

11 February 2015

Mr Jim Garrison, AZ SHPO
Ms. Sally Stang, HCD Director, City of Tucson

RE: 106 Process, Downtown Motor Hotel, 383 South Stone, Tucson
Barrio Historico Historic District Advisory Board
Protest of Sally Stang's January 9, 2015 letter to AZ SHPO Jim Garrison

Dear Mr. Garrison and Ms. Stang,

the Barrio Historico Historic District Advisory Board was asked to be a Consulting Party in this 106 Process on January 29, 2015. The Board voted to do so in a publicly noticed meeting on February 5, 2015.

The Barrio Historico Historic District Advisory Board at the publicly noticed meeting on February 5, also reviewed Sally Stang's letter of January 9, 2015 to the AZ SHPO. The Board voted unanimously to protest the inaccurate information and false conclusions in that letter as indicated below.

ITEM 1

Paragraph 3 of page 2 reads, "Based on a Building Condition Report (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".

Actually the building condition report contains no evidence to support these conclusions.

The report identifies no structural damage to the masonry or concrete, and provides for the full rehabilitation of the building (including all damaged wood).

The total cost of complete rehabilitation of the historic building in its entirety is estimated by the report to be \$ 1,310,425. for 19 motel units with kitchens.

The report suggests it would be preferable to build a 44 unit four story building, however the report contains no cost data on the 44 unit four story building and no cost comparison between the cost feasibility of rehabilitating the historic 1941 building into 19 units with kitchens versus the cost feasibility of constructing a new four story 44 unit building.

The report provides the cost of complete rehabilitation of the historic 1941 building in its entirety but no evidence proving this cost makes such a rehabilitation economically infeasible.

An examination of the plans indicates that the completely rehabilitated historic 1941 building could just as easily be 12 one bedroom units and 7 single room occupancy units, rather than the 19 motel units with kitchens used for the report's basis. In either case the construction cost of the 19 units would be the same \$1,310,425. total or or \$68,970/ unit. These numbers do not include the cost of land, architects, engineers, or fees.

According to other records the cost of the 44 unit four story new building is \$10,500,000 or \$238,136/ unit. It is unclear whether these numbers include land, architects, engineers, or fees.

One needs to accurately compare apples to apples. That has not occurred. Accurate reports are need also to determine the actual effects on both Historic Districts.

Sally Stang cannot say to the AZ SHPO that the Building Condition Report (Attachment C) establishes that "it is not economically feasible to rehabilitate the entirety of the 1941 building", because the Building Condition Report (Attachment C) proves no such thing.

Nor can Sally Stang say, that, "based on the Building Condition Report it is not economically feasible to rehabilitate the entirety of the existing 1941 building because of abundant hazardous materials that would need to be addressed".

Actually the Building Condition Report (Attachment C) establishes no such thing. On the contrary the report states on page 10 that the cost of "lead and asbestos abatement and monitoring" is only \$40,000. This is hardly evidence of "abundant hazardous material", and in fact indicates that the hazardous materials which are present can be abated and managed for a fairly low cost

There is further proof of the feasibility of rehabilitating the entire historic 1941 structure. They can be seen at 475 S. Stone and 485 S. Stone, within a very short walk of two block and three blocks south of the Downtown Motor Hotel. The buildings at these addresses are motels of the same era as the Downtown Motor Hotel in the same neighborhood and same street. They have been successfully rehabilitated in their entirety.

ITEM 2

Paragraph 4 of page 2 of Sally Stang's letter states that, "that there are no adverse effects on the Armory Park and Barrio Historico Historic Districts because the proposed new construction will match the height of an Armory Park Historic Contributing Property behind the project property".

This statement is incorrect. The building referred to behind the project is not a historic contributing property.

The "Historic Building Database Form, SHPO Inventory" for this building indicates that this building (the rear dormitory of the Immaculate Heart Academy 35 E 15th Street) was built in 1956. The database form does not list the building as historic. It was surveyed in 1994 when it was only 38 years old and therefore was not designated historic.

