

HCDAdmin - downtown motor hotel_design

From: Philipp Neher <philipp@rickjoy.com>
To: "mbeerling@compassaffordablehousing.org"
<mbeerling@compassaffordablehousing.org>, "mshoemacher@gmail.com"
<mshoemacher@gmail.com>
Date: 11/21/2014 10:28 AM
Subject: downtown motor hotel_design
CC: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
Attachments: 20141121083127295.pdf

Hello Maryann and Mark,

While your Downtown Motor Hotel project is under governmental review and in public review phase, I would like to encourage you to reconsider the architectural design. You have signaled to proceed even without the HUD loan, therefore further substantial improvements are independent of the outcome of the application process.

Here are some thoughts:

- Why do you need a drive-through garage with an entry from Stone Avenue? Could you provide ingress and egress from the Alley only? The width of the access street between the two sides of parking spaces should be wide enough anyway for creating an in-out situation, especially considering the turning radii required for entering and exiting each parking spot.

You could avoid the garage entry to Stone, which is a completely atypical element in the local streetscape. If your project was located one site further South or across the street, this would not be allowed based on historic zoning. Furthermore, you could add quality open space to your project's most exposed front instead of an asphalt driveway. Architecturally, you could ground your building by closing the garage entry – groundedness is one of the principal elements in the local building culture.

- A big problem of the current design is the massing and the resulting elevations. For example, it is to be expected that the blunt northern façade will be the most identifiable face of Armory Park and the Barrio in view from downtown.

Attached is a quick sketch that takes into consideration the square footage that you have brought forward, but also shows a massing study that would decrease the perception of size by fragmenting the volume. By creating open spaces between the volumes, there will be almost only corner units with the opportunity for natural light from two sides. Thus, you can avoid the unlit and oddly shaped rooms, increasing lifestyle quality and positive identification by the inhabitants. In my view, these separate volumes could have different building heights, giving you an opportunity to reduce height where appropriate.

Furthermore, I suggest that you use our climate to your favor and create a shaded outdoor circulation between the masses instead of the double loaded corridor. All volumes can continue to be efficiently connected by one spine as in your current design. This would offer naturally lit quality space in front of

the apartments, considerably increasing the lifestyle value for the inhabitants.

This kind of massing would reduce the scale of the overall building, it would add open space to the site, it would increase the quality spatial environment in the common areas and in the units, it would add access to natural light and vegetation to the living experience and most importantly, with hard work, you might be able to achieve something that is sensitively placed in its context.

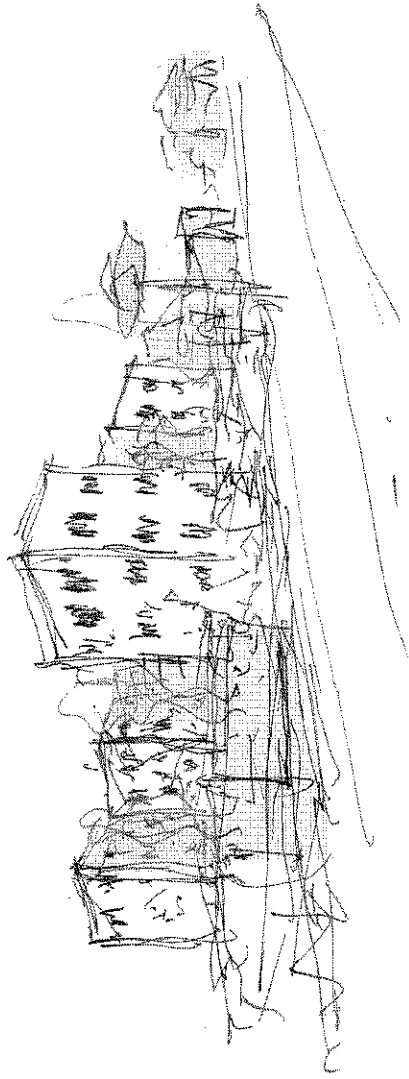
These thoughts are by no way the only direction for improvements, but hopefully foster a fresh mind for the question 'What if?'

Further studies could show if these changes encompass downsizing the program. Nevertheless, if I remember right, it was mentioned in one of the previous meetings that a number in the low 30's was critical to making a project like this operational. While it would have to be studied if design changes increase your budget, the HUD funds, if granted, could be used to make the urgently recommended adjustments. Public money for the public good.

The public discussion continues to confirm that affordable housing options are needed, but it also confirms that quality thinking is required to implement it into the local urban context, in honoring the neighborhoods that are at the core of Tucson's urban identity. Destroying historic heritage while there is an abundance of larger sized and less expensive open land between Congress Street and 22nd does not seem a justifiable path and should not be supported by HUD. But whatever will be decided, please apply more inclusive, higher standards to your thinking.

