

Appendix D

Cultural Resources Consultation



U.S. Department
of Transportation
**Federal Highway
Administration**

ARIZONA DIVISION

4000 North Central Avenue
Suite 1500
Phoenix, Arizona 85012-3500
(602) 379-3646
Fax: (602) 382-8998
<http://www.fhwa.dot.gov/azdiv/index.htm>

April 23, 2012

In Reply Refer To:
010-D(211)N
HOP-AZ

010-D(211)N
TRACS No. 010 PM 247 H7583 01L
I-10, Ina Rd. TI to Ruthrauff Rd. TI
Continuing Section 106 Consultation
"Architectural Resources"

Ms. Nancy E. Pearson, Assistant Permits Administrator
Arizona State Museum
P.O. Box 210026
University of Arizona
Tucson, Arizona 85721-0026

Dear Ms. Pearson:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National

Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in "*Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*" (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).

The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant, do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method of construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email JMallery@azdot.gov.

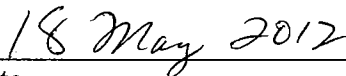
Sincerely yours,



for
Karla S. Petty
Division Administrator



Signature for ASM Concurrence
010-D(211)N



Date

Enclosures



U.S. Department
of Transportation
Federal Highway
Administration

ARIZONA DIVISION

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TRACS No. 010 PM 247 H7583 01L
I-10, Ina Rd. TI to Ruthrauff Rd. TI
Continuing Section 106 Consultation
"Architectural Resources"

Ms. Carol Legard
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW
Washington, D.C. 20004

Dear Ms. Legard:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion D. This project would proceed under the

terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in "*Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*" (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).

The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant; do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method or construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email JMallery@azdot.gov.

Sincerely yours,



^{for}
Karla S. Petty
Division Administrator

Signature for ACHP Concurrence
010-D(211)N

Date

Enclosures

Table 1. Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Casas del Oeste (1-79) Subdivision</i>					
4411 W Placita Rebecca	225370330	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4420 W Ina Road	225370230	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4421 W Placita Rebecca	225370320	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Ina Road	225370240	1981	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Placita Rebecca	225370370	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4431 W Placita Rebecca	225370310	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4440 W Placita Rebecca	225370380	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4460 W Ina Road	225370250	1972-73	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4541 W Calle Marco	225370420	1977	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4551 W Calle Marco	225370410	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4561 W Calle Marco	225370400	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4571 W Calle Marco	225370390	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7211 N Camino de la Cruz	225370260	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7221 N Camino de la Cruz	225370270	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7231 N Camino de la Cruz	225370280	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7241 N Camino de la Cruz	225370290	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7251 N Camino de la Cruz	225370300	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Gibson Tract Subdivision</i>					
2850 W Diamond Street	101153270	1959-61	Not eligible	Not eligible	Not eligible under Criteria A, B, C
2838 W Ruthrauff Road	10115040A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2840 W Ruthrauff Road	10115039A	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4842 N Shannon Road	10115036A	1959	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4846 N Davis Avenue	101150310	1946	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4851 N Maryvale Avenue	101150270	1960-61	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4868 N Shannon Road	101150340	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5151 N Davis Avenue	101150004A	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

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Table 1. Individually surveyed properties, sorted by subdivision (continued)

