



TUCSON
HISTORIC PRESERVATION
FOUNDATION

November 15, 2025

Hon. Mayor Regina Romero and Members of the Tucson Mayor and Council
Tucson Pima County Historical Commission
Armory Park Historic Zone Advisory Board

Re: Serious Procedural and Substantive Concerns, All Saints Apartments / Armory Park HPZ Non-Compliance with Ordinance 11721 and Historic Preservation Zone Standards

To the, the Mayor and Council, Members of the Tucson Pima County Historical Commission, and the Armory Park Historic Zone Advisory Board,

The Tucson Historic Preservation Foundation is deeply concerned by the manner and timeline in which the [All Saints Apartments proposal](#) has been brought forward for public review. The massive multi-block project materials were posted late last week, with multiple hearings scheduled the following Tuesday, allowing only an extremely limited window for substantive evaluation by the public, preservation professionals, or community stakeholders.

Compounding this issue is the reversal of the established and appropriate review sequence. The project has been scheduled for consideration by the Tucson Pima County Historical Commission prior to review by the Armory Park Historic Zone Advisory Board (APHZAB), the advisory body specifically tasked with the first level of review for projects within the Armory Park Historic Preservation Zone. This departure from long-standing City practice undermines the integrity of the HPZ review process, diminishes the authority of APHZAB, and raises serious questions about why this project is being advanced under such extraordinary time constraints.

These concerns are not occurring in isolation. On July 21, 2025, the Foundation submitted a formal letter objecting to the applicant's attempt to delist the contributing property at 410 S. 6th Avenue, an effort that sought to remove the site from the National Register in what appeared to be a strategy to avoid the City's historic preservation standards. That delisting effort appeared to represent an early attempt to circumvent established review processes, zoning requirements, and preservation obligations.

Following that objection, the Foundation was formally invited to serve as a consulting party in a Section 106 review. We agreed to participate in good faith. However, shortly thereafter, the applicant's representatives abruptly canceled the meeting, eliminating the only meaningful avenue for professional preservation input. This sequence of events demonstrates a sustained pattern of bad-faith engagement and disregard for transparent, lawful review.

Given this history, THPF believes that any demolition or removal activities undertaken prior to completion of a lawful Section 106 process must be considered anticipatory demolition under federal law. Section 106 and Section 110(k) of the National Historic Preservation Act prohibit an applicant from intentionally taking actions with the intent to avoid the requirements of Section 106. Any demolition or site disturbance before the conclusion of proper review would therefore constitute an unlawful attempt to preempt the federal process.

Additionally, although presented as a single development, the submission in fact encompasses multiple separate projects across distinct parcels on three separate blocks, each with its own zoning requirements, UDC requirements, and parcel-specific development zone standards. Treating these parcels as one consolidated project effectively circumvents the design, scale, demolition, and setback standards that apply to each parcel.

We believe each parcel must be reviewed individually, consistent with the standards applicable to that specific site. The current presentation does not do so.

Given both the procedural irregularities and the substantive non-compliance issues documented below, THPF urges the City to pause further review until the appropriate process is followed and each parcel is evaluated under the regulations that apply to it. Listed below are the high-level systemic compliance issues we have identified. These items do not address the significant zoning, UDC, and HPZ design standard issues associated with each individual project building, but instead focus on fundamental procedural and regulatory concerns.

I. Demolition and Loss of Historic Fabric

The project proposes demolition at:

410 S. 6th Ave

375 S. Stone Ave

435 S. 6th Ave

No HPZ demolition findings accompany these proposals, and demolition of contributing structures cannot proceed without demonstrating: feasible alternative, preservation is not possible, compliance with §5.8.10.E

These findings are absent.

II. Building 1 (375 S. Stone Ave) Non-Compliance with Ordinance 11721

1. Required HPO Review Not Evidenced

Ordinance 11721, [Exhibit “A,”](#)

Condition 11: “Any modification to the structure in the southeast corner of the C-3 lot shall be reviewed and approved by the City’s Historic Preservation Officer (HPO).”

The applicant proposes extensive modifications in this area, yet the materials include no evidence of required HPO review or approval.

2. Demolition Prohibited Without UDC §5.8.10.E Approval

Condition 12: “Demolition shall require full approval pursuant to UDC §5.8.10.E.”

The project includes partial and full demolition affecting contributing and potentially contributing structures without supplying the required findings under §5.8.10.E.

3. Required Historic Compatibility Not Met

Condition 13: “Exterior details on the proposed mixed-use building shall be historically compatible per the HPZ Design Standards.”