Sincerely,
Philipp

Philipp Neher
Rick Joy Architects | 400 South Rubio Avenue | Tucson, Arizona | 85701 | philipp@rickjoy.com | p +1 520 624 1442 | f +1 520 791 0699



HCDAdmin - Womankraft Art Center notes on alleged Downtown Motor Hotel

From: Womankraft Art <womankraftaz@yahoo.com>
To: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 5:12 PM
Subject: Womankraft Art Center notes on alleged Downtown Motor Hotel

Hello,

This message is coming to you from the core volunteers and members of the Womankraft Art Center. Womankraft is located at 388 s. Stone Avenue - directly across the street from the proposed 44 Unit building.

Womankraft is a non-profit art center founded in 1974. We are 100% volunteer run. We have been at our 388 Stone address since 1991.

Our feelings are:

For one, it's an inappropriate site with an inappropriate building. No parking forethought and description of the rooms is closer to jails cells, as opposed to homes. Is this is the best we can do?

We were horrified by the emails sent back and forth between the developer and the Historic preservation office and quoted in the Tucson Weekly Article. Did anyone from HUD read these public records?

The biggest issue for us is WHY is this a done deal? It seems to be finalized, already done in back rooms, when everything is supposed to go through the neighborhoods. This is the kind of stuff that reeks of graft and bribery when backroom deals are done behind the people.

Womankraft has spent 40 years in this community making this Historic neighborhood decent, and many other people and homeowners have been working here long before that! We have no interest in a 4 story building - the only one in the area we might add, come along and lower value of properties and create more parking issues. It is unreasonable to expect less than half of the units to be people without automobiles. It is unreasonable to the potential renters survive in rooms with no ventilation.

We would also like to mention we received NO notification at all from the developers with intent or information. We have since sent members to the meetings, we have personally called and contacted the Historic Preservation Office, and the City Hotline. We contacted Kgun9 News in the hopes of expressing the truth of how Armory Park and Barrio Libre feel about this issue.

We would very much like to urge you to stop this from happening, we encourage a land swap for something that fits better into the aesthetics of our neighborhood- a moderate two story for another moderate two-story.

It is our desire to see Tucson's historic neighborhoods well restored and pleasant for visitors and tourists to enjoy. Having just had our Historic Status confirmed, we personally feel the necessity of keeping Tucson's architectural history alive.

Please do not hesitate to call us for further explanation. We would love to express our worries of this tragedy. [\(520\)629-9976](tel:520629-9976).

-Grace Rhyne
Executive Director
Womankraft Art Center
[\(520\) 629-9976](tel:520629-9976)

HCDAdmin - Comments on Downtown Motor Hotel - WomanKraft Art Center

From: Grace Rhyne <gerhyne.garay@gmail.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 5:09 PM
Subject: Comments on Downtown Motor Hotel - WomanKraft Art Center

Hello,

This message is coming to you from the core volunteers and members of the WomanKraft Art Center. WomanKraft is located at 388 s. Stone Avenue - directly across the street from the proposed 44 Unit building.

WomanKraft is a non-profit art center founded in 1974. We are 100% volunteer run. We have been at our 388 Stone address since 1991.

Our feelings are:

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-Grace Rhyne
Executive Director
WomanKraft Art Center
(520) 629-9976

HCDAdmin - Fwd: Downtown Motor Hotel, Tucson, Arizona - Section 106 Consulting Party request

From: Demion Clinco <demion.clinco@preservetucson.org>
To: <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 3:06 PM
Subject: Fwd: Downtown Motor Hotel, Tucson, Arizona - Section 106 Consulting Party request
Attachments: 106ConsultParty Downtown Motor Hotel.pdf

----- Forwarded message -----

From: **Demion Clinco** <demion.clinco@preservetucson.org>
Date: Thu, Nov 20, 2014 at 2:42 PM
Subject: Downtown Motor Hotel, Tucson, Arizona - Section 106 Consulting Party request
To: nancy.e.boone@hud.gov
Cc: James garrison <jgarrison@azstateparks.gov>, Jim McPherson <jmcpersoniii@gmail.com>, Zach.R.Carter@hud.gov, Nicole.Ewing-Gavin@tucsonaz.gov, jloichinger@achp.gov, Barbara Pahl <BPahl@savingplaces.org>

Re: Downtown Motor Hotel; 383 South Stone Ave. Tucson, AZ.

Dear Nancy E. Boone,

Tucson Historic Preservation Foundation is deeply concerned about the proposed Downtown Motor Hotel Project in Tucson, Arizona and its potential effects on historic properties. We have not been notified but understand that consultation has been initiated under Section 106 of the National Historic Preservation Act (NHPA) for the project. Tucson Historic Preservation Foundation would like to participate actively in the review process, as a "consulting party" under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(5).

