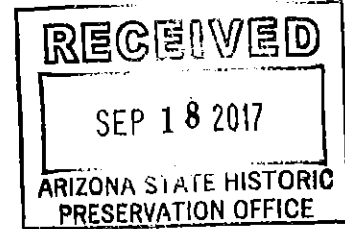




**CITY OF TUCSON HISTORIC PRESERVATION OFFICE**  
DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES



September 18, 2017

Kathryn Leonard  
State Historic Preservation Officer  
1100 W. Washington St  
Phoenix, Arizona 85007

**RE: Phase 2 Final Report for the Broadway Boulevard: Euclid to Country Club  
Historic Buildings Inventory, Vols. 1 and 2**

Ms. Leonard,

In 2012, SHPO provided a courtesy SHPO review of a *Phase 1 Draft Report for the Broadway Boulevard: Euclid to Country Club Historic Buildings Inventory, Vols. 1 and 2*. When submitted it was explained that, because this project is locally funded and permitted, there is no federal nexus requiring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, or Section 4(f) of the Department of Transportation Act of 1966, as amended. However, the historic properties inventory was prepared to voluntarily meet the standards of Section 106 compliance. On November 20, 2012, SHPO signed its concurrence that the *Phase 1 Draft Report* adequately identified the historic properties located in the APE as defined at that time.

The enclosed *Phase 2 Final Report* includes some new Historic Property Inventory Forms for additional properties now known to be affected by the project as the roadway design has reached its final stage, and also includes some changes as listed below. This letter requests a courtesy review of this updated inventory, and SHPO concurrence that this report adequately identifies historic properties affected by the project within the APE as now defined.

The Broadway Boulevard Widening project is a two-mile roadway improvement project slated for Broadway Boulevard between Euclid Avenue and Country Club Road. The roadway project is based on the 1987 Mayor and Council-approved Broadway Corridor Study that was included in the 2006 voter-approved Regional Transportation Authority (RTA) plan. Funding for this project was made possible through the RTA's collection of a half-cent sales tax, 1997 voter-approved County Transportation bonds, and City of Tucson Development Impact fees.

The Area of Potential Effect (APE) for this project was defined using the same approach as stipulated in the MOA for the Modern Streetcar Project. The APE includes all of adjoining, adjacent parcels along both the north and south sides of Broadway Boulevard between Euclid Avenue and Country Club Road, and additional parcels adjacent to

TO: Kathryn Leonard, State Historic Preservation Officer  
SUBJECT: Phase 2 Final Report for the Broadway Boulevard: Euclid to Country Club  
Historic Buildings Inventory, Vols. 1 and 2  
Page 2 of 3

potential intersection improvements. Because the *Phase 1 Draft Report* was submitted before the roadway was fully designed, at that time it was not yet known with certainty the entire set of properties along this portion of Broadway Boulevard that will be affected by roadway changes. The new roadway is now in the final design stage, and this *Phase 2 Final Report* includes revised maps of the APE, some new Historic Property Inventory Forms for additional properties that will be affected by the project, and some changes to previous Historic Property Inventory Forms and appendices. SHPO's review should focus on the following changes:

- Four additional property inventory forms (730 E., 750 E., 3130 E. and 3150 E. Broadway/100 S. Avenida de Palmas) for the west and east ends of the project area, now that the tie-ins to the existing roadway at the ends are known;
- Three changes to property inventory forms included in the *Phase 1 Draft Report*, based on new information submitted for consideration after the October 9, 2012 publication date (930-936 E., 1202 E., and 2343 E. Broadway);
- Text and Appendix A status changes reflecting the listing of the Rincon Heights Historic District on the National Register of Historic Places in February 2013 (noted in red font);
- Comments in Appendix A for properties with signs that may qualify under the City of Tucson's Historic Landmark Signs Ordinance (noted in red font as 'Potential HL Sign'); and,
- Revisions to maps and appendices with Historic Property Inventory Forms corresponding to these changes.

For your ease of reference and review, please note:

**VOLUME 1:**

- Two copies are submitted – one “clean” version without any highlighting; the other with changes in text highlighted for easy recognition; some changed text is also shown in **red** in both copies.
- Updates to Appendix A (page 36-43) are in **red** text in both copies.

**VOLUME 2:**

Forms in Volume 2 that were changed/added can be found by the following page numbers on PDF pages in the electronic file.

*APPENDIX B - Eligible Properties, South side from Euclid to C. Club*

**37** of 558 - 1202 E Broadway (revised form includes architects' names – based on their requests in 2012)

**191** of 558 - 3150 E Broadway/100 S Avenida de Palmas (new form)

TO: Kathryn Leonard, State Historic Preservation Officer  
SUBJECT: Phase 2 Final Report for the Broadway Boulevard: Euclid to Country Club  
Historic Buildings Inventory, Vols. 1 and 2  
Page 3 of 3

*APPENDIX D - Eligible Properties, North side between Campbell-C.Club*

347 of 558 - 2343 E Broadway (Continental Building revised form, including SHPO concurrence on 2014 DOE)

*APPENDIX E - Ineligible Properties, South Side*

424 of 558 - 730 E Broadway (new form)

426 of 558 - 750 E Broadway (new form)

432 of 558 - 930-936 E Broadway (Broadway Volvo revised form, including development map and drawings)

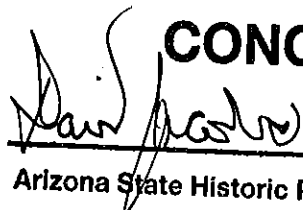
495 of 558 - 3130 E Broadway (new form)

Please note that this report is only an inventory and does not identify project effects on the set of historic properties identified. I recommend approval that, in voluntary compliance with Section 106 of the NHPA as amended, the enclosed updated report adequately identifies the historic properties located in the APE as now defined. Feel free to contact me if you have any questions.

Sincerely,



Jonathan B. Mabry, Ph.D.  
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**CONCUR**  
 18 SEP 17  
Arizona State Historic Preservation Office