Incompatible massing, fenestration, materials, and height demonstrate clear non-compliance.

III. Building 2 (SE - S 6th Ave and E 14th St) Non-Compliance with Armory Park HPZ Design Standards

The HPZ standards require new construction to be: “Compatible with the massing, scale, materials, and relationship to the street of contributing historic structures.”

The proposal does not meet these requirements. The large massing, consolidated footprints, repetitive window patterns, parking configurations, and height are inconsistent with the established character and development pattern of Armory Park.

The HPZ requires: “New buildings shall reflect established setback patterns and maintain the spatial rhythm of the block.”

The proposal introduces consolidated masses, altered circulation patterns, and large new building footprints that break historic block form, and remove the spatial relationships central to the district’s historic identity.

The HPZ states: “New construction must not visually dominate contributing historic structures.”

Along 14th Street, the proposal disregards the established historic streetscape, which is defined by contributing houses, consistent setbacks, and a recognizable residential development pattern. The proposed building ignores these defining characteristics and inserts a mass and scale entirely incompatible with the block. This alone represents a fundamental violation of Armory Park’s HPZ standards. In addition, the three-story building mass placed directly behind the historic two-story school building overwhelms and visually dominates the contributing structure. The scale, height, and unbroken massing erase the historic relationship between the school and its surrounding context. The project also imposes significant visual impacts on the former All Saints Church across the street, compromising its prominence within the district and diminishing the integrity of the historic setting. Building 4’s glazed stair towers, repetitive window grids,

monolithic wall planes, and excessive height are not compatible with the architectural vocabulary of Armory Park. Moreover, the plans posted online are heavily pixelated, making it impossible to determine the actual final heights and preventing meaningful evaluation of the full extent of the project's impacts.

IV. Building No. 4 (410 S. 6th Avenue): Direct Conflict HPZ Standards

1. Unapproved Demolition of Contributing Elements

Partial demolition of the historic resource at 410 S. 6th Ave is proposed without the required §5.8.10.E findings.

2. No Plan Consistent with Tucson HPZ Design Standards

No preservation plan has been developed and no historic documentation of the original building has been provided to guide restoration or rehabilitation.

3. Site Plan Incompatible with HPZ Standards

The proposal places the entire site under surface parking, surrounding the historic structure. This site plan is fundamentally inconsistent with HPZ standards, which require the preservation of historic context, setting, and spatial relationships. Enveloping a contributing building in parking eliminates its historic character, disrupts its orientation, and destroys the spatial patterns that define the district.

4. SHPO Review Not Evidenced

No documentation provided demonstrating that SHPO conducted or completed any review as part of the July 2025 effort to have the building delisted.

V. Mischaracterizations and Inaccuracies in the Design Narrative

The [Design Narrative](#) contains numerous assertions regarding historic compatibility, setbacks, materials, demolition justification, and architectural character that are inconsistent with the HPZ design standards, Ordinance 11721, and the actual elevations.

1. Misrepresentation of “Return to Original Historic Footprint”

The narrative incorrectly asserts that removing additions at 410 S. 6th Ave will “return the building to its original footprint.” HPZ regulations do not permit demolition for this purpose, and the adjacent new six-story mass invalidates this claim.

2. Unsupported Claims of “Spanish Colonial Revival Style”

The narrative describes multiple new buildings as “Spanish Colonial Revival,” despite elevations showing contemporary massing, repetitive punched windows, open stair towers, monolithic forms, and incompatible proportions.

3. Incorrect Exemption Claim for Building 1

The narrative asserts that Building 1 is “outside the HPZ,” implying exemption from compatibility requirements. Ordinance 11721 requires compatibility at district edges and in the C-3 parcel.

4. Material Palette Used as Substitution for Compatibility

The narrative suggests stucco and tile create compatibility, ignoring required alignment with mass, proportion, scale, rhythm of openings, and streetscape, all of which the proposal fails to meet.

5. Setback Assertions Not Supported by Elevations

Claims of 10- and 35-foot setbacks do not mitigate visual dominance, block disruption, or incompatibility with adjacent contributing structures.

6. Parking Descriptions Omit Major Impacts

The narrative does not acknowledge that podium parking, new curb cuts, and altered circulation patterns disrupt the historic block structure.

7. Inadequate Demolition Justification

Demolition is described as removing “non-historic additions” despite a lack of required findings under §5.8.10.E.