The Tucson Historic Preservation Foundation, founded 1985, is a 501(c)3 non profit organization dedicated to preserving and celebrating the distinctive and irreplaceable historic resources of Tucson, Pima County and Southern Arizona. Tucson Historic Preservation Foundation has extensive knowledge about this property and historic and cultural resources in the area.

Because of Tucson Historic Preservation Foundation's knowledge and concern about the potential adverse affect of this project on the Downtown Motor Hotel and the adverse effect to both the Armory Park and Barrio Historico National Register of Historic Places Districts, we believe we can provide important information and a valuable perspective as a consulting party under Section 106. Please include Tucson Historic Preservation Foundation in your distribution list for public notices of any meetings, and for the circulation of any documents for comment.

We are also very concerned about the handling of the section 106 process, the lack of inclusion of consulting parties and highly limited community participation. The formal letter is attached.

We look forward to participating as the review and consultation process moves forward for the Downtown Motor Hotel.

Sincerely,

Demion Clinco

President, Tucson Historic Preservation Foundation

PO Box 40008

Tucson, Arizona 85717

www.preservetucson.org

demion.clinco@preservetucson.org



TUCSON
HISTORIC
PRESERVATION
FOUNDATION

November 19, 2014

Nancy E. Boone
Federal Preservation Officer
US Department of Housing and Urban Development
Office of Environment and Energy
Environmental Planning Division
451 7th Street SW, Room 7248
Washington, DC 20410
Voice: 202.402.5718
Fax: 202.708.3363

Re: Downtown Motor Hotel; 383 South Stone Ave. Tucson, AZ.

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Sincerely,



Demion Clinco
President
Tucson Historic Preservation Foundation
PO Box 40008
Tucson, Arizona 85717
www.preservetucon.org
demion.clinco@preservetucson.org

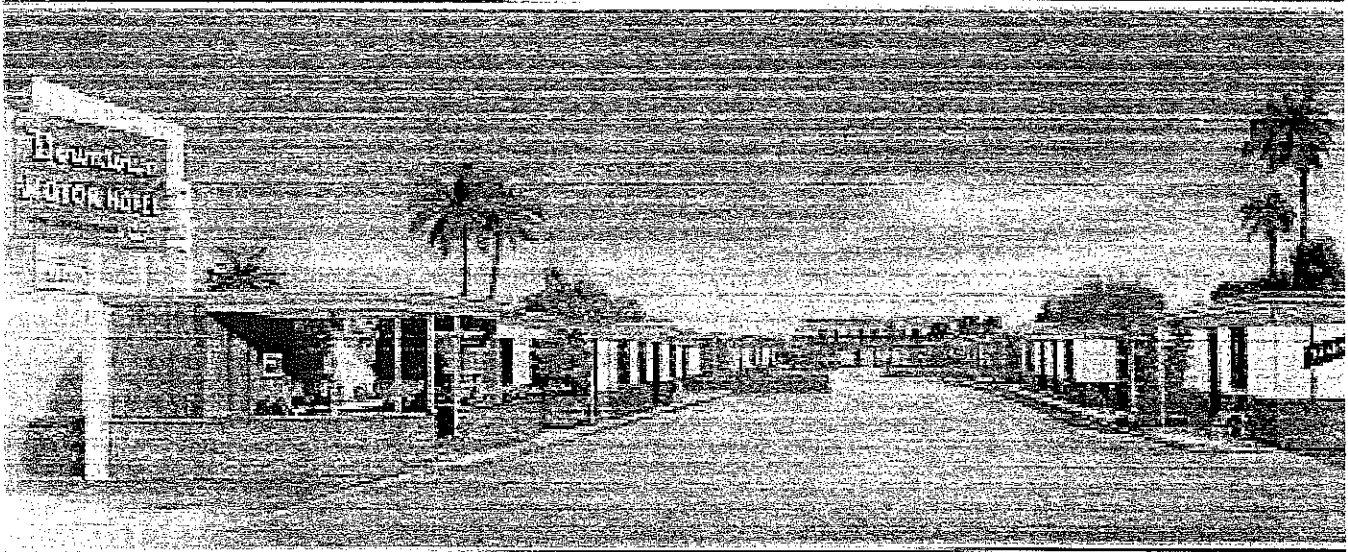
cc: Advisory Council on Historic Preservation
State Historic Preservation Office
City of Tucson - Manager's Office
National Trust for Historic Preservation--Regional Office
Arizona Preservation Foundation

HCDAdmin - Approve of Construction of 44 Units at Downtown Motor Lodge Site

From: Danna Auriana <danna.auriana@yahoo.com>
To: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 12:25 PM
Subject: Approve of Construction of 44 Units at Downtown Motor Lodge Site

I would like to see more affordable housing in the downtown area for those with low income to help increase diversity and improve the culture of the downtown Tucson. I would especially like to see the homeless including Veterans be given an opportunity to live in the downtown area since most housing there is too expensive for them. I approve the construction of 44 units of affordable housing at the site of the Downtown Motor Lodge.

