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Preserving America's Heritage

June 2, 2015

Ms. Sally Stang  
Director  
Housing and Community Development Department  
310 North Commerce Park Loop  
Tucson, AZ 85726

**Ref:** *Proposed Partial Demolition of the Downtown Motor Hotel  
City of Tucson, Arizona*

Dear Ms. Stang:

On May 11, 2015, the Advisory Council on Historic Preservation (ACHP) received a request from the City of Tucson (City) to review and comment on the draft Memorandum of Agreement (MOA) that will evidence its compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800) for the referenced undertaking. The ACHP is participating in consultation as a consulting party. We therefore have been involved in the resolution of adverse effects. We appreciate the opportunity to provide comments to the City as the Responsible Entity pursuant to the environmental regulations of the U.S. Department of Housing and Urban Development (HUD).

While the MOA is a good start, substantive edits will be required to develop another draft. We are providing our edits in red-line strikeout in the attached document (see enclosure). Additional questions have been made using the comments feature. We remind the City that it is responsible for ensuring compliance with the MOA, and implementation of its terms. Accordingly, we urge the City to verify that it is able to meet the requirements of each stipulation. In addition, please clarify the signature status of all consulting parties.

Once the City has reviewed our comments, please revise the draft MOA and circulate it to other consulting parties. You should also consider scheduling another consulting parties meeting to review the revised draft MOA and discuss the proposed mitigation measures.

If you have any questions regarding our comments, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at [jloichinger@achp.gov](mailto:jloichinger@achp.gov).

Sincerely,

Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing and Assistance Section

Enclosure