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Palmdale No. 2 Subdivision</i>					
2964 W. Sago Circle	101142490	mobile home 1964, block addition- 1968	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3037 W. Emerald Circle	101142750	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
3053 W. Jade Place	101143040	1971	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
<i>Sunrise Addition Subdivision</i>					
4821 N. Kain Avenue	101150440	1959	Not eligible	Not eligible	Lacks integrity
4831 N. Valley Park Avenue	101150630	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
4861 N. Valley Park Avenue	101150670	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
<i>Sunrise Addition No. 2 Subdivision</i>					
2550 W Ruthrauff Road	101151010	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2602 W Ruthrauff Road	101150720	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4826 N. Plane Avenue	101150750	1962	Not eligible	Not eligible	Lacks integrity
4833 N. Gold Avenue	101150970	1960	Not eligible	Not eligible	Not individually significant, in an ineligible district
4950 N. Plane Avenue	101150850	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Sunrise Addition No. 3 Subdivision</i>					
2660 W Ruthrauff Road	10115176A	1965	Not eligible	Not eligible	Alterations to primary façade have substantially compromised integrity
2680 W Ruthrauff Road	101151180	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4801 N Sunrise Avenue	101151470	1970	Not eligible	Not eligible	Compromised Integrity, not eligible under Criteria A, B, and C
4833 N. Sunrise Avenue	101151430	1964	Not eligible	Not eligible	Not individually significant, in an ineligible district
4842 N Maryvale Avenue	101151230	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4949 N. Plane Avenue	101151640	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Tres Nogales Subdivision</i>					
3333 W. Tres Nogales Road	101080170	1962	Not eligible	Not eligible	Lacks integrity
3342 W. Tres Nogales Road	101080040	1962	Not eligible	Not eligible	Lacks integrity
3404 W. Tres Nogales Road	101080060	1954	Not eligible	Not eligible	Lacks integrity

(continued next page)

Table 1. Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/Justification
<i>Tucsonita Subdivision</i>					
2565 W Zinnia Avenue	10307048B/ 103070470	1962	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2623 W Violet Avenue	103070200	1957	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2626 W Violet Avenue	103070080	ca. 1945	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2627 W Violet Avenue	103070210	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2629 W Ruthrauff Road	10307002A	1949	Not eligible	Not eligible	Original 1949 residence is substantially altered
2634 W Violet Avenue	103070070	1950	Not eligible	Not eligible	Substantial alterations to the exterior have significantly compromised integrity
2639 W Ruthrauff Road	10307003A	1960-63	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
2656 W Violet Avenue	103070060	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2713 W Violet Avenue	10307026A	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2722 W Violet Avenue	103070170	ca. 1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2729 W Ruthrauff Road	103070120	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2755 W Ruthrauff Road	10307015B	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2819 W Ruthrauff Road	10307066A	1957	Not eligible	Not eligible	Not significant, replacement of doors and windows has compromised integrity
4410 N Highway Drive	103070650	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4619 N Highway Drive	10307069B	1963	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4684 N. Highway Dr.	10307026C	1968	Not eligible	Not eligible	Not significant, does not meet Criteria Consideration A
<i>Individual properties not in a subdivision</i>					
3100 W Curtis Road	10117023A	1931	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3120 W Curtis Road	10117022F	1955	Not eligible	Not eligible	Compromised Integrity
3150 W El Camino del Cerro	10120038C	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4535 West Ina Road	10105009D	ca. 1960	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4715 W Massingale Road	22138008A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4801 W Massingale Road	221380040	1959	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4820 W Massingale Road	221350380	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4901 N Shannon Road	10120009E	1948	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4915 N Shannon Road	10120008A	1958	Not eligible	Not eligible	See continuation sheet
4945 N Shannon Road	10120007F	1971	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5128 N Casa Grande Highway	10120019F	1951	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5140 N Casa Grande Highway	10120019J	1953-55	Not eligible	Not eligible	Substantial alterations, compromised integrity

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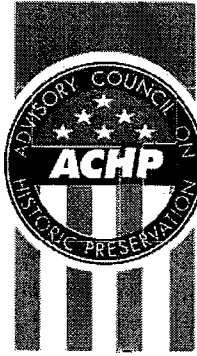
Table 1. Individually surveyed properties, sorted by subdivision (continued)

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Individual properties not in a subdivision (continued)</i>					
5141 N Casa Grande Highway	10120025B	1961	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5201 N Casa Grande Highway	10117019J	1946	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5240 N Highway Drive	10117022B	1969	Not eligible	Not eligible	Additions and alterations have compromised integrity, property is not significant
5266 N Highway Drive	101170270	1962	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5280 (5333) N Highway Drive	10117028A	1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5301 W Ina Road	21401015A	1960	Not eligible	Not eligible	Compromised integrity
5348 N Highway Drive	101170310	1946	Not eligible	Not eligible	Original structure hidden by non-historic additions on SW and SE facades
6913 N Camino Martin	101050170	1941	Not eligible	Not eligible	Compromised Integrity, not eligible under Criteria A, B, and C
6915 N Camino Martin	101050160	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7031 N Camino Martin	10105012F	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

