



MEMORANDUM

Date: August 31, 2022

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Lester
County Administrator

A handwritten signature in black ink, appearing to read "Jan Lester", is written over the printed name of the County Administrator.

Re: **Pima County Historical Commission Update**

This memorandum provides an update on County staff progress to create a Pima County Historical Commission separate from the City of Tucson. The following is a chronology of recent progress and proceedings since the [May 16, 2022](#) update:

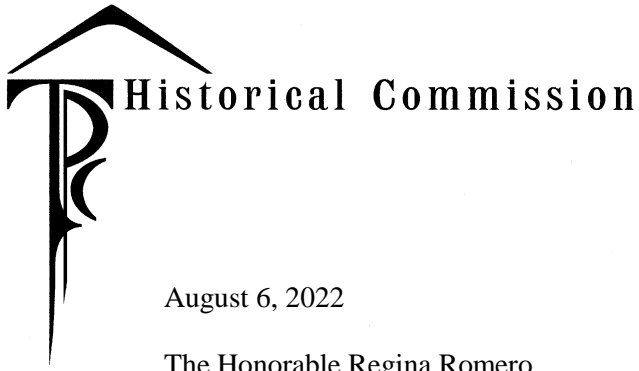
- June 2022: The National Park Service (NPS) is now investigating how many Certified Local Governments (CLG) have joint commissions throughout the nation, and the NPS is working on a national policy/rule.
- June 2022: The Arizona State CLG Coordinator recommended that the County and City *"stop working on separating the commissions until NPS issues its formal policy."*
- August 2022: County staff submitted final draft proposed Phase 1 code revisions to the Pima County Attorney's Office for review.
- August 2022: State Historic Preservation Office (SHPO) indicated that they would arrange a meeting between County, City, NPS, & SHPO, but this has not yet been scheduled.
- August 2022: Meeting of the joint Tucson-Pima County Historical Commission on August 11, 2022, included a lengthy and pointed discussion among Commission members concerning recommendations on proposed City code revisions (Attachment). City staff has indicated that direction from the Mayor & Council may be sought in September or October.

At this point, County staff is continuing to prepare for a separation; however, upon receipt of additional input from the National Park Service and State Historic Preservation Office, further direction may be requested from the Board of Supervisors.

JKL/dym

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator
Francisco García, MD, MPH, Deputy County Administrator and Chief Medical Officer
Steve Holmes, Deputy County Administrator
Carla Blackwell, Director, Development Services Department
Linda Mayro, Director, Office of Sustainability and Conservation



August 6, 2022

The Honorable Regina Romero
and Council Members
P.O. Box 27210
Tucson, AZ 85726-7210

Dear Mayor Romero and Council Members:

In 2021, the City of Tucson (COT) hired consultants Michael Baker International to solicit stakeholder input and document "best practices" in other municipalities regarding historic preservation commissions, ordinances, and the like in preparation for separating the Tucson-Pima County Historical Commission (TPCHC) into two commissions. The consultants are currently working closely with the City's Planning and Development Services Department (PDSD) to prepare their recommendations. At the fourth stakeholder meeting of June 16, the COT Historic Preservation Officer clarified that one of the recommendations moving forward was the elimination of the local zone advisory boards.

At the July meeting of the TPCHC, after hearing a presentation on the history of Tucson's historic preservation ordinance and a presentation on the latest recommendations to change the ordinance, a motion was made, duly seconded, and passed under Item 8-A2 on the July 13 agenda to send a letter to Mayor and Council with the following recommendations. For your reference, I have included a .pdf of the presentation with this letter.

Background information on each of these recommendations will follow.

1. It is imperative that the Historic Zone Advisory Boards [HZABs] retain their design review powers [as part of the current two-step process with the TCPHC Plans Review Subcommittee] because of the unique character and significance of each of the five Historic Preservation Zones and the special knowledge and expertise that only residents of those communities can bring.
2. That the physical splitting of the commissions between the City and Pima County—if it is deemed to be necessary [see below]—be accomplished with a simple text amendment.
3. To call for an administrative local study (which was discussed) documenting the strengths and weaknesses of the HZABs and the TPCHC.
4. Based on that local study, that there be a comprehensive, impartial, transparent process to implement improvements to the existing HZAB and City Historical Commission design review process.

