

Kathryn Leonard SHPO
Arizona State Parks
110 West Washington Street, Suite 100
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July 18, 2025

RE: Historic Sites Review Committee (HSRC), 7-25-2025 Meeting Agenda (amended) Item E, Number 7:
Armory Park Historic District (Additional Documentation): Reclassification for 410 S 6th Ave (Contributing),
Tucson, Pima County.

Historic Property Demolition Architectural Documentation report, dated 1-31-2025 by
Westland Resources, Inc., (compiled by Jen Levstik, staff), on behalf of 415 S. 6th Ave. LLC.

Arizona State Historic Preservation Office Recommendation of Eligibility form, signed by William Collins,
Eric Vondy, Arianna Urban and Kathryn Leonard, dated 4-1-2025.

Dear Ms. Leonard,

We, the Armory Park Historic Zone Advisory Board (APHZAB) are sending you this board approved letter outlining our concerns about the property, the process, and the ramifications to the Historic Preservation Zone concept, while also attempting to correct several errors in the “additional documentation” available to you in these deliberations. Please share this letter with the HSRC in advance of the 7-25-25 meeting.

Property Listing

The subject property was **listed**; by maps (including USGS data), block (232), lot (4), address, and parcel on the July 30, 1976 Listing of the National Register: Armory Park Historic Residential Neighborhood listing. It was *not added* on the 1994 Boundary Amendment NR Listing. The nomination form was approved by Dorothy H. Hall, SHPO, AZ National Parks Division on 4-28-1976. The district was listed as a “National Importance” classification.

As such, per 36CFR-60.15 **Removing properties from the National Register** (a), (1) “The property has ceased to meet criteria for listing in the national Register because of qualities which caused it to be originally listed have been lost, destroyed, or such qualities were lost **subsequent to listing and prior to listing**” (emphasis added), and (b) “Properties listed in the National Register prior to December 13, 1980 may only be removed from the National Register on the grounds established in paragraph (a)(1) of this section.” The property has not changed, other than landscaping and maintenance since its listing. It is still in good condition. Consequently, it appears that only the Keeper of the National Register may have the ability to (potentially) reclassify the property. **Note:** *all five Tucson HPZ's (West University-Dec 12, 1980, being the last) and Pima County's San Xavier HPZ meet this standard.*

The property was/is (specifically), listed on:

Tucson Historic Sites, *City of Tucson, Historic Areas Committee Report*, September 1969

Armory Park 74ff, College of Architecture, University of Arizona, Robert C Giebner, (ed.), 1974

City of Tucson (COT) (*created*) Armory Park Historic District (ord. 4300, 12-23-1974) as the first historic preservation zone.

All were supporting documentation for the 1976 listing nomination form.

Context

The property was listed on the National Register as a significant contributing property, based under federal law (National Historic Preservation Act, 1966), since the Arizona Preservation Act was not created until 1982. There were no Secretary of Interior Standards of Rehabilitation (published 1995), other than those generally outlined in the 1966 NHPA. The City of Tucson was the first in the state to pass a historic preservation ordinance, creating Historic Preservation Zone, (Ord. 3815, 3-19-72), after the initial creation of the Tucson Historical Commission as the Tucson Historical Committee, (Ord. 3712, 9-7-71). The committee collaborated with Charleston Historic Commission to create the standards incorporated in these early ordinances. Standards of Eligibility were not specified until 1992, when the Tucson Arts Council funded grants for the inventories of all Tucson HPZ's.

An inventory, based on the Arizona State Historic Property Inventory compiled by surveyor D. & K. Heininger, (report 2-17-1994, 408 S 6th Ave form, 5.25.1994), included the survey's reference numbers for each property within the district, both old and new. It was incorporated in the COT1994 Armory Park Historic District Boundary Amendment. *Note: Mr. Collins edited the 1996 NR submission*, on behalf of SHPO Edgar Beall, that led to the 1996 NR APRHD Boundary Amendment (listed 6-20-1996) That nomination submission also lists the property as "Contributing Historic".