Further Sally Stang's letter says correctly in paragraph 4 of page 2 that the, "Armory Park Historic District is significant as a representation of change in residential styles in Tucson between the arrival of the railroad and the end of World War II". Because World War II ended in 1945 and because the building directly behind the proposed project was built in 1956, the building directly behind the proposed project is outside of the period of significance to the Armory Park District; and this building (behind the proposed project) is therefore not a contributing historic building.

It should stated further that even if it were a historic contributing building which it isn't, measurement of height is only one of the criteria used to determine if a new building negatively effects the Armory Park and Barrio Historico Historic Districts. The criteria used for examining compatibility (used to determine impact of a new building) are found in the City's Uniform Development Code Sections 5.8.6 and 9-02.7.0.

On September 17, 2014, in a publicly noticed meeting, the Barrio Historico Historic District Advisory Board evaluated the proposed four story building according to those criteria (Code sections 5.8.6 and 9-02.7.0). It was determined unanimously that the proposed building was, "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". Clearly the effect of the proposed four story building on the Armory Park and Barrio Historico Districts is negative. This was reflected in the Board's further unanimous vote, "that the demolition of the historic building and the proposed construction of a four story building at the Downtown Motor Lodge site would cause irreparable damage to the historic zones".

It appears the developer never considered the effect of the proposed 44 unit building on the Historic Districts and is only attempting to do now this after the fact, with the assistance of false statements and logic exhibited in Sally Stang's letter. The Arizona State Historic Preservation Office should not be a party to such attempts.

It is an error in Sally Stang's letter to state that the proposed four story building does not adversely impact the two districts. The proposed building's character is completely in contradiction to the character of the historic buildings in both districts when measured by the criteria in the Code.

ITEM 3

Sally Stang's letter incorporates "Attachment B, the Archaeological site records report" in Paragraph 2 on page 2. Attachment B, the Archaeological site records report is also listed at the end of Sally Stang's letter.

The Barrio Historico Historic District Advisory Board unanimously finds the final sentence on page 43 of this Report (Attachment B) to be in error.

That sentence states that, " if the street facade of the Downtown Motor Hotel is partially retained, little or no visual impact should occur to AZ BB :13:76 (the Barrio Historico Historic District) and AZ BB:13:626 (the Armory Park Historic District).

This remark is incorrect, out of place, unsubstantiated, and contrary to any architectural analysis of the proposed four story building including analysis of the proposed building in the the context of its neighbors, analysis of sight lines, and analysis of building and block sections and elevations of the proposed four story building in the context of the surrounding historic contributing properties. The Report (Attachment B) also ignores the the criteria for compatibility (harmony) in the Code Section 5.8.6 and 9-02.7.0.

The Advisory Board also voted that this opinion, expressed at the end of the Report, appears to be outside the area of expertise of the Report's author

ITEM 4

The Advisory Board voted the first paragraph on the third page to be incorrect.

It reads,

" 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".

As pointed out in Item 1 above it is by no means established that rehabilitation of the historic 1941 building in its entirety is economically infeasible.

Second, while the developer may wish to build 44 units and may have applied for LIHTC funds to build 44 units, this is a self created hardship. This is not a justification for demolishing the historic building and building 44 units that are clearly completely out of scale, size, and detail with the historic districts. This is discussed in Item 2 above.

The developer could have explored rehabilitating the entirety of the historic 1941 building but there is no evidence that occurred. The developer could also have looked at the criteria of compatibility in the Code and the character of the historic districts, and designed accordingly. There is no evidence they did this. Instead it appears they decided to build 44 units without regard to adverse effect such a building would cause to the two historic districts, without regard to the historic 1941 building, and applied for 44 units of LIHTC funds.

The adverse impact of the proposed building on the Historic Districts is discussed in Item 3 above. The adverse effect of the loss of 80-85% percent of the historic 1941 building is discussed in the four 8 1/2 x 11 page handout prepared and submitted to neighborhood residents and to attendees of the two public meetings in this 106 Process by myself as Co-chair of the Barrio Historico Historic District.