Background Information: Recommendation 1

The formation of HPZs was a response to “urban renewal,” which demolished much of the city’s historic multicultural core in the late 1960s. Alene Smith, Alva Torres, and early preservationists witnessed urban renewal and what happens when the residents lose their voice over their own private property rights. All across the nation, urban renewal consistently eliminated area residents’ ability to participate in decision-making processes about the places they called home. The advisory boards in Tucson (HZABs) are the medium for residents to participate directly in the decision-making and appeal processes to preserve historic neighborhoods. Mayor and Council approved Tucson’s Historic Preservation Committees in 1971, codifying citizen participation in historic preservation. HZABs were listed in the COT building code in 1974 and regulated additions and modifications to historic properties and mandated review of proposed demolitions or new construction. Hastened by the potential loss of several additional blocks of historic resources to the Butterfield Expressway, National Register Historic Districts were listed starting in 1975. Tucson’s Historic Preservation Code, the first in Arizona, became a role model for other cities. During Arizona’s Centennial celebrations in 2012, the TPCHC received one of the few prestigious Centennial Awards given, and to my knowledge was the only one given to a preservation/historical commission.

HZABs continue to serve their districts by bringing a deep understanding of the unique context, layout, and building and structures in each of Tucson’s five HPZs. Beyond review and recommendation responsibilities, HZAB volunteers support applicants by answering questions and helping them navigate the process, edit the district design guidelines, and are responsible for district inventories and for updating their National Register nominations.

The Historic Tucson Committee was formed in 1971 and reorganized to become TPCHC in 1974. The duties were expanded with Certified Local Government (CLG) status in 1990. Their role is to “*advise the Mayor and Council, the City Planning and Development Services Department, the Board of Supervisors, and the applicable county officials on issues concerning historic sites, historic structures, and new construction and demolition within Historic Preservation Zones or Historic Landmarks within the community. The formal review functions of the Tucson-Pima County Historical Commission are performed by the TPCHC Plans Review Subcommittee (PRS)*” (<https://www.tucsonaz.gov/pdsd/tpchc-plans-review-subcommittee>). PRS brings a broader perspective to the plans review process and serves as a check and balance. PRS also reviews and provides feedback on nominations. TPCHC volunteers, appointed by both the Tucson Mayor and Council and the Pima County Board of Supervisors, work together to support preservation through the work of its various subcommittees, which include transportation, historic landscapes, preservation awards, and events.

If the current commission were divided between City and County, the subcommittees that produce the bulk of the commission’s work would be negatively impacted, in many cases making them nonfunctional. At the present time, these subcommittees serve the preservation needs of both the City and the County, many of which are overlapping and intertwined. Their elimination would be a significant loss.

Background Information: Recommendation 2

In the spring of 2019, at a meeting of Certified Local Government (CLG) Coordinators, the National Park Service (NPS) expressed an opinion that a joint city/county Historical Commission was inadvisable. The Arizona State Historic Preservation Office (SHPO) CLG Coordinator conveyed these concerns to the Pima County Cultural Resources Department and the City of

Tucson Historic Preservation Office. Recent conversations with NPS staff suggest that separation of the commissions is unnecessary.

Background Information: Recommendation 3

The recently commissioned study by Michael Baker International offers information on the commission structures and procedures of communities other than Tucson, but it must be recognized that this resource is valuable for comparative purposes only.

Before any changes in the structure of the TPCHC are pursued, we feel that – in addition to significant and effective public outreach – a study of the history, current structures and procedures, and specific practices in need of improvement is critical. Reflection on the history and development of the TPCHC and why it has worked for Tucson and Pima County has to the point been absent in the current process. This study should focus on three areas:

- the original design of the Commission and neighborhood advisory boards
- an inventory and analysis of the working structures that are in place today
- a delineation of specific areas of potential improvement

Background Information: Recommendation 4

Once the study is completed, a task force composed of individuals drawn from the City, the TPCHC, and the advisory boards should evaluate the findings and present their conclusions and recommendations to all groups for discussion and approval.

Members of the TPCHC are actively seeking funding for such a study, without which recommendations for change are unlikely to be appropriate. Our hope is that such a study would be objective and not colored by predetermined outcomes.

We greatly appreciate this opportunity to express our concerns. We realize that much of what we included in our recommendations is technical, and we would be glad to provide further clarification if you so desire. As commissioners, we look forward to an opportunity to work with Mayor and Council, PDSD, Pima County, the HZABs, and those who plan projects in historic zones to improve our systems and processes while continuing to protect our communities' historic resources.

Sincerely,



Teresita Majewski, Ph.D., RPA, FSA
Chair, Tucson–Pima County Historical Commission

cc: Tucson–Pima County Historical Commission; Pima County Board of Supervisors; Jan Leshner, Pima County Administrator; Linda Mayro, Sustainability and Conservation – Pima County; Jodie Brown, Tucson Historic Preservation Officer; Koren Manning, Planning Administrator, City of Tucson