Table 2. National Register of Historic Places Evaluation of Subdivisions

Subdivision	Plat date	NRHP district eligibility	Remarks
Casas del Oeste	1972	Not eligible	Less than 40 years old, high integrity
Gibson Tract	1946	Not eligible	Lack of significance, low integrity
Jeremy	1972	Not eligible	Less than 40 years old, low integrity
Palmdale No. 2	1963	Not eligible	Lack of significance, low integrity
Sunrise Addition	1958	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 2	1959	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 3	1959	Not eligible	Locally significant under Criterion C, low integrity
Tres Nogales	1948	Not eligible	Lack of significance, low integrity
Tucsonita	1946	Not eligible	Lack of significance, low integrity

JUN 20 2012



Preserving America's Heritage

June 15, 2012

Ms. Karla S. Petty
Division Administrator
Federal Highway Administration
Arizona Division
4000 North Central Avenue, Suite 1500
Phoenix, Arizona 85012-3500


Ref: *I-10, Ina Road TI to Ruthrauff Road TI, Architectural Resources
City of Tucson, Pima County, Arizona*

The Advisory Council on Historic Preservation (ACHP) received your letter of April 23, 2012, requesting our concurrence regarding the Federal Highway Administration's (FHWA's) National Register of Historic Places (NRHP) eligibility findings and determinations of effect for the referenced undertaking. We understand the NRHP eligibility findings and determinations of effect were carried out pursuant to the terms of the Programmatic Agreement executed on April 26, 1993 among the FHWA, the Arizona Department of Transportation, the Arizona State Historic Preservation Officer and the ACHP, for the Interstate 10 Tangerine Road to Junction I-10/I-19 Projects.

The report is thorough and provides a detailed assessment of historic properties located in the undertaking's area of potential effect. We concur with FHWA's recommendation that none of the architectural resources meet the NRHP Criteria. Further, we agree that the undertaking may result in adverse effects on NRHP eligible archeological sites.

Thank you for the opportunity to review the monitoring report. If we may be of further assistance in this matter, please contact Najah Duvall-Gabriel at (202)606-8585, or via email at ngabriel@achp.gov.

Sincerely,

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

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
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I-10, Ina Rd. TI to Ruthrauff Rd. TI
Continuing Section 106 Consultation
"Architectural Resources"

Mr. Roger Anyon
Pima County
Office of Cultural Resources and Historic Preservation
201 North Stone, 6th Floor
Tucson, Arizona 85701

Dear Mr. Anyon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is subject to Section 106 review. On April 23, 2012, FHWA consulted with you on the adequacy of and recommendations within an inventory of the historic built environment within the project area, "*Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*" (Blackwell and Barnes 2012),

Thank you for responding to our April 23, 2012 letter with a letter dated May 10, 2012 in regards to our consultation regarding the eligibility of architectural resources within the Area of Potential Effects (APE) of the I-10; Ina to Ruthrauff project, and thank you for taking the time to have a subsequent follow up discussion on the telephone with Ruth Greenspan, Linda Davis, and Matt Mallery of the ADOT Environmental Planning Group (EPG) Historic Preservation Team (HPT). FHWA agrees with your comment that the "...incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries...of platted residential subdivisions" does not adequately convey the integral and essential nature of mixed-use land use development in the project vicinity. We acknowledge that

this phrasing detracts from other portions of the report that do, in our opinion, acknowledge the integral history of mixed land use in the area.

The *General Tucson History* section is, as you point out, focused on the history of residential land use and development. The following section, entitled *History and Development of the Project Area*, gives a more balanced discussion of commercial and industrial development of the project area, and includes discussions that explicitly address the pattern of mixed-use development that is characteristic of some parts of the APE. The subsection entitled *Residential Subdivision Development in the Project Area* discusses mixed commercial, industrial, and residential use within individual subdivisions, and the following subsection, *Commercial Corridor Development*, also addresses mixed-use development.

