTM Vapor Encroachment Screening, Terracon, 12/21/2022, Asbestos and Lead Paint Survey, Terracon, 5/9/2023, 2/13/2024, 12/3/2024, and Soil Management Plan, Terracon, 7/17/2023. A Phase I ESA was conducted in 2022 by Terracon followed by a Phase II ESA in 2023 to investigate identified RECs. The Phase II ESA soil and soil vapor results did not exceed regulatory limits. Additional Phase I and Phase II assessments were conducted by Terracon and CEC in response to community concerns. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Additional assessment followed by remediation, if needed, will be conducted during demolition and in anticipation of Phase 2/3 project

activities. A soil management plan was developed and will be used during construction activities if potential impacted soils are encountered. Consideration of radon will occur following construction of housing units in Phases 2 & 3. Mitigation of asbestos and lead paint hazards includes proper handling and work practices during demolition. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

**Supporting documentation**

[2025-4-8 10th Ave Ph I Limited Ph II ESA CEC.pdf](#)

[2025-3-28 10th Ave Wash Ph II ESA Terracon.pdf](#)

[2024-12-3 10th Ave Cont Maint Compound LBP Survey Terracon.pdf](#)

[2024-2-13 10th Ave Cont Maint Compound Lead TCLP Analysis Terracon.pdf](#)

[2023-7-18 10th Ave Cont Maint Compound Ph II ESA Terracon.pdf](#)

[2023-7-17 10th Ave Cont Maint Compound Soil Mgmt Plan Terracon.pdf](#)

[2023-5-9 10th Ave Water Warehouse ACBM LBP Survey Terracon.pdf](#)

[2022-12-27 10th Ave Ph I ESA Terracon.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

## Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402

**1. Does the project involve any activities that have the potential to affect species or habitats?**

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

**2. Are federally listed species or designated critical habitats present in the action area?**

- ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

**Screen Summary**

**Compliance Determination**

This project will have No Effect on listed species because project activities (disturbance related to the three phases of this project) will occur on a site immediately surrounded by long-term developed and paved property, including homes, commercial property, parking lots, and roads, and no listed species or critical habitat is present or known to occur within the project area currently. E-mail from US Fish & Wildlife Service, 2/27/2025. USFWS recommends using native plants for all landscaping activities. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[2025-2-27 10th Ave USFWS TE No Effect.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

**1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

☒ No

☐ Yes

**2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

☐ No

☒ Yes

**3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:**

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

☐ No

☒ Yes

**4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?**

✓ Yes

Based on the response, the review is in compliance with this section.

No

**Screen Summary**

**Compliance Determination**

There are current or planned stationary aboveground storage containers of concern within 1 mile of the project site. 14 ASTs were evaluated. The Separation Distances from the project are acceptable. The project is in compliance with explosive and flammable hazard requirements.

**Supporting documentation**

[2025-7-21 10th Ave AST Summary.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



## Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 4/8/2025.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

### Screen Summary

#### **Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 4/8/2025. The project is in compliance with the Farmland Protection Policy Act.

#### **Supporting documentation**

[US Census Urban Area Map 2025-4-8.pdf](#)

**Are formal compliance steps or mitigation required?**

South-10th-Ave-Phased-  
Aff-Hsg-Redev-Proj-CPF

Tucson, AZ

900000010492763

Yes

✓ No



## Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

**1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?**

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

✓ No

**2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.**

Yes

Describe:

✓ No

**3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination**

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool , data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

<sup>1</sup> Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

<sup>2</sup> If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

<sup>3</sup> Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

**Screen Summary**

**Compliance Determination**

This project does not occur in the FFRMS floodplain. USGS site elevations are more than two feet above the closest BFE. The project is in compliance with Executive Orders 11988 and 13690.

**Supporting documentation**

[2025-8-26 10th Ave USGS Elevations.pdf](#)

[2025-8-26 10th Ave Flood Map BFEs.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

### ***Threshold***

#### **Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

### ***Step 1 – Initiate Consultation***

#### **Select all consulting parties below (check all that apply):**

- ✓ State Historic Preservation Offer (SHPO) Completed

- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

- |                                      |                         |
|--------------------------------------|-------------------------|
| ✓ Ak-Chin Indian Community           | Response Period Elapsed |
| ✓ Fort Sill Apache Tribe of Oklahoma | Response Period Elapsed |
| ✓ Gila River Indian Community        | Completed               |



✓ Hopi Tribe of Arizona	Response Period Elapsed
✓ Mescalero Apache Tribe	Response Period Elapsed
✓ Pascua Yaqui Tribe	Completed
✓ Pueblo of Zuni	Response Period Elapsed
✓ Salt River Pima-Maricopa Indian Community	Completed
✓ San Carlos Apache Tribe	Response Period Elapsed
✓ Tohono O'odham Nation	Response Period Elapsed
✓ Tonto Apache Tribe	Response Period Elapsed
✓ White Mountain Apache Tribe	Completed
✓ Yavapai-Apache Nation	Completed

#### Other Consulting Parties

#### **Describe the process of selecting consulting parties and initiating consultation here:**

Research and evaluation of property by the City of Tucson and Westland Resources; completion of a cultural resources survey and a supplemental historical report; finding of No Adverse Effect; and SHPO and THPO consultation, continuing consultation, and concurrence. Tribes selected for consultation were identified through TDAT and the Arizona Government to Government Consultation Toolkit.

Document and upload all correspondence, notices and notes (including comments and objections received below).

#### **Was the Section 106 Lender Delegation Memo used for Section 106 consultation?**

Yes  
No

#### ***Step 2 – Identify and Evaluate Historic Properties***

##### **1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

The APE of this project includes the project location and the adjacent north, east, south, and west properties, including three contributing sites. The project location is 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, APNs 118-20-0750 and 118-20-078A, and surrounding right of way. See APE map in summary.

**In the chart below, list historic properties identified and evaluated in the APE. Every**

**historic property that may be affected by the project should be included in the chart.**

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
1445 S 11th Ave, Bathroom	Not Eligible	Yes	✓ Not Sensitive
1445 S 11th Ave, Container Bldg 1	Not Eligible	Yes	✓ Not Sensitive
1445 S 11th Ave, Container Bldg 2	Not Eligible	Yes	✓ Not Sensitive
1445 S 11th Ave, Office Bldg	Not Eligible	Yes	✓ Not Sensitive
1445 S 11th Ave, Storage Bldg	Not Eligible	Yes	✓ Not Sensitive
1480 S 10th Ave, Tucson Water Warehouse	Not Eligible	Yes	✓ Not Sensitive
EPSW Roadbed - Sector 5/EPSW	Eligible	Yes	✓ Not Sensitive
EPSW Roadbed - Sector 6/EPSW	Eligible	Yes	✓ Not Sensitive
EPSW Roundhouse/EPSW	Eligible	Yes	✓ Not Sensitive

**Additional Notes:**

The El Paso & Southwestern (EPSW) Historic District is an eligible district. EPSW-014 (EPSW Roadbed - Sector 5), EPSW-016 (EPSW Roundhouse), and EPSW-017 (EPSW Roadbed - Sector 6) are contributors to the EPSW District (not determined to be individually eligible)

**2. Was a survey of historic buildings and/or archeological sites done as part of the project?**

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

**Additional Notes:**

A cultural resources survey was conducted in 2023 followed by a historic background report in 2025.

No

***Step 3 –Assess Effects of the Project on Historic Properties***

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.**

No Historic Properties Affected

✓ No Adverse Effect

Based on the response, the review is in compliance with this section.

**Document reason for finding:**

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. The two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during the cultural resources inventory.

**Does the No Adverse Effect finding contain conditions?**

✓ Yes (check all that apply)

Avoidance

Modification of project

✓ Other

Describe conditions here:

The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground

disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post monitoring technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

No

Adverse Effect

#### **Screen Summary**

##### **Compliance Determination**

Based on Section 106 continuing consultation the project will have No Adverse Effect on historic properties. No Adverse Effect determination by the City of Tucson, 7/25/2025, concurrence by Arizona SHPO, 8/21/2025, concurrence by Gila River Indian Community, 8/13/2025, concurrence by Pascua Yaqui Tribe, 7/29/2025, defer consultation to Tohono O'odham Nation by Salt River Pima-Maricopa Indian Community, 7/28/2025, concurrence by White Mountain Apache Tribe, 8/12/2025, and no issues or concerns determination by the Yavapai-Apache Nation, 7/28/2025. Conditions: The City will notify interested Tribal representatives prior to monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. The City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery

Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post monitoring technical report to interested Tribal representatives for review and comment. The City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County (Lindeman et al 2011). The City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

#### **Supporting documentation**

[2025-8-21 10th Ave NAE SHPO Resp.pdf](#)  
[2025-8-20 10th Ave NAE GRIC Resp.pdf](#)  
[2025-8-13 10th Ave NAE WMAT Resp.pdf](#)  
[2025-8-13 10th Ave NAE GRIC.pdf](#)  
[2025-8-12 10th Ave NAE WMAT.pdf](#)  
[2025-7-30 10th No Comments or Concens YAN Resp.pdf](#)  
[2025-7-30 10th Defer to TON SRPMIC Resp.pdf](#)  
[2025-7-30 10th Appr MDP Req Notif PYT Resp.pdf](#)  
[2025-8-21 10th Ave NAE Conditional Concurrence SHPO.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult YAN.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult WMAT.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult TON.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult TAT.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult SRPMIC.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult SCAT.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult PYT.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult POZ.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult MAT.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult HTOA.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult GRIC.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult FSATOO.pdf](#)  
[2025-7-25 10th Section 106 Cont Consult ACIC.pdf](#)  
[2025-7-25 10th Ave SHPO THPO Consultation Ltrs Att A-E.pdf](#)  
[2025-3-6 10th Ave No Adv Eff SHPO Concurrence.pdf](#)  
[2025-6-4 10th Ave GRIC Req for Contin Consult and Defer to TON as Lead.pdf](#)  
[2025-5-29 10th Ave PYT NAE and HPO Resp.pdf](#)

[2025-5-28 10th Ave TON No Issues Concerns.pdf](#)  
[2025-5-28 10th Ave SRPMIC Forward TON Resp.pdf](#)  
[2025-5-21 10th Ave YAN Receipt Resp.pdf](#)  
[2025-5-21 10th Ave WMAT NAE.pdf](#)  
[2025-5-21 10th Ave SRPMIC Defer to TON Resp.pdf](#)  
[2025-5-19 10th THPO Consultation Ltrs Att A-D.pdf](#)  
[2025-5-19 10th THPO Consult Inv YAN 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv WMAT 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv TON 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv TAT 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv SRPMIC 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv SCAT 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv PYT 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv POZ 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv MAT 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv HTOA 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv GRIC 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv FSATOO 2.pdf](#)  
[2025-5-19 10th THPO Consult Inv ACIC 2.pdf](#)  
[2025-6-11 10th Ave NAE SHPO Contingent Concur.pdf](#)  
[2025-2-5 10th Ave SHPO Consultation Ltr Att G.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

## Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

**1. What activities does your project involve? Check all that apply:**

- ☒ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster  
None of the above

**4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).**

**Indicate the findings of the Preliminary Screening below:**

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

- ✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

**Is your project in a largely undeveloped area?**

- ✓ No

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Document and upload noise analysis, including noise level and data used to complete the analysis below.

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**



✓ Mitigation as follows will be implemented:

No mitigation for Phase 1 activities is required, however, a noise abatement plan will be developed and implemented to mitigate noise for the planned Phase 2/3 residential development.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

#### **Screen Summary**

##### **Compliance Determination**

A Noise Assessment was conducted. The noise level was normally unacceptable: 70.0 db. See noise analysis, Civil & Environmental Consultants, Inc., 4/9/2025. The project is in compliance with HUD's Noise regulation with mitigation.

##### **Supporting documentation**

[2025-4-9 10th Ave Noise Assmt South CEC.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</b>	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No

✓ Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

✓ Yes

Document and upload MOU or Agreement below.

No

**4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen**

Yes

✓ No

**5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?**

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, stormwater and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review. Does your MOU or working agreement exclude your project from further review?

✓ No

Based on the response, the review is in compliance with this section. Upload your correspondence with the EPA and all documents used to make your determination below.

Yes

#### **Screen Summary**

##### **Compliance Determination**

The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above." and Section II.B.2, "Acquisition, disposition, rehabilitation, reconstruction or modernization of existing projects, buildings, and public facilities.")). The project will

utilize and modernize existing municipal water and wastewater facilities and infrastructure. The project is in compliance with Sole Source Aquifer requirements.

**Supporting documentation**

[Sole Source Aquifer Template 5-11-18.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order**

No

✓ Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

## Screen Summary

**Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[2025-8-6 10th Ave Wetlands Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

### 1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

### Screen Summary

#### Compliance Determination

This project is not within proximity of a NWSRS river. There are no NWSRS rivers in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.

#### Supporting documentation

[NWSRS Wild-Scenic Rivers 2024-11-21.pdf](#)

[NRI Wild-Scenic Rivers 2024-11-21.pdf](#)

#### Are formal compliance steps or mitigation required?

Yes

✓ No

## Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?**

Yes

✓ No

Based on the response, the review is in compliance with this section.

### **Screen Summary**

#### **Compliance Determination**

Recent executive actions have resulted in the rescission of environmental justice initiatives.

#### **Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No



# South 10th Ave, Tucson, AZ 85713



## Notes

Aerial Map  
APNs  
425 W 23rd St, 118-20-036A  
1402 S 10th Ave, 118-20-037A  
1445 S 11th Ave, 118-20-076A  
1480 S 10th Ave, 118-20-077A  
no address, 118-20-078A  
no address, 118-20-0750

## Legend

□ Parcels

Project Location

1: 2,257



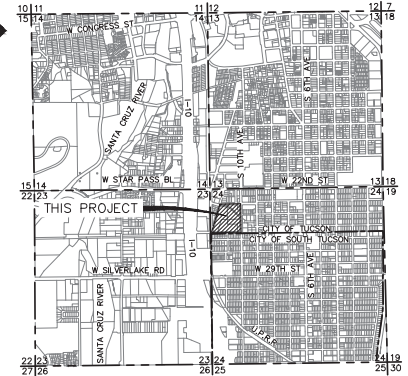
364.4 0 182.21 364.4 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
© City of Tucson

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

## TP-\_\_\_\_-\_\_\_\_-\_\_\_\_



BEING A PORTION OF THE NORTHWEST 1/4  
OF SECTION 24, T-14-S, R-13-E, G&SRM  
TUCSON, ARIZONA  
SCALE: 3"=1 MILE

PSOMAS  
1745 E. RIVER RD, SUITE 245  
TUCSON, AZ 85718  
CONTACT: DON BJELK, RLS  
TEL: (520) 292-2300  
EMAIL: [donbjelk@psomas.com](mailto:donbjelk@psomas.com)

1402 & 1480 S 10TH AVE,  
1445 S 11TH AVE, AND 425 W  
23RD ST, TUCSON, AZ 85713

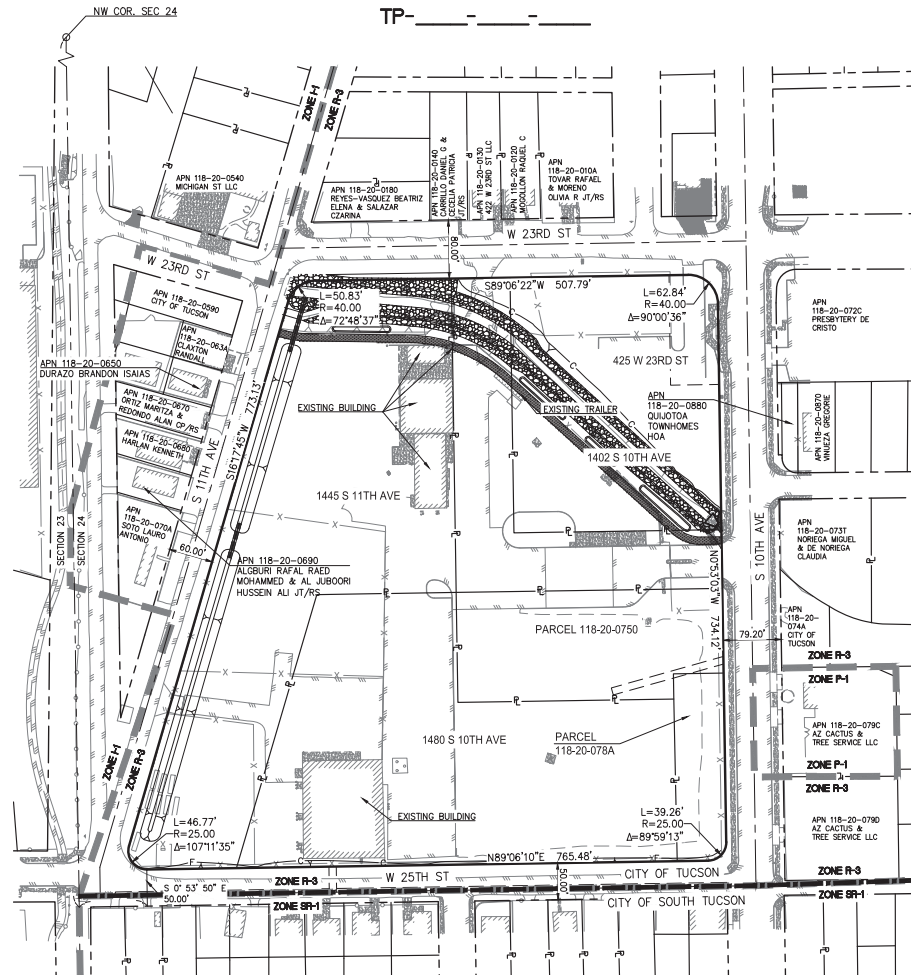
SHEET No.	SHEET DESCRIPTION
1	COVER SHEET
2	GENERAL NOTES
3-8	DEMOLITION PLAN
9	SITE/UTILITY PLAN
10	GRADING PLAN
11-12	TYPICAL SECTION DETAILS
13	CIVIL DETAILS
14	LANDSCAPE & IRRIGATION NO
15	ROOT BARRIER PLAN
16	ROCK MULCH & SEED PLAN
17-18	LANDSCAPE PLANS
19-20	IRRIGATION PLANS
21-22	WATER HARVESTING PLANS
23-24	LANDSCAPE DETAILS
25	IRRIGATION DETAILS

TD- \_\_\_\_\_  
TP-PRE-0125-00006  
DP17-0047  
C9-71-19


ASSESSORS PARCEL #'S 118-20-078A, 118-20-0750, 118-20-077A,  
118-20-076A, 118-20-037A, AND 118-20-036A  
OF SECTION 24, T14S, R13E, G&SRM,  
CITY OF TUCSON, PIMA COUNTY, ARIZONA

PROJ NO: 7TUS180116 SCALE: HORIZ 1" = 80' 1 of 25  
DATE: APRIL 2025 VERT N/A

1745 E. River Road, Suite 245  
Tucson, AZ 85718  
(520) 292-2300 (520) 292-1290 fax  
[www.psomas.com](http://www.psomas.com)



Q.	REVISION	DATE
+	+	
+	+	
DRAWN BY:	LH	04/25
DESIGNED BY:	KL	04/25
CHECKED BY:	KL	04/25



1745 E. River Road, Suite 245  
Tucson, AZ 85718  
(520) 292-2300 (520) 292-1290 fax  
[www.psomas.com](http://www.psomas.com)

	EXISTING		
		CENTER LINE	
		PROJECT BOUNDARY	
		RIGHT-OF-WAY LINE	
		EASEMENT LINE	
		PROPERTY LINE	
		CITY LIMITS	
		ZONING LIMITS	
		PAVEMENT	
	4" G	GAS MAIN	
	OHE	OVERHEAD ELECTRIC	
	UGE	UNDERGROUND ELECTRIC	
	COM	UNDERGROUND COMMUNICATION LINE	
	S	SEWER MAIN	8" S
	W	WATER MAIN	8" W
	SD	STORMDRAIN PIPE	
	X	CHAIN LINK FENCE	X
		CROSS SECTION DETAIL	
	RSR	RISER	
		LIGHT POLE	
		UTILITY POLE	
		UTILITY POLE & RISER	
	ECLB	ELECTRIC CONTROL BOX	
	LCLB	LIGHT CONTROL BOX	
	TSCB	TRAFFIC CONTROL BOX	
	EM	ELECTRIC METER	
		ELECTRIC PANEL	
	E	ELECTRIC TRANSFORMER	
	E (M)	ELECTRIC MANHOLE	
		GUY WIRE	
		COMMUNICATION PEDESTAL	
		SEWER MANHOLE	
		SEWER CLEANOUT	
		WATER VALVE	
		DRAIN VALVE ASSEMBLY	
		FIRE HYDRANT	
		WATER REDUCER	
		AIR RELEASE VALVE	
		BACKFLOW PREVENTER	
		WATER METER	
		STORMDRAIN MANHOLE	
		BOLLARD	
		SIGN	
		BUILDING	
		CONCRETE	
		GRAVEL	
		ASPHALT REMOVAL	
		ASPHALT/GRAVEL REMOVAL	
		ROCK RIPRAP	
		CUT LIMITS	C
		FILL LIMITS	F
		GRADING LIMITS	



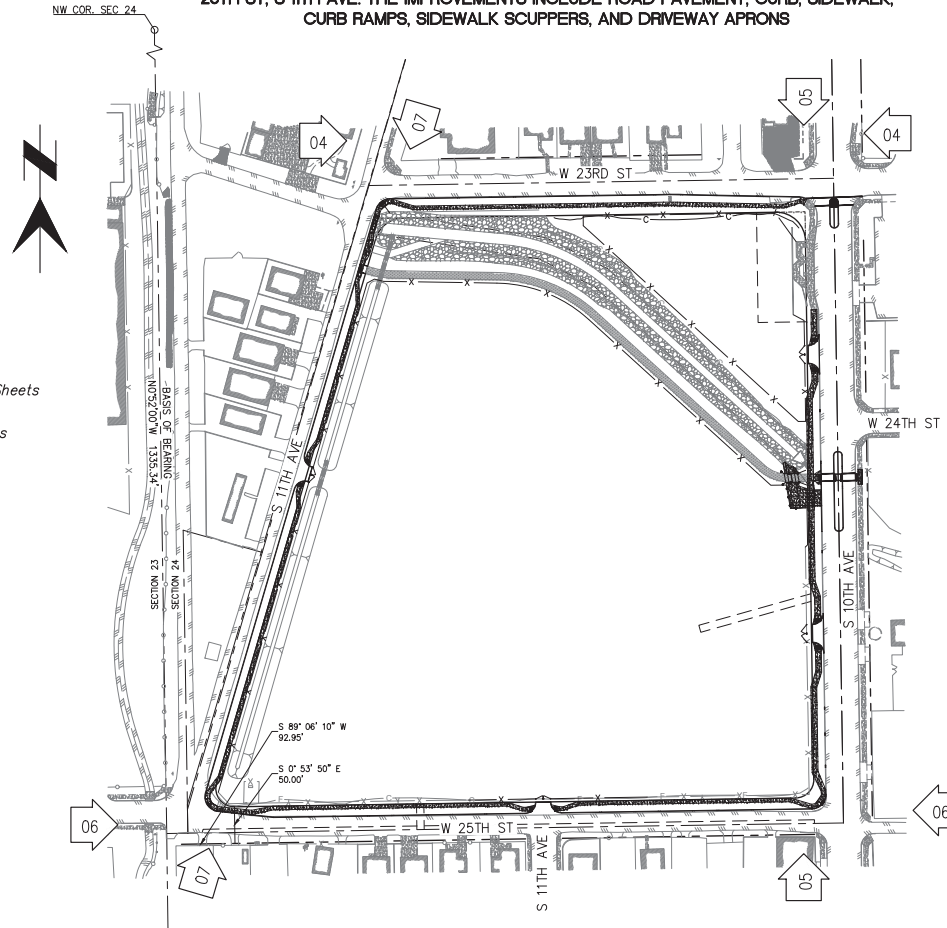


CITY OF TUCSON, ARIZONA  
1402-1450 S 10TH AVE

OFFSITE IMPROVEMENTS

COT PLAN No. \_\_\_\_\_

OFFSITE IMPROVEMENTS FOR 1402-1450 S 10TH AVE ALONG W 23RD ST, S 10TH AVE, W 25TH ST, S 11TH AVE. THE IMPROVEMENTS INCLUDE ROAD PAVEMENT, CURB, SIDEWALK, CURB RAMPS, SIDEWALK SCUPPERS, AND DRIVEWAY APRONS



INDEX OF SHEETS

PAGE NO.	SHEET NO.	SHEET DESCRIPTION
1	CV01	Cover Sheet and Legend
2-3	NT01-NT02	Notes and Section Details
4-7	GM01-GM04	Geometry Plan and Profile Sheets
8-9	DT01-DT02	Construction Grading Details
10	LS01	Landscape & Irrigation Notes
11	LS02	Root Barrier Plan
12	LS03	Rock Mulch Plan
13	LS04	Landscape Plan
14	LS05	Landscape Plan
15-16	LS06-LS07	Irrigation Plan
17-18	LS08-LS09	Water Harvesting Plan
19-20	LS10-LS11	Landscape Details
21	LS12	Irrigation Details

Constructed by:

Construction Company

Completion Date

Red-Lines by:

Construction Administrator Name & Company

Completion Date

Record Document by:

As-Built Designer Name & Company

Completion Date

ORIGINAL SIZE 24"x36"  
DO NOT SCALE  
A REDUCED SIZE

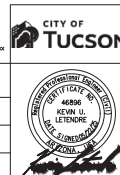
OWNER  
CITY OF TUCSON  
HOUSING AND COMMUNITY DEVELOPMENT  
DEPARTMENT  
310 N. COMMERCE PARK LOOP  
SANTA RITA BUILDING  
TUCSON, AZ 85745  
(520) 791-4171

PRELIMINARY  
NOT FOR CONSTRUCTION

Record Document  
Dated: \_\_ / \_\_ / \_\_

PSOMAS  
1745 E. River Road, Suite 245  
Tucson, AZ 85718  
(520) 362-2200 (520) 292-1290 fax  
www.psomas.com

NO.	DATE	REVISION	BY



COVER SHEET DEPARTMENT OF TRANSPORTATION/ENGINEERING DIVISION			
1402-1450 S. 10TH AVENUE OFFSITE IMPROVEMENT PLAN			
APPROVALS	SIGNATORY	DATE	APPROVED _____ 20__
DESIGN SECTION/PERMITS AND CODES			1
TRAFFIC ENGINEERING			OF
STREETS AND TRAFFIC MAINTENANCE			21
ENGINEERING LANDSCAPE ARCH			
ENGINEERING ADMINISTRATOR			
DRWN. BY LT 5/25	DSGN. BY KL 5/25	CHKD. BY KL 5/25	PLAN NO. _____



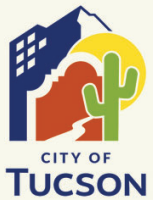
LOCATION MAP  
Section 24, T-14-S, R-13-E, G&SRM  
Tucson, Arizona  
Scale: 1"=3 Mile

NEW	EXISTING
RIGHT OF WAY	---
EASEMENT	---
SECTION LINE	---
PROPERTY LINE	---
PAVEMENT SPOT ELEVATION	---
STORM SEWER	SD
ELECTRIC LINE (TRAFFIC SIGNAL)	E
UNDERGROUND ELECTRIC LINE	UGE
OVERHEAD ELECTRIC	OHE
UTILITY POLE	UP
LIGHT POLE	LP
TRAFFIC SIGNAL BOX	TSB
STREET LIGHT BOX	SLB
UNDERGROUND TV CABLE	CATV
FIBER OPTIC	FO
WATER MAIN	W
UNDERGROUND TELEPHONE LINE	COMM
NATURAL GAS LINE	G
GAS LINE MARKER	GLM
IRRIGATION VALVE	IV
GATE VALVE	GV
BENCHMARK	BM
SEWER LINE	S
SEWER MANHOLE	SMH
FENCE	F
PAVEMENT & CURB	---
SIDEWALK	---



# 1402 South 10th Affordable Housing Development

March 6th, 2025



# Project Overview

- **What:** Affordable housing with an estimate of 300-400 mixed-income units; details and specifics TBD
- **Why:** Tucson's increasing need for affordable housing and the directive to develop affordable housing on City-owned properties
- Public amenities to be designed with community to incorporate community wishes and priorities
- Will be developed by City of Tucson non-profit El Pueblo Housing Development and a co-developer to be selected through a procurement process



# Project Updates

## Environmental Testing

- Additional testing completed by CEC (Second Opinion Phase I) and Terracon (wash testing)
- Final reports will be ready by March (CEC)/April (Terracon) due to adding testing and lab delays (previously expected in February)

## Infrastructure Construction Schedule

- Infrastructure construction to begin in conjunction with Phase I Environmental Site Assessment completion and environmental clearance



El Pueblo  
Housing Development

# Follow Up

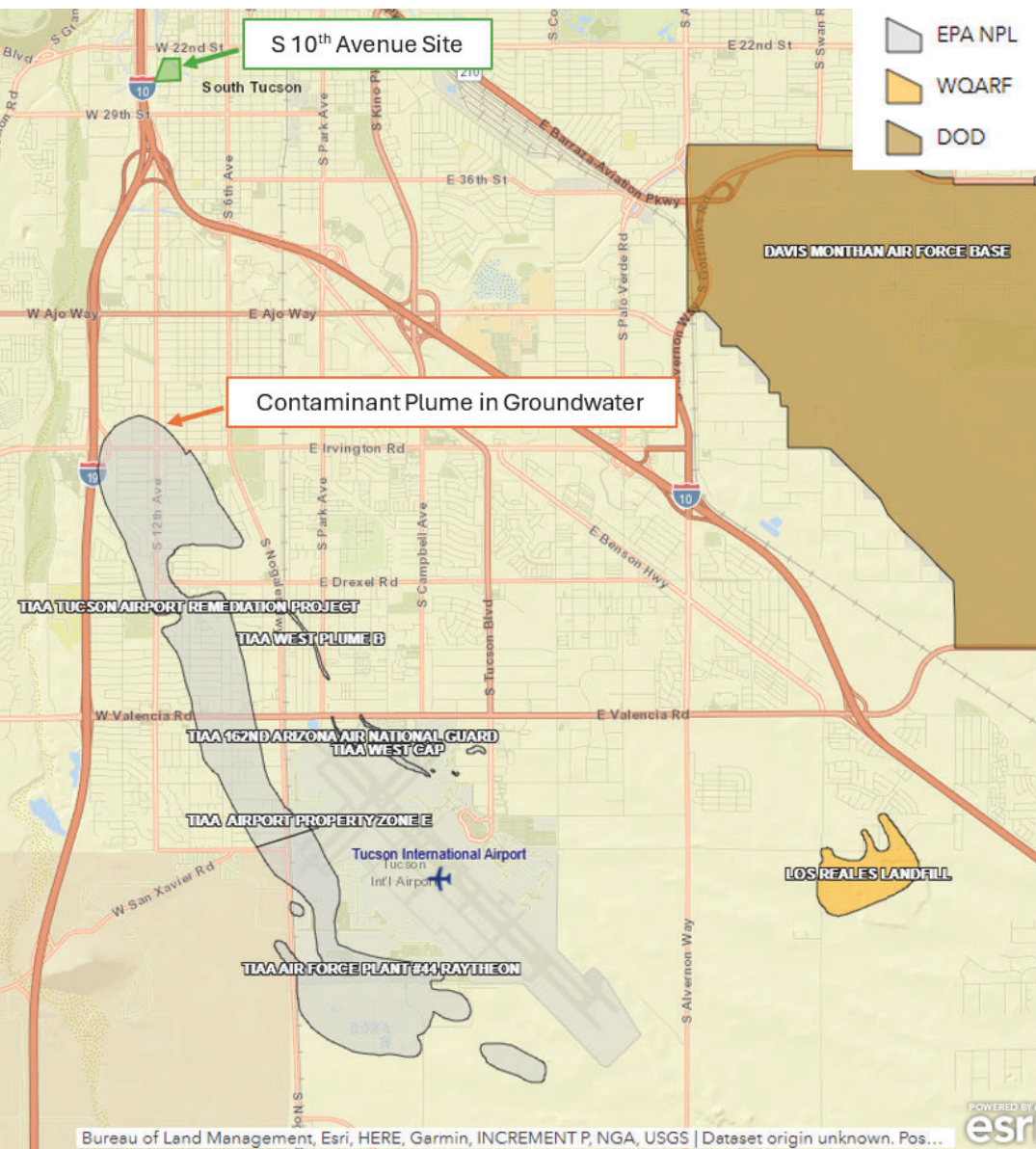
We heard the following questions/concerns at the last project meeting on January 30, 2025:

- **Parking:** The site will have parking; details will be determined in future phases as we start working on project design
- **Traffic:** A traffic impact study will be conducted as the project details are more refined
- **Outreach:** 1) Postcards sent to Barrio Santa Rita Park-West Ochoa households (~1000) and additional households within 1/4 mile of the site (~450); 2) Flyers distributed door-to-door in the project area (~160) ; 3) Emails sent/phone calls made to everyone who shared their contact info at previous meetings; 4) Flyers shared with Ochoa Community School, Drachman Montessori Magnet School and Joh Valenzuela Youth Center for distribution; 5) Meeting info posted on HCD social media
- **TEC Contamination/Plume:** Plume does not go under the project site (map on next slide)



**El Pueblo**  
Housing Development





# TCE Plume Map

Source: ADEQ eMaps

ADEQ eMaps include all known contaminant plumes under EPA and ADEQ supervision

Find ADEQ eMaps here:

<https://adeq.maps.arcgis.com/apps/webappviewer/index.html?id=e224fc0a96de4bcd4b0e37af3a4daec&showLayers=Counties;Composting%20Facilities>



**El Pueblo**  
Housing Development



Added: Door-to-Door,  
Social Media, & Flyer  
Distribution

## Meeting Notices

\* Mailing list not complete

\* Newspapers

\* Radio + Spanish Radio

\* Want meetings when there are updates

\* More frequent updates/convos w/ a community representative

\* Chicanos por la causa = good example of  
affordability for residents

\* Project Plan?