Downtown MOTOR HOTEL



OFFICIAL 

MEMBER PREFERRED MOTELS

TUCSON'S LARGEST AND FINEST MOTEL IN THE HEART OF THE CITY

The Barrio Historico Historic District Advisory Board voted unanimously on November 18, 2014 at a publicly noticed meeting, "that the demolition of the historic building and proposed construction of a four story building at the Downtowner Motor Lodge site both would cause irreparable damage to the historic zones". The Board also voted unanimously "that they doubt the legality of the City of Tucson process regarding this development to date".

The style of the proposed four story building can best be characterized as a generic three stories of wood frame on top of a parking garage totaling four stories. It possesses no characteristics of Armory Park or Barrio Historico Historic Districts, nor would anyone ever identify it as related to these historic zones or even this city. It is a generic three stories of frame stucco double loaded corridor housing units sitting on top of a masonry parking garage. It is a case of a developer trying to cram too many apartments on too small of a site. It is completely out of place having nothing to do with the character of Armory Park (which is largely one and two story Victorian Territorial style) or the character of Barrio Historico (which is mostly one story adobe).

There are no four story buildings anywhere in Armory Park or in Barrio Historico. The proposed building's development zone surrounding it (Stone Avenue, 14th Street, Russell Avenue, and 15th Street) contains a one story Victorian brick house on Stone, two one story Victorian adobes on 15th Street, one one story brick Victorian guesthouse on Russel Avenue, a six unit one story adobe craftsman bungalow complex on 14th Street and a two story plus attic Victorian brick building beside it on Stone Avenue. Across the Street west of the site on Stone Avenue are a pair of two story Victorian houses that are actually located in the Barrio Historico Historic District although they clearly have the character and design of representative of the Armory Park District.

The Developer of the four story likes to compare the size and height of the proposed building to the historic Convent on 15th Street and 6th Avenue. The Convent was a religious building and not a residential building, nor is it in the developer's development zone, nor is it characteristic of Armory Park. The comparison is also an insult to the architectural character and quality of the historic Convent which is two stories high with the first floor made of stone and the second floor made of brick. It has an extremely high pitched shingle roof, tall wooden double hung windows split two over two, a classic entry with columns and pediment, stone stair entry, a generously landscaped front yard, excellent materials and details, and completely different proportions, rhythm, and character than the proposed four story building. Equally obvious the Convent does not sit on top of a garage nor is the entry to the building via an asphalt road. The only similarity between the two buildings is that they are both large.

Development Services Department Planner Frank Dillon for information on the Downtown Motor Lodge project. He would provide no information except to refer me to the City Preservation Officer Jonathan Mabry. Jonathan Mabry in response to telephone calls said he had no public records or public files on the project. His remarks were clearly false and probably illegal. Compass Housing delayed meeting with the Advisory Board for months but finally agreed to meet with the Advisory Board on September 17. It is unknown if they were merely patronizing the Advisory Board or if they had learned that the existing Memorandum of Agreement was invalid.

At the first meeting of the current 106 Process on October 28 neither Jonathan Mabry nor other City staff nor the developer presented a single floor plan, elevation, section, or site plan of the proposed four story building nor a single floor plan, elevation, section, or site plan of the historic building nor its history. It seems a rather odd way to gain public input about a project when such basic information was not provided to the public. Nor was any clear explanation of 106 process given, nor did the City or the Developer explain the previous signed Memorandum of Agreement, nor did they explain that Jonathan Mabry the City's Preservation Officer had already given the Developer a letter on May 13 giving his finding that there would be no adverse effect on the Historic Zones if the historic Joesler building was torn down. It should also be pointed out that again in the current 106 process as with first 106 process the majority of residents and property owners of Barrio Historico and Armory Park were not notified of the the October 28 meeting nor presumably of the meeting tonight November 20.

Regarding mitigation of the impacts of this project, the clearest and most appropriate mitigation would be not to build the four story building and to restore the historic Joesler building for housing for low income people, the stated mission of the non-profit part of the non-profit for-profit developers involved in this project. Restoring the historic building would meet the aim of providing housing for low income people, and remove the negative impact of the four story incompatible building.

A second means of mitigating the impact of the four story building would be to move it to a non historic area of the downtown such as the property owned by the City of Tucson on Toole Avenue north of the Transit Center. If the City were to provide that land the developer could sell or exchange the Downtown Motor Lodge site. It has also been suggested that the developer consider locating the project near the Mercado on West Congress again selling their Motor Lodge site. At a public meeting with the City staff at the main library last month these ideas were clearly expressed and supported by historic zone residents. On October 28 it became apparent that City staff had not explored those ideas. Nor had the developer. The developer has expressed a fear of losing their funding, however if the very real negative impacts of the project are to be mitigated they need to bring their funding sources into the process and be prepared to change the project. This could include rehabilitating the historic building or moving the project. Likewise if the City of Tucson is serious about mitigating the negative impacts of the four story building on the historic zones they need to correct their past behavior, operate in a transparent manner, comply with state and federal law, and recognize the validity of the concerns and recommendations of the historic zone residents.