Renaming some of the section headings to more explicitly refer to their content and adding a paragraph or two that explicitly acknowledges the essential nature and significance of mixed land use in the project area would probably help to focus and balance the historic context. However, even without those changes, we believe a close reading of the document gives adequate context within which to evaluate the architectural resources in the project area.

FHWA received concurrences with the adequacy of the report and on our recommendation that none of the properties evaluated in this report is eligible for inclusion in the National Register of Historic Places (NRHP) from the State Historic Preservation Office, the Advisory Council on Historic Preservation, the Arizona State Museum, the Arizona State Land Department, the Town of Marana, the Yavapai-Prescott Indian Tribe, and the Hopi Tribe. Pima County was the only response received that did not concur with the adequacy of the report. As we received no responses that disagreed with any of the eligibility recommendations, FHWA does not intend to reconsult on the eligibility recommendations.

Thank you again for your response. We look forward to continuing consultation with Pima County on this and other projects in the future. If you have additional questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email JMallery@azdot.gov or contact [Meesa Otani](mailto:meesa.otani@dot.gov) at 602-382-8976 or email meesa.otani@dot.gov.

Sincerely yours,



for
Karla S. Petty
Division Administrator

Table 1. Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Casas del Oeste (1-79) Subdivision</i>					
4411 W Placita Rebecca	225370330	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4420 W Ina Road	225370230	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4421 W Placita Rebecca	225370320	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Ina Road	225370240	1981	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Placita Rebecca	225370370	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4431 W Placita Rebecca	225370310	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4440 W Placita Rebecca	225370380	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4460 W Ina Road	225370250	1972-73	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4541 W Calle Marco	225370420	1977	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4551 W Calle Marco	225370410	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4561 W Calle Marco	225370400	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4571 W Calle Marco	225370390	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7211 N Camino de la Cruz	225370260	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7221 N Camino de la Cruz	225370270	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7231 N Camino de la Cruz	225370280	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7241 N Camino de la Cruz	225370290	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7251 N Camino de la Cruz	225370300	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Gibson Tract Subdivision</i>					
2850 W Diamond Street	101153270	1959-61	Not eligible	Not eligible	Not eligible under Criteria A, B, C
2838 W Ruthrauff Road	10115040A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2840 W Ruthrauff Road	10115039A	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4842 N Shannon Road	10115036A	1959	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4846 N Davis Avenue	101150310	1946	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4851 N Maryvale Avenue	101150270	1960-61	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4868 N Shannon Road	101150340	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5151 N Davis Avenue	101150004A	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

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Table 1. Individually surveyed properties, sorted by subdivision (continued)

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Palmdale No. 2 Subdivision</i>					
2964 W. Sago Circle	101142490	mobile home 1964, block addition-1968	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3037 W. Emerald Circle	101142750	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
3053 W. Jade Place	101143040	1971	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
<i>Sunrise Addition Subdivision</i>					
4821 N. Kain Avenue	101150440	1959	Not eligible	Not eligible	Lacks integrity
4831 N. Valley Park Avenue	101150630	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
4861 N. Valley Park Avenue	101150670	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
<i>Sunrise Addition No. 2 Subdivision</i>					
2550 W. Ruthrauff Road	101151010	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2602 W. Ruthrauff Road	101150720	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4826 N. Plane Avenue	101150750	1962	Not eligible	Not eligible	Lacks integrity
4833 N. Gold Avenue	101150970	1960	Not eligible	Not eligible	Not individually significant, in an ineligible district
4950 N. Plane Avenue	101150850	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Sunrise Addition No. 3 Subdivision</i>					
2660 W. Ruthrauff Road	10115176A	1965	Not eligible	Not eligible	Alterations to primary façade have substantially compromised integrity
2680 W. Ruthrauff Road	101151180	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4801 N. Sunrise Avenue	101151470	1970	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4833 N. Sunrise Avenue	101151430	1964	Not eligible	Not eligible	Not individually significant, in an ineligible district
4842 N. Maryvale Avenue	101151230	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4949 N. Plane Avenue	101151640	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Tres Nogales Subdivision</i>					
3333 W. Tres Nogales Road	101080170	1962	Not eligible	Not eligible	Lacks integrity
3342 W. Tres Nogales Road	101080040	1962	Not eligible	Not eligible	Lacks integrity
3404 W. Tres Nogales Road	101080060	1954	Not eligible	Not eligible	Lacks integrity