\* Land  
Acknowledgement +

\* Large Group is  
Good

\* Funding + Conditions

\* Parking

\* Traffic

Incorporated

Under Consideration

Future Engagement  
when Substantive  
Updates

City will update the  
community at large

Continuing Large  
Groups

Integrated into  
Project Plan & Future  
Engagements

See Previous Slide

Noted for Future  
Discussion



Adaapta is a woman-owned and operated business with a mission to educate, empower, and equip communities to achieve their economic, social, and environmental goals by successfully redeveloping underutilized and contaminated properties.



**Danielle Getsinger**

*CEO*

[danielle@adaapta.com](mailto:danielle@adaapta.com)



**Michelle Spohnheimer**

*Portfolio Director*

[michelle@adaapta.com](mailto:michelle@adaapta.com)



**Yolanda Bouchee**

*Subject Matter Expert*

[yolanda@adaapta.com](mailto:yolanda@adaapta.com)

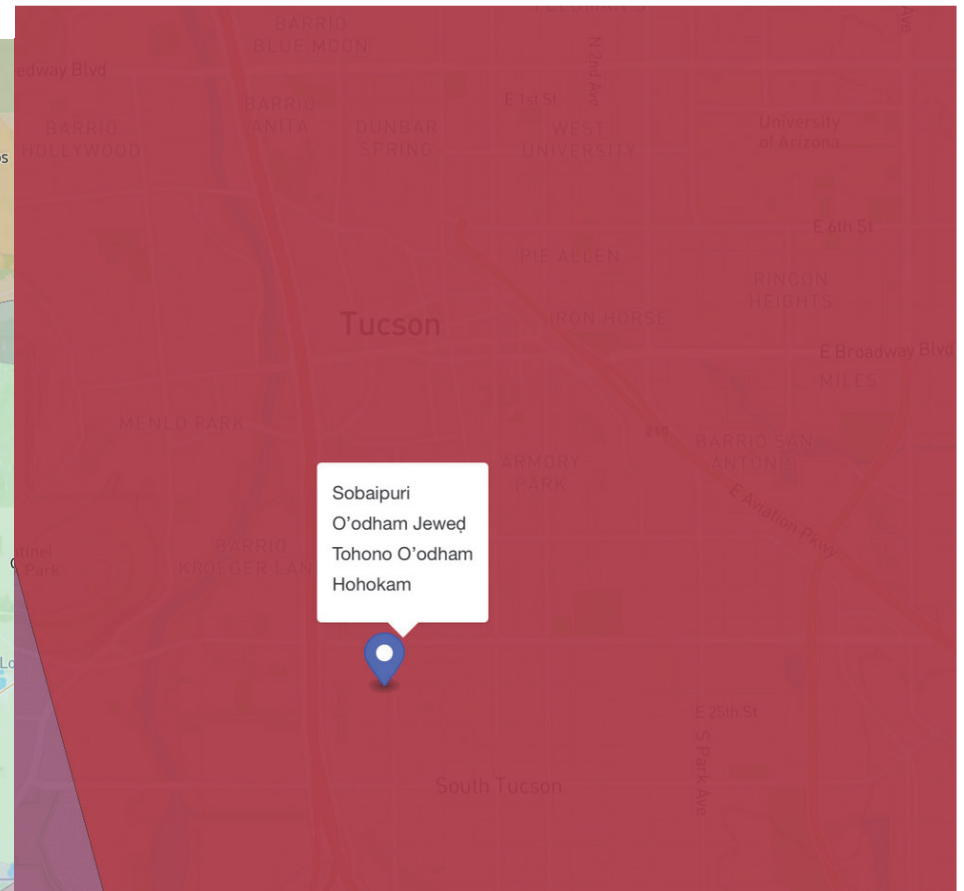
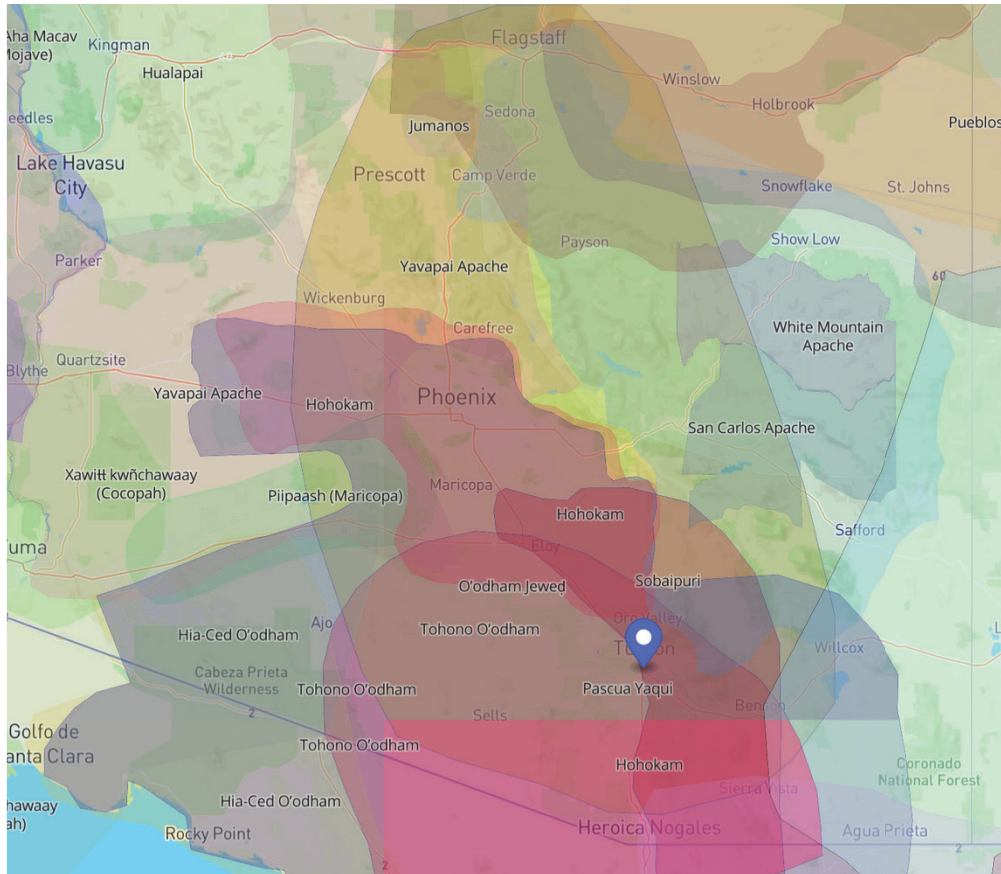


**Krisandra Provencher**

*Project Manager*

[krisandra@adaapta.com](mailto:krisandra@adaapta.com)

# LAND ACKNOWLEDGEMENT



<https://native-land.ca>

# WHY ARE WE HERE?

- Adaapta specializes in the redevelopment of environmentally distressed property (aka brownfields)
- Technical support directed by EPA's Land Revitalization Program
  - Provide planning support for funding and financing of brownfields projects
  - Enhance community engagement and communication efforts



*A brownfield is a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant (US EPA).*



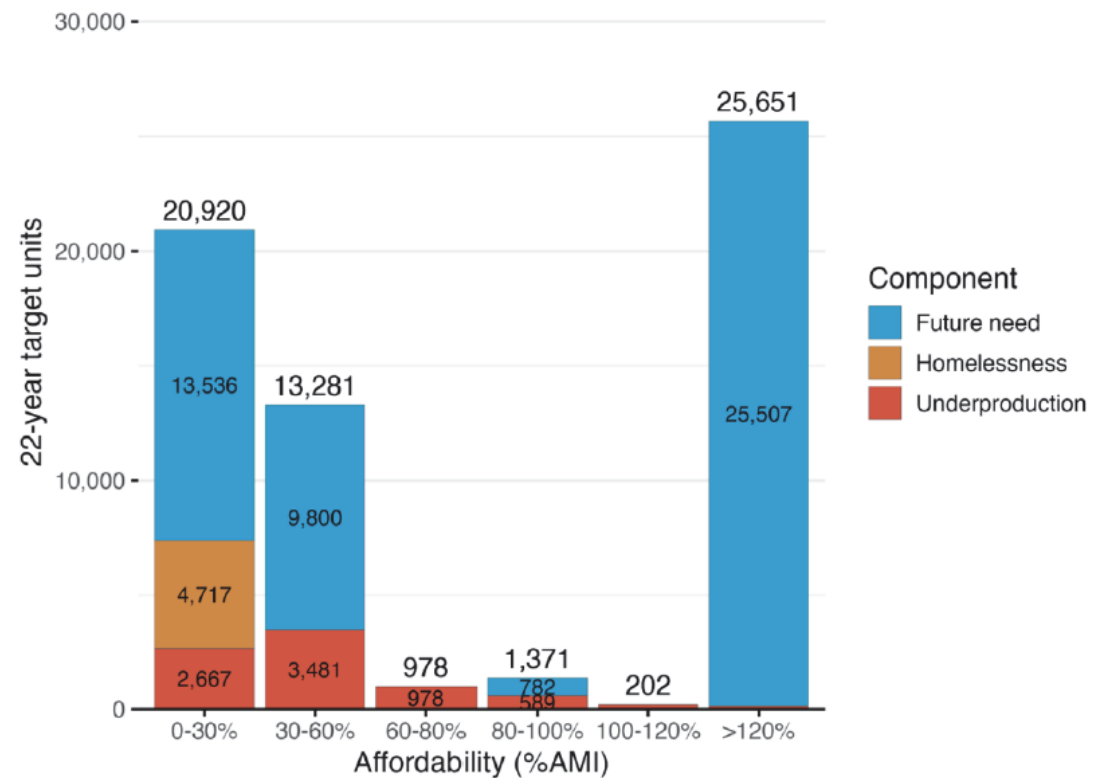
# TERMINOLOGY

- **Affordable Housing** – Housing that costs no more than 30% of a household's gross income, including utilities.
- **Area Median Income (AMI)** – The midpoint of a region's income distribution, meaning half of the households earn more and half earn less.
- **Subsidized Housing** – Housing where the rent is reduced based on the tenant's income. The balance of rent is typically supported through a federal program such as the **Section 8 Housing Choice Voucher Program** or **Public Housing**.
- **Income-Restricted Housing** – Housing that caters to households below a specific income limit but is not subsidized. **Low-Income Housing Tax Credits** (LIHTC) developments contain income restricted units.
- **Mixed-Income Housing** – Includes housing units for a wider range of income levels within a single building or development.
- **Mixed-Use Development** – A building or development that combines residential and commercial uses.

# TUCSON HOUSING NEEDS

- **Projected Housing Demand:** Need over 62,000 new housing units by 2045 to accommodate population growth, underproduction, and homelessness.
  - Homelessness: 4,717 units (7%)
  - Underproduction: 8,061 units (13%)
  - Future Population Growth: 49,625 units (80%)
- **Income-Specific Housing Needs:**
  - 34,000 units required for households earning 0–60% AMI—a major affordability gap.
  - 26,000 units needed for higher-income households (120%+ AMI).
- **Short-Term Housing Needs:**
  - 35,000 units needed by 2033 (10-year est.).
  - 20,000 units needed by 2028 (5-year est.).

**Exhibit 2. Housing Need Components by Income, Tucson, 2024–2045**



# TUCSON HOUSING NEEDS

34,000 units needed for households  
below 60% AMI



Tucson needs housing ranging  
from affordable to market-rate  
housing

26,000 units needed for households  
over 120% AMI



Without market-rate units available, households in higher income ranges will  
buy housing priced at a point for lower income households.

# AFFORDABLE HOUSING

Affordable housing is defined as spending **no more than 30% of income on rent or mortgage**, including utilities, and aims to support low- to moderate-income families by ensuring safe housing.

## Benefits:

- Allows families to afford essentials like food and healthcare.
- Promotes economic stability and reduces homelessness.
- Strengthens communities by providing housing for essential workers.

## Types of Affordable Housing:

- Government-subsidized programs (e.g., Section 8).
- Nonprofit and community housing initiatives.
- Workforce housing for middle-income earners in high-cost areas.





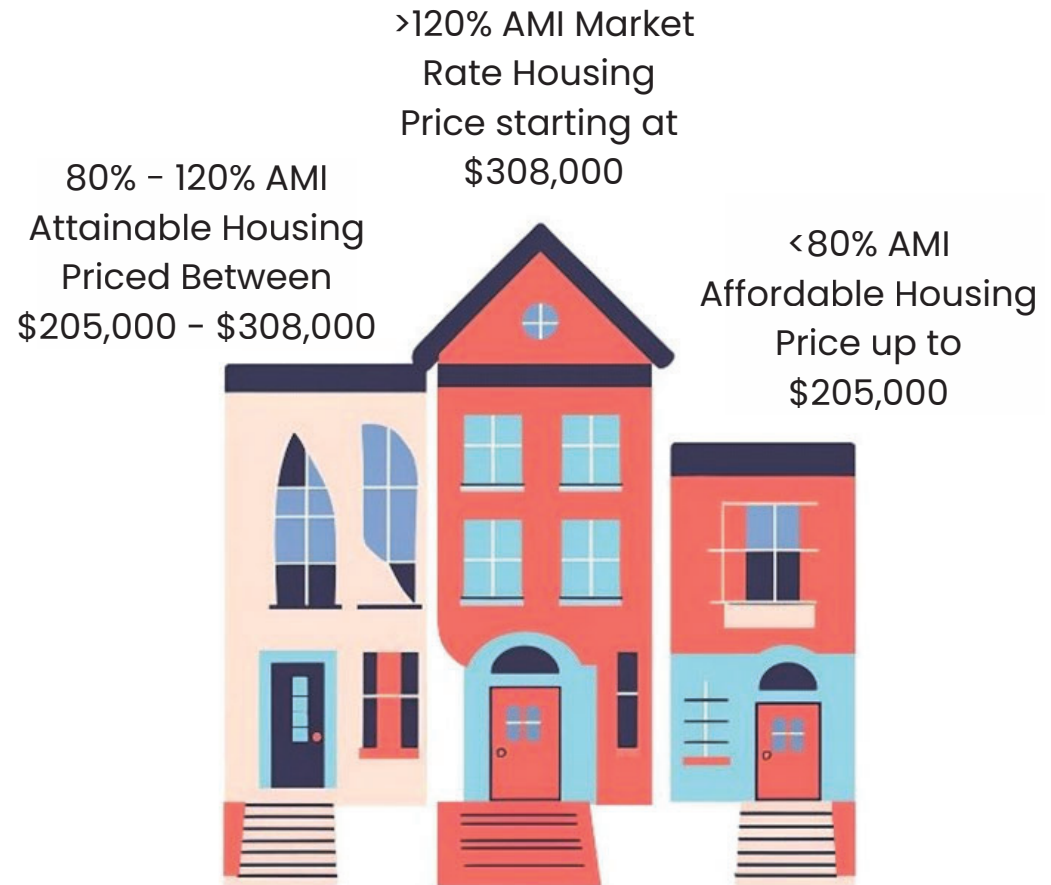
# MIXED-INCOME HOUSING

## Benefits:

- Income generated from market rate units can help fill the gap in development costs of affordable housing units.
- Social benefits for all residents.

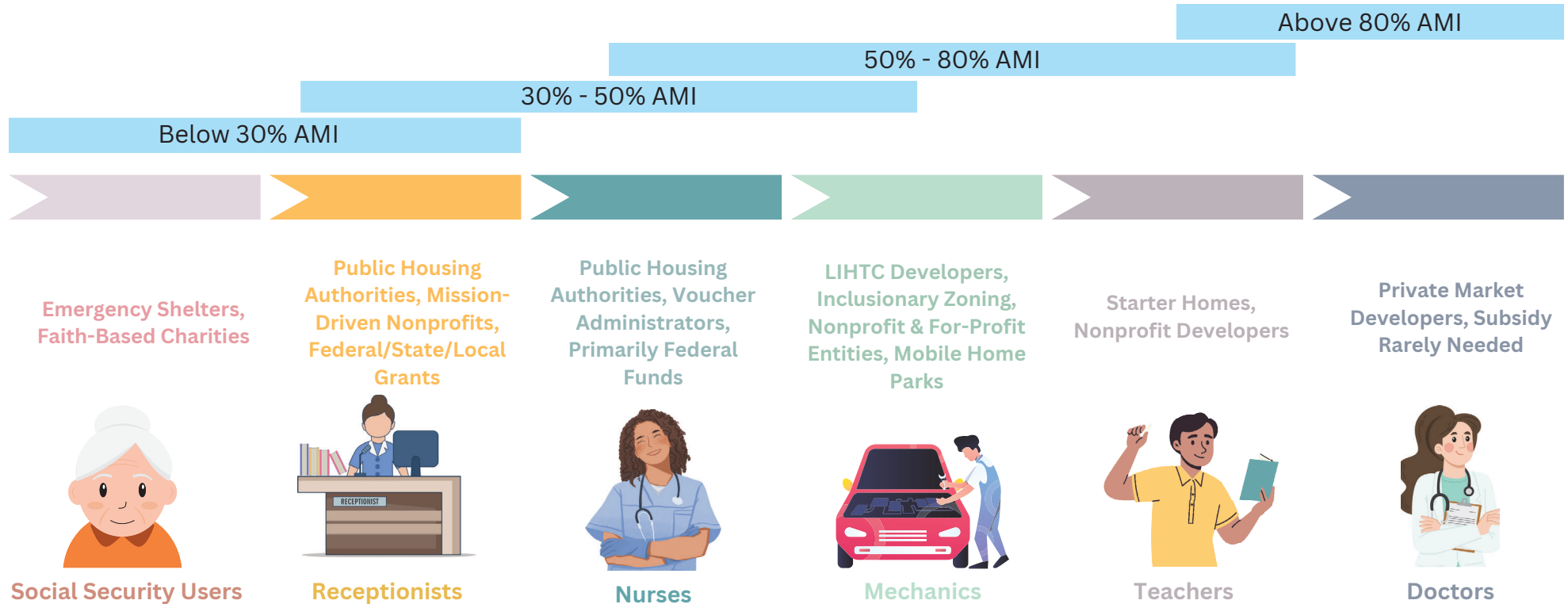
## What Contributes to Project Success:

- Design that does not distinguish between affordable and market rate housing.
- Providing for a continuum of income levels not just low income and high income.
- Shared community amenities such as open spaces or community facilities.



*NOTE: The 1402 S 10th ST Housing Development will be primarily affordable housing.*

# AFFORDABLE HOUSING: WHO IT SERVES & HOW IT IS PROVIDED



*Tucson, AZ Metro Area (family of 4)*

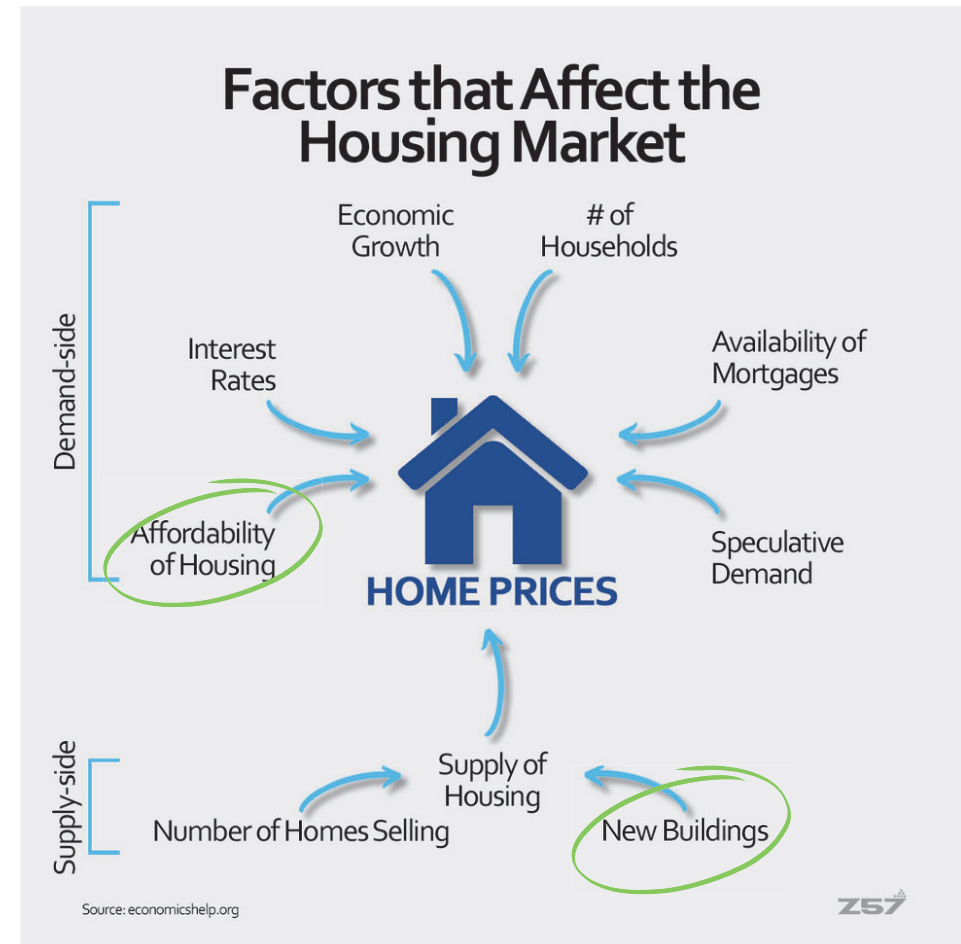
**30% AMI:** \$31,200

**50% AMI:** \$44,650

**80% AMI:** \$71,400

# HOW DO YOU MAKE HOUSING AFFORDABLE?

- **Government Subsidies** – Tax credits, grants, and low-interest loans to reduce development costs.
- **Nonprofit Developers** – Organizations focused on affordability rather than profit, securing funding from various sources.
- **Land Donations & Public-Private Partnerships** – Collaboration between governments, developers, and nonprofits to lower costs.
- **Low-Cost Financing & Tax Incentives** – Tools like Low-Income Housing Tax Credits (LIHTC) and bond financing.
- **Alternative Construction Methods** – Modular housing, adaptive reuse, and other cost-saving building techniques.

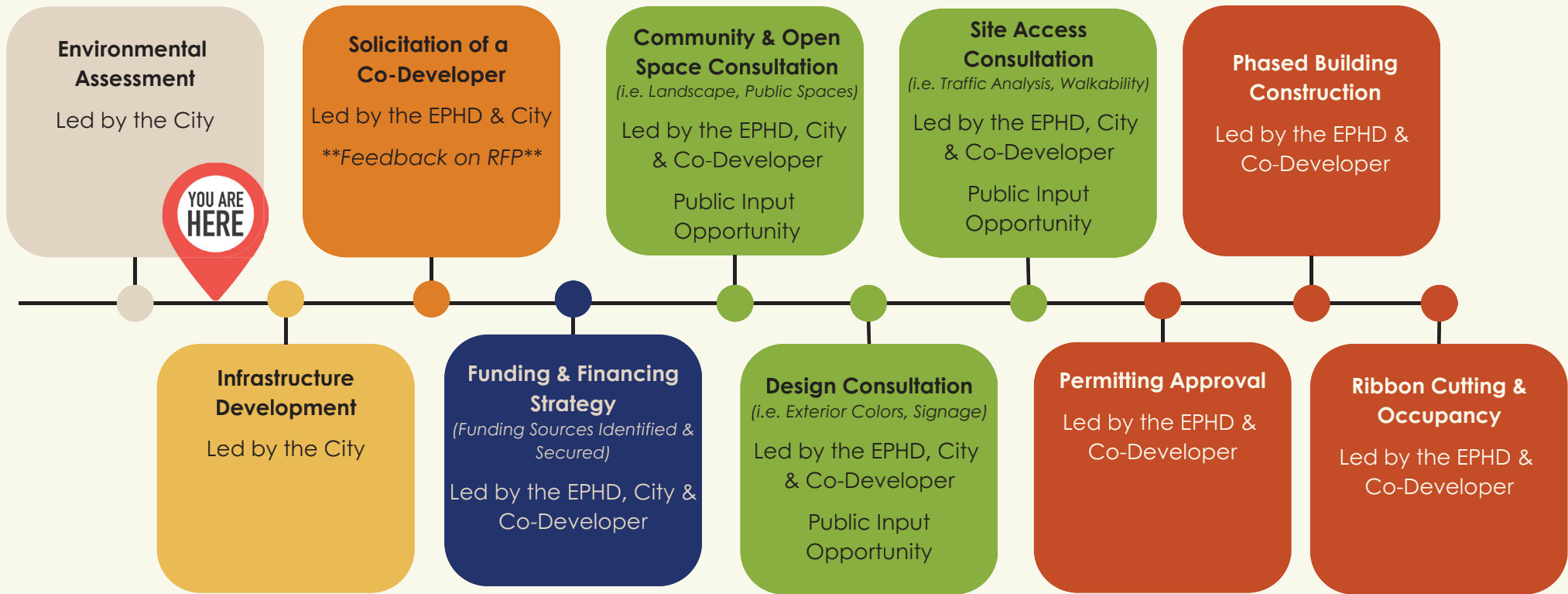


# POINTS FOR FUTURE DISCUSSION

- Parking & Traffic
- Property Valuation & Taxes
- Funding Strategies
- RFP for Co-Developer
- Exterior Design Elements (e.g., colors, signage)
- Public Amenities & Spaces



# South 10th Avenue Development





# Phase I Environmental Site Assessment

City of Tucson (COT) Container Maintenance Compound (CMC) and  
Water Stores Compound (WSC)

1402 South 10th Avenue

(APNs 118-20-0374A, 118-20-0076A, 118-20-077A, 188-20-078A, 118-20-  
0750, and 118-20-036A)

Tucson, Pima County, AZ

December 27, 2022

Terracon Project No. 63227145



**Prepared for:**

City of Tucson Environmental & General Services  
Tucson, Arizona

**Prepared by:**

Terracon Consultants, Inc.  
Tucson, Arizona

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**Terracon**

Environmental



Facilities



Geotechnical



Materials

December 27, 2022



City of Tucson Environmental & General Services  
4004 South Park Avenue, Building 1  
Tucson, AZ 85726

Attn: Ms. Valerie Herman  
P: (520) 837-2270  
E: [Valerie.Herman@tucsonaz.gov](mailto:Valerie.Herman@tucsonaz.gov)


Re: Phase I Environmental Site Assessment  
City of Tucson Container Maintenance Compound and Water Stores Compound  
1402 South 10th Avenue  
Tucson, Pima County, Arizona 85713  
Terracon Project No. 63227145

Dear Ms. Herman:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Phase I Environmental Site Assessment (ESA) report for the above-referenced site. This assessment was performed in accordance with Terracon Proposal No. P63227145 dated September 19, 2022.