8. Incorrect Characterization of a Multi-Parcel Project as One “Community”

The narrative treats multiple distinct parcels as a single unified project, even though the UDC requires that all properties, buildings, and structures within an HPZ be evaluated for compliance with the zoning designation, UDC standards, and HPZ design standards that apply to each individual property.

The All Saints Apartments submission, in its current form, does not comply with Ordinance 11721, the UDC Historic Preservation Zone, or Armory Park Historic Preservation Zone Design Standards. The project also raises serious procedural concerns regarding scheduling, review sequence, and the presentation of multiple unrelated parcels as a single unified development.

The Tucson Historic Preservation Foundation respectfully requests immediate suspension of project review until the proper procedural order is restored, including initial review by APHZAB.

Separately, based on the merits and the current submission, the THPF urges formal denial of the project.

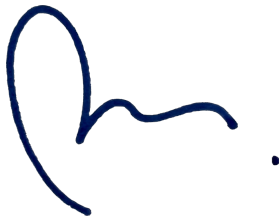
If the proposal is resubmitted THPF requests:

- 1. Full individual parcel-specific review, consistent with applicable zoning, HPZ standards and individual parcel-specific development zone standards.**
- 2. Completion and documentation of required HPO review before any further consideration.**
- 3. Mandatory redesign of new construction Building 1 at 375 S. Stone Ave to comply with ordinance 11721 conditions.**

- 4. Mandatory redesign of all new construction within the HPZ design standards including height, compatibility and massing standards.**
- 5. Separate demolition hearings for each parcel proposing demolition, consistent with UDC §5.8.10.E. (regardless of SHPO Determination of Eligibility.)**
- 6. Deferral of all hearings until the public and reviewing bodies have adequate time for analysis.**

The Foundation supports sensitive infill and needed housing but must oppose projects that disregard ordinance conditions, historic preservation standards, and established review processes.

Respectfully submitted,

A handwritten signature in dark blue ink, consisting of a large, stylized 'D' followed by a series of loops and a final dot.

Demion Clinco
CEO, Tucson Historic Preservation Foundation

11-16-2025

TO:

Desiree Aranda, Historic Preservation Officer
T-PCHC-Plans Review Subcommittee
Armory Park Historic Zone Advisory Board

c/o PDSDHistoric@tucsonaz.gov

RE:

11-18-2025 PRC Agenda, Item 4c TC-COM-1125-02090

11-18-2025 APHZAB Agenda, Item 4c TC-COM-1125-02090

After ten years of discussions, a multi-year rezoning, dozens of individual reviews of various iterations of design plans, countless neighborhood and review meetings, approvals and withdrawals, **it is truly unfortunate that PDSD has decided to waive all precedents, policies, directives, ordinances and legal requirements, by placing concurrently on both PRS and APHZAB agendas a single full review for an 11 parcel development package that spans 3 separate blocks, 3 different zoning districts and has not met any development package review requirements for any building, proposed or extant, within the overall site.** Indeed, the TC-COM reference number itself is currently invalid and requires resubmission.

As such, a courtesy review for a project concept might be in order, but a full review should not be legally made.

In reviewing the submitted sub-packets provided to both boards, it appears that neither the developer, nor PDSD are completely aware of the code requirements inherent in each site, let alone for each building. The “design narrative” is factually incorrect, in that it appears the development team is unaware of what HPZ zoning actually is, or what its requirements are.

All eleven parcels are within the Armory Park National Register Historic District. Eight are within the Armory Park HPZ. The parcels within Block 232 are also within the IID-GIID. The seven parcels on Block 109 are entirely HPZ, without any waiver of standards.

Site 1:

Although nominally zoned C3, due to the C9-19-21 rezoning (Ordinance 11721) of 375 S Stone Ave (parcels 117-14-087B, -087C, -087D), any demolitions must obtain Mayor and Council approval as described in UDC 5.8.10E; any developments package must be historically compatible to UDC 5.8.9, and require input from both PRS and APHZAB. It will also have to meet all IID-GIID requirements to use that overlay, including the prohibition on demolitions of contributing or eligible contributing buildings/structures. Per 36CFR 60.15, the Keeper of the National Register makes any determinations on properties within Armory Park NRD listed before 12-13-1980. This will apply also to site 2, 410 S 6th Ave, and can only be made through the full Section 106 Process. As such, any prior approvals for the project’s suggested demolitions will be in violation of Federal Law.

The building form is little changed since the January 2025 iteration, although the exterior elements scheme is revised. It does not meet UDC 5.8.9 design standards, in any category. The unnecessary extension of the 3-story open gallery and stair element eastward to now include the area of the former historic garage almost appears spiteful in its presentation and disregards the remaining historic streetscape of S Russel Ave. Usually, if an IID accepted development package is eventually made for the site that meets all actual legal conditions, only a courtesy review by APHZAB will be made.