At a meeting of the Tucson Pima County Historical Commission on Tuesday October 18 regarding this project, residents of the Historic Districts made the same objections to the project outlined above. The developer made a power point presentation that never showed the building in context, never showed the four story building's neighbors. This project clearly has been based to date on too many units (44) for this site, a non transparent process, and attempts to pull the wool over the eyes of the historic zone residents and possibly others. In this process they have been aided by some City staff. If the meeting tonight November 20 is merely a repeat of the developer's power point presentation of their out of scale four story building, no plans, sections, elevations of the historic building or the four story building, no acknowledgement that the proposed building is clearly damaging to the historic zones, then process is clearly a fraud and HUD and the Arizona State Housing Office should take note of this, intervene, and condition their funding.

Jody Gibbs, Architect
Co-chair person
Barrio Historico Historic District Advisory Board
j.gibbsarchitect@gmail.com 520 878 8740

November 18, 2014

Comments on the Section 106 review for the Downtowner Motel at 383 S. Stone Ave. Tucson, Arizona

To Whom It May Concern:

The Section 106 regulations require Federal agencies to seek and consider the public's views at every stage of the review process according to the National Historic Preservation Act. According to the information given out at the October 28, 2014 meeting, the purpose of the meeting was to gather information from the public for the Section 106 review. At the October 28, 2014 meeting and also at the previous meeting I attended there was not a final plan available to review. The previous meeting had four plans on presentation boards and in handouts but the four plans were all different designs and I was told the the final plan had not been chosen. However, according to an October 8, 2014 email by the SPHO architect Bob Frankeberger, the Section 106 process is complete and the MOA is finished so my question is how can the City of Tucson and AzSPHO complete the Section 106 process before a meeting to gather information from the public is finished? This appears to be a violation of Section 106 guidelines.

I checked on the City of Tucson Planning and Development Services website the day after the meeting and found a development plan that had been reviewed and was only waiting on a landscape change before the plans were approved. The building itself was already approved. I would like to know how the plans can be reviewed and almost approved yet not be available at the Section 106 meetings.

Comments on the adverse effects of this project

- 1) The physical destruction of about 90% of the Downtowner Motel will be the major adverse effect of this historical property and the surrounding historical properties. This property is a mid-twentieth century example of a motor court development near downtown Tucson, designed by eminent Tucson architect Josias Joesler. Saving only the front part of the building and the sign and erecting a four story structure behind it will overwhelm and destroy any integrity of the small amount of the building that will not be demolished.
- 2) The planned alteration of the building and site is inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The four story addition is not in scale with the portion of the one story building that will be saved. Comments made by the developer and the SHPO's architect about the changes that were made to the existing building in the 1950's that they claim destroyed the historic value of the building are incorrect and easily removed (such as the filling in of the northwest corner structure). The Secretary's Standards recommend "Designing a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character" and to not design a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.
- 3) The planned four story addition is incompatible with the front part of the building and with the historic structures surrounding the site. The four story addition will overwhelm the front part of the existing building and will tower over the adjacent historic two story building to the south

and the historic one story building to the northeast. Once again, the Secretaries Standards state that the design of a new addition should be take into consideration the appearance of other buildings in the historic district and neighborhood and be compatible in terms of mass to these surrounding buildings.

- 4) Neglect and deterioration. The City of Tucson is complicit in the neglect of this building and subsequent deterioration. Complaints have been made about this property in the past and the City of Tucson did nothing to enforce the existing regulations on maintaining a rental building and now supports using federal monies to demolish a historic structure. I can not believe that retaining ten percent of the existing building will meet National Register criteria, maybe for the sign but the City is good at restoring signs and putting up plaques to say what historic building sat on this site.

Sincerely,

William Balak
708 S. Rubio Avenue
Tucson,

Arizona

85701

SUBJECT: DOWNTOWN MOTOR LODGE

PUBLIC MEETING NOTICE

DATE: WEDNESDAY, NOVEMBER 19, 2014

I am writing this letter regarding the construction of a 44-unit affordable housing project at 383 S. Stone Ave., Tucson, AZ known as the Downtown Motor Lodge.

This project is much needed to provide affordable housing for Veterans and low income persons that work in the downtown area. It has been designed to provide access to public transportation and amenities that support a walkable lifestyle, and is conveniently located to shopping, schools, health care, public services and worship services. The project will offer tenants the use of a library, computer room, private outdoor areas, secured parking and bicycle storage. All of this is important to low income persons that work downtown.

This project has also been designed with energy efficient features that will contribute to the long-term sustainability of the project.