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Table 1. Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Tucsonita Subdivision</i>					
2565 W Zinnia Avenue	10307048B/ 103070470	1962	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2623 W Violet Avenue	103070200	1957	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2626 W Violet Avenue	103070080	ca. 1945	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2627 W Violet Avenue	103070210	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2629 W Ruthrauff Road	10307002A	1949	Not eligible	Not eligible	Original 1949 residence is substantially altered
2634 W Violet Avenue	103070070	1950	Not eligible	Not eligible	Substantial alterations to the exterior have significantly compromised integrity
2639 W Ruthrauff Road	10307003A	1960-63	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
2656 W Violet Avenue	103070060	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2713 W Violet Avenue	10307026A	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2722 W Violet Avenue	103070170	ca. 1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2729 W Ruthrauff Road	103070120	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2755 W Ruthrauff Road	10307015B	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2819 W Ruthrauff Road	10307066A	1957	Not eligible	Not eligible	Not significant, replacement of doors and windows has compromised integrity
4410 N Highway Drive	103070650	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4619 N Highway Drive	10307069B	1963	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4684 N. Highway Dr.	10307026C	1968	Not eligible	Not eligible	Not significant, does not meet Criteria Consideration A
<i>Individual properties not in a subdivision</i>					
3100 W Curtis Road	10117023A	1931	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3120 W Curtis Road	10117022F	1955	Not eligible	Not eligible	Compromised integrity
3150 W El Camino del Cerro	10120038C	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4535 West Ina Road	10105009D	ca. 1960	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4715 W Massingale Road	22138008A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4801 W Massingale Road	221380040	1959	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4820 W Massingale Road	221350380	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4901 N Shannon Road	10120009E	1948	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4915 N Shannon Road	10120008A	1958	Not eligible	Not eligible	See continuation sheet
4945 N Shannon Road	10120007F	1971	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5128 N Casa Grande Highway	10120019F	1951	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5140 N Casa Grande Highway	10120019J	1953-55	Not eligible	Not eligible	Substantial alterations, compromised integrity

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Table 1. Individually surveyed properties, sorted by subdivision (continued)

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Individual properties not in a subdivision (continued)</i>					
5141 N Casa Grande Highway	10120025B	1961	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5201 N Casa Grande Highway	10117019J	1946	Not eligible	Not eligible	Compromised Integrity, not eligible under Criteria A, B, and C
5240 N Highway Drive	10117022B	1969	Not eligible	Not eligible	Additions and alterations have compromised integrity, property is not significant
5266 N Highway Drive	101170270	1962	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5280 (5333) N Highway Drive	10117028A	1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5301 W Ina Road	21401015A	1960	Not eligible	Not eligible	Compromised Integrity
5348 N Highway Drive	101170310	1946	Not eligible	Not eligible	Original structure hidden by non-historic additions on SW and SE facades
6913 N Camino Martin	101050170	1941	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
6915 N Camino Martin	101050160	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7031 N Camino Martin	10105012F	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

Table 2. National Register of Historic Places Evaluation of Subdivisions

Subdivision	Plat date	NRHP district eligibility	Remarks
Casas del Oeste	1972	Not eligible	Less than 40 years old, high integrity
Gibson Tract	1946	Not eligible	Lack of significance, low integrity
Jeremy	1972	Not eligible	Less than 40 years old, low integrity
Palmdale No. 2	1963	Not eligible	Lack of significance, low integrity
Sunrise Addition	1958	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 2	1959	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 3	1959	Not eligible	Locally significant under Criterion C, low integrity
Tres Nogales	1948	Not eligible	Lack of significance, low integrity
Tucsonita	1946	Not eligible	Lack of significance, low integrity