We appreciate the opportunity to be of service to you on this project. In addition to Phase I services, our professionals provide geotechnical, environmental, construction materials, and facilities services on a wide variety of projects locally, regionally and nationally. For more detailed information on all of Terracon's services please visit our website at [www.terracon.com](http://www.terracon.com). If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,  
**Terracon Consultants, Inc.**

  
Breana M. Quesada  
Assistant Scientist

  
Derek D. Koller, CIH, CHMM  
Office Manager / Principal

Terracon Consultants Inc. 355 S Euclid Ave Ste 107 Tucson, AZ 85719-6654

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Environmental



Facilities



Geotechnical



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## Phase I Environmental Site Assessment

City of Tucson Container Maintenance Compound and Water Stores Compound ■ Tucson, AZ  
December 27, 2022 ■ Terracon Project No. 63227145



## APPENDICES

APPENDIX A	<u>Exhibits</u> <ul style="list-style-type: none"><li>■ Exhibit 1 – Topographic Map</li><li>■ Exhibit 2 – Site Diagram</li></ul>
APPENDIX B	Site Photographs
APPENDIX C	<u>Historical Documentation</u> <ul style="list-style-type: none"><li>■ EDR Historical Topo Map Report</li><li>■ EDR Aerial Photo Decade Package</li><li>■ EDR Certified Sanborn® Map Report</li><li>■ EDR City Directory Abstract</li><li>■ Pima County Assessor's Office Parcel Information</li><li>■ Pima County MapGuide Parcel Detail</li><li>■ Texas Environmental Research Chain of Title &amp; Environmental Lien Search</li></ul>
APPENDIX D	Environmental Database Information
APPENDIX E	Credentials
APPENDIX F	Description of Terms and Acronyms
APPENDIX G	Arizona Department of Environmental Quality (ADEQ) Records
APPENDIX H	Notice to Proceed Letter

## EXECUTIVE SUMMARY

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Terracon Proposal No. P63227145 dated September 19, 2022 and was conducted consistent with the procedures included in ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The ESA was conducted under the supervision or responsible charge of Derek D. Koller, CIH, CHMM, and Environmental Professional. The site reconnaissance was performed by Breana Quesada and Cameron Leonard on September 28, 2022.

### Findings and Opinions

A summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

### Site Description and Use

The site is comprised of six parcels (Pima County Assessor's Parcel Numbers [APN] 118-20-037A, 118-20-036A, 118-20-076A, 118-20-0750, 118-20-077A, and 118-20-078A) and covers approximately 12.27-acres of land. The site is owned by the City of Tucson (COT) developed with City of Tucson (COT) Container Maintenance and Water Stores Compound, Tucson Water, City of Tucson Refuse Transfer Center, and vacant office building. The remainder of the site is concrete-paved or landscaped areas. A table summarizing pertinent information regarding the site parcels is provided below:

APN	Associated Address	Site Improvements	Acreage
118-20-037A	1402 South 10 <sup>th</sup> Avenue	Parcel consists of two non-contiguous area separated by the Downtown Airport Wash. The north portion is developed with a 1,617 structure (currently vacant) and the south portion is developed with an office trailer.	3.09
118-20-036A	425 West 23 <sup>rd</sup> Street	Paved and landscaped areas.	0.22
118-20-076A	1445 South 11 <sup>th</sup> Avenue	Two interconnected buildings collectively covering 3,569 square-feet and containing a wash-bay, welding shop, maintenance area, paint booth and office area.	3.79
118-20-0750	No assigned address	An aboveground storage tank (AST), fuel dispenser, and auxiliary equipment shed.	1.18
118-20-077A	1480 South 10 <sup>th</sup> Avenue	A 14,098 square foot office building/warehouse occupied by Tucson Water and associated parking areas.	3.53
118-20-078A	No assigned address	Paved and landscaped areas.	0.43
Total Acreage:			12.24

### Historical Information

Based on review of historical information, the site was developed with a dwelling and detached

## Phase I Environmental Site Assessment

City of Tucson Container Maintenance Compound and Water Stores Compound ■ Tucson, AZ  
December 27, 2022 ■ Terracon Project No. 63227145



garage with a shed as early as 1919, the earliest historical documentation available. According to information available, the City of Tucson has owned the site since at least 1931. By 1947, additional residences were added. By 1972, the site was developed by the City of Tucson and from 1992 through 1996, the central portion of the site was used for refuse storage. Historical city directories identified the City of Tucson Refuse Transfer Station as the primary site operation which is further discussed in the Records Review section.

### **Records Review**

Selected federal and state environmental regulatory databases as well as responses from state and local regulatory agencies were reviewed. The City of Tucson 10<sup>th</sup> Avenue Fuel Facility and Refuse Transfer Station, addressed at 1402 South 10<sup>th</sup> Avenue, were identified on the aboveground storage tank (AST), EMAP, and RGA Landfill (LF) databases of the current regulatory database. The AST associated with the listing was reportedly installed in 1996 and continues to operate at the site, last being validated in 2016. The EMAP listing identifies the facility as an active remediation area through the use of digital imagery; however, Terracon could not corroborate the existence of an active remediation area at the site. These listings are further discussed in Section 4.1.

The Sanitation Transfer Fuel Site facility, located at the historic site address 1450 South 10<sup>th</sup> Avenue, was identified on the underground storage tank (UST), Leaking UST (LUST), SWF/LF, and Enforcement databases of the current regulatory database. The UST listing (Arizona Department of Environmental Quality [ADEQ] Facility ID # 0-005177) indicates that a diesel UST was installed in 1983 and closed by permanent removal in 1996. The associated LUST cases (LUST ID Nos. 4540.01, 4540.02, 4540.03, and 4540.04) were opened and closed in 1996. These listings are further discussed in Section 4.1. Terracon's review of analytical data associated with the UST Removal and LUST cases indicates that soil sampling did not meet current ADEQ protocol as submitted soil samples were only analyzed for Total Petroleum Hydrocarbons (TPHs). As such, the former UST System and LUST cases represents a REC to the site.

The other facilities listed in the database report do not appear to represent RECs to the site at this time based upon current regulatory status, apparent topographic and hydrogeologic gradient, depth to groundwater, and/or distance from the site.

### **Prior Reports**

Terracon reviewed a previous Allwyn Phase I ESA, dated December 2, 2013, for which a summary is provided in Section 3.7. Allwyn identified the following two RECs to the site:

- 1: The refuse transfer station was operable at the time the previous Phase I ESA was performed and the potential for subsurface hydraulic equipment was noted to be a REC to the site.
- 2: Former stockpiled refuse debris on the east portion of the site were noted as a REC.

Terracon also reviewed Allwyn Phase II ESA, dated December 14, 2015, for which a summary is provided in Section 3.7. Allwyn conducted a Phase II to evaluate the soil in the vicinity of the former stockpiled refuse area. Allwyn concluded the soil sample analytics indicated no further site



## Phase I Environmental Site Assessment

City of Tucson Container Maintenance Compound and Water Stores Compound ■ Tucson, AZ  
December 27, 2022 ■ Terracon Project No. 63227145



assessment was required at that time in the area where stockpile debris were observed in aerial photography. The Allwyn 2015 Phase II ESA did not assess soils in the area of the refuse transfer station and Terracon could not obtain information verifying whether the facility included subsurface hydraulic equipment. As such, Terracon still considers the potential for subsurface impacts in the vicinity of the former refuse transfer station to be a REC to the site.

### Site Reconnaissance

During the site reconnaissance, Terracon observed one former hydraulic lift and/or trench drain in the Container Maintenance facility. These features represent RECs to the site. Based on the site reconnaissance, other RECs associated with current site operations were not identified.

### Adjoining Properties

The site is bound on the north by West 23<sup>rd</sup> Street followed by residences; on the east by South 10<sup>th</sup> Avenue followed by Southside Presbyterian Church (north), residential (central), and Arizona Cactus and Tree Service; on the south by West 25<sup>th</sup> Street followed by residences; and, on the west by South 11<sup>th</sup> Avenue followed by residences. RECs to the site were not observed with the adjoining properties.

### Additional Services

Per the agreed scope of services specified in the proposal, the following additional services (i.e., Vapor Encroachment Screen, Lead in Drinking Water, and Radon Records Review) were conducted. Please note the findings of the Vapor Encroachment Screen are provided under a separate cover (Terracon Project No. 63227145A).

Findings for the additional services are as follows:

- **Lead in Drinking Water:** The water quality report indicated that the results from the 2021 monitoring met the standards for safe drinking water.
- **Radon Records Review:** The site is considered to have a moderate potential for elevated indoor concentrations of radon gas.
- **Vapor Encroachment Screening:** A vapor encroachment screening (VES) was provided under a separate cover, Terracon Project No. 63227145A. The potential for a vapor encroachment condition (VEC) exists at the site, based on LUST files 4540.01, 4540.02, 4540.03, and 4540.04 associated with a former diesel UST, were opened in August 1996 and closed in November 1996 to closed soil only levels meeting Risked Based Corrective Action (RBCA) Tier 1 standards.
- **Aboveground Storage Tank Review:** An aboveground storage tank (AST) review for a one-mile search radius identified two ASTs as summarized on the next page.
  - 10th Ave Fuel Facility, Transfer Station, and Incident – S. 10th Ave located at site address 1402 South 10th Avenue further discussed in Section 4.1.
  - 18<sup>th</sup> Steet Fuel Facility located at 501 West 18<sup>th</sup> Street approximately 1,860 feet to the north and hydrogeologically down-gradient of the site.

## Phase I Environmental Site Assessment

City of Tucson Container Maintenance Compound and Water Stores Compound ■ Tucson, AZ  
December 27, 2022 ■ Terracon Project No. 63227145



## Significant Data Gaps

Terracon did not encounter significant data gaps while preparing this ESA Report.

## Opinions and Conclusions

We have performed a Phase I ESA consistent with the procedures included in ASTM Practice E 1527-21 at 1402 South 10<sup>th</sup> Avenue, 425 West 23<sup>rd</sup> Street, 1445 South 11<sup>th</sup> Avenue, and 1480 South 10<sup>th</sup> Avenue, Tucson, Pima County, Arizona, the site. Controlled RECs (CRECs) and historic REC (HREC) were not identified with the site. The following RECs and VEC were identified with the site.

- **REC 1:** During site reconnaissance a former hydraulic lift and/or trench drain was observed. Due to the potential of subsurface soil impacts, these features are considered RECs to the site.
- **REC 2:** A review of current regulatory database and ADEQ records identified City of Tucson (ADEQ UST Facility ID 0-005177) as an UST facility. Based on a review of prior reports and ADEQ records, the subsurface soil investigations associated with the historic UST operation and closed LUST cases, only included analysis for total petroleum hydrocarbons (TPHs) and does not meet current ADEQ protocol. As such, the former UST system and associated LUST cases represents a REC to the site.
- **VEC 1:** A vapor encroachment screening (VES) was provided under a separate cover, Terracon Project No. 63227145A. The potential for a vapor encroachment condition (VEC) exists at the site, based on LUST files 4540.01, 4540.02, 4540.03, and 4540.04 associated with a former diesel UST, were opened in August 1996 and closed in November 1996 to closed soil only levels meeting Risked Based Corrective Action (RBCA) Tier 1 standards.

## Recommendations

Based on the scope of services, limitations, and conclusions of this assessment, Terracon recommends the following additional actions:

- **Recommendation 1 (REC 1):** A sub-slab soil investigation should be conducted in the proximity of the former hydraulic lift and/or trench drain at the site, in order to identify potential impacts, if any, from the equipment.
- **Recommendation 2 (REC 2):** A subsurface soil investigation that meets current ADEQ UST Removal Protocol should be conducted in the vicinity of the historic UST system was removed.
- **Recommendation 3 (VEC 1):** A subsurface soil gas investigation should be conducted in the vicinity of the historic UST system. Additionally, if redevelopment plans indicate a

## Phase I Environmental Site Assessment

City of Tucson Container Maintenance Compound and Water Stores Compound ■ Tucson, AZ

December 27, 2022 ■ Terracon Project No. 63227145



building within a 60-foot radius of the historic UST system, subsurface soil gas investigation should be conducted.

- **Recommendation 4:** Although not a REC, due to extensive and varied history of the site for light industrial uses, there is the potential for otherwise unidentified RECs to exist at the site. As such, Terracon recommends that a Soil Management Plan (SMP) be developed and referenced in the event that indications of soil contamination are identified during earthwork and development in areas not already identified as RECs.



# Limited Site Investigation

City of Tucson (COT) Container Maintenance Compound  
(CMC)

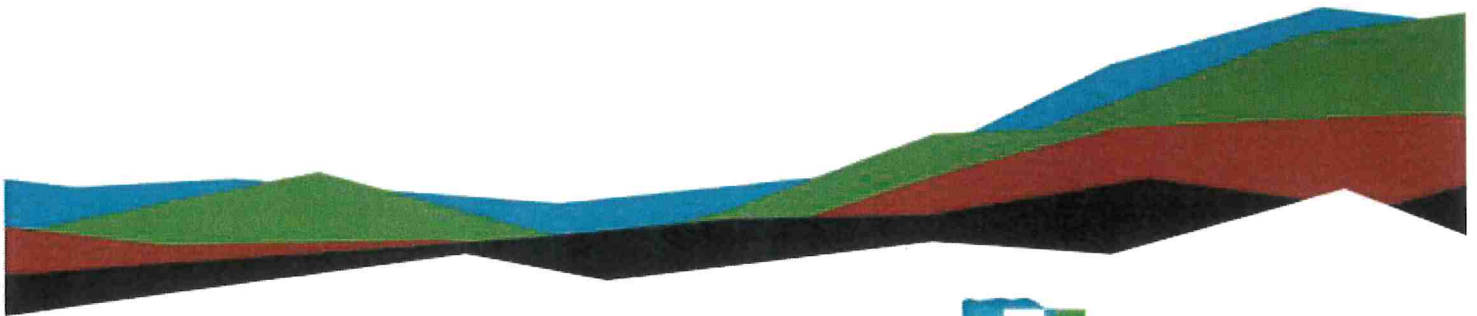
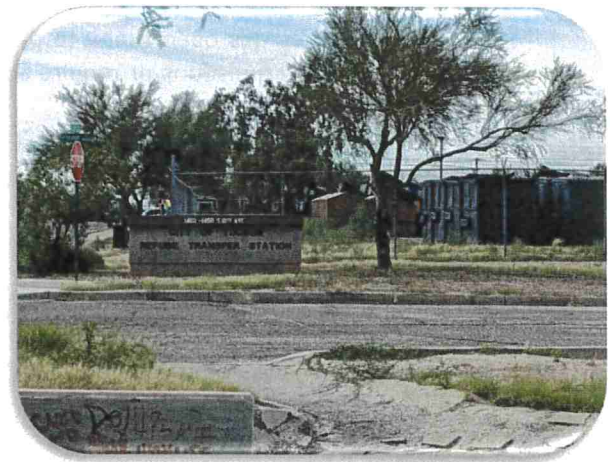
(APNs 118-20-0374A, 118-20-0076A and 118-20-0750)

1402 South 10th Avenue

Tucson, Pima County, AZ

July 18, 2023 | Terracon Project No. 63227145A

Prepared for:  
City of Tucson Environmental & General Services  
4004 South Park Avenue, Building 1  
Tucson, AZ 85726



Nationwide

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- Facilities
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- Materials



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4004 South Park Avenue, Building 1  
Tucson, AZ 85726

Attn: Mr. Frank Bonillas  
P: (520) 837-3814  
E: [Frank.Bonillas@tucsonaz.gov](mailto:Frank.Bonillas@tucsonaz.gov)

Re: Limited Site Investigation  
City of Tucson Container Maintenance Compound  
Tucson, Pima County, Arizona 85713  
Terracon Project No. 63227145A

Dear Mr. Bonillas,

Terracon Consultants, Inc. (Terracon) is pleased to submit our report of Limited Site Investigation (LSI) activities completed at the site referenced above. Terracon conducted the LSI in general accordance with our proposal P63227145A dated February 24, 2023.

Terracon appreciates this opportunity to provide environmental consulting services to City of Tucson. Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,  
**Terracon Consultants, Inc.**

*Breana Quesada*

Breana Quesada  
Assistant Scientist

A handwritten signature in black ink, appearing to read 'Jared C. Geissler'.

Jared C. Geissler, P.E.  
Authorized Project Reviewer  
Senior Associate

Explore with us



## Executive Summary

This LSI was performed in general accordance with the scope of services outlined in the Terracon Consultants, Inc. (Terracon) Proposal No. P63227145A dated February 24, 2023. Terracon personnel advanced a total of six soil borings and installed one sub-surface soil vapor probe at the site to evaluate potential releases associated with the identified recognized environmental conditions (RECs) in the Terracon Phase I Environmental Site Assessment (ESA – Report No. 63227145) dated December 27, 2022. Soil and subsurface soil vapor samples were collected and analyzed in accordance with the procedures outlined in Section 3.

A summary of our “Findings, Conclusions, and Recommendations” is provided below. It should be recognized that details of the LSI were not included or fully developed in these sections, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

## Findings

The lithology encountered at the site generally consisted of silty sands and clays. In the vicinity of the former UST basin, silty, sandy clay was encountered. PID readings ranging from 0.1 parts per million (ppm) to 1.1 ppm were measured in soil samples collected during the advancement of the borings. The field screening results are presented on the boring logs found in Appendix C. The PID reading from the soil vapor well prior to sampling was 49.3 ppm.

The soil sample analytical results provided by the laboratory were compared to the current (March 2009) ADEQ residential soil remediation levels (SRLs) [rSRLs], non-residential SRLs (nrSRLs), and ADEQ Minimum Groundwater Protection Levels (GPLs – September 1996). The following is a summary of the soil sample results:

- Arsenic, barium, chromium, and lead were detected in the soil samples SS-4-4, SS-5-4, and SS-6-4. The reported concentrations were below the rSRLs, nrSRLs, and GPLs.
- Volatile organic compounds and tentatively identified compounds (VOCs +TICs), polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs) were not reported above laboratory detection limits (RDLs).

The soil vapor sample analytical results provided by the laboratory were compared to the Environmental Protection Agency (EPA)’s recommended default values used within the Vapor Intrusion Screen Calculator (VISL) which considers a target risk for carcinogens (TCR) of  $10^{-6}$  and a target hazard quotient for non-carcinogens (THQ) of 0.1 for residential and commercial receptors. The VISL Calculator results are presented in Appendix E. The following is a summary of the soil vapor sample results:

- Benzene, chloroethane, isopropylbenzene, toluene, 1,2,4-trimethylbenzene, M & P-xylene and O-xylene were detected above RDLs in sample SG-1 but measured concentrations were below respective EPA residential and commercial VISLs.

## Conclusions

Based on the scope of services described in this report and subject to the limitations described herein, Terracon concludes the following:

- The laboratory results of the soil samples submitted for analysis indicated soils did not contain analytes at concentrations above established ADEQ SRLs or Minimum GPLs. A copy of the analytical report and chain of custody are included in Appendix D.
- The laboratory results of the soil vapor sample submitted for analysis did not contain analytes at concentrations above respective EPA residential and commercial VISLs. A copy of the analytical report and chain of custody are included in Appendix D.

## Recommendations

### Further Investigation Not Recommended

The scope of the LSI was intended to assess the presence/absence of environmental impacts based upon historical site information and current site operations identified in Terracon's Phase 1 ESA. The scope was limited to that presented in the proposal and as such was not intended to address the magnitude or extent of environmental impacts. Soil vapor data are subject to seasonal variability associated with environmental conditions and the effects of overlying buildings. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations, or exploratory services. The data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

Based on review of the analytical results from soil vapor samples collected during this LSI, the site does not appear to be affected by a release of chemicals of concern at concentrations exceeding applicable Action Levels or risk-based screening criteria. Therefore, further investigation or action is not recommended at this time.

Based on the history of the site, Terracon recommends that a Soil Management Plan be developed and referenced in the event that indications of soil contamination and/or non-native subsurface features (e.g., septic system) are identified during earthwork and development in areas not already identified as RECs.

**PHASE I ENVIRONMENTAL SITE ASSESSMENT AND  
LIMITED SOIL SAMPLING**

**PIMA COUNTY ASSESSOR PARCEL NUMBERS 118-20-037A,  
118-20-077A, 118-20-076A, 118-20-036A, 118-20-0750, 118-20-078A AND  
ASSOCIATED RIGHT-OF-WAY**

**Prepared For:**

**CITY OF TUCSON  
Housing & Community Development Department  
310 N. Commerce Park Loop  
Tucson, AZ 85745**

**Prepared By:**

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.  
TUCSON, ARIZONA**

**CEC Project 348-249**

**FINAL REPORT DATE: APRIL 8, 2025  
AAI DATE: JANUARY 12, 2025  
AAI EXPIRATION DATE: JULY 11, 2025**



**Civil & Environmental Consultants, Inc.**

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## APPENDICES

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Appendix I – Phase II ESA Laboratory Results

Appendix J – CEC Staff Resumes

Appendix K – Notice to Proceed

## **ABBREVIATIONS / ACRONYMS**

AAI	All Appropriate Inquiries
ACBM	Asbestos-Containing Building Material
ACIDS	Arizona CERCLIS Information System
ADEQ	Arizona Department of Environmental Quality
ADWR	Arizona Department of Water Resources
APN	Assessor's Parcel Number
APP	Aquifer Protection Permit
AGFD	Arizona Game and Fish Department's
ARS	Arizona Revised Statutes
ASPL	Arizona's Superfund Program List
ASL	Above Mean Sea Level
ASTM	ASTM International
AUL	Activity and Use Limitations
AZPDES	Arizona Pollutant Discharge Elimination System
bgs	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylene
BLM	Bureau of Land Management
CAP	Central Arizona Project
CD	Compact Disc
CEC	Civil and Environmental Consultants, Inc
CEG	Conditionally Exempt Generator
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CORRACTS	Corrective Action Sites
CFR	Code of Federal Regulations
CREC	Controlled Recognized Environmental Conditions
DAG	Deactivated Generator
DEUR	Declaration of Environmental Use Restriction
ECHO	Enforcement and Compliance History Online
EP	Environmental Professional
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
ESA	Endangered Species Act
ESE	Environmental Science & Engineering
GIS	Geographic Information System
GPL	Groundwater Protection Levels
HREC	Historical Recognized Environmental Condition
LBP	Lead-Based Paint
LQG	Large Quantity Generator
LSA	Limited Site Assessment
LUST	Leaking Underground Storage Tank
MTBA	Migratory Bird Treaty Act
MUMA	Multiple Use Management Areas
NFRAP	No Further Remediation Activity Planned
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System



NPL	National Priorities List
NRIS	National Register of Historical Places
OSHA	Occupational Safety and Health Administration
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Poly-Chlorinated Biphenyls
PDF	Portable Document Format
PEL	Permissible Exposure Limit
PFAS	Per- and Polyfluoroalkyl Substances
PVC	Poly-Vinyl Chloride
RBCA	Risk Based Corrective Action
RCRA	Resource Conservation and Recovery Act
RDL	Recorded Detection Limit
REC	Recognized Environmental Condition
RH	Rural Homestead
RSL	Regional Screening Level
SARA	Superfund Amendments and Reauthorization Act
SEMS	Superfund Enterprise Management System
SPS	Superfund Program Section
SQG	Small Quantity Generator
SRL	Soil Remediation Level
SVOC	Semi-Volatile Organic Compound
TCR	Target Risk for Carcinogens
THQ	Target Hazard Quotient
TIC	Tentatively Identified Compound
TPH	Total Petroleum Hydrocarbon
TSD	Transport, Storage or Disposal Facility
USC	United States Code
USFS	United States Forest Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VEC	Vapor Encroachment Concern
VEMUR	Voluntary Environmental Mitigation Use Restriction
VISL	Vapor Intrusion Screening Level
VOC	Volatile Organic Compound
VRP	Voluntary Remediation Program
WQARF	Water Quality Assurance Revolving Fund
XRF	X-Ray Fluorescence (XRF)

## EXECUTIVE SUMMARY

Civil & Environmental Consultants (CEC) has completed a Phase I Environmental Site Assessment (ESA) with limited soil sampling, on behalf of the City of Tucson, for Pima County Assessor Parcel Numbers (APNs) 118-20-037A, 118-20-077A, 118-20-076A, 118-20-036A, 118-20-0750, 118-20-078A and associated right-of-way located near S. 10<sup>th</sup> Avenue, Tucson, Arizona, hereafter referred to as the “Subject Property”. The Subject Property consists of approximately 12.3 acres of mixed warehouse/commercial property and associated right-of-way that is proposed for redevelopment with mixed-use housing for low to moderate income households. This Phase I ESA was performed in general conformance with the scope and limitations of ASTM International (ASTM) Practice E1527-21, Standard Practice for Environmental Site Assessments. At the request of the City of Tucson (COT), the Phase I ESA was expanded to include a limited Phase II ESA, consisting of soil sampling for pesticides and per- and polyfluoroalkyl substances (PFAS). The Subject Property is identified in the aerial below:



APN	Address	Owner	APN Size (Sq. Ft.)	RECs Identified (Y/N)
118-20-037A	1402 S 10th Ave	City of Tucson	134,523	Y
118-20-077A	1480 S 10th Ave		153,833	N
118-20-076A	1445 S 11th Ave		165,346	Y
118-20-036A	425 W 23rd St		9,534	N
118-20-0750	No Address		51,709	Y
118-20-078A	No Address		19,163	N
Right-Of-Way	No Address/Portion of W 23 <sup>rd</sup> St		640	N
Total			534,748	Y

This Phase I ESA was performed in general conformance with the scope and limitations of the ASTM International (ASTM) Practice E1527-21, Standard Practice for Environmental Site Assessments. The purpose of this Phase I ESA was to identify recognized environmental conditions (RECs), Historical Recognized Environmental Conditions (HRECs) and Controlled Recognized Environmental Conditions (CRECs), as discussed in Section 1.1, as well as to satisfy the regulations of 24 CFR 58.5(i)(2) and address items in Section 1.2. of this assessment. As defined by the ASTM standard, “The term recognized environmental condition means (1) the presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the Subject Property under conditions that pose a material threat of a future release to the environment. A de minimis condition is not a recognized environmental condition.” This Phase I ESA product was completed in accordance with the scope-of-services agreement.

Historical research, document review and site assessment activities were conducted between January 12, 2025, and March 12, 2025. In general, the following items were noted:

- Review of historical aerials photographs indicate the Subject Property was vacant/undeveloped and residential property from at least 1936 to at least 1956. The Subject Property was developed for commercial/industrial use from at least 1967 through 2024 with portions of the Subject Property used for refuse storage/staging from at least 1992 through at least 1996 and a refuse transfer station in place from at least 1984 through at least 2015. The subject property was used in its current configuration as a refuse container maintenance facility and Tucson Water warehouse from at least 2017 through at least 2024.
- The Subject Property is zoned primarily as residential (R-3) which provides for high density, residential development and compatible uses. Civic, educational, recreation, religious uses, and select other uses, such as day care and urban agriculture, that provide reasonable compatibility with adjoining residential uses are also permitted in areas zoned R-3. A portion of the W. 23rd Street right-of-way that is included in the Subject Property is zoned for light industrial use (I-1), which allows for industrial uses that do not have offensive characteristics, in addition to land uses permitted in more restrictive non-residential zones. Select other agriculture, civic, commercial, industrial, retail, storage, utility, and wholesaling uses may also be permitted in areas zoned I-1. A zoning map of the Subject Property is provided in Appendix A, Figure A-4.
- Depth to groundwater beneath the Subject Property is approximately 89 feet below ground surface (bgs) with a direction of flow to the northwest.

- The Subject Property is identified as being within Flood Zone X, which is defined as areas determined to be outside the 0.2% annual chance of flood. A flood map of the Subject Property is provided in Appendix A, Figure A-6.
- The elevation for the Subject Property ranges from approximately 2,380 feet above mean sea level (asl) (northwest) to approximately 2,400 feet asl (southeast).
- The Subject Property is west of S. 10th Avenue between W. 23rd Street and W. 25th Street, Tucson, Arizona, being in the Northwest Quarter of Section 24, Township 14 South, Range 13 East, Gila and Salt River Base and Meridian (Appendix A, Figures A-1 and A-2).