Site 2:

After an 8-month attempt to “administratively delist” a listed contributing building failed, the development team is now attempting to partially demolish that same listed contributing building, prior to the Section 106 process, by suggesting a return to its “original footprint”. Because SHPO determined 410 S 6th Ave (parcel 117-14-090A) to be a Contributing Structure, per its 1948 configuration, which is unchanged, no partial demolition of the building can be warranted outside of the Section 106 process evaluations. Any attempt would be an unlawful attempt to preempt federal law. Stranding a likely non-contributing remnant in a parking lot, will preempt Secretary of the Interior Standards, SHPO standards, and COT HPZ standards, and IID-GIID requirements. The site cannot be legally redeveloped as proposed.

Please note that a redevelopment proposal for 7/ 8 units within the building /site, made in 2021, viewable under T21-PRE 0173, was well received by the board (see 10-19-2021 APHZAB LAR).

Site 3

It's incorrect that the 7 parcels in Block 109, are only listed as 410, 415, 435 South 6th Ave. They are actually 7 individual parcels on a minor subdivision plat with the addresses of: 405, 415, 425 and 435 S 6th and 410, 414 and 418 S Arizona Avenues.

Building 2 will cover 405 S 6th Avenue and 410, 414, and 418 S Arizona Avenue. Each parcel has a different development zone. Despite the errors on the final plat, adjacent zoning is HO3 and HR3, not HC3. Because of this embedded error, and in light of UDC 6.4.5.C.2, the setback requirements for 14th Street and Arizona Ave are 20' or 1.5 H. The height limit on S Arizona Ave is 25', established by 115 E 15th St.

All previous iterations of the designs reviewed by APHZAB have suggested that the setback on 14th Street should match the prevailing set backs of 408 S 6th Ave and 140 E 14th St (12'). Guidance for the portion of building 2 along Arizona Ave has also suggested that 2-story height would be appropriate there, not 3. Required sidewalks and landscape buffers are not shown.

Building 5 (415 S 6th) has always been proposed and generally recommended for adaptive reuse within the interior, while restoring the exterior. This iteration is solely multi-family residential use, rather than mixed use. The resolution of the subsequent to original construction exterior mechanical metal louvers in former window openings is yet to be resolved in the shown plans. No details are provided for restoration work on the exterior in this plan. The removal of the chimney is suggested, contrary to code. Complete, detailed and dimensioned plans will be required for any final review.

Building 6 (435 S 6th) similarly has always been proposed and generally recommended for adaptive reuse, with exterior restoration and parking. This design iteration again is incomplete for full review. Please note that the demolition of the rear shed has already been done, without review.

Other problems with this package that are unresolved:

The massing, volume and scale of Building 2 is larger than any building in the development zone, including Academy Lofts, All Saints Church, or the Catholic School. Indeed it is actually larger than ANY contributing structure (or portion thereof) in the HPZ including Safford School, its middle school annex, the Carnegie Library, the former Armory, and the contributing portion of the Temple of Music and Art. Contrary to UDC 5.8 standards that require it to be compatible in massing, scale, materials, height, rhythm, proportions, and others, it will overwhelm and minimize all the area's contributing structures.

There are no development zone or district examples on contributing structures that have:

- exterior access open corridors, functioning as the primary entrance access
- multi storied balconies facing and overlooking neighboring residential yards
- exterior open stair (multi-story) access routes
- horizontal windows forms
- trash enclosures abutting residential yards
- breeze-block perimeter walls

Procedural issues

Each site requires separate reviews, consistent with underlying and overlay zoning compliance. Staff has already indicated that each site separated by a public street must be reviewed independently.

Review schedule: concurrent review by PRS (first) and APHZAB (second) on the same day is unprecedented.

Complexity of project's scope requires more than five days for review, and consideration of additional information for each aspect of review.

the SHPO letter, dated August 11, 2025 states explicitly that 410, 415, 435 S 6th Ave are contributing structures relating to 408 S 6th, called All Saints Church/ Cursillo. The area is defined by its spatial relationships and contextual streetscape elements. This plan violates that intention and attempts to preempt the Section 106 process for the project.

I request staff reformat the reviews either as "Courtesy of Project Scope" only, or remove them from both agendas until review standards are met.

Please share these comments with both PRS and APHZAB.

Sincerely,

John Burr