With respect to the historic district, the construction will remove a blighted structure that diminishes the quality and character of the neighborhood but will preserve the two front buildings along South Stone Avenue along with the vintage street sign. This property has been an eyesore and an attractive nuisance for vandals. By undertaking a respectful approach to the project, the vibrancy of the neighborhood will be enhanced.

I strongly support this project and encourage the full support of the City of Tucson as the responsible entity awarding federal funds.

If you have any questions or need any additional information, please feel free to contact me at 520-307-2654.

Jeanne V. Shaw
9581 E. Via del Sol Feliz
Tucson AZ 85748

HCDAdmin - Section 106 Process - Downtown Motor Lodge, 383 S. Stone Avenue, Tucson Arizona

From: Jody Gibbs <j.gibbsarchitect@gmail.com>
To: HCDAdmin HCDAdmin <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 3:28 AM
Subject: Section 106 Process - Downtown Motor Lodge, 383 S. Stone Avenue, Tucson Arizona

The Barrio Historico Historic District Advisory Board voted unanimously on November 18, 2014 at a publicly noticed meeting, "that the demolition of the historic building and proposed construction of a four story building at the Downtowner Motor Lodge site both would cause irreparable damage to the historic zones". The Board also voted unanimously "that they doubt the legality of the City of Tucson process regarding this development to date".

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Evaluating the impact of the proposed four story building on the Armory Park and Barrio Historico Historic Districts is not merely a question of size. The criteria are numerous. They are clearly spelled out by the Secretary of the Interior and are listed in the City Code pertaining to Historic Zones. The Barrio Historico Historic District Advisory Board evaluated the proposed four story building by those criteria and found it completely inappropriate as indicated in the minutes of the Board's publicly noticed meeting of September 17, 2014 on record at the City Clerk's office quoted below.

"Mary Ann Beerling of Compass Affordable Housing Inc and Mark Shoemacher of Bethel Development made a fifteen minute presentation

of Compass Affordable Housing Inc's proposal for the Downtowner Motel site on Stone Avenue including a computer generated illustration showing the proposed building and its surrounding historically zoned neighbors. The site is surrounded by Armory Park Historic Zone on the north, east, and south and by the Barrio Historico Historic Zone on the west.

The Advisory Board evaluated the project per Unified Development Code section 5.8.5 and the criteria found in section 5.8.6.

Bob Vint said the proposal was too much building on too little a site. Anne Hazen said she was from a military family. She said many veterans suffer from PTSD and need quiet private balconies and open green space which the proposal lacks. Mary Lou Heuett said the majority of the Advisory Board's members worked for three years to develop the low income elderly housing in the historic zone at 18th and Convent and that the problem was the proposed building not its proposed low income tenants. Bob Vint moved and Anne Hazen seconded that the Mayor and Council and the Planning Director be informed that the proposed building is not compatible with its surrounding historically zoned neighbors in height, street scape, setbacks, site utilization, roof type, exterior wall materials, proportions, projections and recessions, doors, windows, rhythm, building form, and details, and that more public meetings should be held to allow more discussion".

I have also read the February 13, 2014 thirteen page "Capital Needs Assessment" prepared by Acanthus Architecture & Planning, PC for Bethel Development Inc in order to justify the demolition of the historic Downtown Motor Lodge. The report is biased, misleading, and inadequate to justify demolition of the historic building.

- 1) The report identifies the rear of the property as an alley. The rear street is actually Russel Avenue.
- 2) The report says the property is not registered as historic. It is indeed a listed property.
- 3) The report is based upon the future use of the property as a motel. The future use of the historic building for this developer would be low income housing
- 4) The cost estimates made in the report are made on "general knowledge" without competitive estimates from contractors.
- 5) For unexplained reasons the report suggests a future use of 44 units on this half acre site.
- 6) The report incorrectly says there is inadequate parking in the historic building's current configuration. Actually the existing building could be easily remodeled into approximately twenty eight single room units, or fifteen one bedroom units, or eight two bedroom units. The site currently has eight parking units off Russell Avenue. One parking space per unit is more than sufficient in the case of eight low income two bedroom units. For a larger number of low income units a parking variance can be obtained. This is completely consistent with low income historic hotel/motel/apartment parking standards used in Tucson such as the Coronado Hotel on 4th Avenue at the underpass which is supported by the City of Tucson for low income residents.
- 7) The report suggests there is no room for ramps into the ground floor units. Actually the reuse of the historic building for low income housing would likely only have parking in the existing eight garages at the rear off Russell Avenue. And the existing large asphalt central area would be converted into a green area with trees and plants. There would be no problem in adapting the historic building to ADA requirements. Approximately 80% of the units of any size (single room, one bedroom, or two bedroom) would be on the ground floor.
- 8) The report says the current doors are 30" wide. They can easily be widened to 36" where necessary without compromising the integrity of the historic building.
- 9) The report suggests questionable structural condition in the existing historic building. The building is of brick construction and wood frame interior partitions and wood roof framing. The brick and the concrete foundations show no sign of structural damage.
- 10) The report states the repair of the existing building is cost prohibitive. Actually the wood can be easily replaced where necessary. There is considerable cost savings in the existing foundations, brick

masonry, concrete slabs, and the largely one story design of the building. In my opinion, based on fifty years of architecture and construction, it is quite feasible to repair the existing historic building.