SUMMARY

The logic of Sally Stang's letter is that a developer can use an inappropriately high number of units for justification of a proposed building rather than using character of the Districts defined by the criteria listed in the Code. Her letter suggests they can ignore those criteria, match the height of a non contributing building behind the project, and retain a small portion of the street facade and then "presto" say there will be little or no visual impact or negative effect on the two historic districts or the existing 1941 building. This is false. The proposed project negatively effects the historic 1941 building by destroying 80 - 85% and negatively effects the two Historic Districts by being completely out of scale and size and other criteria set by the Code and indicated above.

Her letter is based upon false assumptions and false conclusions, and without consultation and vote by all Consulting Parties.

The 106 process should not be conducted in this manner.

This project appears to have been designed with the intent of building 44 units, without concern for either the 1941 historic building or for the effect of the 44 unit four story building on the two Historic Districts. After the fact the developer is looking for justifications, excuses, and falsehoods to proceed (lamentably with the assistance of Sally Stang and Jonathan Mabry).

Sally Stang's letter of January 9, 2015 to the AZ SHPO Jim Garrison is incorrect and should never have been sent. The letter should be retracted by the City and/or returned by the AZ SHPO.

A new and accurate letter should be prepared after consideration by the Consulting parties in an appropriately conducted 106 Process.

The Barrio Historico Historic District Advisory Board Board protests the content of the letter, and any attempt to move on to mitigation on such false premises. That would be merely misusing the 106 process as a rubber stamp to the detriment of the historic districts.

Sincerely,

Jody Gibbs, Co-chair
Barrio Historico Historic District Advisory Board



HCDAdmin

From: Leslie Cho-Newman <lesliec@cityhighschool.org>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/22/2015 7:38 PM

Ms. Stang,

As a Tucson resident and property owner living in the Barrio Viejo affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,

Leslie Cho Newman

--

Leslie Cho Newman
Spanish Teacher
Spanish Family Liaison
City High School
(520) 623-7223 x103

<http://cityhighschool.org/support/volunteer>
<http://cityhighschool.org/about/staff/leslie-cho-newman>

HCDAdmin - Save the Downtown Motor Hotel!

From: Zobella Vinik <zobellav@gmail.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/22/2015 3:10 PM
Subject: Save the Downtown Motor Hotel!
Cc: <sally.stang@tucsonaz.gov>, <jgarrison@azstateparks.gov>, <steve.kozachi...>

Ms. Stang,

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,
Zobella Vinik
Resident of Barrio Viejo

HCDAdmin - Our Neighborhoods' Future?

From: sara hunsaker <sarahun@comcast.net>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/22/2015 7:25 AM
Subject: Our Neighborhoods' Future?

February 22, 2015

Ms. Sally Stang,

This ill-considered building will damage the environments of Barrio Libre and Armory Park—and especially South Tucson as well as our history, our visual surroundings and the future development of our neighborhoods. Already the North boundary has suffered with the moving of the Senior Citizens and we feel the encroachment of the University and a chaotic downtown. We are a neighborhood of residential family people. We have tried to keep the development as low-key and compatible as possible.

I am curious why you rejected the neighbors of this project from participating as a consultants in Section 106, and why you continue to thwart a democratic process which could include us (who live here and care about our neighborhood— Armory Park and Barrio Libre) from having a voice? This South Stone area greatly affects my neighborhood and home. It is tragic that you have also chosen to systematically disempower those who live adjacent or close, those most affected by this ill-conceived project.

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

I ask you to please consider the long term, negative effects that your decisions may have on the lives and properties of anyone near this proposed development---and me— a property owner in Armory Park for 40 years now.

I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved. What is your problem? Perhaps we could help?!

Thank You,

Sara Hunsaker

330 East 14th. Street

Tucson, 85701

>

HCDAdmin - downtown motel

From: Porter Penelope <paporter@aol.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/21/2015 8:24 PM
Subject: downtown motel
Cc: <jgarrison@azstateparks.gov>, <steve.kozachik@tucsonaz.gov>, <zach.r.car...>

Ms. Stang,

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

I feel very strongly that this will affect all of us that live and own property around this project. The Downtown Motel as it sits now is a horrible problem, but you want to replace it with a new and larger problem. The proposed building could not be uglier and less in keeping with its neighbors. Its scale is much too large. The impact on parking will be overwhelming. Don't pretend that the new residents will not have cars or that they will not have family and friends with cars. Your attitude that those most affected should just shut up and have no standing in the decision is disgusting.

