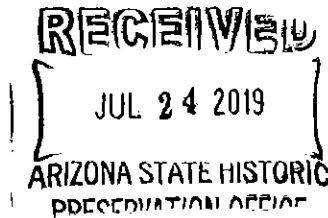


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July 24, 2019

In Reply Refer To:

010-E(210)A
TRACS No. 010 PM 260 H7825 01L
I-10; Jct. I-19 to SR 83 and SR 210, Golf Links to I-10.
Initial Section 106 Consultation
"no adverse effect"
Built environment report

Dr. David Jacobs, Compliance Specialist
State Historic Preservation Office
1100 West Washington St.
Phoenix, Arizona 85007

Dear Dr. Jacobs:

The Arizona Department of Transportation (ADOT) is planning improvements along Interstate 10 (I-10) between milepost (MP) 260.79 and MP 272.30, and an extension of State Route (SR) 210 along Alvernon Way, from I-10 to the existing SR 210, in and adjacent to the cities of Tucson and South Tucson, Pima County, Arizona (see Figure 1 in the enclosed report). The project is located in portions of

- Section 25 of Township 14 South, Range 13 East (Gila and Salt River Baseline and Meridian [GSRBM])
- Sections 21, 22, and 27-34 of Township 14 South, Range 14 East (GSRBM)
- Section 3, 4, 10, 11, 13, 14, and 24 of Township 15 South, Range 14 East (GSRBM)
- Sections 19, 20, 28-30, and 33 of Township 15 South, Range 15 East (GSRBM)

as depicted in US Geological Survey topographic maps (7.5-minute series) of the Tucson (AZ) and Tucson SW (AZ) quadrangles. The project would occur within

- ADOT-owned right-of-way (ROW)
- State trust land managed by the Arizona State Land Department (ASLD)
- Land owned by the Arizona Board of Regents (ABOR)
- US Department of Defense land upon Davis-Monthan Air Force Base (DOD/DM)
- City of Tucson (City)-owned ROW
- Pima County (County)-owned land and ROW
- Union Pacific Railroad (UPRR)-owned land

Because this project would employ federal funds, it is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 *et seq.*). The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by

ADOT pursuant to 23 U.S.C. § 327 and a memorandum of understanding, dated April 16, 2019 and executed by the Federal Highway Administration and ADOT.

Consulting parties for this project are the DOD/DM, the Arizona State Historic Preservation Office (SHPO), ASLD, the Arizona State Museum (ASM), the County, the City, UPRR, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Pascua Yaqui Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation (Four Southern Tribes lead), the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

The proposed project would consist of improvements to the I-10 corridor from the I-10/I-19 traffic interchange (TI) easterly through the Kolb Road TI, and the extension of SR 210 south along the Alvernon Way alignment to I-10. At this time, there are two build alternatives under consideration – Alternative I and Alternative IV – as well as a “no-build” alternative. Between the I-10 / I-19 TI and Alvernon Way, and along the Alvernon Way / SR 210 extension, alternatives I and IV share the same design components and follow the same design footprint (see Figures 2 – 5 in the enclosed report). The two alternatives are differentiated east of the Alvernon Way / I-10 TI along the I-10 corridor. Specific design elements common to *both* alternatives would include:

- Along the I-10 corridor, between the I-10 / I-19 TI and the Alvernon Way TI:
 - Adding up to two lanes in each direction on I-10
 - Adding a new grade-separated diamond interchange at Country Club Road
 - Reconfiguring the 6th Avenue TI, Park Avenue TI, Kino Parkway TI, and Alvernon Way TI to accommodate the widening of I-10 and local side streets
 - Removing the Palo Verde Road TI
 - Removing eastbound and westbound frontage roads between Craycroft Road and Kolb Road
 - Reconfiguring the Valencia Road TI, Craycroft Road TI, Wilmot Road TI, and Kolb Road TI to accommodate the widening of I-10 and local side streets
- Along the Alvernon Way alignment, linking SR 210 and I-10.
 - Providing four travel lanes in each direction
 - Reconfiguring the Alvernon Way TI to accommodate the new connection with SR 210 and the widening of I-10
 - Constructing new roadway connections at Alvernon Way, Golf Links Road, and Barranza-Aviation Parkway
 - Adding a new grade-separated diamond interchange at Ajo Way
 - Elevating SR 210 over Ajo Way and Irvington Road, south of the UPRR bridge

Design elements specific to Alternative I would consist of:

- Widening the I-10 alignment to accommodate five to six travel lanes in both directions between the Alvernon Way / I-10 TI and east of the Kolb Road TI

Design elements specific to Alternative IV would consist of:

- Widening the I-10 alignment between Alvernon Way to Kolb Road to serve as a collector-distributor (CD) roadway, adding up to four lanes in each direction
- Providing CD roadway access at Valencia Road, Craycroft Road, Wilmot Road, and Kolb Road

New ROW would be required if either of the two build alternatives is selected. Table 1 details the new ROW that would be required. Temporary construction easements may also be necessary during project construction, but none have yet been identified.