11) The report appears to be deliberately biased and predetermined to recommend demolition of the historic building and construction of a four story 44 unit building.

12) The report provided is inadequate to justify demolition of the historic on the basis of cost or useful life.

The developer has never discussed or recognized the historic importance of the existing building. The building was designed by noted Tucson Architect Josiah Joesler in 1941 at a time when Tucson had a population of less than 48,000 people. Stone Avenue was the main highway between Nogales from the south and El Paso from the east to Phoenix to the north. The building represents the auto-centric basis of Tucson's development. It also marks the end of regional design for Joesler and a city turning to a "modern design" and away from Mexican regional architecture. The year 1941 is the year of U.S. entry into the second war after more than a decade of depression. It is a period when Tucson had been subjected to two decades of Hollywood film and national radio. The train would still be important during the war years, but the era of national highways and massive dependency on (and control of urban form by) the automobile will soon arrive. Mass homogenous suburbanization of Tucson and other western American "cities" would soon arrive complete with interstate highways, urban sprawl of endless FHA housing, and strip vehicular oriented shopping along Broadway, Speedway, Grant, and Twenty-Second Street. Joesler's building marks the end of the era when downtown was still alive. The decline and largely abandonment of the downtown will begin with the end of the war in 1945. Tucson appears to have always had a cultural inferiority complex that lead it to destroy its past. Destroying the Downtown Motor Lodge by Josiah Joesler and replacing it with a bland four story generic four story frame stucco building (a building that really could be located anywhere in the U.S.) would be typical of Tucson trying "to keep up with Kansas City" , trailing after Phoenix while denying it all the while, thinking that the "Dwell Magazine aesthetic" is really where is at, and seriously degrading two more historic neighborhoods as they have recently done with recent similar buildings such as the five story frame and stucco apartments called "the district" in the West University Historic District, the four story frame and stucco apartments called "the Junction" in the Iron Horse Historic Neighborhood, and the generic fourteen towers at Speedway and Tyndall built in the backyards of one story historic bungalow houses on the east side of Euclid also in the West University Neighborhood. Such a cultural inferiority complex played a major role in Tucson's urban renewal decision to destroy the main Mexican Barrio "La Calle", replacing it with the Tucson Convention Center which was DOA (dead on arrival) but "up to date with Kansas City". Possibly Tucson would like to forget that Joesler drank himself to death in a downtown hotel or perhaps they never knew. The City government apparently think the tourists would rather see the four story frame stucco building building not a brick building by Joesler just as they thought the tourists would rather see the Tucson Convention Center not the Mexican Barrio "La Calle". Apparently "new and big" are still cultural objectives. Joesler's Downtown Motor Lodge is a unique part of our history and clearly can be made into useful housing.

The Barrio Historico Historic District Advisory Board also wishes to point out the lack of transparency in the planning of this project and its 106 Process. The existing and apparently invalid 106 Review was done with no notice to any residents and property owners in the Barrio Historico Historico District and no notice to the majority of property owners and residents in the Armory Park Historic District. Both the Developer and the City failed to notify and involve impacted groups and still haven't in any meaningful way. The demolition of the historic Joesler building and the construction of the four story building will irreparably damage all residents in both Historic Districts and others in Tucson who care about the City's history and historic buildings. The previous non- noticed and largely unknown 106 process was determined invalid by HUD because the developer was not the " responsible entity" , when apparently the City of Tucson is. Hence the current 106 Review is being done by the City of Tucson to correct the previous error identified by HUD. But the objective appears to be the same namely to destroy the

historic Joesler building and build the four story building. Because the first 106 process was invalid the first Memorandum of Agreement between the State Historic Preservation Office and the Developer was also invalid. The signed but currently invalid Memorandum of Agreement gave the Developer the right to destroy the historic building and to construct the four story building. Permission was given to the Developer by the Arizona State Historic Preservation Office (SHPO). On May 13 the City's Historic Preservation Officer Jonathan Mabry wrote a letter to the developer stating that he found that the demolition of the historic building caused no adverse effect on the historic zones. He did this with no input from or notice to the residents of the historic district. The developer signed the Memorandum on July 28. The SHPO signed the Memorandum on August 8. The State Historic Preservation Office said the new building was "in scale" with its surrounding historic neighbors and would cause no adverse effect. The City, the developer, and SHPO agreed but in a closed non transparent non public process.