Other assertions made in the Westland Resources document that are incorrect:

1976 listing: "only a small number of properties were listed, all before 1925"

The 1976 listing included 552 properties, all or portions of 33 blocks, 91 named structures, all block listings, with exclusion of 25 lots, 4 intrusions, photos of 48 buildings, all Street and Avenue address listings (by inclusive blocks) USGS maps (1974) ariels of the district (1974), acreage (98), and Armory Park 74ff, with its classification system. The full listing is 150 pages, including more recent individual listings, 10 projects that were awarded federal grants for rehabilitation (prior to 1978). A number of properties were specifically listed that were completed or remodeled prior to 1974, because at the time, especially after the urban renewal demolitions of 1966-73, the concept of an overall historic district that conveyed the feelings and associations of the historic neighborhood overcame the **newer** specific 50 year rule on contributing properties. **Note: the 50 year rule only applied to individually listed structures in 1976. The categories offered at the time were: "1800-99, 1900-". No end date was assigned. It is only now assumed to be 1925.** That was why it was listed as a District. A number of properties were listed then as "Contributing, Non-historic". This includes: the Catholic School, 415 S 6th Ave (built 1947-8), the 1965-7 expansion areas of the Carnegie Library, 220 (then 211) S 6th Ave; all post 1936 additions to Safford School (6 in total), and the Temple of Music and Art. All Saints Church, 408 S 6th Ave, (tower removed, conversion from "Eclectic Neoclassical brick to Spanish Colonial Revival stucco and tile roof in 1947-48, was listed as Contributing Historic, as was the Parish House, 410 S 6th Ave, (renovated 1948-50), since they were a single parcel in 1974. By our reckoning (in comparing the 1919 and 1948 Sanborn

maps in *Armory Park 74ff*), over 100 buildings of the 552 properties were not built prior to 1920. (*Side Note: the Temple of Music & Art, 330 S Scott Ave, was listed in 1976 with a supposed construction date of 1920. We now know it was begun in 1927, completed in 1929*). 80% of the expanded district was listed in 1976.

As a reference, we have included maps from *Armory Park 74ff*: 1901, 1919, 1948, 1974. We have also added the map from that document defining the 5 *Classifications* used then (A: Architecturally and Contextually Irreplaceable; B: Architecturally and Contextually Valuable; C: Contextually Valuable; D: Architecturally or Contextually Valuable; E: Negative Impact-can be replaced appropriately) of **all the properties still extant in 1974**. Both the All Saints/Cursillo and house (408, 410) are listed as *Class B: Architecturally and Contextually Valuable*.

The (1994-COT) (1996 NR) Expanded District added (20%): 135 structures; one object (Maybeck Bench), one site, NL (Velasco House) for: 686 structures, 109 listed as NC, 35 complete blocks, 11 partial blocks and an expanded period of significance "1860's-1945". **It did not remove or reclassify any prior listed buildings.**

History of the Site Area and relationship with the larger Tucson religious community (especially Catholic),(and within the eastern half of block 232--see Block 232 images in appendices):

The Sisters of St Joseph arrived in Tucson 1870. Initially, they establish a school adjacent to the original Cathedral. They constructed a new Convent and school in 1886 (Sanborn map 1887), the first in Arizona, on vacant land within the city boundaries. Later named as lots 5,6,9,10 in surveyed block 232 (see J. B Wright map 1906, basis of all future COT maps). The address now is 35 E 15th St. In 1930, it was sold to the Sisters of the Immaculate Heart of Mary, hence it is now known as the Immaculate Heart Academy.

The Catholic Diocese of Tucson acquired lots 1, 4 of that block by 1898 (and begin purchasing the adjacent west half of block 109, starting in 1925). **Note: this single parcel, comprising both lots** (now containing 410 and 408 S 6th Ave) **remained as a single parcel until 1990**, when the Diocese sold it to: Tucson Local Development Corporation TLDC (410) and Downtown Development Corp (DDC) (408), irregularly splitting it into two parcels. All pre 1990 information about the proper(-ty/-ties) is predicated on this relationship of the All Saints Church, (now called the Cursillo) and the Priest's House adjoining it as a *defining single property in relationship within the larger religious district*. As such, it was a secondary use on the same parcel.

The first All Saints Church (called the Cursillo, then) was begun (1898, completed 1912, adobe) by Bishop Henri Granjon, and destroyed by fire in 1918. The 1912 opening was accompanied by the (Tucson Citizen) Headline: "House of Worship for English Speaking Catholics". It had a cruciform shape on a north south axis and extended over both lots 1 and 4. (See 1901 AP map page, 1912 images). A new church was begun in 1919, again by Bishop Granjon, with a new east west orientation. It was not completed until 1923 (Pima Co assessor records specify 1920 as the year the property entered records). From our extensive files, it appears the Priest's House was constructed shortly after the Church's opening. The construction site shed is clearly evident in the May 10, 1924 aerial photo, provided by Ms. Levstik. We have also included a photo, c1920-21 of the site while the brick facing was going on during construction, and the completed building in 1923 (AHS photo, Buehman Collection).