Thank You,

I live one block away from it.

Penelope Porter

From: Lisa Mele <lisamele@icloud.com>
To: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
CC: "sally.stang@tucsonaz.gov" <sally.stang@tucsonaz.gov>, "jgarrison@azstat...
Date: 02/21/2015 12:48 PM
Subject: Stone /Motor lodge

I am a long time resident of the Barrio Libre/ Historico. I know part of the argument of building this monster building is there needs to be more low income housing downtown. I have low income projects all around me, one only 1/2 blk away, that takes up an entire 1/2 a city block. . And another that takes up many many blocks of city land only a couple of blocks from me. As a matter of fact. There are many low income housing developments all around me. So this idea that there needs to be more downtown is just not true. As a matter of fact, going through the lists of low income housing available on the pimacountyHousingsearch.org available through the pimacounty.gov website, there is ample low income housing throughout the city with many vacancies, many, many, many vacancies.

This project needs to be built In harmony to the buildings and neighborhoods around it. Pure and simple. Too much private money has been invested in these downtown historic neighborhoods, you must respect this!! This proposed building down grades our neighborhoods, and devalues our investments. Projects like this, will discourage future development of this area. And can be the negative weight that helps degrade positive future growth.

With no help from the city, the private citizens of Tucson have restored these neighborhoods, to a state of tourism attraction, and many people wanting to live here. Why would you want to hurt such a thing? Please support the people that have already invested in Tucson, without a handout from the city and govt!

This proposed building belongs at Grant and Oracle, the NW corner, behind the walgreens that is there, that's exactly where a building like this would look ok. And there are large empty lots just sitting there, build there!!!!

Let's continue to build Downtown Tucson into something the future can sustain. This is a tourist destination now, it's not a place for more low income housing. Especially when it looks like this.

People have wanted to rebuild the Motor lodge into an active business, which would generate jobs and tax dollars, why not allow that?

What difference does it make where this building is erected? Does the trolley need to be a part of it?? It's not like low income housing residents can afford to ride the trolley? You can create trolley shuttles I suppose.....

Make this building to scale for CRYING OUT LOUD!!!!!!!

STOP IGNORING US!!!!!!

If this project is so wonderful, why don't you knock down your neighbors home and erect it next door to your house?

Lisa Thomson

HCDAdmin - Downtown Motor Hotel

From: greta ward <greta@dropletstudios.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/21/2015 12:27 PM
Subject: Downtown Motor Hotel
Cc: <sally.stang@tucsonaz.gov>, <jgarrison@azstateparks.gov>, <steve.kozachi...>

Ms. Stang,

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,

Greta Ward

Barrio Viejo Resident and Homeowner



greta ward
www.gretaward.com

"Our lives are not as limited as we think they are, all things are possible, laughter is holier than piety, freedom is sweeter than fame, and in the end it's love and love alone that really matters."

~ Tom Robbins

HCDAdmin - Downtown Motor Hotel

From: Carrie Vonier <carrie.vonier@basistucson.org>
To: "HCDAdmin@tucsonaz.gov" <HCDAdmin@tucsonaz.gov>
Date: 02/21/2015 12:18 PM
Subject: Downtown Motor Hotel
Cc: "sally.stang@tucsonaz.gov" <sally.stang@tucsonaz.gov>, "jgarrison@azstat..."