I wish to draw your attention the Minutes of the September 10 meeting of the Barrio Historico Historic District Advisory Board which are on public record at the City Clerk's office. Those minutes regarding the Downtown Motor Lodge read as follows, "despite repeated requests to the City staff (including Planning and Development Services Department staff Frank Dillon and Jonathan Mabry on the Downtown Motor Lodge for over three months no information has been provided".

During the previous three months I had made FOIA and Arizona Public Records to City Planning and Development Services Department Planner Frank Dillon for information on the Downtown Motor Lodge project. He would provide no information except to refer me to the City Preservation Officer Jonathan Mabry. Jonathan Mabry in response to telephone calls said he had no public records or public files on the project. His remarks were clearly false and probably illegal. Compass Housing delayed meeting with the Advisory Board for months but finally agreed to meet with the Advisory Board on September 17. It is unknown if they were merely patronizing the Advisory Board or if they had learned that the existing Memorandum of Agreement was invalid.

At the first meeting of the current 106 Process on October 28 neither Jonathan Mabry nor other City staff nor the developer presented a single floor plan, elevation, section, or site plan of the proposed four story building nor a single floor plan, elevation, section, or site plan of the historic building nor its history. It seems a rather odd way to gain public input about a project when such basic information was not provided to the public. Nor was any clear explanation of 106 process given, nor did the City or the Developer explain the previous signed Memorandum of Agreement, nor did they explain that Jonathan Mabry the City's Preservation Officer had already given the Developer a letter on May 13 giving his finding that there would be no adverse effect on the Historic Zones if the historic Joesler building was torn down. It should also be pointed out that again in the current 106 process as with first 106 process the majority of residents and property owners of Barrio Historico and Armory Park were not notified of the the October 28 meeting nor presumably of the meeting tonight November 20.

Regarding mitigation of the impacts of this project , the clearest and most appropriate mitigation would be not to build the four story building and to restore the historic Joesler building for housing for low income people, the stated mission of the non-profit part of the non-profit for-profit developers involved in this project. Restoring the historic building would meet the aim of providing housing for low income people, and remove the negative impact of the four story incompatible building.

A second means of mitigating the impact of the four story building would be to move it to a non historic area of the downtown such as the property on owned by the City of Tucson on Toole Avenue north of the Transit Center. If the City were to provide that land the developer could sell or exchange the Downtown Motor Lodge site. It has also been suggested that the developer consider locating the project near the Mercado on West Congress again selling their Motor Lodge site. At a public meeting with the City staff at the main library last month these ideas were clearly expressed and supported by historic

zone residents. On October 28 it became apparent that City staff had not explored those ideas. Nor had the developer. The developer has expressed a fear of losing their funding, however if the very real negative impacts of the project are to be mitigated they need to bring their funding sources into the process and be prepared to change the project. This could include rehabilitating the historic building or moving the project. Likewise if the City of Tucson is serious about mitigating the negative impacts of the four story building on the historic zones they need to correct their past behavior, operate in a transparent manner, comply with state and federal law, and recognize the validity of the concerns and recommendations of the historic zone residents.

At a meeting of the Tucson Pima County Historical Commission on Tuesday October 18 regarding this project, residents of the Historic Districts made the same objections to the project outlined above. The developer made a power point presentation that never showed the building in context, never showed the four story building's neighbors. This project clearly has been based to date on too many units (44) for this site, a non transparent process, and attempts to pull the wool over the eyes of the historic zone residents and possibly others. In this process they have been aided by some City staff. If the meeting tonight November 20 is merely a repeat of the developer's power point presentation of their out of scale four story building, no plans, sections, elevations of the historic building or the four story building, no acknowledgement that the proposed building is clearly damaging to the historic zones, then process is clearly a fraud and HUD and the Arizona State Housing Office should take note of this, intervene, and condition their funding.

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From: Elaine M Paul <empaul38@gmail.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 11/20/2014 8:18 AM
Subject: Downtown Motor Motel

After attending a meeting with interested parties and viewing the proposed design for this project my reaction is we as a community can do better and the people this project is suppose to serve deserve better.

My family and I have been residents of Barrio Viejo for 35 years and have watched and participated in the development of two very successful projects designed to serve low income residents in our neighborhood. Both Hope 6 and Lalo Guerero Elderly Housing are successful in part because of their thoughtful design. They both provided light , open space and a design that fits into the neighborhood and therefore makes their residents feel like part of our neighborhood.

This project does none of those things , this is essentially warehousing people , a concept I thought we had long ago dismissed . We are left as a community with this awful solution because this project does not work on this piece of land . It is simply too small. It is not economically feasible for the developer to go smaller and as a result of that reality the under served are again victimized.

We have to do better than this. The only people who will benefit from this project moving forward are the developers .Our community , all of our community including the underserved deserve better.

Elaine Paul