



SHPO - 2014 - 0485 (123453)
ARIZONA STATE HISTORIC PRESERVATION OFFICE

CITY OF TUCSON
HOUSING & COMMUNITY DEVELOPMENT DEPARTMENT
ADMINISTRATION DIVISION



January 9, 2014

James W. Garrison
State Historic Preservation Officer
1300 West Washington St.
Phoenix, AZ 85007

RE: Downtown Motor Apartments, Tucson Arizona

Dear Mr. Garrison:

In relation to its application to the Arizona Department of Housing for Low Income Housing Tax Credits (LIHTC), the developer of a project to construct affordable housing at 383 South Stone Avenue previously consulted with the Arizona State Historic Preservation Office (AZ SHPO) to develop a Memorandum of Agreement (MOA) about the resolution of adverse effects of the project on this historic property. The developer has recently applied to the City of Tucson (City) for HOME loan funding from the federal department of Housing and Urban Development (HUD). The use of these funds makes the project a federal undertaking subject to review under Section 106 of the 1966 National Historic Preservation Act (NHPA), as amended, 54 U.S.C. § 306108 (formerly 16 U.S.C. § 470f), and its implementing regulations, 36 C.F.R. Part 800.

The City has been designated a Certified Local Government under Section 101(a) of the NHPA, and has a role in the NHPA compliance process. The developer's application to the City for HOME loan funding triggers an existing Programmatic Agreement (PA) between the City, the AZ SHPO, and the Advisory Council on Historic Preservation (ACHP). Under the authority of this PA, the City has assumed HUD's environmental review responsibility as the Responsible Entity for this HOME-funded project in accordance with its Environmental Review Procedures, 24 C.F.R. Part 58 (Part 58). The triggering of this PA therefore requires an additional Section 106 consultation process and new MOA for this



project. As Director of the City Department of Housing and Community Development, I am acting as the Agency Official under Section 106 of the NHPA and as the Certifying Officer under Part 58, and am leading the Section 106 consultation process for this project.

The property where the project is located is a recently designated Contributing Property within the Armory Park National Register District, and is adjacent to the boundary of the Barrio Libre National Register District. Originally, the City defined the Area of Potential Effects (APE) for this undertaking according to 36 CFR § 800.16(d) as the Armory Park Historic District. Following public input and conversations with consulting parties we have expanded the APE to include the Armory Park and Barrio Libre Historic Districts (see Attachment A). Steps taken to identify historic properties within the project APE include checking the National Register of Historic Places, referencing maps of National Register-listed properties within the City, and an archaeological site records check (see Attachment B).

Based on a building condition report (see Attachment C), it is not economically feasible to rehabilitate the entirety of the existing 1941 building because of the numerous structural problems and abundant hazardous materials that would need to be addressed. The proposed project will instead include partial demolition of the existing building while retaining and rehabilitating its street-facing portions and restoring the original sign; and construction of an attached four-story building containing 44 housing units (see Attachment D).

It is the finding of the City that the planned project will adversely affect the Contributing Property at 383 South Stone Avenue because it will involve demolition of the majority of the existing 1941 early modern building; there are no adverse effects on the Armory Park and Barrio Libre Historic Districts because the proposed new construction will match the height of an Armory Park Historic District Contributing Property behind the project property, and the partial demolition and new construction will not alter the characteristics that qualified them for inclusion in the National Register of Historic Places, as defined in their National Register forms. According to those forms, Armory Park Historic District is significant as a representation of changes in residential architectural styles in Tucson between the arrival of the railroad and the end of World War II; Barrio Libre Historic District is significant as a representation of Hispanic building traditions and Territorial Period architecture in Tucson.



January 9, 2015

Because it is not economically feasible to rehabilitate the entirety of the existing building, and new construction cannot be designed to create the number of affordable housing units needed to receive the LIHTC without demolishing the majority of the existing building, avoidance of adverse effects on this Contributing Property is not possible. However, the project is designed to minimize the adverse effects by retaining and rehabilitating the street-facing portions of the historic building and restoring its original sign. A Memorandum of Agreement (MOA) will be developed in consultation with the AZ SHPO and other consulting parties to stipulate how the adverse effects of the project will be resolved through mitigation measures.

Please review this letter and its attachments and indicate whether the AZ SHPO concurs with the definition of the APE, the identification of historic properties affected, and the finding of adverse effect. After the City receives the AZ SHPO concurrence, it will notify the ACHP of the finding of adverse effect and inquire whether it chooses to participate in the development of the MOA.

Sincerely,

Sally Stang
Director

Department of Housing and Community Development
City of Tucson

TO THE MOTOR HOTEL ONLY

Attachments:

- A. Map of the Area of Potential Effect.
- B. Archaeological site records check report.
- C. Building condition report.
- D. Conceptual design of proposed project.

CONCUR

Arizona State Historic Preservation Office

13 JAN 15