The 1924 image provided by Ms. Levstik, is a cropped image from a photo taken by the Army Corps of Engineers on May 10, 1924, (A-5, negatives at AHS). The full image also shows the future site of the Temple of Music and Art, 330 S Scott Ave, as a vacant lot, although it too was listed in 1976.

In 1919, there were four Catholic Diocese Parrish in Tucson: St. Augustine (1866), All Saints (1912), Holy Family (1913, 338 W University Blvd), and Santa Cruz (1220 S 6th Ave), all within the original City of Tucson (2 square miles). The downtown area was the central locus of all faith institutions Tucson, prior to the post war (WWII) era in Tucson. All Saints Church and related properties are **significant in Tucson history** because, following the opening of Marist College in 1915, for boys, it became the locus of religious education for girls, first with the Sisters of St. Joseph/ Immaculate Heart school immediately south, and with the newly established Catholic School across 6th Ave (established in c1930s with the purchase of the mansion (formerly 101-139 E 14th St.), demolished in 1948, just after the mid-1948 opening of the Catholic School (415 S 6th Ave). This same school housed all students downtown after the closure of Marist College in 1968. The diocese leased 410 S 6th Ave in 1972 to La Frontera, who renamed it "La Casa Vida" as part of *their* branding and used the building until the mid-second decade of the 2000s.

In 1947-48, a decision was made to renovate nearly all Catholic Church properties in the area to the Spanish Colonial Revival Style. All Saints Church was first, along with the construction of the Catholic School, followed by the Priests House, and the 435 S 6th Ave Rectory (which conjoined two historic homes, with additions. By 1955, styles again changed and the dormitory block added to the 35 E 15th St (4 lot single parcel) site in 1956-7 (listed as Contributing Non-Historic in 1994/6, currently) was built in the modern style, replacing the historic garage/ apartment, laundry, and other small historic accessory structures. The Priests House was remodeled in 1948-51, and somewhat expanded on the east side (being the only area possible for expansion) to meet the expanding needs of the larger religious district contained within the Armory Park neighborhood. As the House was at the center of the religious and educational district, it held a central position in daily area life.

Other photos we have added in the appendices, for context of the site are:

- **1929 aerial, and cropped image showing Priests House** (AZ Daily Star archive).
- 1936 rodeo parade aerial (AHS file).
- 1939-40s rodeo parade aerials, showing roof/chimney of original Priests house (AHS-Magee Collection).
- 1946 aerial of downtown, showing importance of area at time (AZ DS archive).
- 1947-48 rodeo parade aerials, showing block 232 context, 410 before renovation, demolitions of 375 S Stone (2/3, prior to 1949), early construction of 415 S 6th Ave (AHS, Magee C.).
- 1948 aerials, showing 415 complete, 435 pre-reconstruction (AHS).
- 1957 aerials, showing dormitory, completed renovations.
- images of *block 232 site, including 1974 lots used to exclude lots 2,3,7* on 1976 NR listing.

A complexity to research has been that Pima County did not keep complete (or accurate) records of religious properties that were exempt from tax, until a property moved into a commercial classification. Additionally, per Reverend Gerald F. Kicanas DD, during consultation with members of this board in 2015, (then in regard to the Marist College renovation,) many diocese documents, especially older property records of church owned buildings in downtown Tucson were lost in a series of storage fires in various diocese offices in the 1950s-60s.

Note: We have yet to research the 1928 aerals and 1936 aerals, housed at the Tempe site of the Arizona Historical Society, Newcomer collections, which are unavailable on-line. We plan to do additional research, if needed, before a possible appeal letter to the Keeper of the National Register.

Specific Building Details of 410 S 6th Ave.

From the 1948-49 (amended) Sanborn maps images, measurements taken by the Pima County Assessor's office, various footprints and plans (those shown in the Westland Resources form, pages 33-38: (uncredited) by Bill Mackey, Worker Studios Inc., and other earlier iterations of development plans for the property (note: the last, Tucson PSD# T22PRE0129 which plans to renovate the structure (410) into 8 market rate apartments), we discover that **none of the records provided are accurate**. The 1961, 71, 78 COT property record card is incomplete, with inaccurate drawings ('71). The 2017 assessors record card generally has the "measurements" correct, but *not* the building forms. The assessors record map shows the 2025 current parcels/lots, not those used historically, which we have provided here. **An accurate Historic Property Assessment is still warranted.**

Other assertions in the Westland Resources Inc. document that are in error:

"Erroneously listed in 1994" Please see above.