## FINDINGS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 for Pima County APNs 118-20-037A, 118-20-077A, 118-20-076A, 118-20-036A, 118-20-0750, 118-20-078A and associated right-of-way located near S. 10<sup>th</sup> Avenue, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. **The assessment has revealed the following HREC and RECs in connection with the Subject Property.**

- The Subject Property, under the address of 1450 S. 10th Avenue, is listed as having four (4) closed LUST cases. The cases were reportedly opened in August 1996, which corresponds to the removal date for the UST formerly located on the Subject Property. The files were closed in November 1996 with a Priority Code of 5R1, indicating that closed soil contaminant levels met risk-based corrective action (RCBA) requirements. CEC requested and reviewed the ADEQ UST/LUST files associated with the Subject Property. The ADEQ files contained a site characterization report completed in November 1996 by Environmental Science & Engineering, Inc. (ESE). The site characterization included drilling four (4) vertical borings in proximity to the release area(s) identified during the UST removal project. The site characterization report indicated that none of the soil samples collected indicated total petroleum hydrocarbon (TPH) or Benzene, Toluene, Ethylbenzene and/or Xylene (BTEX) constituents above the laboratory reporting limits. Based on the results of the site characterization completed by ESE, ADEQ closed the four (4) LUST cases associated with the subject property (Item 5, Appendix D). CEC has identified the UST and closed LUST cases as an HREC to the Subject Property. The 5R1 case status, however, indicates closure with some level of soil contamination left in place which could represent a potential vapor intrusion concern. CEC was, however, provided a copy of an assessment report, completed by Terracon and dated July 18, 2023, which included an assessment of the former UST and dispenser locations. The assessment, which is discussed in Section 11.2.2, included both soil and soil vapor sampling; indicated the soil samples submitted for analysis did not contain analytes at concentrations above established soil remediation or groundwater protection levels. Additionally, the laboratory results of the soil vapor sample submitted for analysis did not contain analytes at concentrations above respective EPA residential and commercial vapor intrusion screening levels. Terracon concluded that no further assessment was necessary. Based on our review

of the LSA, CEC concurs with Terracon and recommends no further assessment of the closed LUST cases.

- CEC identified what appeared to be an abandoned (buried) sump in a concrete slab near the northeast corner of the container maintenance facility, southeast of the office trailer (Photograph 5) (APN 118-20-037A). The former use of this structure could not be ascertained, CEC has identified it as a REC and recommends a Phase II ESA, consisting of subsurface soil sampling beneath the structure, to document the current disposition of the soil at the location. The results of this future assessment should be used to assess the need for any potential remedial activities at this location.
- Mr. Ramon Polanco, City of Tucson Environmental and General Services Department, was interviewed regarding the refuse container maintenance and former transfer station portion of the Subject Property. Mr. Polanco indicated that hydraulic oil was previously used and stored in the north (former electrical) shop building (APN 118-20-076A). CEC has identified the use and storage of hydraulic fluid in the north (former electrical) shop building as a REC to the Subject Property. CEC recommends a Phase II ESA, consisting of near surface soil sampling, in proximity to the north shop building to assess for impacts from potential past releases of hydraulic fluid.
- Previous Phase I ESAs, completed by others, indicated the presence of hydraulic equipment at the former transfer station facility and identified the equipment and use of hydraulic fluid in this area as a REC to the Subject Property (APN 118-20-0750). CEC was provided subsequent site assessments for the site; however, a review of these documents indicated the REC regarding the former use and presence of hydraulic equipment and tanks at the transfer station facility was not addressed. CEC believes the REC to still be a valid concern; however, since the former transfer station facility has been demolished, backfilled and the area cleared and graded, it is likely that any contamination associated with potential historic releases of hydraulic fluid has been buried and or mixed with clean soil and diluted to non-detectable levels. CEC recommends additional assessment for impacts associated with potential hydraulic releases in proximity to the former transfer station facility if the future use of the property will result in direct exposure to potentially impacted soils in this area. Additionally, if stained soil or petroleum odors are noted during construction activities, CEC recommends the work in the area be stopped and the area be evaluated by an environmental professional. Contaminated soils encountered on the Subject Property should be handled in accordance with the 2023 Soil Management Plan produced by Terracon.



**CEC identified the following issues that are not a REC, HREC or CREC, but the client should be aware of concerning the Subject Property:**

- APN 118-20-036A, under the address of 425 W. 23rd Street, was reportedly connected to the sanitary sewer system on August 10, 1971. There was no other sewer connection information available for any of the other associated APNs. Sewer connection records are provided in Appendix E, Item 4. It should be noted that sewer connection dates are filed by address, parcels with no assigned address have no associated sewer connection data available. Historical aerials indicate the Subject Property had multiple structures as early as 1936, thus it is possible that structures constructed on the Subject Property prior to 1971 may have been serviced by septic system(s). Assuming the only material introduced to the septic systems was domestic waste, no long-term environmental impact to the Subject Property would be expected. Septic systems can; however, be physical hazards during construction activities and proper precautions should be taken if earth disturbance is to occur within the Subject Property. Additionally, CEC recommends proper abandonment in accordance with Pima County requirements should a septic system be discovered. This is not a REC to the Subject Property and no further action is recommended at this time.
- El Campo Tire Warehouse, Circle K #2705579/Exxon Co USA #73904, Atko Building Materials Inc. and Express-It are listed within 0.1 mile of the Subject Property and have a combined total of seven (7) LUST cases. The files associated with each of the seven (7) cases have been closed with a Priority Code of 5R1, indicating that closed soil contaminant levels met RBCA requirements. These facilities are not identified as RECs to the Subject Property. The 5R1 case status; however, indicates closure with some level of soil contamination left in place. The El Campo, Circle K and Atko facilities are at least 150 feet and down-gradient from the Subject Property and are not identified as VECs. The Express-It facility at 601 W. 22nd Street is within 100 feet of the Subject Property and the associated LUST cases have been identified as potential vapor encroachment concerns to the right-of-way portion of the northwest corner of the Subject Property. CEC recommends a Phase II ESA, consisting of soil vapor sampling, be completed if future development of the Subject Property includes the construction of habitable structures within the right-of-way portion or within one hundred (100) feet of the former Express-It property.
- CEC identified a wash drain and sump/separator for washing trash containers in the open-air work/wash area of the warehouse style shop building (Photograph 18) (APN 118-20-076A). The wash drain and appurtenances are connected to the public sewer and permitted under Industrial Wastewater Discharge Permit No. 12442. The active wash drain and separator are not identified as a REC; however, CEC recommends that they be properly abandoned or removed, and the connection to the sewer permanently sealed, if no further use is identified. If they are to be abandoned/removed, CEC recommends that samples of the underlying soil be collected and analyzed by a laboratory to document the current disposition of the soil.

- Two (2) pad mounted transformers and two (2) sets of pole-mounted transformers were observed on or adjacent to the Subject Property (Appendix B, Photographs 30, 42, 45 and 52). There were no labels on the transformers identifying them as not containing PCBs. Therefore, the transformers are classified as contaminated (with 50 parts ppm to 500 ppm) PCBs, per Section 40 Code of Federal Regulations, Part 761. No indication of stains or leaks was observed at the time of the site visit. If the transformers were to leak in the future or need to be removed, Tucson Electrical Power (TEP) should be notified immediately and will be responsible for repair, clean-up and removal. No REC has been identified, and no further action is recommended.
- CEC identified 1- and 5-gallon containers of water-based paint in the storage/break room of the warehouse-style shop building (Appendix B, Photographs 14 & 15) (APN 118-20-076A). Additionally, CEC observed flammables cabinets containing gasoline, spray paint and petroleum-based lubricants in the storage/break room and welding shop (Photographs 16 & 25). The identified substances and containers were neatly and properly stored and are not identified as a REC to the Subject Property but should be removed and properly disposed should no further use for them be identified. No further action is recommended at this time.
- CEC observed a paint storage shed containing several 5-gallon buckets of water-based paint at the north end of the ware-house style shop building (Appendix B, Photograph 9), a drum of detergent in the open-air work/wash area (Photograph 19), a pesticide shed and secondary chemical containment structure/shelter in the former Tucson Water yard area at the southwest corner of the Subject Property (Photograph 39) and a chemical tote containment shelter in the former Tucson Water storage yard in the west-central portion of the Subject Property. Additionally, compressed gas cylinders were noted outside of the welding shop (secured) and former Tucson Water warehouse building (unsecured) (Photographs 22 and 34). The paint buckets and detergent are not identified as a REC to the Subject Property but should be removed and properly disposed of if no further use is identified. Likewise, the compressed gas cylinders are not identified as a REC but are a potential safety concern, particularly those that are not properly secured, and should be removed from the Subject Property if no further use is identified. If the cylinders are to remain on the Subject Property, CEC recommends that they be properly secured to prevent tipping which could lead to a projectile hazard. According to Mr. Fernando Loss, property representative, the tote storage northwest of the former Tucson Water warehouse building was used to store food grade oil, used to lubricate pump equipment at remote well sites. Mr. Loss was specifically questioned about the pesticide storage shed and secondary containment structure in the yard area west of the warehouse building. He indicated that neither was ever used on the Subject Property; they were transported from other properties

and stored at that location. No REC has been identified and no further action is recommended.

- CEC was provided multiple asbestos and/or lead-based paint (LBP) inspection reports for structures currently in place on the Subject Property and structures that have been demolished and/or removed from the Subject Property. Although the provided reports indicate that no LBP was identified for the structures currently in place on the Subject Property, it should be noted that the Occupational Safety and Health Administration (OSHA) Lead in Construction Standard states that “negative” X-Ray Fluorescence (XRF) readings (i.e. those below the HUD/EPA definition of what constitutes lead-based paint [1.0 mg/cm<sup>2</sup>]) do not relieve contractors from performing exposure assessments (personal air monitoring) on their employees and such readings should not be interpreted as lead free. Although an XRF reading may be “negative”, airborne lead concentrations still may exceed the OSHA Action Level or the OSHA Permissible Exposure Limit (PEL) depending on the work activity. A review of the reports provided indicated asbestos containing building materials (ACBM) that may be a consideration for any future demolition and/or renovation projects planned for the Subject Property. The presence of ACBM is not identified as a REC, and CEC recommends no further action at this time. However, CEC recommends that the asbestos inspection reports, and a certified asbestos abatement contractor, be consulted prior to any construction or demolition activities that may disturb these materials.
- At the request of the City, this Phase I ESA was expanded to include limited soil sampling at the Subject Property for pesticides and per- and polyfluoroalkyl substances (PFAS). No pesticides were detected above the residential soil remediation levels (SRLs) in the six (6) samples collected for this assessment. No additional assessment with regard to pesticides is recommended at this time. Based on the laboratory results for PFAS, it appears the near surface soils in Downtown Airport Wash, both within the site boundary and upstream, have been impacted by one or more PFAS compounds, at concentrations exceeding the THQ 1.0 RSLs. CEC recommends these results be considered for the future redevelopment and/or use of the Subject Property. Since there are currently no soil remediation standards or requirements for PFAS, remediation or mitigation measures would be at COT’s discretion. It should be reiterated, the EPA Regional Screening Levels (RSLs) are still being evaluated and revised as new data becomes available. Remediating to the current RSLs does not mean PFAS contaminants will not exceed future RSLs and/or SRLs when they are published.

It is the opinion of CEC that this Phase I ESA constitutes “... appropriate inquiry into ... uses of the property consistent with good commercial or customary practice” as defined in Section 1.1 of ASTM Standard Practice E 1527-21.



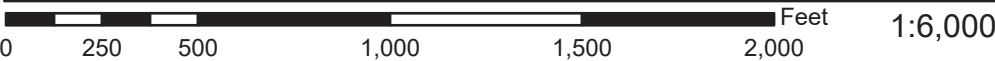
## Documentation

CEC completed this assessment based on a review of pertinent maps (**Appendix A**); a site visit (photographs in **Appendix B**); user-provided information (**Appendix C**); a review of Federal and State records (**Appendix D**); City and County Records (**Appendix E**); Historical Aerial Photographs (**Appendix F**); Limited Title & Lien Information (**Appendix G**); Environmental Questionnaires (**Appendix H**); and the results of a Limited Phase II ESA (**Appendix I**). The resumes of Ryan Dunning, Principal, and Chad Hancock, Project Manager, with CEC who completed this Phase I ESA, are in **Appendix J**. The notice to proceed is in **Appendix K**. Limitations of this Phase I ESA are in Section 1.4.

# National Flood Hazard Layer FIRMette



110°58'52"W 32°12'32"N



Basemap Imagery Source: USGS National Map 2023

## Project Location

### Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
MAP PANELS		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 8/6/2025 at 9:18 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

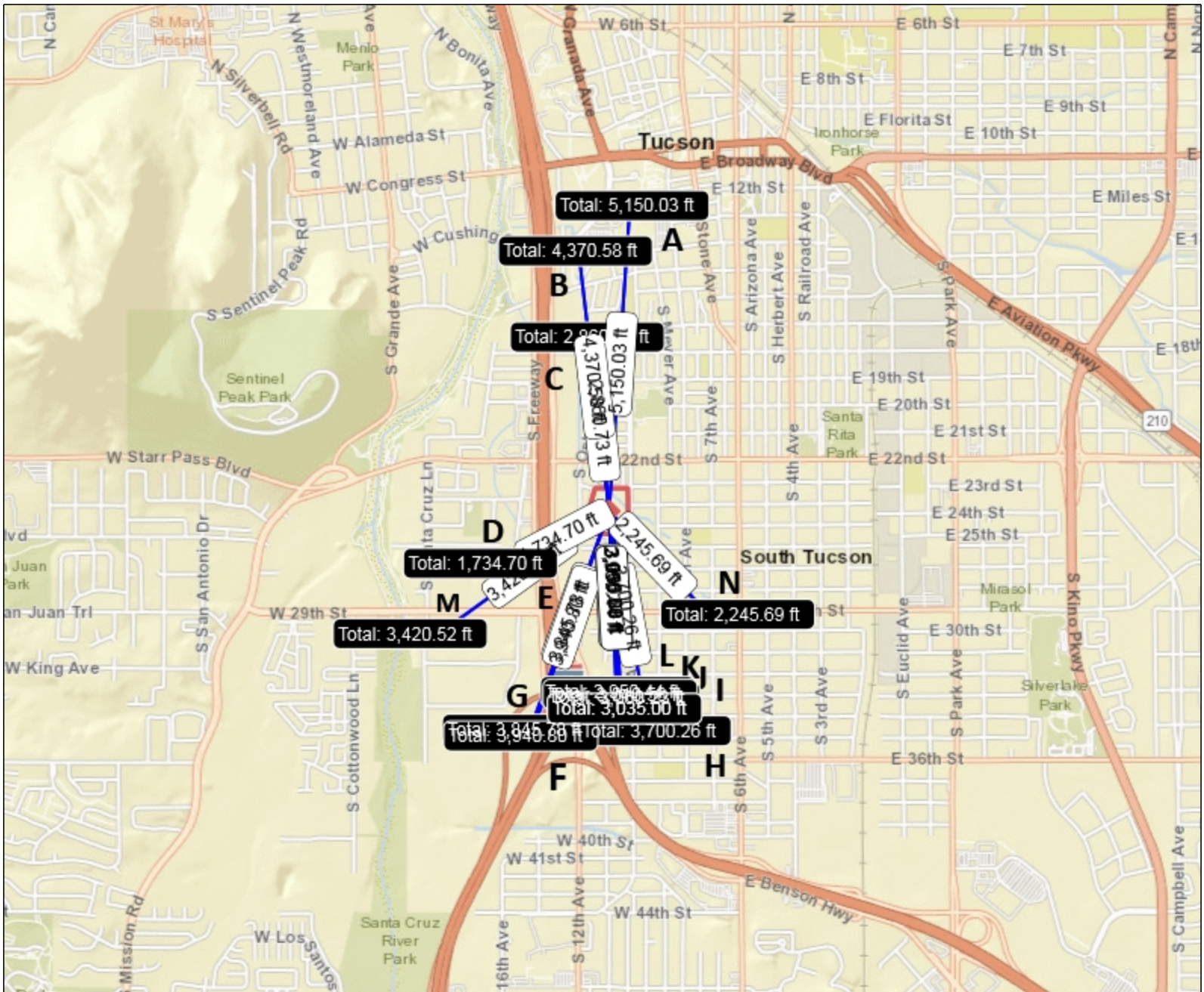
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

## South 10<sup>th</sup> Avenue – Aboveground Storage Tank Summary

Location	Container	ASDBOP (ft)	ASDPPU (ft)	ASDBPU (ft)	Measured Distance (ft)	AST
260 S Church Ave (Tucson Convention Center) (One 200-gallon diesel undiked AST is sat further than the 350-gallon AST)	350 gallons, anhydrous ammonia, undiked	154.80	178.59	30.95	5,150.00	A
300 S Fire Central PI (Tucson Fire Department Headquarters)	200 gallons, diesel, undiked	n/a	141.45	23.89	4,370.00	B
594 W 18 <sup>th</sup> St (Tucson Water) (One 300-gallon undiked, AST containing anti-freeze, one 1,000-gallon AST containing waste oil, and one 1,000-gallon AST containing oil (all undiked) are sat further than the 10,000-gallon AST)	10,000 gallons, unleaded gasoline, undiked	n/a	721.77	145.78	2,860.00	C
1514 S Freeway (Barnett's Propane)	30,000 gallons, propane, undiked	674.27	1140.69	242.26	1,735.00	D
	1,050 gallons, propane, undiked	222.59	282.25	51.43	1,585.00	E
682 W 34 <sup>th</sup> St (Arizona Department of Transportation)	1,000 gallons, propane, undiked	219.03	276.57	50.28	3,940.00	F
	200 gallons, diesel, undiked	n/a	141.45	23.89	3,845.00	G
2425 S 10 <sup>th</sup> Ave (Magnum Paving)	3,500 gallons, gasoline, undiked	n/a	466.08	89.73	3,700.00	H
2222 S 10 <sup>th</sup> Ave (SealMaster) (An 8,000-gallon undiked AST containing petroleum-based sealant is sat further than the 10,000 AST)	10,000 gallons, petroleum-based sealant, undiked	n/a	721.77	145.78	3,060.00	I
	6,000 gallons, petroleum-based sealant, undiked	n/a	583.42	115.12	3,010.00	J
	6,000 gallons, petroleum-based sealant, undiked	n/a	583.42	115.12	3,035.00	K
	1,100 gallons, gasoline, undiked	n/a	287.77	52.55	2,950.00	L
919 W Silverlake Rd (Creco Rental) (A 500-gallon undiked AST containing unleaded gasoline is sat further than AST containing diesel)	500 gallons, diesel, undiked	n/a	207.20	36.50	3,420.00	M
120 W 29 <sup>th</sup> St	12,000 gallons, liquid nitrogen, undiked	n/a	778.73	158.60	2,245.00	N



# South 10th Ave, Tucson, AZ 85713



## Notes

AST Map

## Legend

1: 36,112



5,830.6 0 2,915.28 5,830.6 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
© City of Tucson

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

## Acceptable Separation Distance (ASD) Electronic Assessment Tool

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**Note:** Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="350"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text" value="154.80"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="178.59"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="30.95"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

**For mitigation options, please click on the following link:** [Mitigation Options \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

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### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="200"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="141.45"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="23.89"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="10000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="721.77"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="145.78"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="30000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text" value="674.27"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="1140.69"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="242.26"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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**Note:** Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1050"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text" value="222.59"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="282.25"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="51.43"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text" value="219.03"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="276.57"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="50.28"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="200"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="141.45"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="23.89"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="3500"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="466.08"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="89.73"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="10000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="721.77"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="145.78"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

**For mitigation options, please click on the following link:** [Mitigation Options \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

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Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="6000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="583.42"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="115.12"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1100"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="287.77"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="52.55"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="500"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="207.20"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="36.50"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="12000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="778.73"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="158.60"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

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**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Gabriel Lopez**

Chairman

Ak-Chin Indian Community

42507 West Peters & Nall Road

Maricopa, Arizona 85138

GLopez2@ak-chin.nsn.us

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Chairman Lopez:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

Page 2 of 7

In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

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South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

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disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

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ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,



Section 106, Continuing Consultation

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Page 7 of 7

need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c: Elaine F. Peters, Ak-Chin Indian Community
- Tracy Wind, Ak-Chin Indian Community
- Avi Buckles, WestLand Resources
- Jennifer Levstik, WestLand Resources
- Desiree Aranda, City of Tucson, PDSD
- Johanna Hernandez, City of Tucson, HCD
- Rolanda Mazeika, City of Tucson, HCD
- Emilie Fisher, City of Tucson, HCD
- Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Jennifer Heminokeky**  
Chairwoman  
Fort Sill Apache Tribe of Oklahoma  
43187 US Highway 281  
Apache, Oklahoma 73006-8038  
jennifer.heminokeky@fortsillapache-nsn.gov

Re: Section 106, Continuing Consultation  
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Dear Chairwoman Heminokeky:

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The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c: Michael Darrow, Fort Sill Apache Tribe of Oklahoma
- Avi Buckles, WestLand Resources
- Jennifer Levstik, WestLand Resources
- Desiree Aranda, City of Tucson, PDSD
- Johanna Hernandez, City of Tucson, HCD
- Rolanda Mazeika, City of Tucson, HCD
- Emilie Fisher, City of Tucson, HCD
- Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Stephen Roe Lewis**  
Governor  
Gila River Indian Community  
PO Box 97  
Sacaton, Arizona 85147

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Governor Lewis:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

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South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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### Consultation

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The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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Sincerely,

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

c:     Reylynne Williams, Gila River Indian Community  
        Larry Benallie, Jr., Gila River Indian Community  
        Avi Buckles, WestLand Resources  
        Jennifer Levstik, WestLand Resources  
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        Johanna Hernandez, City of Tucson, HCD  
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Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Timothy L. Nuvangyaoma**  
Chairman  
Hopi Tribe of Arizona  
PO Box 123  
Kykotsmovi, AZ 86039

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Chairman Nuvangyaoma:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### **Consultation**

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

c:     Stewart Koyiyumptewa, Hopi Tribe of Arizona  
        Avi Buckles, WestLand Resources  
        Jennifer Levstik, WestLand Resources  
        Desiree Aranda, City of Tucson, PDSD  
        Johanna Hernandez, City of Tucson, HCD  
        Rolanda Mazeika, City of Tucson, HCD  
        Emilie Fisher, City of Tucson, HCD  
        Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Thora Walsh Padilla**  
President  
Mescalero Apache Tribe  
PO Box 227  
Mescalero, New Mexico 88340  
tpadilla@mescaleroapachetribe.com

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear President Padilla:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

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July 25, 2025

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Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c: Holly Houghten, Mescalero Apache Tribe
- Avi Buckles, WestLand Resources
- Jennifer Levstik, WestLand Resources
- Desiree Aranda, City of Tucson, PDSD
- Johanna Hernandez, City of Tucson, HCD
- Rolanda Mazeika, City of Tucson, HCD
- Emilie Fisher, City of Tucson, HCD
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Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Arden Kucate**  
Governor  
Pueblo of Zuni  
PO Box 339  
Zuni, New Mexico 87327  
arden.kucate@ashiwi.org

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Governor Kucate:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

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- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

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The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

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July 25, 2025

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need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c:
- Kurt Dongoske, Pueblo of Zuni
  - Avi Buckles, WestLand Resources
  - Jennifer Levstik, WestLand Resources
  - Desiree Aranda, City of Tucson, PDSD
  - Johanna Hernandez, City of Tucson, HCD
  - Rolanda Mazeika, City of Tucson, HCD
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Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Julian Hernandez**  
Chairman  
Pascua Yaqui Tribe  
7474 South Camino de Oeste  
Tucson, Arizona 85746  
jhernandez1@pascuayaqui-nsn.gov

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Chairman Hernandez:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

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pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

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Director, City of Tucson, Housing & Community Development

- c: Karl A. Hoerig, Ph.D., Pascua Yaqui Tribe  
Avi Buckles, WestLand Resources  
Jennifer Levstik, WestLand Resources  
Desiree Aranda, City of Tucson, PDSD  
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**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Terry Rambler**  
Chairperson  
San Carlos Apache Tribe  
PO Box 0  
San Carlos, AZ 85550  
trambler@scatui.net

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

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## Section 106, Continuing Consultation

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July 25, 2025

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c: Vernelda Grant, San Carlos Apache Tribe
- Avi Buckles, WestLand Resources
- Jennifer Levstik, WestLand Resources
- Desiree Aranda, City of Tucson, PDSD
- Johanna Hernandez, City of Tucson, HCD
- Rolanda Mazeika, City of Tucson, HCD
- Emilie Fisher, City of Tucson, HCD
- Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Martin Harvier**  
President  
Salt River Pima-Maricopa Indian Community  
10005 East Osborn Road  
Scottsdale, Arizona 85256

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear President Harvier:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

Page 4 of 7

pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

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July 25, 2025

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disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c:     Shane Anton, Salt River Pima-Maricopa Indian Community  
       B. Sunday Eiselt, Salt River Pima-Maricopa Indian Community  
       Avi Buckles, WestLand Resources  
       Jennifer Levstik, WestLand Resources  
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**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Calvin Johnson**  
Chairman  
Tonto Apache Tribe  
Tonto Apache Reservation #30  
Payson, Arizona 85541  
cjohnson@tontoapache.org

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c:
- Jeri De Cola, Tonto Apache Tribe
  - Avi Buckles, WestLand Resources
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**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**Peter Steere**

**Jefford Francisco**

Tohono O'odham Nation

PO Box 837

Sells, Arizona 85634

peter.steere@tonation-nsn.gov

jefford.francisco@tonation-nsn.gov

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
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Dear Msrs. Steere and Francisco:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

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The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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compound for the municipal water utility (Tucson Water). Together with existing buried utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases,

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Phases 2 and 3, are anticipated to include construction of the housing units and provide pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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century-era of forced schooling in Tucson. Since the project area had been cleared and disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Agreement and stop work and notify descendant communities immediately if any ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### **Consultation**

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

c:     Avi Buckles, WestLand Resources  
        Jennifer Levstik, WestLand Resources  
        Desiree Aranda, City of Tucson, PDSD  
        Johanna Hernandez, City of Tucson, HCD  
        Rolanda Mazeika, City of Tucson, HCD  
        Emilie Fisher, City of Tucson, HCD  
        Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Kasey Velasquez**

Chairman  
White Mountain Apache Tribe  
PO Box 700  
Whiteriver, Arizona 85941  
kasey.velasquez@wmat.us

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Chairman Velasquez:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

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During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

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The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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Sincerely,

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Ann Chanecka

Director, City of Tucson, Housing & Community Development

c: Mark Altaha, White Mountain Apache Tribe  
Ramon Riley, White Mountain Apache Tribe  
Avi Buckles, WestLand Resources  
Jennifer Levstik, WestLand Resources  
Desiree Aranda, City of Tucson, PDSD  
Johanna Hernandez, City of Tucson, HCD  
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Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

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**Ann Chanecka**  
Director  
Housing & Community Development  
(520) 837-6691  
ann.chanecka@tucsonaz.gov

July 25, 2025

**The Honorable Tanya Lewis**  
Chairwoman  
Yavapai-Apache Nation  
2400 West Datsi Street  
Camp Verde, Arizona 86322

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Chairwoman Lewis:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

Page 4 of 7

pedestrian and bicycle access to the El Paso and Southwest Greenway, a shared use path that connects to Downtown Tucson. The overall redevelopment timeline is anticipated to be three to five years from pre-development (Phase 1) through final construction of the housing development (Phases 2 and 3).

Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

The project location was previously surveyed for cultural resources by Statistical Research, Inc. (SRI) in 2023 with negative results, satisfying the archaeological review requirement of the existing Programmatic Agreement between the City, SHPO, and the Advisory Council on Historic Preservation (ACHP). SRI confirmed the Southern Pacific Railroad Roundhouse building (AZ BB:13:397 [ASM]) was relocated outside of the project area to the west, at the southwest corner of the intersection of West 25th Street and South 11th Avenue.

At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

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disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

### **Proposed Phased Treatment**

The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
- Prepare a project-specific Monitoring and Discovery Plan addendum to the City's and Pima County's standard monitoring plans and submit it to the consulting parties for review.
- Obtain a standard Burial Discovery Agreement from the ASM.
- Implement the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps, if necessary, and in consultation with the Tribes, SHPO, and ASM.
- Provide a qualified monitor during ground disturbing activities in the project area, except for portions of the former refuse transfer station site. Ground disturbing activities in these areas primarily consist of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.
- Prepare a technical report at the end of monitoring activities and submit it to the consulting parties for review.

The City will notify interested Tribal representatives prior to the monitoring efforts and afford an opportunity for any traditional religious activities prior to ground disturbance. Further, the City will notify descendant communities if any subsurface deposits or features associated with the old school or Native American Addition are encountered during monitoring. The City and its contractors will also abide by the Burial Discovery Agreement and stop work and notify descendant communities immediately if any

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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ancestral remains are encountered. The City will also provide a copy of the draft post-monitoring technical report to interested Tribal representatives for review and comment.

Based on the results of additional research and onsite monitoring, the City will conduct continuing consultation with SHPO and interested Tribes. A monitoring and discovery plan (MDP) has been prepared for the project based on the City's blanket MDP. In the event of inadvertent discoveries for any ground disturbing activities not yet identified in the areas of concern, if applicable, and subsequent Phased activities (Phase 2 and 3), the City will follow the monitoring discovery procedures as outlined in the *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al 2011).

Additionally, the City will engage with interested Tribes and community members to identify potential historic interpretation and public art opportunities to incorporate into the redevelopment of the property.

### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

Page 7 of 7

need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,

A handwritten signature in black ink that reads "Ann Chanecka". The signature is fluid and cursive, with the first name "Ann" and last name "Chanecka" clearly distinguishable.