Ms. Stang,

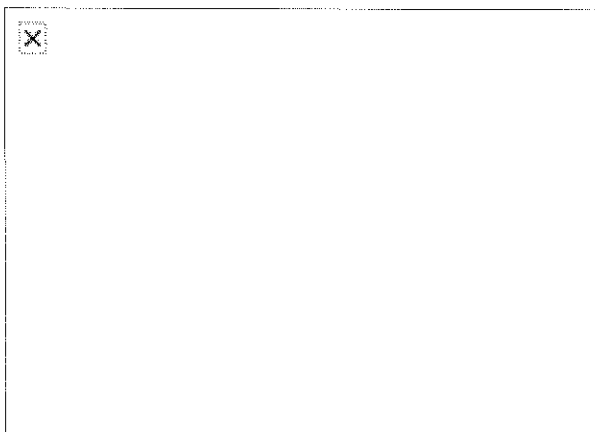
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I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,
-Carrie Vonier

Santa Rita Park neighborhood resident



HCDAdmin - FW: Downtown Motor Hotel

From: Richard Brittain <rgbrittain@msn.com>
To: "hcdadmin@tucsonaz.gov" <hcdadmin@tucsonaz.gov>
Date: 02/21/2015 10:21 AM
Subject: FW: Downtown Motor Hotel

From: rgbrittain@msn.com
To: sallystang@tucsonaz.gov; jgarrison@azstateparks.gov; stevekozachik@tucsonaz.gov;
zach.r.carter@hud.gov; jloichinger@achp.gov
Subject: Downtown Motor Hotel
Date: Sat, 21 Feb 2015 10:18:37 -0700

Ms. Stang,

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,

Richard G. Brittain
581 South Meyer Avenue
Tucson, Arizona 85701
520-884-8226

HCDAdmin - Downtown Motor Hotel

From: <nanozuzu@gmail.com>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/21/2015 7:29 AM
Subject: Downtown Motor Hotel
Cc: <sally.stang@tucsonaz.gov>, <jgarrison@azstateparks.gov>, <steve.kozachi...>

Ms. Stang,

As a Tucson resident and property owner living in the historic neighborhood affected by the development of the Downtown Motor Hotel, I must object to and oppose the development as proposed by Compass Affordable Housing and Bethel Development Inc.

This monstrosity of a building will adversely affect our property, our historic resources, our visual historic surroundings and the future development of our neighborhoods. Having rejected my participating as a consultant in Section 106, you continue to thwart the democratic process and exclude me from having a voice in the one area that will greatly affect me, my neighborhood and home. It is tragic that you have further chosen to systematically cut out anyone within sight of or adjacent to the DMH, those most affected by this ill-conceived project.

I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,
Nancy Warshawer
46 w Simpson St

HCDAdmin - DOWNTOWN MOTOR HOTEL

From: Alex Kairoff <kairoff@email.arizona.edu>
To: <HCDAdmin@tucsonaz.gov>
Date: 02/20/2015 4:16 PM
Subject: DOWNTOWN MOTOR HOTEL
Cc: <sally.stang@tucsonaz.gov>, <jgarrison@azstateparks.gov>, <steve.kozachi...>

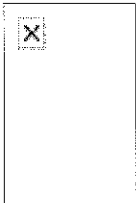
Ms. Stang,

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I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. Another idea I had is that as investor, if the developer would consider an offer to purchase the site as-is for a different use (such as rehabbing the hotel to function again). As proposed, this has not been achieved.

Thank You,



Alex Kairoff | REALTOR® | CENTRA REALTY
Cell: **520.576.8281**
Fax: 520.620.6257
Alex@CentraRealty.com
www.RealTucsonProperties.com
532 N. 4th Ave. Ste. 100, Tucson, AZ 85705

From: David Elliott <davoelliott@gmail.com>
To: <sally.stang@tucsonaz.gov>
CC: <jgarrison@azstateparks.gov>, <steve.kozachik@tucsonaz.gov>, <zach.r.car...>
Date: 02/22/2015 7:38 AM
Subject: Downtown Motor Hotel

Ms. Stang,

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I ask you to please consider the long term, negative effects that your decisions may have on my life and the lives and properties of anyone near this proposed development. Moving forward, I ask that the design be reduced and modified to be within aesthetic balance and proportion to its surrounding historic neighborhoods. As proposed, this has not been achieved.

Thank You,
David Elliott
430 E 19th St
Tucson Arizona