Year of Plat: listed as "NA". The area was first platted in 1872, by S. W Foreman, followed by George Roskrige in 1893, in double block squares. It was officially platted in 1906 by the J. B. Wright map, the basis used for all assessor block maps hence.

Note: The 1976 NR listing includes "religious and educational" qualities.

"West 1/2, 1 story additions, East 1/2, two story". "doubling the square footage": This is patently false. The original main form (30x40) was two story, with original masonry service wing, sunporch, both one story, that retain their original wood sash double hung (not single hung) wood windows with a 6/1 configuration, which is still clearly visible. The post 1948 renovations included two new 2 story additions (12' x 21', 20.5' x 29.5') on the east, with a realigned open masonry porch (7' x 14') and only a small (13.2' x 15.4') new one- story room on the west. The percentage of original/new is about 64/36%.

"Setting": The landscaping is discussed, but not the overall site, streetscape context, historic associations, larger religious community associations, etc. **The setting is largely the same as when the building was listed in 1976.** It continues to convey its longstanding relationship with the religious districts, and the larger relationship to and within the community to this day

Aerial Mapping: The 1924 aerals were generally unknown to the larger community before 2021. They were researched as part of the Mapping Racist Covenants project in 2023. The assertion that no other aerial mapping exists until 1958 is also inaccurate. They may not yet be researched and incorporated into City of Tucson/ Pima County GIS maps but they are physically available for 1928, 1936, 1939, 1948, 1957 that we know of. Perhaps images in these other aerals will later provide more definitive information.

From the information in the first paragraph of this section, and other photographic evidence, and with an understanding of reading historical architectural plans and their conventions, as well as those of the

building trade standards of the time, we can reasonably speculate that the original Priest's House was a standard, 2 story NeoColonial form masonry brick house with original sunporch, servant's wing, and a central columned porch (possibly with a balcony), front door with sidelights (moved to the former parlor new entrance), side columned porch, and a basement. Nearly all original windows were (6/1 configuration) wood double hung, Craftsman style, sash windows, either singly, in pairs (with central post,) or in a 3-part series configuration, all with ogee details. The closed eave details/cornicing remain, as does the pyramidal roof with 2 large chimneys. Because of the masonry (thickness) wall information we have, we assume it was built with the standard soft brick (approximately 10" x 4" x 3.5"), generally available at the time. We do not know definitively the exterior *style* on the neocolonial form. It was likely Mission, which was popular in Tucson in the 1920's. The window forms were often used in neocolonial buildings in the 1920s-30s. It is also unknown when the building was originally stuccoed. The soft brick often was later plastered, soon after construction for durability. We do know the Spanish tile ridge detail on the pyramidal roof was added later (photographic evidence). We assume it was built by a contractor/builder (with a few modifications) based on a standard pattern book form, common at the time. Older forms/ styles were often employed in Tucson decades after their trends became unpopular elsewhere.

Calculations:

Original footprint:

Central form 30' 5" x 40' 5" (x2)	1235.5 (x2) = 2471
Masonry Sunroom 9.75 x 20'	= 195
Servants block 18' 8" x 20'	= 378
rear connector 5' 6" x 4' 5"	= 25
basement 18' 8" x 20' (less approx. 42 feet)	= 336
south chimney (note: 1/2 in sunroom area)	= 3.7
open side porch 9" x 8' 6" 78	
front porch 10' x 7' 70	
roof area (1.5' overhang) main block	1368.5
roof area enclosed (8" overhang)	638.35
roof area, porches	176

Total ft. sq. enclosed = 3408.7
 Total footprint ft.sq. = 1957.25
 Total roof A, enclosed = 2006.8
 Total roof A open = 176

Simple calculations for the 3 additions, yields the following:

Total ft. sq. enclosed = 1930.8
 Total footprint ft. sq. = 1060
 Total roof area ft. = 1229.2
 (includes 7x14 open porch)

Total current ft. sq. within current envelope, per our drawings = 5339.5 plus 600, garage
 Developer's, (per Worker Inc. drawings) estimate = 5339.5 plus 600 garage
 Assessors estimate = 4723 plus 600 garage

Percentage of original building, by footprint 63.37%

Percentage of original building, by square footage 63.84 %

We have included (speculatively likely) floor-plans for the original building (two floors) and 4 elevations. It could be restorable to its original configuration (pre-1945), as 99% remains *in situ*.