Ann Chanecka

Director, City of Tucson, Housing & Community Development

- c: Marley Juan, Yavapai-Apache Nation  
Avi Buckles, WestLand Resources  
Jennifer Levstik, WestLand Resources  
Desiree Aranda, City of Tucson, PDSD  
Johanna Hernandez, City of Tucson, HCD  
Rolanda Mazeika, City of Tucson, HCD  
Emilie Fisher, City of Tucson, HCD  
Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan





July 25, 2025

**Kathyrn Leonard**

State Historic Preservation Officer

Arizona State Parks & Trails

1110 West Washington Street, Suite 100

Phoenix, Arizona 85007

azshpo@azstateparks.gov

Re: Section 106, Continuing Consultation  
South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1,  
1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd  
Street, Tucson, Pima County, Arizona, 85713

Dear Ms. Leonard:

The City of Tucson (City) is considering funding the project listed above with Federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City has assumed HUD's environmental review responsibilities for the project, including State and Tribal consultation related to historic properties. The project is being considered for assistance in the Economic Development Initiative - Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs and is subject to review under 24 CFR Part 58. This project will require ground disturbance consisting primarily of demolition of existing structures and utility and infrastructure improvement work in the public rights of way.

Based on our review of the City of Tucson Historic Preservation Webmap, the National Register of Historic Places database, historical maps and archival records, and the Arizona State Museum AZSITE database, we have defined the Area of Potential Effect (APE) as the project location and the adjacent north, east, south, and west properties. Review for this project was conducted by Historic Preservation Principal Investigators Jennifer Levstik and Avi Buckles of WestLand Resources.

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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In March 2025, the City received concurrence to its finding of No Adverse Effect from the Arizona State Historic Preservation Office (SHPO). Additional historical site information then became available to the City in late March 2025, prompting review of the City's original finding, invitations for Tribal consultation, and continuing consultation with SHPO. On June 23, 2025, the City met with members of the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and the Tohono O'odham Nation) to discuss concerns raised regarding the possible presence of a former Presbyterian day school for Native American students within the proposed project area and/or adjacent to the northeast and southeast portions of the project area (areas of concern).

The City is conducting this continuing consultation with Tribes identified through HUD's Tribal Directory Assessment Tool and Arizona's Government-to-Government Consultation Toolkit and SHPO to comply with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800. We invite Tribes to assist with identifying historic properties in the project area that may have religious and cultural significance, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

### **Project Location**

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside of and south of the Downtown Archaeological Sensitivity Zone, on the east side of Interstate 10, north of West 25th Street, Township 14 South, Range 13 East, Section 24. The closest known cultural resources to the project area are as follows: the El Paso and Southwestern Roadbed - Sector 5 to the west, and the El Paso and Southwestern Roundhouse and the El Paso and Southwestern Roadbed - Sector 6 to the southwest. The surrounding neighborhood is a mix of commercial and residential uses. The project area consists of six City-owned properties and right of way. The main project area was formerly the location of a refuse transfer station and refuse container maintenance compound. The transfer station is now closed, and the container maintenance site is anticipated to relocate operations to another location in 2025. The southwest portion of the project was formerly operated as a storage/warehouse compound for the municipal water utility (Tucson Water). Together with existing buried

## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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utilities, the modern industrial use of the project area has significantly altered the historic ground surface. Engineering analysis of the as-builts for the refuse transfer station and buried utilities show that portions of the project area have been excavated down to 16-ft in depth. However, this modern deep disturbance does not extend throughout the project area, and intact sediments are still expected within much of the project area.

Although the six project parcels have no onsite structures or archaeological sites listed or eligible for listing on the National Register of Historic Places, further archival research has identified that the project area lies within a neighborhood originally platted as the “Native American Addition” in 1904 and was known colloquially in the early 1900s as the “Papago Village.” A former Presbyterian day school for local O’odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps, suggesting there may be additional features associated with the Native American Addition located within or adjacent to the project area. The day school (Tucson Indian Day School) was separate from the Tucson boarding school for O’odham and other Native students (known as the Tucson Indian Boarding School) which was located along the Santa Cruz River on the northeast corner of the current Interstate 19 and Ajo Way.

### **Project Description**

The South 10th Avenue Phased Affordable Housing Redevelopment project consists of redevelopment activities on six parcels comprising approximately 14.5-acres of City-owned property and right-of-way to support the development of 300 to 500, mixed-income, housing units in Tucson, Arizona. The property redevelopment is anticipated to consist of three phases. Phase 1 - Pre-development activities including planning, engineering, environmental and other studies, permitting, demolition of existing buildings and improvements, site preparation (clearing, grading), construction of infrastructure improvements, and other affordable housing pre-development activities. Pre-development activities and infrastructure improvements are anticipated to impact streets and rights-of-ways for utility improvements (water, wastewater, electric, natural gas, telecommunications, etc.), improvements to public infrastructure such as sidewalks and walkways, construction of a bridge over the Airport Wash. The next two Phases, Phases 2 and 3, are anticipated to include construction of the housing units and provide

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July 25, 2025

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Six existing buildings located within the project area are slated for demolition as part of the undertaking. Inventory forms for these buildings have been prepared by WestLand Resources. None of the existing structures in the project area have been determined to be eligible individually or as a contributor to a potential historic district.

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At the City's request and in response to Tribal input, additional research was conducted by SRI, which confirmed the presence of a former day school for Native American students referred to as "Tucson Indian Day School", that operated within and adjacent to the proposed project area, specifically in the northeast and southeast portions of the project area (areas of concern). The request by the Tribes also resulted in the discovery of the information about the greater Native American Addition, which served as a residential area for local O'odham in Tucson during the early 1900s.

During the June 23, 2025 consultation meeting with the Four Southern Tribes, it was determined that a ground penetrating radar (GPR) survey was not acceptable to the Tribes as a burial investigative tool and the City also deemed it unreliable due to the potential for construction debris backfill being used in the southeast portion of the site when the former refuse transfer station was demolished. All parties agreed to first conduct additional archival research on the project area to better understand its historical use and relationship with both O'odham and other Tribal students during the twentieth century-era of forced schooling in Tucson. Since the project area had been cleared and

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July 25, 2025

Page 5 of 7

disturbed, it was also determined that archaeological monitoring during any ground-disturbing activities would most likely be the most prudent and appropriate approach to ensure no significant cultural deposits or ancestral burials were present.

Based on the additional research conducted by SRI and conversations with interested Tribal representatives, the City proposes the following archival research and monitoring processes for this phased affordable housing redevelopment project.

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The City proposes the following treatment actions prior to and during the proposed Phase 1 construction activities:

- Complete the historical research report that traces land use and submit it to the consulting parties for review.
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## Section 106, Continuing Consultation

South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1, 1402 and 1480 South 10th Avenue, 1445 South 11th Avenue, and 425 West 23rd Street, Tucson, Pima County, Arizona, 85713

July 25, 2025

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### Consultation

Direct effects will be limited to two locations in the northeast and southeast project area boundaries and rights of way where historical maps indicate the presence of a former Presbyterian school for local O'odham students. There will be no indirect effects of the project on surrounding properties. Based upon the information above, principally that the two areas of direct effects were previously disturbed and no evidence of surficial cultural remains have been found during cultural resources inventory, the City has determined that a finding of No Adverse Effect to Historic Properties is appropriate for this project.

The City of Tucson respectfully submits this finding of No Adverse Effect to Historic Properties in accordance with 36 CFR § 800.4(d)(1) for your review and consideration. Please find attached a historical research report for the South 10th Avenue Site, a Monitoring and Discovery Plan prepared for the project, and other supporting documentation. Please provide your concurrence or objection, electronically within 30 days of your receipt of this recommended finding.

Please contact Desiree Aranda, City of Tucson Historic Preservation Officer, by e-mail at [desiree.aranda@tucsonaz.gov](mailto:desiree.aranda@tucsonaz.gov), or by phone at 520-837-6968, if you have any questions,

Section 106, Continuing Consultation

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July 25, 2025

Page 7 of 7

need any additional information, or if you would like to arrange a meeting to discuss the project.

Sincerely,



Ann Chanecka

Director, City of Tucson, Housing & Community Development

c:     Avi Buckles, WestLand Resources  
        Jennifer Levstik, WestLand Resources  
        Desiree Aranda, City of Tucson, PDSD  
        Johanna Hernandez, City of Tucson, HCD  
        Rolanda Mazeika, City of Tucson, HCD  
        Emilie Fisher, City of Tucson, HCD  
        Daniel Bursuck, City of Tucson, PDSD

Attachment A – Aerial Map

Attachment B - APE Map

Attachment C – Phase 1 Project Site Plan

Attachment D – Historical Background Report

Attachment E – Monitoring and Discovery Plan

SHPO has reviewed and accepts both the historical report and the Monitoring and Discovery Plan. We concur that if the Monitoring and Discovery Plan is implemented during construction activities, a finding of No Adverse Effect is appropriate.



Erin Davis

Archaeological Compliance Specialist

Arizona State Historic Preservation Office

August 21, 2025





# South 10th Ave, Tucson, AZ 85713



## Notes

Aerial Map  
APNs  
425 W 23rd St, 118-20-036A  
1402 S 10th Ave, 118-20-037A  
1445 S 11th Ave, 118-20-076A  
1480 S 10th Ave, 118-20-077A  
no address, 118-20-078A  
no address, 118-20-0750

## Legend

□ Parcels

Project Location

Approximate boundary of former  
refuse transfer station

1: 2,257



364.4 0 182.21 364.4 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
© City of Tucson

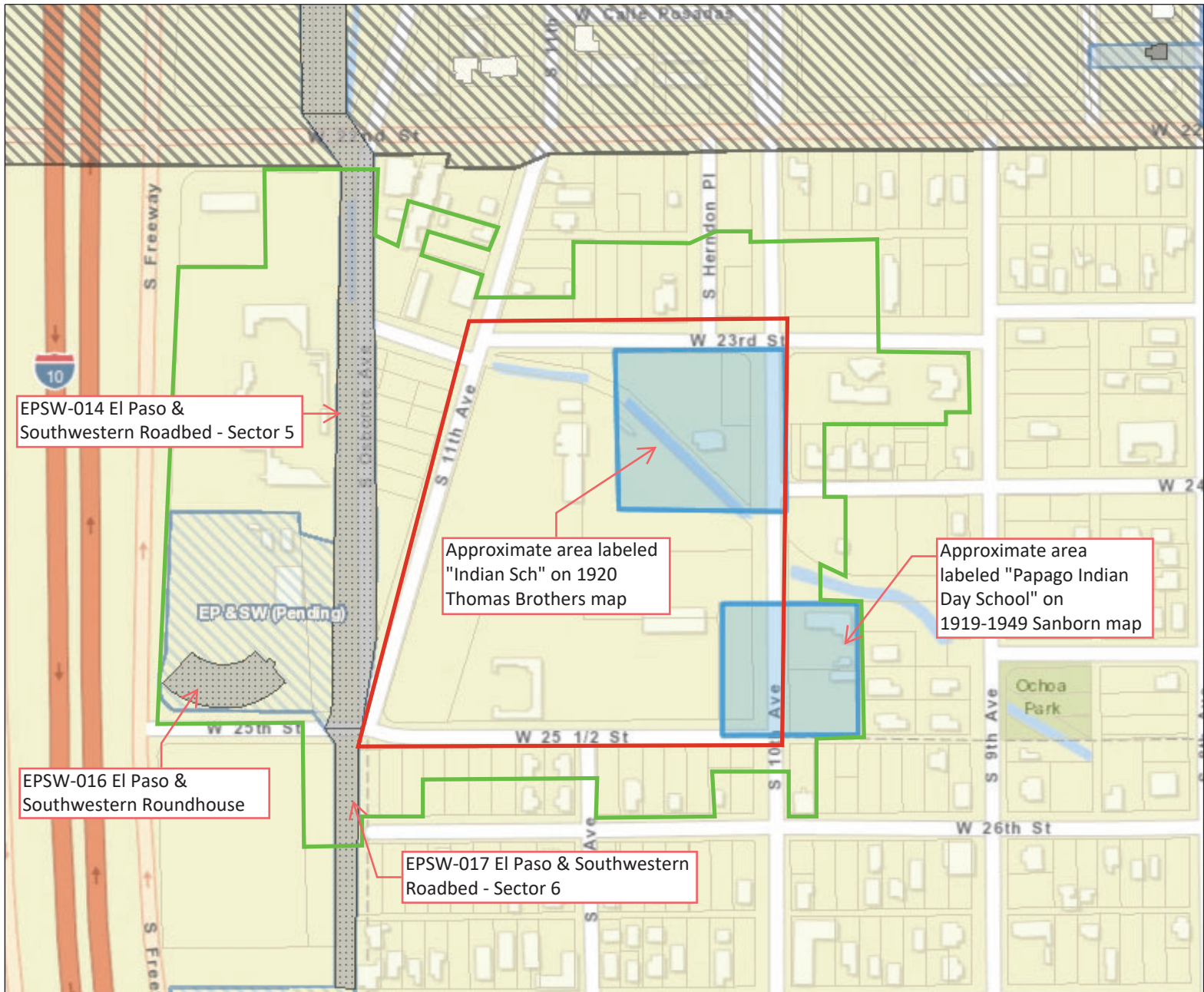
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION





# South 10th Avenue, Tucson, AZ 85713



## Notes

APE Map

## Legend

- |                              |  |
|------------------------------|--|
| <b>Historic Properties</b>   | Vacant                                     |
| Listed                       | Outside of HD                              |
| Listed and Local Contributor | City of Tucson Historic Zoning             |
| Eligible                     | City of Tucson National Register Districts |
| Ineligible                   | Current National                           |
| Non-Contributor              | Eligible National                          |
| No Data                      | Archaeological Sensitivity Zones           |
| Demolished Contributor       | Parcels                                    |
| Demolished                   | Railroads                                  |
| Demolished                   | Historic Landmark                          |

Project Area

APE

1: 4,514



728.8 0 364.41 728.8 Feet

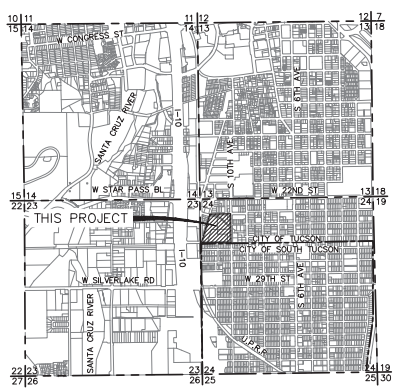
WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
© City of Tucson

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

DEVELOPMENT PACKAGE  
FOR  
SOUTH 10TH AVENUE

TP- - - -



LOCATION MAP

BEING A PORTION OF THE NORTHWEST 1/4  
OF SECTION 24, T-14-S, R-13-E, G&SRM  
TUCSON, ARIZONA  
SCALE: 3"=1 MILE

OWNER/DEVELOPER

CITY OF TUCSON HOUSING AND COMMUNITY DEVELOPMENT  
310 N COMMERCE PARK LOOP, TUCSON AZ 85745  
CONTACT: JOHANNA HERNANDEZ, DEPUTY DIRECTOR  
TEL: (520) 791-4171  
EMAIL: JOHANNA.HERNANDEZ@TUCSONAZ.GOV

LAND SURVEYOR

PSOMAS  
1745 E. RIVER RD, SUITE 245  
TUCSON, AZ 85718  
CONTACT: DON BUEK, RLS  
TEL: (520) 292-2300  
EMAIL: deb.jelk@psomas.com

CIVIL ENGINEER

PSOMAS  
1745 E. RIVER RD, SUITE 245  
TUCSON, AZ 85718  
CONTACT: KEVIN LETENDRE, PE  
TEL: (520) 292-2300  
EMAIL: kletendre@psomas.com

SITE ADDRESS

1402 & 1480 S 10TH AVE,  
1445 S 11TH AVE, AND 425 W  
23RD ST, TUCSON, AZ 85713

SHEET INDEX

SHEET No.	SHEET DESCRIPTION
1	COVER SHEET
2	GENERAL NOTES
3-8	DEMOLITION PLAN
9	SITE/UTILITY PLAN
10	GRADING PLAN
11-12	TYPICAL SECTION DETAILS
13	CIVIL DETAILS
14	LANDSCAPE & IRRIGATION NOTES
15	ROOT BARRIER PLAN
16	ROCK MULCH & SEED PLAN
17-18	LANDSCAPE PLANS
19-20	IRRIGATION PLANS
21-22	WATER HARVESTING PLANS
23-24	LANDSCAPE DETAILS
25	IRRIGATION DETAILS

TP- - - - -  
TP-PRE-0125-00006  
DP17-0047  
C9-71-19

COVER SHEET

DEVELOPMENT PACKAGE  
FOR  
SOUTH 10TH AVENUE

ASSESSORS PARCEL #'S 118-20-078A, 118-20-0750, 118-20-077A,  
118-20-076A, 118-20-037A, AND 118-20-036A  
OF SECTION 24, T14S, R13E, G&SRM,  
CITY OF TUCSON, PIMA COUNTY, ARIZONA

PROJ NO: 77US180116  
DATE: APRIL 2025

SCALE: HORIZ 1" = 80'  
VERT N/A

1 of 25

PSOMAS

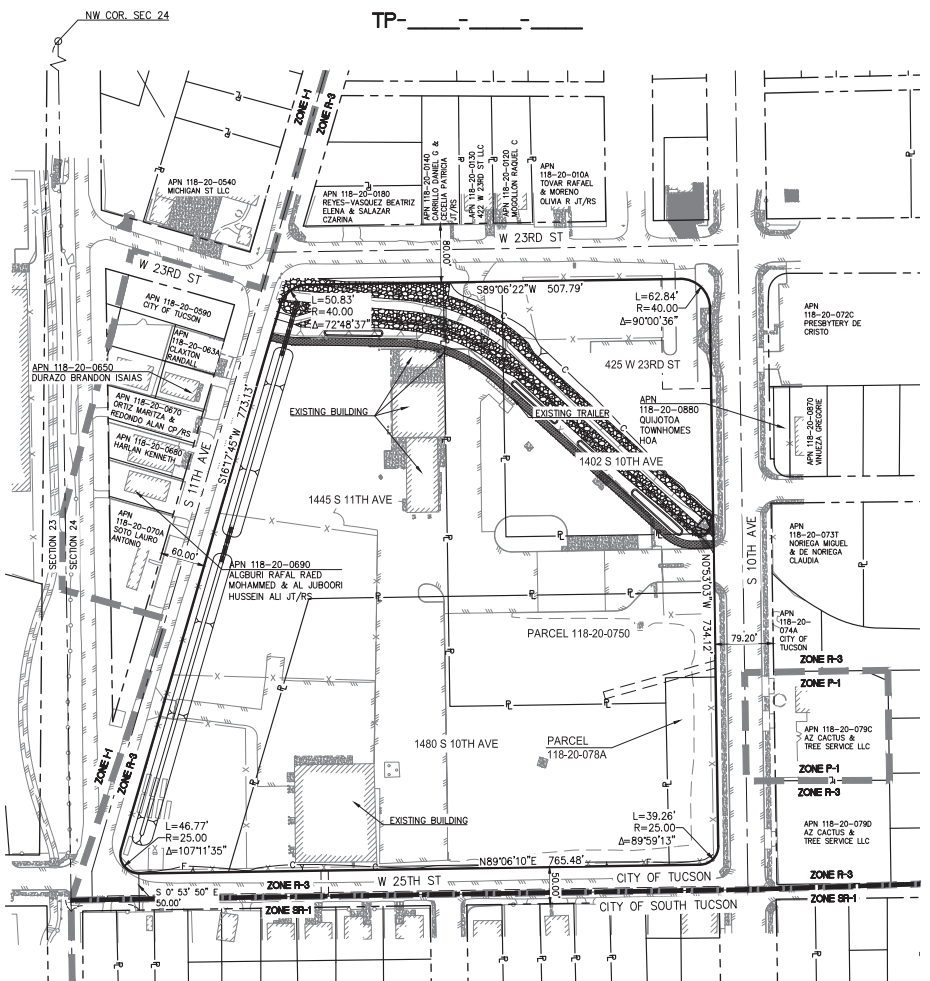
1745 E. River Road, Suite 245  
Tucson, AZ 85718  
(520) 292-2300 (520) 292-1290 fax  
www.psomas.com



DESIGNED BY: KL	DATE: 04/25
CHECKED BY: KL	DATE: 04/25



PROJECT OVERVIEW  
SCALE: 1" = 80'



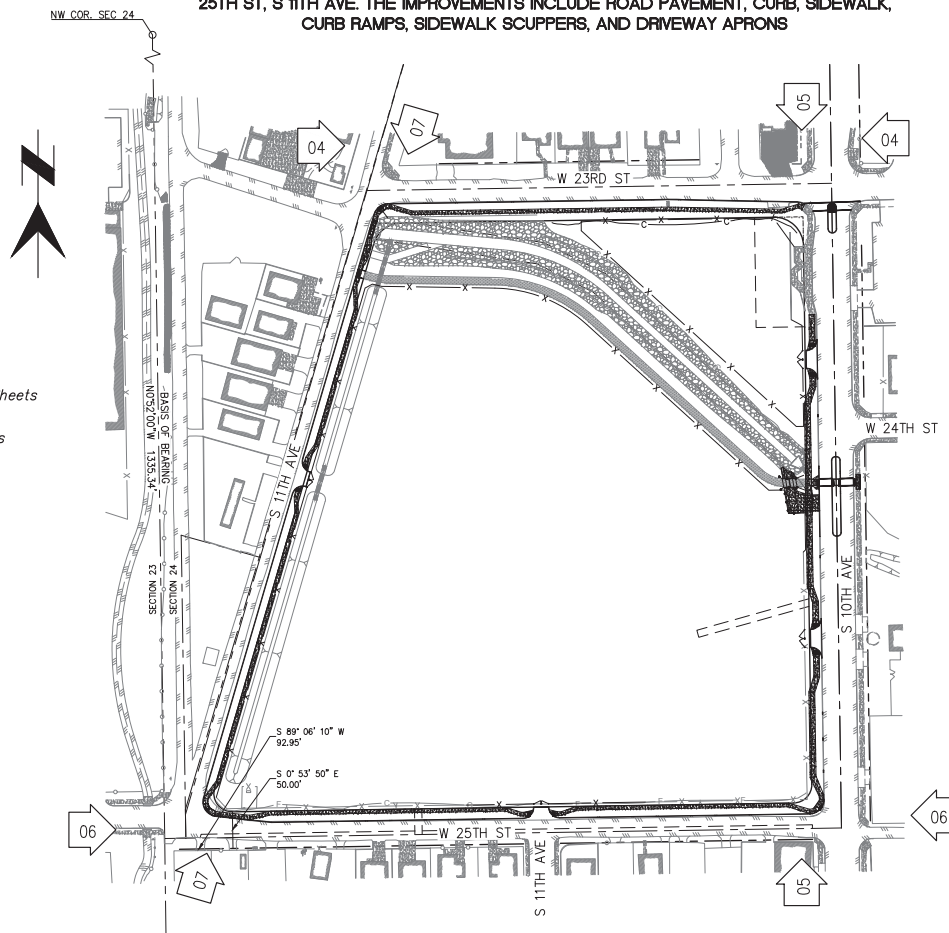
LEGEND

EXISTING	NEW



OFFSITE IMPROVEMENTS  
COT PLAN No. \_\_\_\_\_

OFFSITE IMPROVEMENTS FOR 1402-1450 S 10TH AVE ALONG W 23RD ST, S 10TH AVE, W 25TH ST, S 11TH AVE. THE IMPROVEMENTS INCLUDE ROAD PAVEMENT, CURB, SIDEWALK, CURB RAMPS, SIDEWALK SCUPPERS, AND DRIVEWAY APRONS



<u>PAGE NO.</u>	<u>SHEET NO.</u>	<u>SHEET DESCRIPTION</u>
1	CV01	Cover Sheet and Legend
2-3	NT01-NT02	Notes and Section Details
4-7	GM01-GM04	Geometry Plan and Profile Sheets
8-9	DT01-DT02	Construction Grading Details
10	LS01	Landscape & Irrigation Notes
11	LS02	Root Barrier Plan
12	LS03	Rock Mulch Plan
13	LS04	Landscape Plan
14	LS05	Landscape Plan
15-16	LS06-LS07	Irrigation Plan
17-18	LS08-LS09	Water Harvesting Plan
19-20	LS10-LS11	Landscape Details
21	LS12	Irrigation Details

Constructed by:

Construction Company

Completion Date \_\_\_\_\_

Red-Lines by:

---

Construction Administrator Name & Company

Completion Date

Record Document by:

As-Built Designer Name &amp; Company

Completion Date

ORIGINAL SIZE 24"x36"  
DO NOT SCALE  
A REDUCED SIZE

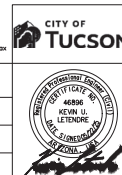
**OWNER**  
CITY OF TUCSON  
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OFFSITE IMPROVEMENT PLAN

APPROVALS	SIGNATORY	DATE	APPROVED _____ 20____  TRANSPORTATION DIRECTOR REF. _____ SCALE: _____	1 OF 2
DESIGN SECTION/PERMITS AND CODES				
TRAFFIC ENGINEERING				
STREETS AND TRAFFIC MAINTENANCE				
ENGINEERING LANDSCAPE ARCH				
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July 23, 2025

Desiree Aranda  
Historic Preservation Officer Planning and Development Services City of Tucson  
201 N. Stone Av, 3rd Floor  
Tucson, AZ 85701

Re: Historical Background Report for the 10th Avenue Affordable Housing Redevelopment Project (City of Tucson Project Number COT 23-006), Pima County, Arizona (Technical Report 25-55)

Dear Ms. Aranda:

Statistical Research, Inc. (SRI), presents this historical background report for the 10th Avenue Affordable Housing Redevelopment Project (City of Tucson Project Number COT 23-006) in Pima County, Arizona. The project area is located on 13.3 acres of City land in the NW  $\frac{1}{4}$  of the NW  $\frac{1}{4}$  of Section 24 in Township 14 South, Range 13 East (1996 Tucson, Arizona, U.S. Geological Survey [USGS] 7.5-minute quadrangle), and is bounded by four streets: South 10th Avenue to the east, South 11th Avenue to the west, West 25th Street to the south, and West 23rd Street to the north (Figure 1). The northwest corner of the current project area was platted as the Native American Addition in 1904 and was the site of a Presbyterian mission to the Tohono O'odham. This report focuses on development of the Native American Addition over time, differentiating the federal Indian day school that was built in the project vicinity from the Indian Boarding School run by the Presbyterian Church several miles to the southwest (Figure 2). This report also examines what has been found about other uses of this particular area by Native peoples during the historical period as well as the role played by Presbyterian Church's ministry in its development. We hope this research provides additional detail that may help to broaden our understanding of these past uses and inform any future work at the site.

## Executive Summary

Despite the rich cultural heritage of Native peoples in North America, various religious groups and the U.S. government made it their goal to impose new belief systems and promote assimilation through the educational training of Native American youth. The policies to achieve these objectives varied over time, but throughout much of the nineteenth and early twentieth centuries, the government used different religious groups to lead these educational efforts. Federal officials chose the Presbyterian Church to develop schools for the Tohono O'odham and Akimel O'odham people. The Presbyterian Board of Home Missions (later known as Presbyterian Board of National Missions) oversaw those efforts in Tucson, opening the Tucson Indian Boarding School in 1888 and later overseeing the operations of the Tucson Indian Day School at a different site in south Tucson.

The Tucson Indian Boarding School, which was eventually located on a 160-acre ranch owned by the Presbyterian Board, bordered the Santa Cruz River and was reached by a road later known as Ajo Way. The school served the Tohono O'odham and Akimel O'odham people but also Native American students from more than a dozen other Tribes. The Tucson Indian Day School, according to information from deeds, was built on land purchased by the federal government and likely located near the southeast corner of the project area or in the Native American Addition, which was platted in 1904 by a large Tucson-area landowner, George Pusch. The southern portion of this plat is also located in the project area.



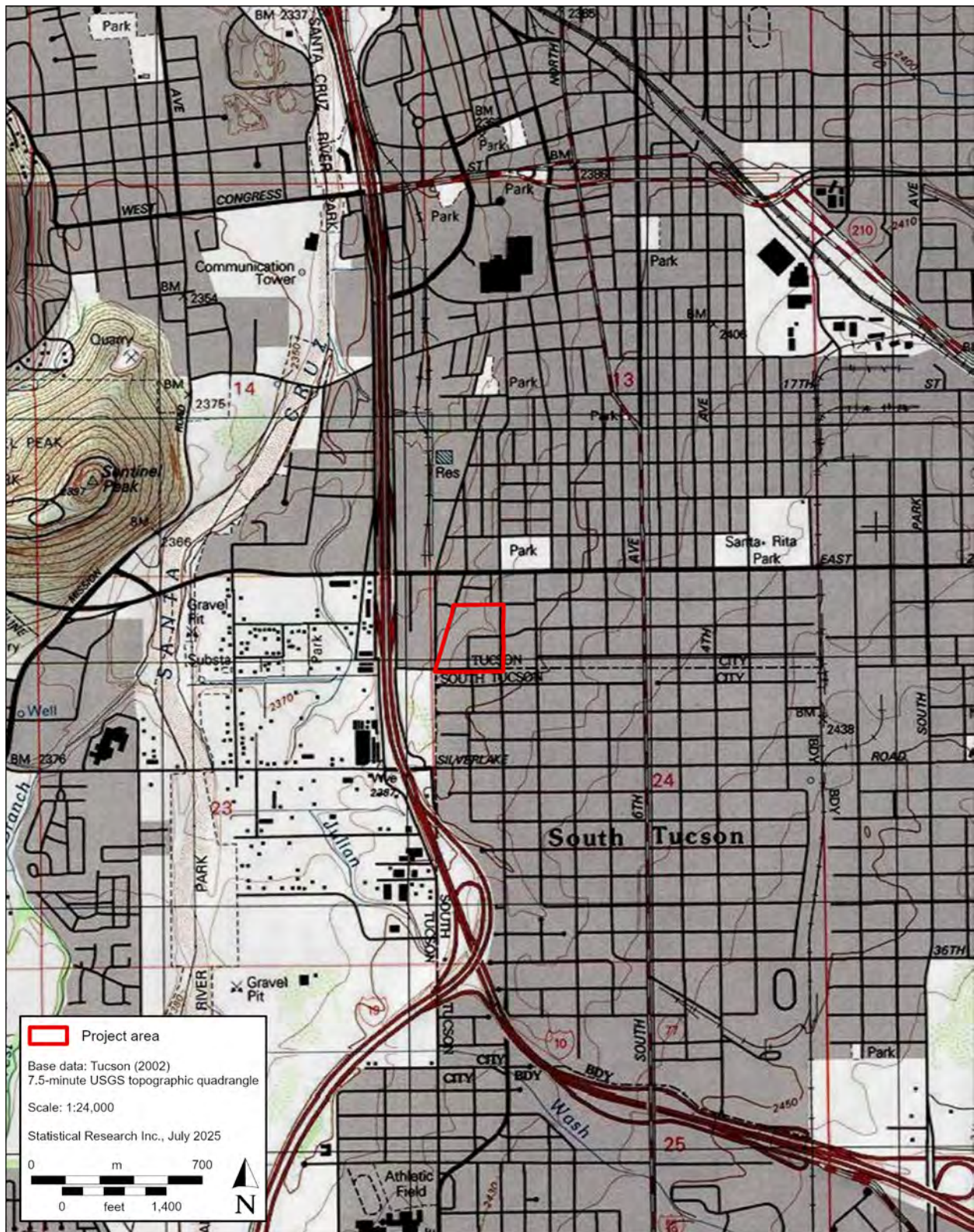


Figure 1. Current map of the project area.





**Figure 2. Map showing the different locations of the Tucson Indian Boarding School, also known as the Tucson Indian Industrial School, and the Tucson Indian Day School.**



Some references place the school at other locations in the vicinity of the project area, but deeds indicate that the school was likely located on Papago Street within the Native American Addition or near the southeastern corner of the project area (Figures 3 and 4). The school provided domestic and technical training for young Native students up to the age of 14. There were no boarding facilities, and most of the students lived nearby in an area known as the Papago Village, which served as the home for Tohono O'odham and other Native people who came from outer villages to trade or work in Tucson, sometimes on a temporary basis. A Presbyterian missionary, the Reverend F. S. Herndon, and his wife moved to the Native American Addition and built a mission there in 1904 to serve the people living in the Papago Village. They were also instrumental in the construction of the Papago Indian Church, later known as the Southside Presbyterian Church, on a site just to the east of the Native American Addition on West 23rd Street.

The Tucson Indian Day School continued in operation until 1918 or 1919, when the government closed the school, but the facility was then used by Tucson School District 1 from 1920 to 1921 for overflow students who were scheduled to attend the Ochoa School, which was under construction at that time on West 25th Street to the southeast of the Native American Addition. Apparently, the former Indian day school facility continued to be used as an annex or supplemental building for Ochoa School, at least during the 1920s, when overcrowding caused the need for additional space. The federal government deeded its property near the southeastern portion of the project area to the City of Tucson in 1955, following the earlier sale to the City of Tucson of land owned by the Presbyterian Church and by the Pusch family in the Native American Addition. Most of these parcels are part of the current project area. The building on the federal school property was removed, with any salvageable materials made available to what was then called the Papago Tribal Council. According to later environmental studies, this area was in the vicinity of a later transfer station and road right-of-way, whereas land in the Native American Addition was leveled and primarily used for parking, equipment storage and possibly a few commercial operations until the present day. SRI recommends monitoring during ground disturbance caused by construction within the project area, except for portions of the former transfer station site, where previous deep disturbance is known.

## **Background**

As with Native populations today, throughout history Indigenous peoples on the North American continent developed their own body of knowledge, including both sacred and practical beliefs, which formed the basis of their culture and which they passed on from generation to generation. Elders and family members provided education through both oral traditions and physical training and adopted new ideas that originated from contact with other Native groups (Trafzer et al. 2006:5–6). Despite these rich cultural traditions, various religious groups made it their goal to impose new belief systems and promote assimilation through missionary activities and also the establishment of schools for Native American youth. From its earliest days, the U.S. government supported these efforts and placed an additional emphasis on vocational or trade school training.

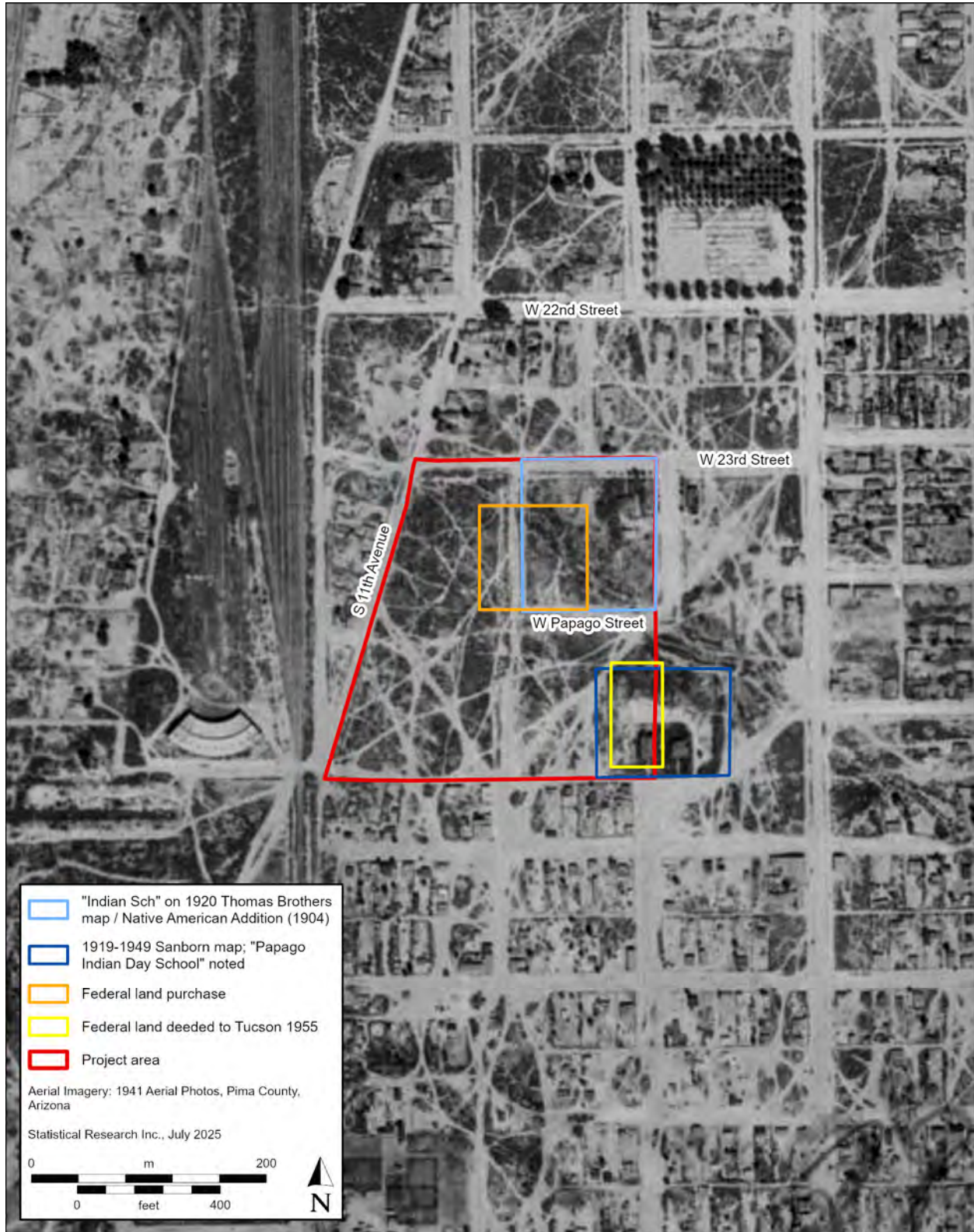
The U.S. Department of Interior (USDI) Bureau of Indian Affairs (BIA) (originally called the Office of Indian Affairs), from its founding in 1824, became the primary agent for policy development and enforcement of federal laws. During his presidency, Ulysses S. Grant, developed a new focus on Indian affairs known as the peace policy, which included a more central role for government in education, including the establishment of federally funded schools for Native children, both on and off Tribal lands. Reformers during this period were at odds over whether the day school or boarding school approach was more effective. The ideas of Captain Richard Henry Pratt, in particular, influenced the early development of government-run boarding schools like Carlisle in Pennsylvania in the belief that to promote assimilation and learning, Native children should be isolated from their parents and traditional culture while being taught Christian values and work ethic based on a military model (Trafzer et al. 2006:11–15).

Although the BIA's directions changed with different administrations, for most of the nineteenth and into the twentieth century it encouraged representatives of religious denominations to play a major role in teaching Native children. Even when the government began to take a more direct control of Native American education with the establishment of reservation schools, funding remained limited and the reliance on religious groups to lead teaching efforts continued (Prucha 1984:696–697, 699; Trafzer et al. 2006:7–15).



**Figure 3. Figure showing the outlines of the project area, the Native American Addition, the map locations of the Indian Day School, as well as the parcels owned by the federal government within the project area.**





**Figure 4. Figure showing the outlines of the project area, the Native American Addition, the map locations of the Indian Day School, as well as the parcels owned by the federal government within the project area, overlaid on a 1941 aerial photograph.**

Competition and sometimes even antagonism grew between various Protestant denominations and Catholic churches that sponsored missionaries to Native Americans during this period, as the government determined which denominations would be in exclusive control of the education of specific Tribal groups. At that time, the Presbyterian Church was placed in charge of the Tohono O’odham and Akimel O’odham people in Arizona.

## **Tucson Indian Boarding School**

The Presbyterian Board of Home Missions received some government funding to operate both a boarding school and a day school at different locations in Tucson. In 1888, the Presbyterians initially opened a contract boarding school that was known by several names, including the Tucson Indian Industrial School, the Tucson Indian Training School, the Tucson Indian Boarding School, and also Escuela. To avoid confusion, Tucson Indian Boarding School will be used in this report. The school served the children of the Tohono O’odham and Akimel O’odham people, referred to in church records as the Papago and Pima. It was initially located in northeast Tucson near the University of Arizona on several lots that were leased from the City of Tucson. Federal support ended in 1894 and from that point on, the Presbyterian Church relied on its own funding from donations and even from contract work like road grading that was performed by the students. The students also provided help to construct the school buildings at the site near the university, but as urban development began to surround the property, the Mission Board decided to move the school (Anonymous 1890; *Papago Indian News* March 1960:9; Presbyterian Historical Society 2025).

In 1907 the Board purchased 160 acres of property three miles south of Tucson, where they constructed numerous school buildings and a farm, with much of the labor once again provided by the students. The Tucson Indian Boarding School property bordered the Santa Cruz River on the west and was reached by a road originally known as the Indian School Road, although later called Ajo Way. The boarding school eventually served as many as 150 students from throughout the country and remained in operation at its south Tucson location until 1960, when changing federal policies and financial issues forced it to shut down. The property was sold and most of the boarding school buildings were demolished in 1964. The Santa Cruz Plaza shopping center was later developed on a portion of the former school site (Anonymous 1890; Newland 2022; *Papago Indian News* March 1960:9; Presbyterian Historical Society 2025).<sup>1</sup>

## **The Native American Addition**

Most of the boarding school’s student body came from Tohono O’odham and Akimel O’odham villages throughout Arizona or from other Tribal communities, but some who attended the school also lived a few miles away in what was known as the Native American Addition. This property, located in the NW ¼ of the NW ¼ of Section 24, Township 14 South, Range 13 East, was part of a 40-acre tract originally claimed as a cash entry by John Moore and later purchased by George and Madeline Pusch. Pusch was a German immigrant and early resident of Tucson who had made his fortune as a cattle rancher, butcher, and land developer. He owned some of the largest ranches in Arizona and also served on the Tucson City Council and in the territorial legislature (Zipf 2025). He and his wife apparently had a strong interest in the Tohono O’odham people and, in May 1904, platted the Native American Addition to Tucson. The plat was framed by Papago Street on the south, Sacaton Avenue on the west, Quijotoa Avenue on the east and West 22nd Street on the north, with Herndon Place stretching to the north from the midpoint of the plat (Pima County Assessor 1904) (Figure 5).

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<sup>1</sup> Additional information about the Tucson Indian Boarding School and historical photographs of its facilities may be found in the Arizona Memory Project at <https://azmemory.azlibrary.gov/nodes/view/247759>. The Presbyterian Historical Society in Philadelphia, Pennsylvania, maintains an extensive collection of archival materials about the school (<https://pcusa.org/historical-society/collections/research-tools/guides-archival-collections/rg-103>) as does the Arizona Historical Society in the Elsie Prugh Herndon Collection ([https://www.arizonahistoricalsociety.org/wp-content/uploads/library\\_Tucson-Indian-Training-School.pdf](https://www.arizonahistoricalsociety.org/wp-content/uploads/library_Tucson-Indian-Training-School.pdf)).

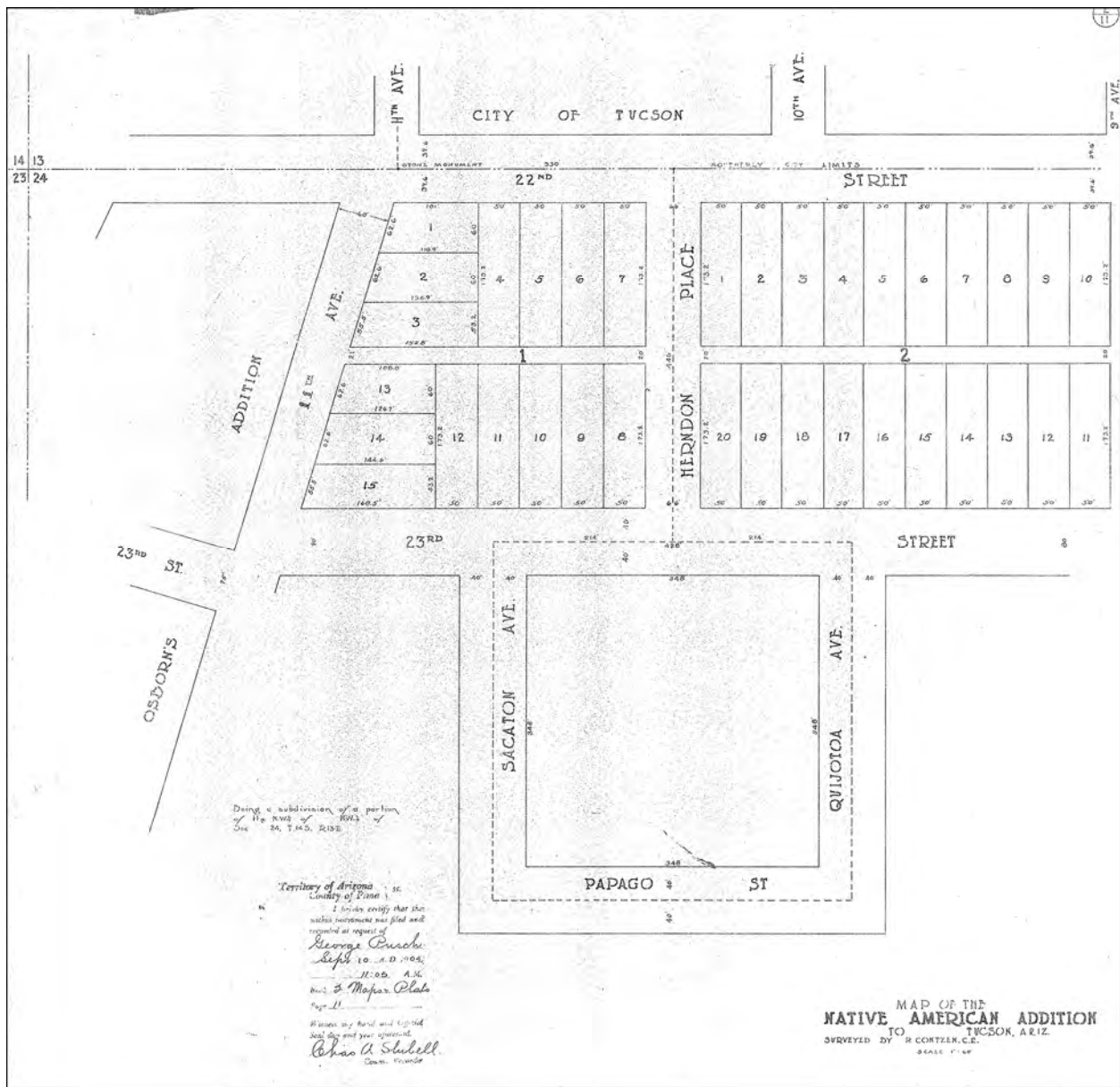


Figure 5. Original map of the Native American Addition, 1904.

Pusch was familiar with the work of the Reverend F. S. Herndon, a Presbyterian missionary who had arrived in Tucson in 1893 and served for 7 years as a faculty member and then superintendent of the Tucson Indian Boarding School. In 1903, according to his wife, Elsie Prugh Herndon, the couple moved south of Tucson to minister more directly to the Tohono O'odham people. The Herndons apparently worked with Pusch and developed their mission on part of the Native American Addition, and near what was known as the Papago Village (Elm and Hatch 1989:194, 205; Hamilton 1948:117).

Some of the Tohono O'odham traveled from outer villages to trade and work in Tucson, and according to information based on papers left by Elsie Herndon, many intermittently lived on land in south Tucson that was part of the Native American Addition. As described in a report based on her writings, "the Indians were living in old round houses or in homes made of brush, flattened tin cans, mud, canvas or anything else that would give protection" (Hamilton 1948:116–117). Other newspaper accounts later describe the Papago Village as extending for many blocks from West 23rd Street to the south and east (*Tucson Citizen*, Supplement, 23 October 1927:8). Pusch apparently donated some of the land in the Native American Addition to the Presbyterian Board of Home Missions and planned to encourage Tohono O'odham families who lived there to purchase lots on the rest of the property and build more substantial dwellings. The Herndons also lived in a tent in the northeast portion of the addition near West 23rd Street while they began to build an adobe manse that would be used as the base of their missionary work (Hamilton 1948:117–118) (Figure 6).

Among the first of the Tohono O'odham to build an adobe dwelling in the Native American Addition was Jose Alvarez, who later worked at the University of Arizona. Another resident was Jose Pablo, who had graduated from the Tucson Indian Boarding School in 1903 and was hired by the Presbyterian Board to act as an assistant and interpreter for the Herndons. A deed from Pusch to Joseph Ramos in 1907 is for land also purchased in the Native American Addition. According to the Herndon papers, as many as 30 families eventually built homes in the addition, which for many years continued to be known as the Papago Village (Hamilton 1948:117–118) (Figures 7 and 8).



**Figure 6. Photograph of the adobe manse built by the Herndons for their ministry work in the Native American Addition. Courtesy of David Leighton, *Arizona Daily Star*, Tucson, Arizona.**



**Figure 7. Photograph of Elsie Herndon crossing from her home to the Papago Village. Courtesy of Elsie Herndon Collection, Arizona Historical Society, Tucson, Arizona. Reproduced in Elm and Hatch 1989.**



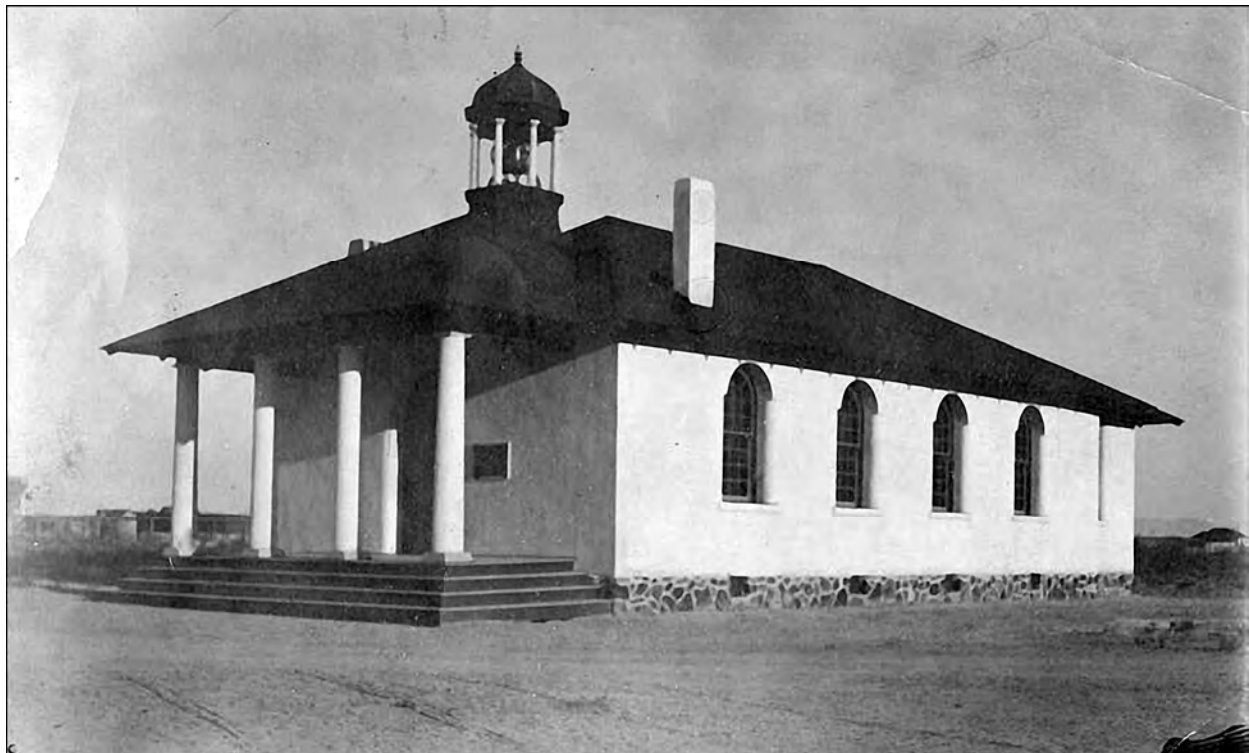
**Figure 8. Native American man with what is believed to be the Papago Village in the background. Courtesy of David Leighton, *Arizona Daily Star*, Tucson, Arizona.**



## **Papago Indian Church/Southside Presbyterian Church**

Although the Herndons held services for the village residents outdoors or in the manse when it was completed, there were enough potential parishioners to build a larger chapel. In 1905, the Presbyterian Church was able to purchase land just to the east of the Native American Addition on West 23rd Street, and F. S. Herndon with the help of Jose Pablo and others began construction of what would become the Papago Indian Church, later known as Southside Presbyterian Church (Figure 9). Money for the project was raised from Presbyterian supporters throughout the country, and the church also received donations of furnishings, hymnals and other necessities (Hamilton 1948:119). The 30 founding members were all Tohono O'odham with the exception of Elsie Herndon and her son. When the building was completed and dedicated in the fall of 1906, the church served not only the Native American community but also both Mexican and Chinese residents of the area. The original chapel burned down in 1937, but a new church was completed in 1947, and at that time, the name was changed to Southside Presbyterian Church (Southside Presbyterian Church 2025a, 2025b).

Former students of the Tucson Indian Boarding School who remained in the Tucson area to work formed the nucleus of church membership. They also served as interpreters when needed for most of the church services and other activities. Reverend Herndon had been studying the Tohono O'odham language for many years and had begun to make translations of portions of the Bible into a written form of the language that he had developed. Although missionary efforts were centered on the Papago Village, Herndon also made month-long journeys to visit outlying Tohono O'odham villages, where he and his assistants would hold meetings, play a small organ or a phonograph they brought with them and preach lessons from the Gospel. The Presbyterians felt that the federal government had done little to better the living conditions of the Tohono O'odham people, and Herndon helped individuals to build or remodel homes and convinced physicians and nurses to come to the Papago Village as well as the outlying settlements and provide health care at no cost. He was also one of the main supporters of a designated reservation for the Tohono O'odham (Hamilton 1948:123–125).



**Figure 9. Photograph of the early Papago Indian Church, later known as the Southside Presbyterian Church. Courtesy of David Leighton, Arizona Daily Star, Tucson, Arizona.**

Soon after the church was built, another former member of the Tucson Indian Boarding School staff also purchased land in the Native American Addition and evidently built a small dwelling near the Herndon residence. Clara Schreiner bought two lots from George Pusch, one in 1905 and another in 1907, before her marriage to Charles Kirk. The property was across the street from the manse, and the house was apparently intended as a residence for church assistants and likely not occupied for any length of time by Ms. Schreiner (Hamilton 1948:120).

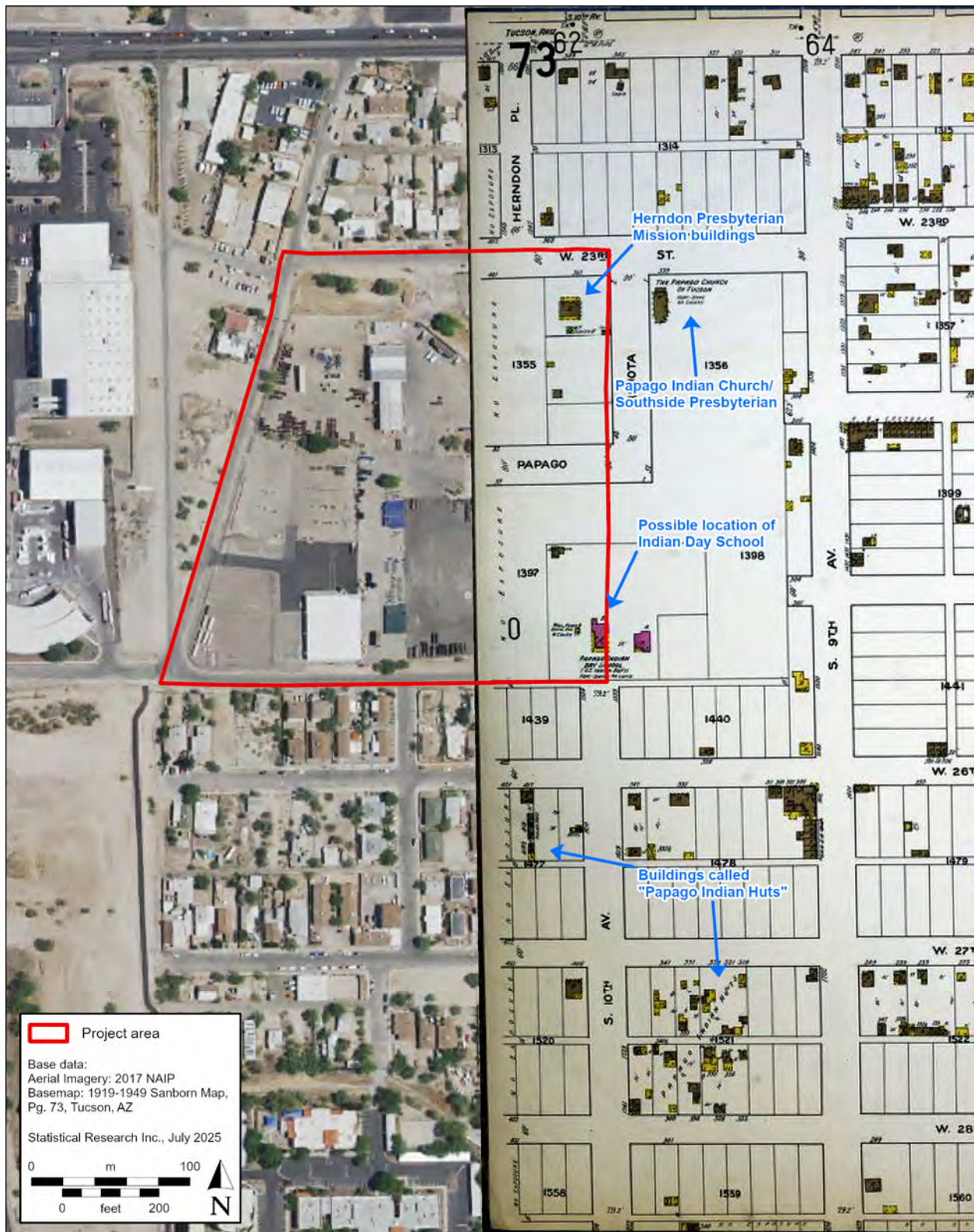
Although the extent of the Papago Village site and the numbers of Native peoples living within the Native American Addition or the current project area during this period are not known, the 1910 census provides a fairly comprehensive look at the population that was enumerated by census takers in that year. As part of this census, the government separated all Native Americans from the rest of the residents of a precinct and then listed them separately, gathering information on most of the same categories as the rest of the population, but also adding separate information on blood quantum, education and also whether the individual or family lived in what they termed a fixed or aboriginal dwelling. Although the exact location of any dwelling was not included, generally the enumerators did provide some indication of location based on whether the dwelling was on a specific street or between two streets (U.S. Bureau of Census 1910) (Figure 10).

A more thorough review of this census information is needed, but there is an indication of several hundred Native people classified as Papago, with some additional residents identified as Pima and also Yaqui, in the wider vicinity of the project area, extending both to the south, east and west of the Native American Addition. It is difficult to determine a number for those who were living within the project area, but it is a smaller percentage of those enumerated. Although the names of individuals and family members in the area are well documented, census takers often did not seem to take much care to address the questions of occupation and education, although some who had attended the Tucson Indian Boarding School were noted.