Just for informative purposes:

Current sales estimates 2025 based on similar Armory Park properties \$1.2 million-1-6 million

Current replacement (AP) costs \$400-425 x 5340 range from \$2.14-2.3 million

Governing Laws

Federal: Keeper of the National Register, determination. Again, per 36 CFR 60.15, unlikely delisting, especially since federal funding, Section 106 processes will be required for the larger redevelopment plan's implementation.

State: opinion only, informed guidance to COT, KNR. Under the circumstances, has **no lawful authority to delist property administratively**, since it is as was listed in 1976.

Pima County: PRS of TPCHC can make a recommendation to allow demolition to 1) Planning Director, PDSD, and Mayor and Council, after *revised* Full Property Documentation, and approved replacement development plan during the process outlined in Tucson code 5.8.10.E.

COT: Governing authority of Code Protections for the property. Delisting very unlikely/unnecessary for approval of a demolition, after due process, and an approved redevelopment plan. No process outlined in Tucson code for delisting. A code amendment, following a lengthy process would be required to do so.

Ramifications of entertaining a recommendation to delist a property on the National Register since 1976

There are only 6 Historic Preservation Zones (districts) in Arizona, all in Tucson (5) and Pima County (1). At times, SHPO has been both favorable and adversarial regarding the Tucson Historic Districts and Zones, over the years. Fortunately, all six should be "safe" since they all predate the December 13, 1980, requirement in 36CFR 60.15.

Certainly, some buildings have been lost (nearly 130+, since 1980) by neglect, willful demolition, incremental alterations over time, *et al*. The 2009 City of Tucson map of the AP district notes: 657 structures, 1 Individual listing, 109 NC, 21 demolished. In the 16 years until the present, we've seen another 15 demolished—generally accessory structures, fortunately.

We feel that the subject property would be listed as contributing historic under current listing requirements. Only Mayor and Council may choose to recommend demolition in the public's interest.

We fully respect Jen Levstik's qualifications/experience/ integrity as an historian. However, the *Historic Property Demolition Architectural Documentation Report* is not a City-created document, but uses an older blank online form, with the old city logo. It was prepared by Westland Resources Inc., a private firm, (Ms. Levstik is on staff), hired on behalf of the owner, 415 S. 6th Ave. LLC, a private development corporation, using only publicly available documents available on-line through The City of Tucson and Pima County governments. As such we believe and have presented significant other information that shows the report

to be flawed, incomplete, and replete with factual errors, presumptions, assumptions, speculations and biased conclusions in favor to the owner's interests.

It is unfortunate that this National Register property, that is likely about 100 years old, last modified 75 years ago, and listed nationally almost 50 years ago, is being used to test whether removing Historic Preservation Zone properties from the National Register, individually or in areas, is a viable path towards a new Urban Renewal plan undertaking, based on developer's interests and business. **It would indeed set a very bad precedent.** It could open the door for any owner in any Tucson HPZ to entertain delisting their property. It could eventually lead to the dissolutions of some NR districts in Tucson, most especially in the Historic Preservation Zones, by potentially reducing the mandatory 51% retention requirement of the National Register. A similar case—the Marist College Historic District, lost over 60% of its contributing resources a decade ago.

Conclusions

We, the APHZAB, request that you consider the supporting documentation contained in this letter and the attached appendices, and urge you not to accept the proposal to delist 410 S 6th Ave.

- The listing of the property was vetted by architectural professionals, local, state, and federal officials, and concerned residents.
- The pre-listing alterations were known to be outside of the period of significance in 1969, 1972, 1974, 1976, as well as in 1994, and 1996.
- The building has not undergone any other observable changes since 1948-51.
- Through its continuity its contribution to the neighborhood's history, development patterns, streetscape and context are valued and significant.

We are extremely concerned that this delisting would establish a precedent for future demolition of additional historic structures.

Sincerely,
Steve

Steve Grede, Chair
Armory Park Historic Zone Advisory Board

cc: Terry Majewski, Susan Lawson, Eric Vondy, William Collins, Arianna Urban, Desiree Aranda, Karen Uhlich, Demion Clinco, Stan Schuman, and John Burr.

See Appendix