### **Tucson Indian Day School**

By the time of this census, the federal government had also purchased land in the Native American Addition. Although the government provided initial financial backing for some of the buildings and other improvements for the Tucson Indian Boarding School, no additional funding was allocated to the Presbyterian Church for its upkeep after 1894. The government, however, did support the construction of a day school for the Tohono O'odham and other Native children. A potential site was property in the Native American Addition, apparently to the north of Papago Street along the southern boundary of the addition, which the government bought in 1907 (Pima County Recorder 1907). The government also owned property to the southeast of the Native American Addition, which the Sanborn 1919-1949 map suggests was also potentially the school site (Pima County Recorder 1955) (see Figure 3). The exact dates of the construction of the school are not currently known, but the Presbyterian Board of Home Missions ran the school, which was under the leadership of A. M. Phillipson. Originally an Indiana resident, Phillipson was well respected among the missionary community and later continued his educational service at other Native American schools in Arizona.

The Tucson Indian Day School enrollment apparently fluctuated. A newspaper article in 1914, for example, placed the enrollment at 16 during the first week, but advised that Mr. Phillipson “expects a much larger attendance later on” (*Arizona Daily Star*, 27 September 1914:4). The school took students from kindergarten up to the age of 14, with the hope that they would then attend boarding schools. The industrial school focus extended even to this younger student body, with elementary-level work in domestic science and manual training with a particular emphasis on agriculture (*Arizona Daily Star*, 15 August 1915:27). A half-acre garden area was adjacent to the school and with the installation of an irrigation system, was used to teach modern methods of gardening and food cultivation (*Arizona Daily Star*, 15 September 1916:3). Improvements to the school buildings over time included the addition of shower baths and curbing and walkways around the campus (*Arizona Daily Star*, 23 October 1915:3).



**Figure 10. Figure showing the 1919-1949 Sanborn map and locations of the Herndon mission, the Papago Indian Church, the potential day school site and some of the dwellings that were likely part of the extended Papago Village. Much of the Native American Addition was not included on Sanborn maps of the area.**

In addition to its student courses, the BIA also used the day school to encourage Indian families to adopt new parenting strategies. During Baby Week, for example, the teachers, local doctors and other personnel offered daily talks and workshops on health and child rearing (*Tucson Citizen*, 15 May 1918:5). The school also served as a voting precinct and a military registration center. Although the reasons are unknown, the government decided to close the school in late 1918 or 1919 but agreed to allow Tucson School District 1 temporary use of the day school building for the overflow of students who would attend a new facility, the Ochoa School, after it was completed (BIA 1919:11).

The city's student population was experiencing significant growth by the 1920s and because of severe overcrowding, the Tucson School Board had authorized bond levies in 1920 and 1921. These levies were passed by voters and raised the funds to build three new elementary schools in District 1. While the Ochoa School, which was located on West 25th Street to the southeast of the Native American Addition, was under construction in 1920 and 1921, the overflow students from other elementary schools were sent to what was known during that time as the Twenty-fourth Street School. The school building was part of the former government school, the Tucson Indian Day School. Despite its name, some sources indicate that the school was located just north of Papago Street in the Native American Addition (Cooper 1968:61; Brousseau 1993).

### **Later Sales and Uses**

The Twenty-fourth Street School apparently closed in 1921 after the Ochoa School on West 25th Street was completed, but it was used as a supplementary building or annex of the Ochoa School when more room for students was needed after that time (*Arizona Daily Star*, 5 February 1926:5). The Herndons continued their ministry to the Tohono O'odham until the fall of 1926, when they announced their decision to leave for Tuba City, Arizona, where they planned to extend their missionary activities to the Navajo people (*Tucson Citizen*, 19 September 1926:10). The couple returned to Tucson after retiring from their Navajo ministry in 1934 and Reverend Herndon died in April 1936 (*Arizona Daily Star*, 9 April 1936:3). One of the Herndon sons Prugh Herndon had followed his parents into missionary work and taught at the Tucson Indian Boarding School (*Tucson Citizen*, 19 September 1926:10).

Some of the property in the Native American Addition owned by the Presbyterian Board of Home Missions (later known as the Board of National Missions of the Presbyterian Church) was sold to the City of Tucson in 1947 and additional holdings were turned over in 1953. All the remaining property in the Native American Addition owned by the descendants of George Pusch was transferred to his son, Fred Pusch, who then sold it to the city in 1947. The land occupied by the Tucson Indian Day School and later the Twenty-fourth Street School and any adjacent property owned by the federal government was turned over to the City of Tucson in March of 1955 by a quit claim deed, signed on behalf of the USDI. A provision in the deed required that the City of Tucson demolish the existing structure on the property and give the Papago Council of the Papago Tribe of Indians permission to remove any salvage from the structure without any cost to the Tribe (Pima County Recorder 1955; Civil and Environmental Consultants 2025:Appendix G).

The Phase I Environmental Assessment indicates that project-area parcels within the Native American Addition are now vacant and have not contained any development since at least 2012 except for parking and a commercial storage yard. Prior use of the site is difficult to assess based on currently available records and aerials provided in the Phase 1 report. A review of the aerials in the report suggests that the project area was vacant from approximately 1936 to 1955, although research discussed above suggests that at least one previous structure on the southeastern corner of the project area remained on the property until it was transferred to the City of Tucson in 1955. The disposition of any housing that previously belonged to the Presbyterian Church or to the Pusch family descendants is currently unknown (Civil and Environmental Consultants 2025:2–3; Appendix F, G).



## **Management Recommendations**

The project area includes the portion of the Native American Addition south of West 23rd Street, which served as the location of a Presbyterian mission to serve the Tohono O'odham people beginning as early as 1904. Research indicates that the Reverend F. S. Herndon and his wife constructed a manse on land near an area that was described as the Papago Village, which was used as a place for the homes or encampments of some of the Tohono O'odham and other Native peoples who came from outer villages to trade or work in Tucson. The Herndons and others also helped to build the Papago Indian Church, later called the Southside Presbyterian Church, on land purchased to the east of the Native American Addition on West 23rd Street. The area just to the north of Papago Street, which was at that time platted as part of the Native American Addition, was purchased by the federal government and possibly became the long-term site of the Tucson Indian Day School, later occupied by Tucson School District 1 in 1920 and 1921 while the nearby Ochoa School was under construction. The building was then used as an annex, when needed, to house overflow students from the Ochoa School.

Deeds indicate that another parcel owned by the government on the southeast corner of the project area also might have been the site of the Indian day school building. This property was deeded to the City of Tucson and the building on it demolished in 1955, with salvage provided, if desired, to the Tohono O'odham council (Pima County Recorder 1955). Both the manse built by the Herndons and a smaller residence that was used for assistants to the missionaries are believed to have been located within the project area, although when these buildings were removed is not currently known. At least a portion of what is commonly referred to as the Papago Village was also within the Native American Addition but possibly stretched into other parts of the project area and apparently into additional blocks in this part of south Tucson. Although much of the development likely consisted of structures and other features that did not have foundations or other extensive subsurface construction, and the site subsequently has been graded and surface materials added over time, SRI believes that monitoring should be conducted during major ground disturbance within the project area to ensure that if any sites associated with these various historical-period features are uncovered, they will be appropriately assessed by archaeologists.

Thank you for the opportunity to work with the City of Tucson on this project. Please let me know if you have additional questions or concerns.

Sincerely



Sharon Boswell  
Principal Investigator and Historian

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July 18, 2025

Desiree Aranda  
 Historic Preservation Officer  
 Planning and Development Services  
 City of Tucson  
 201 N. Stone Ave., 3rd Floor  
 Tucson, AZ 85701

Re: Monitoring and Discovery Plan for the 10th Avenue Affordable Housing Redevelopment Project (City of Tucson Project Number COT 23–006), Pima County, Arizona (Technical Report 25-55)

Dear Ms. Aranda:

Statistical Research, Inc. (SRI), presents this monitoring and discovery plan for the 10th Avenue Affordable Housing Redevelopment Project (City of Tucson Project Number COT 23–006) in Pima County, Arizona. The City of Tucson (City) has requested archaeological monitoring during the ground-disturbing activities associated with the planned construction for the project. The project area is located on 13.3 acres of City land in the NW<sup>1</sup>/<sub>4</sub> of the NW<sup>1</sup>/<sub>4</sub> of Section 24 in Township 14 South, Range 13 East (1996 Tucson, Arizona, U.S. Geological Survey [USGS] 7.5-minute quadrangle), and is bounded by four streets: South 10th Avenue to the east, South 11th Avenue to the west, West 25th Street to the south, and West 23rd Street to the north (Figure 1). Previous survey of the project area did not identify any cultural resources; however, archival research found two separate historical maps that depict possible Native American school locations that intersect the project area (Boswell 2025; Sulkosky et al. 2025). A 1920 Thomas Brothers map of Tucson depicts an area labelled “Indian Sch” in the northeast portion of the current project area and a 1919–1949 Sanborn Fire Insurance map depicts an area labelled “Papago Indian Day School (U.S. Indian Dept)” that overlaps the southeast portion of the project area (Sulkosky et al. 2025:Figures 19h and 19k) (Figure 2). In addition, a portion of the project area was known as the Native American Addition, platted in 1904, and the area around the current project was known as Papago Village (Boswell 2025). The City acquired the project area by 1931 (Terracon Consultants 2022:iv), and buildings associated with the two potential school locations are present on aerial maps until 1949 (Civil & Environmental Consultants 2025:43). Sometime after 1949, existing structures in the project area were razed, and the project area was used for commercial and industrial purposes from approximately 1967 through 2024. Over this period, the project area was used for refuse storage and staging, as a refuse transfer station, as a refuse container maintenance facility, and as a Tucson Water warehouse (Civil & Environmental Consultants 2025:45). These later industrial uses appear to have removed any surface indications of prior Native American settlement or schools in the project area. Disturbances from these later industrial uses also resulted in excavations from 4 to 18 feet deep to install sewer, water, and electrical lines and construct the transfer station. Although the survey for the project did not find evidence of any historical-period archaeological features, deposits, or artifacts, the City, in response to tribal input, has requested archaeological monitoring of ground-disturbing construction activities within the project area to identify any possible ancestral burials or buried cultural features or archaeological deposits that may be associated with a Native American day school or settlement. Ground-disturbing construction activities in the previously disturbed areas discussed above will not be monitored.

The City currently has a monitoring and discovery plan entitled *A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the City of Tucson and Pima County* (Lindeman et al. 2012) which pertains to monitoring projects within 1 of 11 archaeological sensitivity zones defined throughout the City. Although the current project is not located within a sensitivity zone, this document is based on that existing plan and updates the monitoring and discovery procedures contained therein for the current project. The existing Pima County monitoring plan, *Cultural Resources Monitoring Plan for Certain Maintenance and Repair Projects in Pima County, Arizona* (O'Mack and Boley 2010), is also used for its focus on the treatment of historical-period resources and features that may be encountered during the current project.

## **Monitoring Procedures**

The monitoring strategy employed for the current project will be the observation of construction excavation as defined by Lindeman and colleagues (2012:56). A project-director-level archaeologist who is also trained as a human osteologist will monitor planned ground-disturbing activities in the project area.

Monitoring will follow the procedures detailed in the existing City plan (Lindeman et al. 2012:57) and will entail the following:

1. Maintenance of a daily field log that will document the location(s) monitored; the name and title of the construction supervisor on duty; the time spent monitoring; whether artifacts, features, or other cultural resources were encountered; and the measures taken in such event.
2. Appending provided construction plans on a daily basis, showing the area(s) monitored.
3. Recording the location(s) of monitoring daily with a handheld Global Positioning System (GPS) receiver.
4. Digital photography and a corresponding photograph log documenting daily monitoring and construction activities.
5. Daily email updates to the appropriate City contact(s).
6. Preparation of a short, letter report documenting the overall monitoring effort if it involves a negative finding, including a brief project background, a map of the locations monitored, select photographs, and management recommendations. This monitoring report will be emailed to the appropriate City contact(s) as a PDF-format document within 2 weeks of the completion of monitoring.

The monitor will coordinate with the appropriate construction supervisor(s) to ensure the safety of all monitoring work and the monitor's compliance with all applicable regulations and standards. The monitor will also discuss with construction staff the monitoring procedures that will be used; what kinds of archaeological materials, features, and deposits could potentially be encountered during excavations; and the procedures involved if cultural resources or materials are encountered.

## **Encountering Archaeological Features, Deposits, or Artifacts**

If buried archaeological features, deposits, or artifacts are encountered during construction that meet the Arizona State Museum (ASM) Site Definition Policy, then all ground-disturbing activities in the discovery location will cease, and the appropriate City contact(s) will be notified immediately. The City will consult

with the State Historic Preservation Office (SHPO) and affiliated tribal communities on the discovery. The ASM will also be contacted immediately to obtain an emergency Arizona Antiquities Act (AAA) Project-Specific Permit. The steps detailed in Policy and Procedures Regarding the Issuance of Emergency Arizona Antiquities Act Permits (ASM 2020) will be followed. Once an emergency permit has been issued, construction and monitoring will be allowed to proceed after a signed permit application and a project-area map, an ASM quote request, and a site-number-request form have been submitted to the ASM Permit Office.

After notifications and while waiting for the emergency permit, the archaeological monitor will examine and document the finding. The locations of all artifacts, features, or deposits will be mapped with a survey-grade GPS receiver and then documented through the preparation of detailed notes; field forms; and hand-drawn, scaled plan-view maps or profile drawings; and photographs, if appropriate. The treatment of non-mortuary and mortuary features are discussed separately in the sections below.

### **Treatment of Non-Mortuary Archaeological Features and Deposits**

O'Mack and Boley (2010:68) presented general procedures for the discovery of subsurface, non-mortuary features which are paraphrased here. If subsurface, non-mortuary features are found during monitoring, the construction activity will be halted and the monitor will assess the finding. If the feature is exposed in such a way that additional construction will not further harm it (for example, in the wall of a backhoe trench), the monitor will record the feature in the manner described in the paragraph above and any diagnostic artifacts seen in the backdirt or feature fill will be collected (see Lindeman et al. 2012:Table 3.1). Construction will then be allowed to resume. If a subsurface feature is discovered and additional construction will further destroy it, the monitor (and additional SRI staff, if necessary) will excavate the feature before construction is allowed to resume.

Non-mortuary historical-period features encountered in urban settings in Tucson can be categorized as one of three kinds: architectural features (e.g., houses, buildings, walls, foundations, etc.), extramural features (e.g., pits, trash middens or dumps, borrow pits, privies, etc.), and linear features (e.g., canals or ditches, roads, berms or railbeds, railroad tracks, etc.) (Lindeman et al. 2012:Table 3.1; O'Mack and Boley 2010:70–71). Excavation methods for each type are presented in Lindeman and colleagues (2012:Table 3.1) and O'Mack and Boley (2010:70–71) and are detailed below.

#### **Architectural Features**

Excavation of bounded architectural features, such as the remains of a historical-period house or other building, will begin with a rectangular control unit (e.g., 1-by-1 m to 2-by-2 m in size, within the boundaries of the feature). The control unit will be excavated by strata if identifiable or in arbitrary 10-cm levels. All fill will be screened through ¼-inch mesh, except for 10 cm of floor fill, which will be screened through ⅛-inch mesh. Once the control unit has established the basic stratigraphy, the remainder of the feature will be excavated in appropriate subdivisions in the same fashion. When the base or floor of the structure has been defined, the structure and any floor assemblage will be mapped in detail. All subfeatures (e.g., posts, interior wall or subdivisions, postholes, floor pits, etc.) will be excavated, and all fill will be screened through ¼-inch mesh, with the exception of fill collected for flotation. Appropriate flotation, pollen, and other samples will be taken, and the features will be documented photographically.

For architectural features that do not define bounded interior spaces (e.g., wall segments, free-standing walls, etc.), their horizontal extents will be exposed, mapped, and photographed. The sediment surrounding them will also be excavated to expose their vertical faces, which will be recorded in a similar manner.

## **Extramural Features**

Extramural features that contain fill will be exposed fully horizontally and mapped in plan view. The feature will then be bisected, and one half will be excavated. A profile will be drawn, and the remainder of the feature will be excavated in arbitrary 10-cm levels, in natural strata, or as a single unit, depending on the size of the feature and its stratigraphy. Contents of pit features will be screened through ¼-inch mesh, except for fill collected for flotation or pollen samples. Larger features such as refuse middens, borrow pits, or privies will be sampled with a unit of appropriate size (e.g., 1 by 2 m). Detailed information on each excavated feature, including a plan view and cross section, will be recorded. Flotation, pollen, and other samples will be judgmentally collected, and features will be documented photographically and descriptively.

## **Linear Features**

Linear roadbeds, railroad berms, alignments, or tracks that may be encountered during monitoring will be exposed and traced out in the project area, mapped, and photographed. If a canal or ditch is identified, a detailed, scaled profile will be drawn, with a particular focus on changes in grain size and coloration. Ostracode, pollen, and other soil samples may be taken as appropriate. The linear extent of the canal or ditch within the project area will be traced and mapped, and the possible relationship of the feature to previously documented features beyond the project area will be considered. Any other associated features such as gates will also be recorded.

## **Artifact Collection**

Artifacts observed in backdirt from construction excavation that are not associated with a known archaeological feature will not be collected, unless they are of exceptional cultural or temporal diagnostic significance. Historical-period artifacts associated with or manually excavated from features will be analyzed in the field or collected according to the procedures outlined in Lindeman and colleagues (2012:60) and O'Mack and Boley (2010:64–65). Artifacts not collected will be described and analyzed to the extent practical in the field.

Although not anticipated, the collection and in-field analyses of any precontact-period artifacts will follow the procedures outlined in Lindeman and colleagues (2012:57–58).

## **Treatment of Human Remains, Funerary Objects, Sacred Ceremonial Objects, and Objects of National or Tribal Patrimony**

A Standard Burial Agreement with ASM will be obtained prior to any monitoring work. If human remains, funerary objects, sacred ceremonial objects, and/or objects of national or tribal patrimony are encountered, the monitor will halt all construction activities within 15 m (50 feet) of the remains and/or object(s) and will notify the City and the ASM Repatriation Office immediately. Other appropriate notifications will be made as specified in the project Burial Agreement with ASM. Any human remains or artifacts disturbed during the initial encounter will be rejoined with the discovery. The monitor will, then, take appropriate measures to secure and protect the remains and/or objects in place and make sure they are not viewed by anyone but necessary project staff. Measures will include covering the remains and/or objects with unbleached cotton muslin and dirt; barricading the discovery; and providing overnight security as necessary, such as fencing or a security guard. All project personnel will avoid any unnecessary handling or disturbance of the remains and/or objects.

## **Mortuary Feature Recovery**

Features containing human remains and funerary objects encountered during monitoring will be assigned a unique provenience number in the field and then described and recorded on a feature log form. The horizontal extent of the feature will be defined and the feature boundary mapped by hand. Mapping nails, a local datum, and an identifying tag will be established near the feature but outside its boundary. The feature boundary, mapping nails, and datum will be recorded and mapped with a GPS receiver.

After authorization to recover the mortuary features is received, additional qualified archaeological staff (including an osteologist) will be mobilized as necessary to recover any human remains within a single day. For larger mortuary features with significant amounts of fill, it may be necessary to recover as much fill as possible the workday before exposing human remains and funerary objects. In those cases, the mortuary feature would be covered and protected as described above until recovery is complete.

Mortuary features will be recovered using 10–20-cm thick arbitrary levels if there is no discernable stratigraphy in the feature fill. If stratigraphy is present, then the feature will be recovered in natural layers or strata. If natural strata are encountered that are thicker than 20 cm, they will be recovered in 10–20-cm thick arbitrary levels. At the completion of each recovery level, appropriate level forms and hand-drawn plan view maps will be completed. All mortuary feature fill will be screened through 1/8-inch wire mesh. No sediments or materials from mortuary features will be sampled and subjected to any specialized archaeological analyses (i.e., flotation analysis, pollen analysis, etc.). All artifacts, human remains, and funerary objects encountered during screening will be collected and housed appropriately as described in the section below.

For mortuary features that are, or contain, cremated human remains, the entirety of the human remains and the sediment matrix within which the remains are found will be recovered together. The sediment surrounding the recovered cremated remains will also be recovered and screened through 1/8-inch wire mesh, and any artifacts, human remains, or funerary objects collected from the screen will be recovered as part of the mortuary feature. If the cremated remains are in a vessel or container, they will not be removed from the vessel. The vessel and its contents will be recovered in their entirety and not separated. Cremated remains and any associated funerary objects or materials will also be housed appropriately as described in the section below.

The recovery of mortuary features will be recorded on standardized level and feature forms and will include detailed information on recovery methods and feature fill, size, and morphology. Inventories and descriptions of all human remains and funerary objects recovered will also be included. Hand-drawn scaled maps and illustrations will also be prepared depicting the position and orientation of human remains and funerary objects. An ASM Human Remains Documentation Packet will be prepared for each set of human remains within each mortuary feature. All information recorded will be used to interpret the mortuary practice or practices that led to the creation or deposition of the mortuary feature as well as its condition and integrity.

### **Animal Mortuary Features**

Animal mortuary features, defined as the intentional interments of animal remains, may also be encountered during monitoring. Such features will be treated the same as human remains, funerary objects, sacred ceremonial objects, and/or objects of national or tribal patrimony. The same notification protocol will be followed, and they will be recovered, treated, and documented in the same manner as human mortuary features.

## **Housing of Human Remains, Funerary Objects, Sacred Ceremonial Objects, and Objects of National or Tribal Patrimony**

Human remains, funerary objects, sacred ceremonial objects, and objects of national or tribal patrimony will be escorted to SRI's secured facility in Tucson to be housed temporarily before being repatriated to the claimant Tribe. Human remains and objects will be housed with care and respect and in a manner that does

not cause physical modification and breakage. Each group of human remains, each funerary object, and each bag of cultural materials will be assigned a unique provenience number in the field and inventoried. Human remains and objects will not be wrapped in or come in contact with synthetic materials. Human remains will be wrapped in unbleached cotton muslin and placed in a labeled paper bag. Funerary objects and other cultural materials that may be recovered from feature fill will be placed in labeled paper bags or cardboard boxes. If the human remains and funerary objects are contained in a vessel, the vessel will be wrapped in unbleached cotton muslin and placed in a labeled paper bag or cardboard box. Human remains will not be removed from funerary vessels. Cotton string will be used to attach labels.

### **Treatment and Documentation of Human Remains, Funerary Objects, Sacred Ceremonial Objects, and Objects of National or Tribal Patrimony**

Human remains, funerary objects, sacred ceremonial objects, and objects of national or tribal patrimony will be documented using non-destructive methods at SRI's secured Tucson facility. Human remains and funerary objects will not be photographed, washed, or reconstructed using tape or glue. Sediments adhering to remains or objects may be gently brushed or wiped away using a soft bristle brush or dry cloth only to the extent necessary to identify the remains or object or to collect necessary information. A qualified osteologist will document all human remains to professional standards following Buikstra and Ubelaker (1994) and complete ASM Human Remains Documentation Packets. The contents of intact cremation vessels, which may contain human remains, ash, and sediment, will not be disturbed during documentation. Form, size, decoration, and other relevant characteristics of funerary objects will be documented with standardized forms and hand-drawn scaled illustrations, and all information will be entered into the project database.

### **Reporting on Human Remains, Funerary Objects, Sacred Ceremonial Objects, and Objects of National or Tribal Patrimony**

A report documenting the recovery of the human remains that fulfills the procedures of the Burial Agreement with ASM will be prepared for the City, the ASM Repatriation Coordinator, and other parties, such as claimant Tribes, as described in the Burial Agreement. The report will include a summary of the project and the archaeological sites or sites identified in the project area if the resources meet the ASM site definition. Each mortuary feature will be described in detail and will include an inventory of remains and funerary objects. Plan view maps of each feature also will be presented depicting the position and location of all human remains and all associated objects.

## **Artifact and Sample Analyses**

The analysis of all recovered artifacts and samples will follow the procedures outlined in Lindeman and colleagues (2012:58–60). O'Mack and Boley (2010:64–65) also provided detailed procedures for the analysis of historical-period artifacts. Given the expectation of the current project that any archaeological features or deposits that may be encountered during monitoring would be historical-period in age, their procedures will also be followed.

## Report

If buried archaeological features, deposits, or artifacts are encountered during construction that meet the ASM Site Definition Policy and an emergency AAA Project-Specific Permit is issued, a draft report will be prepared that describes the project, the monitoring and archaeological field methods used, the features and deposits found, and the results of all artifact and sample analyses. The report will also feature a discussion of the findings in relation to relevant research themes and questions in Lindeman and colleagues (2012:53–55) and O’Mack and Boley (2010:45–60). Relevant research themes from those plans may include “Settlement Patterns and Landscape Use,” “Affinity,” and “Urban Sites.” Since it is anticipated that any archaeological features or deposits encountered during monitoring would be historical period in age and related to a Native American school and the Tohono O’Odham settlement that once overlapped the project area, it is likely that pertinent research themes for the project would focus on the history of Native American schools and Christian missionization among the Tohono O’Odham, the Tohono O’Odham community that once lived in and around the project area, and the relationships among this community and other non-native groups in the early Tucson urban landscape of the late nineteenth and early twentieth centuries.

The draft report would be submitted to the City for its review. Once comments were provided and addressed, a second draft would be prepared for ASM, SHPO, and affiliated tribal communities to review. A revised final report would then be submitted to the City and ASM.

If no buried archaeological features, deposits, or artifacts are encountered during construction, the project report would be submitted to the City, SHPO, and affiliated tribal communities, and would consist of a letter documenting the overall monitoring effort that included a brief project background, a map of the locations monitored, select photographs, and management recommendations.

## Curation

If buried, non-mortuary archaeological features, deposits, or artifacts are encountered during construction that meet the ASM Site Definition Policy and an emergency AAA Project-Specific Permit is issued, a curation agreement with the ASM would be obtained. All project documentation and artifacts and samples collected would be prepared and submitted according to ASM standards and would follow the precepts of the curation agreement.

If no buried, non-mortuary archaeological features, deposits, or artifacts are encountered during construction, there would be no curation of project materials.

Thank you for the opportunity to assist the City with this project. Please let me know if you require any additional information.

Sincerely,

A handwritten signature in black ink that reads "William M. Graves". The script is cursive and fluid, with the first letters of the first and last names being capitalized and prominent.

William M. Graves, Ph.D. , RPA  
Principal Investigator



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Terracon Consultants

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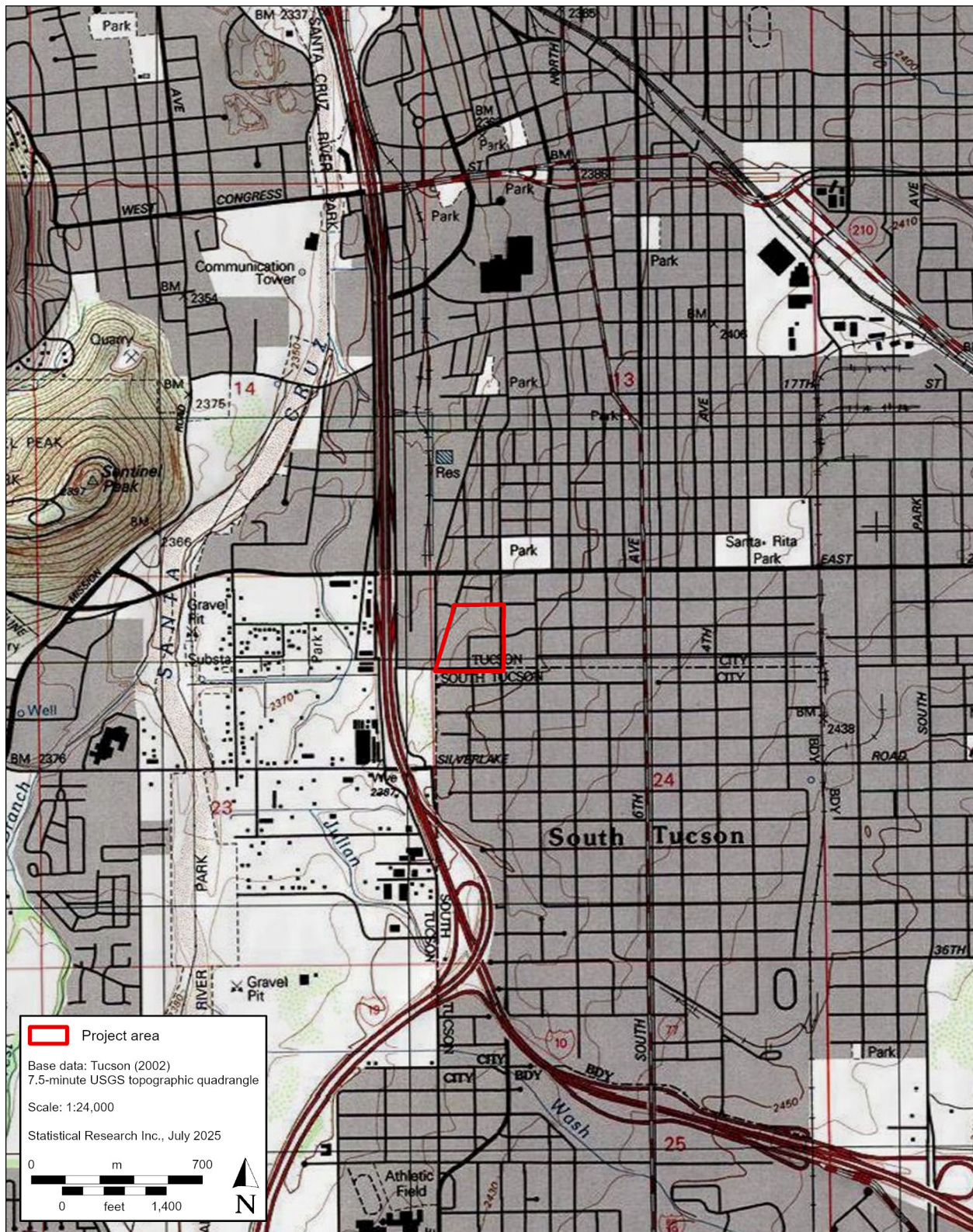


Figure 1. Location of project area.





**Figure 2. Possible locations of Native American schools within the project area.**



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**RE: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1**

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**From** Desiree Aranda <Desiree.Aranda@tucsonaz.gov>

**Date** Wed 7/30/2025 8:04 AM

**To** Karl Hoerig <khoerig@pascuayaqui-nsn.gov>; Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>; Julian Hernandez <jhernandez1@pascuayaqui-nsn.gov>

**Cc** Avi Buckles <abuckles@westlandresources.com>; Jennifer Levstik <jlevstik@westlandresources.com>; Johanna Hernandez <Johanna.Hernandez@tucsonaz.gov>; Emilie Fisher <Emilie.Fisher@tucsonaz.gov>; Daniel Bursuck <Daniel.Bursuck@tucsonaz.gov>

Good morning, Karl,

Thank you very much for your response and for reviewing the materials provided. The City will be sure to include the Pascua Yaqui Tribe in notification and consultation regarding historic properties or Ancestors that may be encountered during the project.

Thank you again,  
Desiree

**Desiree Aranda**

*Historic Preservation Officer*

**phone** 520.837.6968

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**From:** Karl Hoerig <khoerig@pascuayaqui-nsn.gov>

**Sent:** Tuesday, July 29, 2025 11:11 AM

**To:** Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>; Julian Hernandez <jhernandez1@pascuayaqui-nsn.gov>

**Cc:** Avi Buckles <abuckles@westlandresources.com>; Jennifer Levstik <jlevstik@westlandresources.com>; Desiree Aranda <Desiree.Aranda@tucsonaz.gov>; Johanna Hernandez <Johanna.Hernandez@tucsonaz.gov>; Emilie Fisher <Emilie.Fisher@tucsonaz.gov>; Daniel Bursuck <Daniel.Bursuck@tucsonaz.gov>

**Subject:** [EXTERNAL] Re: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

Dear Rolanda,

Thank you to the City of Tucson for continuing consultation with the Pascua Yaqui Tribe regarding the planned South 10<sup>th</sup> Avenue Phased Affordable Housing Redevelopment Project, located primarily between 10<sup>th</sup> and 11<sup>th</sup> Avenues and 23rd and 25 ½ Streets in Tucson. As I noted in previous correspondence to Emilie Fisher on 5/28/2025, the PYT THPO does not have any information about the Day School located in that area, but the southern boundary of the project area does meet the northern extent of the Tribally designated Barrio Libre near reservation community. Because of the long history of Yaqui and O'odham inter-residence in the area around the APE, the Pascua Yaqui Tribe would like to be included in notification and consultation regarding any historic properties or Ancestors that might be encountered as a result of project work. Other than this request that the Tribe be included in notifications (Chairman Hernandez and I are the Tribe's designated NAGPRA representatives), the monitoring and discovery plan provided appears appropriate.

With warmest regards,  
Karl

Karl A. Hoerig, Ph.D.  
Tribal Historic Preservation Officer  
Pascua Yaqui Tribe  
5100 W. Calle Tetakusim, Room 130  
Tucson, AZ 85757  
(520) 883-5116  
[karl.hoerig@pascuayaqui-nsn.gov](mailto:karl.hoerig@pascuayaqui-nsn.gov)

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**From:** Rolanda Mazeika <[Rolanda.Mazeika@tucsonaz.gov](mailto:Rolanda.Mazeika@tucsonaz.gov)>  
**Sent:** Friday, July 25, 2025 3:39 PM  
**To:** Julian Hernandez <[jhernandez1@pascuayaqui-nsn.gov](mailto:jhernandez1@pascuayaqui-nsn.gov)>  
**Cc:** Karl Hoerig <[khoerig@pascuayaqui-nsn.gov](mailto:khoerig@pascuayaqui-nsn.gov)>; Avi Buckles <[abuckles@westlandresources.com](mailto:abuckles@westlandresources.com)>; Jennifer Levstik <[jlevstik@westlandresources.com](mailto:jlevstik@westlandresources.com)>; Desiree Aranda <[Desiree.Aranda@tucsonaz.gov](mailto:Desiree.Aranda@tucsonaz.gov)>; Johanna Hernandez <[Johanna.Hernandez@tucsonaz.gov](mailto:Johanna.Hernandez@tucsonaz.gov)>; Emilie Fisher <[Emilie.Fisher@tucsonaz.gov](mailto:Emilie.Fisher@tucsonaz.gov)>; Daniel Bursuck <[Daniel.Bursuck@tucsonaz.gov](mailto:Daniel.Bursuck@tucsonaz.gov)>  
**Subject:** Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

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Good afternoon Chairman Hernandez:

The City of Tucson is considering funding the project listed above with funds from the U.S. Department of Housing and Urban Development (HUD). The City has assumed environmental review responsibilities, including Tribal consultation related to historic properties, for the project under 24 CFR Part 58. The project is being considered for assistance in the Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs.

Please find attached the City's Section 106 Continuing Consultation letter and attachments.

A hard copy of the consultation letter will also be sent to you by mail.

Thank you for your consideration,  
Rolanda



**Rolanda Mazeika**  
Environmental Project Coordinator  
Housing & Community Development | City of Tucson  
[rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov)  
mobile 520.668.4453







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**RE: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1**

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**From** Desiree Aranda <Desiree.Aranda@tucsonaz.gov>

**Date** Wed 7/30/2025 8:10 AM

**To** Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>; Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>; Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>

**Cc** Avi Buckles <abuckles@westlandresources.com>; Jennifer Levstik <jlevstik@westlandresources.com>; Johanna Hernandez <Johanna.Hernandez@tucsonaz.gov>; Emilie Fisher <Emilie.Fisher@tucsonaz.gov>; Daniel Bursuck <Daniel.Bursuck@tucsonaz.gov>

Good morning, Sunday,

Thank you very much for your response. We will make note that the Salt River Pima-Maricopa Indian Community THPO defers to the Tohono O'Odham Nation THPO as lead in the consultation process.

All the best,  
Desiree

**Desiree Aranda**

*Historic Preservation Officer*

phone 520.837.6968

---

**From:** Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>

**Sent:** Monday, July 28, 2025 9:01 AM

**To:** Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>; Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>

**Cc:** Avi Buckles <abuckles@westlandresources.com>; Jennifer Levstik <jlevstik@westlandresources.com>; Desiree Aranda <Desiree.Aranda@tucsonaz.gov>; Johanna Hernandez <Johanna.Hernandez@tucsonaz.gov>; Emilie Fisher <Emilie.Fisher@tucsonaz.gov>; Daniel Bursuck <Daniel.Bursuck@tucsonaz.gov>

**Subject:** [EXTERNAL] RE: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

The SRPMIC THPO defers to the Tohono O'Odham Nation THPO as lead in the consultation process for this project.

Thank you.

B. Sunday Eiselt

Acting THPO, THPO Archaeologist

Salt River Pima-Maricopa Indian Community

10,005 E. Osborn Road

Scottsdale, AZ 85256

[Sunday.Eiselt@srpmic-nsn.gov](mailto:Sunday.Eiselt@srpmic-nsn.gov)

Office: (480) 362 3347



**From:** Rolanda Mazeika <[Rolanda.Mazeika@tucsonaz.gov](mailto:Rolanda.Mazeika@tucsonaz.gov)>

**Sent:** Friday, July 25, 2025 3:52 PM

**To:** Anton, Shane <[Shane.Anton@SRPMIC-nsn.gov](mailto:Shane.Anton@SRPMIC-nsn.gov)>; Eiselt, Sunday <[Sunday.Eiselt@srpmic-nsn.gov](mailto:Sunday.Eiselt@srpmic-nsn.gov)>

**Cc:** Avi Buckles <[abuckles@westlandresources.com](mailto:abuckles@westlandresources.com)>; Jennifer Levstik <[jlevstik@westlandresources.com](mailto:jlevstik@westlandresources.com)>; Desiree Aranda <[Desiree.Aranda@tucsonaz.gov](mailto:Desiree.Aranda@tucsonaz.gov)>; Johanna Hernandez <[Johanna.Hernandez@tucsonaz.gov](mailto:Johanna.Hernandez@tucsonaz.gov)>; Emilie Fisher <[Emilie.Fisher@tucsonaz.gov](mailto:Emilie.Fisher@tucsonaz.gov)>; Daniel Bursuck <[Daniel.Bursuck@tucsonaz.gov](mailto:Daniel.Bursuck@tucsonaz.gov)>

**Subject:** Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

**ATTENTION:** This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good afternoon Mr. Anton and Ms. Eiselt:

The City of Tucson is considering funding the project listed above with funds from the U.S. Department of Housing and Urban Development (HUD). The City has assumed environmental review responsibilities, including Tribal consultation related to historic properties, for the project under 24 CFR Part 58. The project is being considered for assistance in the Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs.

Please find attached the City's Section 106 Continuing Consultation letter and attachments.

A hard copy of this package will be sent to President Harvier by mail.

Thank you for your consideration,

Rolanda



**Rolanda Mazeika**  
Environmental Project Coordinator  
Housing & Community Development | City of Tucson  
[rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov)  
mobile 520.668.4453







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**Re: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1**

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**From** Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>

**Date** Wed 7/30/2025 3:29 PM

**To** Margaret Hangan <mhangan@yan-tribe.org>

**Cc** Jennifer Levstik <jlevstik@westlandresources.com>; Avi Buckles <abuckles@westlandresources.com>; Desiree Aranda <Desiree.Aranda@tucsonaz.gov>; Emilie Fisher <Emilie.Fisher@tucsonaz.gov>

Good afternoon Ms. Hangan:

Thank you for providing the Yavapai-Apache Nation's response to this consultation.

We appreciate your consideration of this project and look forward to working with you in the future.

Best,

Rolanda



**Rolanda Mazeika**  
*Environmental Project Coordinator*  
Housing & Community Development | City of Tucson

[rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov)

mobile 520.668.4453



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**From:** Margaret Hangan <mhangan@yan-tribe.org>

**Sent:** Monday, July 28, 2025 4:53 PM

**To:** Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>

**Subject:** [EXTERNAL] FW: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

Thank you for the opportunity to review these documents. The Yavapai-Apache Nation has no comments nor concerns.

Margaret Hangan

Archaeologist

Yavapai-Apache Nation

2400 W Datsi St

Camp Verde, AZ 86322

[mhangan@yan-tribe.org](mailto:mhangan@yan-tribe.org)

Cell:760 455-3024

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**From:** Marley Juan <mjuan@yan-tribe.org>

**Sent:** Monday, July 28, 2025 12:08 PM

**To:** Margaret Hangan <mhangan@yan-tribe.org>

**Subject:** FW: Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

Good Afternoon Margaret,

Received this, FYI.

Thanks!

**Marley Juan**

Yavapai-Apache Nation  
Yavapai Culture Manager  
Office#928-649-6963  
Cell#928-274-4723  
Nav Lithe- "That's All!"

---

**From:** Rolanda Mazeika <[Rolanda.Mazeika@tucsonaz.gov](mailto:Rolanda.Mazeika@tucsonaz.gov)>

**Sent:** Friday, July 25, 2025 4:04 PM

**To:** Marley Juan <[mjuan@yan-tribe.org](mailto:mjuan@yan-tribe.org)>

**Cc:** Avi Buckles <[abuckles@westlandresources.com](mailto:abuckles@westlandresources.com)>; Jennifer Levstik <[jlevstik@westlandresources.com](mailto:jlevstik@westlandresources.com)>; Desiree Aranda <[Desiree.Aranda@tucsonaz.gov](mailto:Desiree.Aranda@tucsonaz.gov)>; Johanna Hernandez <[Johanna.Hernandez@tucsonaz.gov](mailto:Johanna.Hernandez@tucsonaz.gov)>; Emilie Fisher <[Emilie.Fisher@tucsonaz.gov](mailto:Emilie.Fisher@tucsonaz.gov)>; Daniel Bursuck <[Daniel.Bursuck@tucsonaz.gov](mailto:Daniel.Bursuck@tucsonaz.gov)>

**Subject:** Section 106, Continuing Consultation - South 10th Avenue Phased Affordable Housing Redevelopment Project - Phase 1

**CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.**

Good afternoon Marley Juan:

The City of Tucson is considering funding the project listed above with funds from the U.S. Department of Housing and Urban Development (HUD). The City has assumed environmental review responsibilities, including Tribal consultation related to historic properties, for the project under 24 CFR Part 58. The project is being considered for assistance in the Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan State and Local Fiscal Recovery Funds (HOME-ARP SLFRF) Programs.

Please find attached the City's Section 106 Continuing Consultation letter and attachments.

A hard copy of this package will also be sent to Chairwoman Lewis by mail.

Thank you for your consideration,  
Rolanda



**Rolanda Mazeika**  
Environmental Project Coordinator  
Housing & Community Development | City of Tucson  
[rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov)  
mobile 520.668.4453





# White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

**To:** Ann Chanecka – Director, City of Tucson, Housing & Community Development

**Date:** August 12, 2025

**Re:** *South 10<sup>th</sup> Avenue Phase Affordable Housing Redevelopment Project - Phase I*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; July 25, 2025. In regard to this, please refer to the following statement(s) below;

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed Phase I housing redevelopment project at 1402 and 1480 South 10<sup>th</sup> Avenue, 1445 South 11<sup>th</sup> Avenue, and 425 West 23<sup>rd</sup> Street, in Tucson. Pima County, Arizona.

Please be advised, we have reviewed the information provided, and we have determined the proposed undertaking will have a ***“No Adverse Effect”*** on the White Mountain Apache tribe’s cultural heritage resources and/or historic properties.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

*Mark Altaha*

White Mountain Apache Tribe – THPO  
Historic Preservation Office



# GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2193, SACATON, AZ 85147

## TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162

August 13, 2025

Ann Chanecka, Director  
City of Tucson Housing & Community Development  
310 North Commerce Park Loop  
Tucson, Arizona 85745

RE: Section 106 Continuing Consultation South 10<sup>th</sup> Avenue Phased Affordable Housing Redevelopment Project Phase I, 1402 and 1480 South 10<sup>th</sup> Avenue, 1445 South 11<sup>th</sup> Avenue, and 425 West 23<sup>rd</sup> Street, Tucson, Pima County, Arizona 85713

Dear Director Chanecka,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received your consultation documents dated July 25, 2025. The GRIC-THPO initially replied to this undertaking on June 4, 2025. The City of Tucson is considering funding the redevelopment of the South 10<sup>th</sup> Avenue Phased Affordable Housing Redevelopment Project Phase I located at 1402 and 1480 South 10<sup>th</sup> Avenue, 1445 South 11<sup>th</sup> Avenue, and 425 West 23<sup>rd</sup> Street, Tucson, Pima County, Arizona. Funding for this undertaking will be provided by the U.S. Department of Housing and Urban Development (HUD), Economic Development Initiative-Community Project Funding (CPF) and HOME Investment Partnerships American Rescue Plan Program State and Local Fiscal Recovery Funds (HOME-ARPPSLFRF). The project will occur on six (6) parcels of land comprising 14.5 acres of City of Tucson owned property and right-of-way (ROW). Phase I of this undertaking will consist of: planning; engineering; environmental and other studies; permitting, demolition of existing buildings; site clearing and grading; improvements to waterlines, wastewater lines, electric lines, natural gas lines, and telecommunications; and construction of sidewalks, walkways and a bridge providing pedestrian and bicycle access. This undertaking is a Federal undertaking subject to review under Section 106 of National Historic Preservation Act (NHPA).

The project is located in Tucson's Barrio Santa Rita Park-West Ochoa Neighborhood Association, outside and south of the Downtown Archaeological Sensitivity Zone. Historic properties were identified within the project area and WestLand Resources has prepared State of Arizona Historic Property Inventory Forms (AZHPIF) for each of these buildings: 1) El Paso and Southwestern Roadbed-Sector 5 and Sector 6. This property (the same property in 2 different locations of the project area) is not Register eligible; 2) El Paso Southwestern Roundhouse. The property is Register eligible and will not be affected by this undertaking; 3) An office building that is not Register eligible; 4) A bathroom that is not Register eligible; 5) Container Buildings 1 and 2 that are not Register eligible; 6) A storage building that is not Register eligible; and 7) The Tucson Water Warehouse that is not Register eligible.



Statistical Research, Inc. (SRI) archaeologically surveyed the project area. No archaeological sites were identified within the project area. SRI confirmed and documented that site AZ BB:13:397, the Southern Pacific Railroad Roundhouse building, was relocated outside of the project area and this building will not be affected by this undertaking. In addition, SRI archival research identified a possible former Presbyterian day school for Native American students.

The City of Tucson requested SRI to conduct additional research of the project area to verify if a former day school for Native American Students is present within the project area. SRI report *"Historical Background Report for the 10<sup>th</sup> Avenue Affordable Housing Development Project (City of Tucson Project Number COT 23-006), Pima County, Arizona (Technical Report 25-55"* has been attached for review and comment. The City of Tucson reports that the project area is located within a neighborhood originally platted as the "Native American Addition" in 1904 and was known colloquially as the "Papago Village." The Native American Additions served as a residential area for local O'odham in Tucson during the early 1900s. A former Presbyterian day school for local O'odham students was once located within or directly adjacent to the project area. Outbuildings associated with the day school and the home of Presbyterian minister Frazier Herndon are depicted on 1919 Sanborn Fire Insurance Maps. Additional features associated with the Native American Addition may be located within or adjacent to the project area. The day school (Tucson Indian Day School) appears to be separate from the Tucson Indian Boarding School, which is located along the Santa Cruz River, northeast of current Interstate 10 and Ajo Way. The project area has been heavily disturbed and features associated with day school are no longer visible on the ground surface.

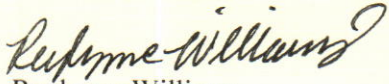
The City of Tucson is recommending archaeological monitoring for Phase I of this undertaking that will comply with archaeological monitoring methodology presented in *"A Plan for Monitoring and Discovery within Public Right-of-way in Eleven Archaeological Sensitivity Zones in the city of Tucson and Pima County"* and *"Cultural Resources Monitoring Plan for Certain Maintenance and Repair Project in Pima Count, Arizona,"* The City of Tucson has also attached *"Monitoring and Discovery Plan for the 10<sup>th</sup> Avenue Affordable Housing Redevelopment Project (City of Tucson Project Number COT 23-006), Pima County Arizona (Technical Report 25-55)* for review and comment. The City of Tucson is proposing to: 1) Complete a historical research report documenting land use of the project area (attached document); 2) Prepare a project-specific Monitoring and Discovery plan as an addendum to the City's and Pima County's standard monitoring plans (attached document); 3) Obtaining a standard Burial Discovery Agreement from the Arizona State Museum (ASM) prior to the beginning of archaeological monitoring activities; 4) Implementing the project's monitoring and discovery plan and follow unanticipated discovery recovery or mitigation steps; 5) Provide a project-director-level archaeologist/bioarchaeologist as the archaeological monitor during ground disturbing activities in the project area; and 6) Preparing a technical report at the end of monitoring activities. The City of Tucson has made a finding of no adverse effect for this undertaking.

The GRIC-THPO concurs with a finding of no adverse effect and with recommendations for archaeological site monitoring. The historic background report is well written and is an acceptable reporting document. The monitor and discovery plan is also an acceptable document. We trust that in the event of any discovery, our office will be contacted. The GRIC-THPO will continue to participate in the consultation process for this undertaking. The project occurs within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-

Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'Odham Nation). The GRIC-THPO defers to the Tohono O'Odham Nation as lead in the consultation process.

Thank you for consulting with the GRIC-THPO. If you have any questions please do not hesitate to contact our office at 520-562-7162.

Respectfully,

A handwritten signature in cursive script, reading "Reyllynne Williams".

Reyllynne Williams  
Tribal Historic Preservation Officer  
Gila River Indian Community





April 9, 2025

Rolanda Mazeika  
City of Tucson  
310 N. Commerce Park Loop  
Tucson, AZ 85745

Dear Ms. Mazeika:

Subject: Revised HUD-Compliant Noise Assessment for the “South 10<sup>th</sup> Avenue Site”, Tucson, AZ  
CEC Project: 346-766

Civil & Environmental Consultants, Inc. (CEC) is pleased to present the City of Tucson (City) with the results of the HUD-compliant noise assessment for the six (6) Pima County Assessor’s Parcel Numbers (APNs) that comprise the City of Tucson Housing and Community Development’s (HCD) “South 10<sup>th</sup> Avenue Site”, as referenced in Section 1.0.

## 1.0 SCOPE OF SERVICES

In accordance with our proposal, dated October 14, 2024, CEC subcontracted with Spendiarian & Willis Acoustics & Noise Control LLC (SWANC) to complete a single HUD-compliant noise assessment inclusive of the following six (6) Pima County APNs in Tucson, AZ:

APN	Address	Owner
118-20-037A	1402 S. 10 <sup>th</sup> Ave.	The City of Tucson
118-20-036A	425 W. 23 <sup>rd</sup> St.	
118-20-0750	No address	
118-20-078A	No address	
118-20-077A	1480 S. 10 <sup>th</sup> Ave.	
118-20-076A	1445 S. 11 <sup>th</sup> Ave.	

CEC understands that the City is in the early stages of project planning and development for the redevelopment of the site to provide a mix of housing for low-to-moderate income households. The Noise Assessment was requested in anticipation of the planned property redevelopment and to satisfy the regulations of 24 CFR Part 51, Subpart B.



## 1.1 Traffic Study

Upon an initial review of the traffic information available in proximity to the subject property, SWANC noted that the data, provided by the Pima Association of Governments (PAG), did not differentiate the medium and heavy truck counts from regular automobile traffic. As a result, SWANC recommended that CEC contract with a third party to complete a 24-hour traffic study that differentiated between the different classes of vehicular traffic. In accordance with the change order requested on November 17, 2024, CEC contracted with Field Data Services of Arizona, Inc. to conduct a traffic study in proximity to the subject property. The traffic study was conducted on December 3, 2024, and included the following two monitoring stations:

- 22<sup>nd</sup> Street, between 11<sup>th</sup> Avenue and 10<sup>th</sup> Avenue
- 10<sup>th</sup> Avenue, between 23<sup>rd</sup> Street and 25<sup>th</sup> Street

The traffic data, as reported by Field Data Services of Arizona, Inc., is included as Attachment 1.

## 1.2 HUD-Compliant Noise Assessment

As noted above, CEC subcontracted with SWANC to complete a HUD-compliant noise assessment inclusive of the six (6) Pima County APNs that comprise the subject property. The noise assessment was conducted from the site's boundaries, as requested by HCD, and included the following:

- Identify noise assessment locations
- Inventory transportation noise sources
- Create the HUD noise assessment

The results of SWANC's noise assessment are presented in the Preliminary HUD Noise Assessment Report provided in Attachment 2.

## 2.0 CONCLUSIONS & RECOMMENDATIONS

Based on the findings of the HUD-Compliant Noise Assessment, as provided in the Executive Summary of the Preliminary HUD Noise Assessment Report (Attachment 2), SWANC concluded that the Day/Night Noise Level (DNL) for the proposed site is between 65 and 70 dBA. Based on the DNL, a noise abatement plan will be needed for residential structures as well as shielding for outdoor spaces from I-10 to meet HUD standards. It was noted the primary sound source on the site is I-10. SWANC recommends the buildings be arranged on the west, north, and south perimeter of the site to provide shielding for outdoor gathering spaces.

Rolanda Mazeika – City of Tucson  
CEC Project: 346-766  
Page 3  
April 9, 2025

### **3.0 CLOSING**

CEC appreciates the opportunity to provide our professional consulting services to the City of Tucson. Should you have any questions concerning this project, please do not hesitate to contact Chad Hancock at (520) 488-9205.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

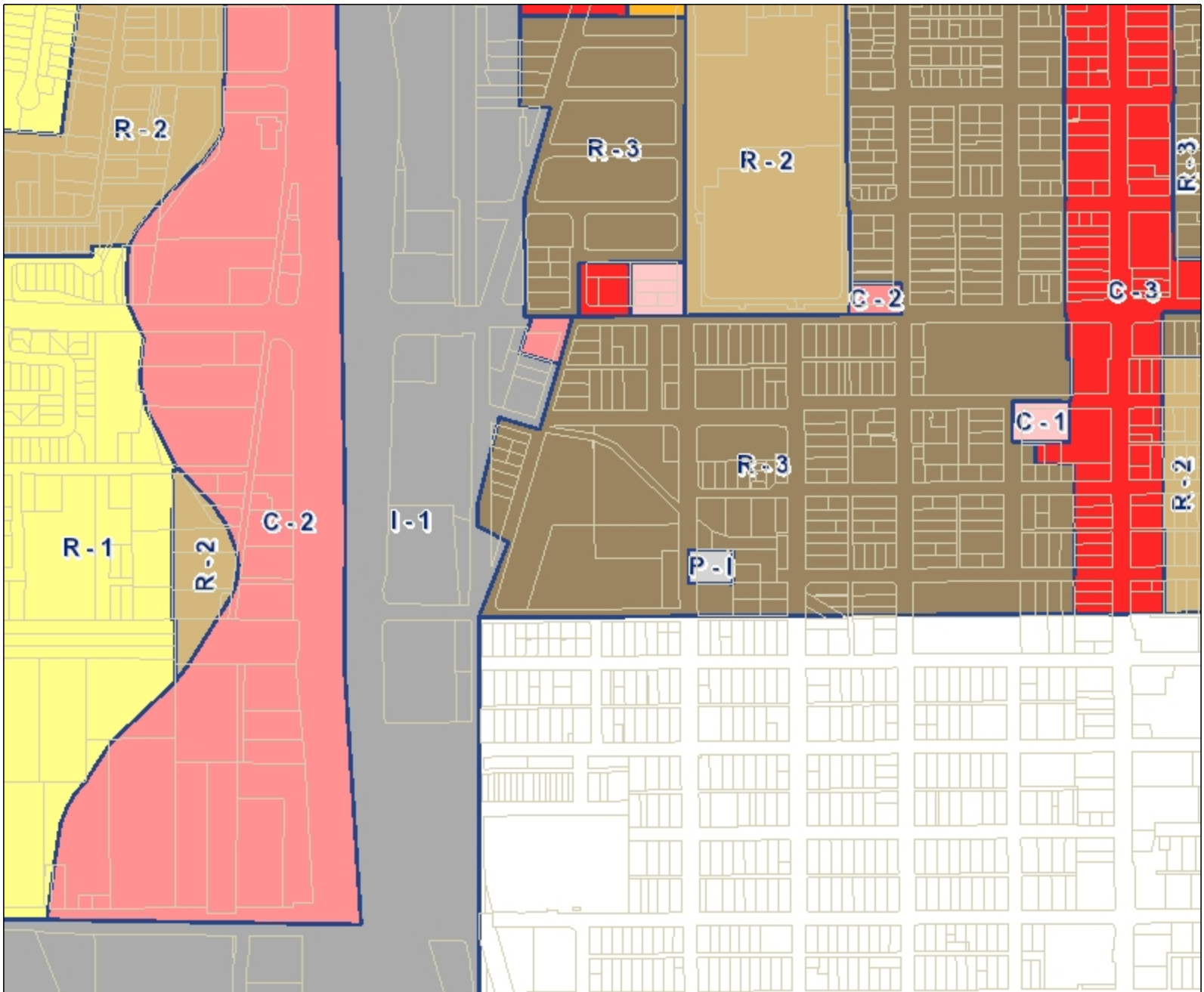
A handwritten signature in blue ink, appearing to read "Chad S. Hancock".

Chad Hancock  
Project Manager

A handwritten signature in blue ink, appearing to read "Ryan Dunning".

Ryan Dunning  
Vice President

Attachments: 1: Traffic Study  
2: Preliminary HUD Noise Assessment



## Notes

Zoning Map

## Legend

Parcels

Tucson Zoning

<all other values>

PAD

R-1

HLR-1

HR-1

NR-1

R-2

HLR-2

HR-2

NR-2

R-3

HR-3

NR-3

UR-3

C-1

HC-1

HLC-1

UC-1

UHC-1

C-2

HC-2

C-3

HC-3

HLC-3

UC-3

HNC

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HLRX-2

HRX-2

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I-1

I-2

OCR-1

OCR-2

HOXR-2

MU

RH

SH

RV

MH-1

1: 9,028



1,457.6 0 728.82 1,457.6 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
© City of Tucson

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

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## 2025 FFIEC Geocode Census Report

Address: 1402 S 10th Ave, Tucson, Arizona, 85713

MSA: 46060 - TUCSON, AZ

State: 04 - ARIZONA

County: 019 - PIMA COUNTY

Tract Code: 0054.00

### Summary Census Demographic Information

Tract Income Level	Moderate
Underserved or Distressed Tract	No
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$96,100
2025 Estimated Tract Median Family Income	\$67,087
2020 Tract Median Family Income	\$48,500
Tract Median Family Income %	69.81
Tract Population	3585
Tract Minority %	61.87
Tract Minority Population	2218
Owner-Occupied Units	503
1- to 4- Family Units	1433

### Census Income Information

Tract Income Level	Moderate
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$69,466
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$96,100
% below Poverty Line	28.99
Tract Median Family Income %	69.81
2020 Tract Median Family Income	\$48,500
2025 Estimated Tract Median Family Income	\$67,087
2020 Tract Median Household Income	\$45,040

### Census Population Information

Tract Population	3585
Tract Minority %	61.87
Number of Families	550
Number of Households	1649
Non-Hispanic White Population	1367
Tract Minority Population	2218
American Indian Population	95
Asian/Hawaiian/Pacific Islander Population	51
Black Population	140
Hispanic Population	1798
Other/Two or More Races Population	134

### Census Housing Information

Total Housing Units	2035
1- to 4- Family Units	1433
Median House Age (Years)	78
Owner-Occupied Units	503
Renter Occupied Units	1146
Owner Occupied 1- to 4- Family Units	486
Inside Principal City?	YES
Vacant Units	386