Table 1. Jurisdiction and area of anticipated new ROW

Land Jurisdiction	Alternative I	Alternative IV
Private	120.30 ac	134.87 ac
ABOR	3.45 ac	3.45 ac
County	32.43 ac	32.50 ac
ASLD	5.37 ac	5.37 ac

Cultural Resource Investigations

The project area, shared by both build alternatives, has been considered during the course of 89 previous cultural resources investigations, resulting in survey coverage of approximately 86.4 percent. Those resulting in the recordation of historic properties are synopsisized in Table 2. Additional archaeological survey would likely be necessary if either Alternative I or Alternative IV is selected following the ongoing Environmental Assessment.

Table 2. Select cultural resource surveys within the project area

Citation	Reference	Consultation
Fraser 2008	<i>Vehicular Bridges in Arizona 1880–1964</i>	Clementino (ADOT) to Collins (SHPO), January 12, 2012; SHPO concurrence February 28, 2012
Barnes and Wright 2001	<i>A Cultural Resources Survey of Approximately 29.4 Miles of Interstate 10 Right of Way between Mileposts 231.8 - 240.5 and Mileposts 260.5 - 281.2 in the Vicinity of Marana and Tucson, Pinal and Pima Counties, Arizona (revised)</i>	Jacobs (SHPO) to Ohnersorgen (ADOT), July 19, 2001
Doak 2006	<i>The Sinclair II Survey: A Class III Cultural Resource Survey of a 317-Acre Parcel in Tucson, Arizona, the Former Site of the Tucson Downtown Airport</i>	Not available

Citation	Reference	Consultation
Harry 1999	<i>Cultural Resource Survey of State Land near Kolb and I-10</i>	Not available
Rieder et al. 2006	<i>Class III Cultural Resources Survey, SFPP, LP, El Paso to Phoenix Expansion Project, Arizona portion, Cochise and Pima Counties, Arizona</i>	Not available

Jacobs Engineering Group, Inc. (Jacobs) recently completed an historic built environment investigation within and adjacent to the proposed project's shared project area. Forty-two historic buildings, both commercial and residential, were identified and assessed, along with one historic residential district. The results of this study are reported in *A Historic Building Inventory and Historic Road Evaluation for the I-10; Jct. I-19 to SR 83 and SR 210, Golf Links to I-10 Project, Tucson, Pima County, Arizona* (Ingwersen et al. 2019), which is enclosed for your review and comment. Based on this study, ADOT has determined that none of the 43 newly-assessed properties are eligible for the National Register of Historic Places (NRHP).

Cultural Resources

A total of 82 cultural resources have been identified within or immediately adjacent to the shared Alternative I / Alternative IV project limits (see Table 3). This includes one historic district, 42 historic buildings, 31 historic in-use structures, and eight archaeological sites.

Table 3. Cultural resources in the shared Alternative I / Alternative IV APE

Resource	Resource Type	Eligibility	Consultation	Direct Impacts ^a	Treatment
<i>Historic, Architectural Resources</i>					
Littletown subdivision	Historic residential subdivision	Not eligible	Herein determined	n/a	None
42 individual buildings (see enclosed report)	Historic residential and commercial buildings	Not eligible	Herein determined	n/a	None
<i>Historic, In-Use Structures</i>					
Southern Pacific Railroad Mainline	Railroad alignment	Eligible	Remington (ADOT) to Jacobs (SHPO), December 8, 2009; SHPO concurrence December 24, 2009	Yes	None
ADOT structures 1107-1112, 1162, 1163, 1217-1220, 1223-1226, 5555	Historic I-10 bridges and culverts, ca. 1965 – 1967	Ineligible (594-597, 1044, 1045, 1052)	Clementino (ADOT) to Collins (SHPO) January 12, 2012; SHPO concurrence February 28, 2012	n/a	None

Resource	Resource Type	Eligibility	Consultation	Direct Impacts ^a	Treatment
ADOT structures 594-597, 1044, 1045, 1052	Historic I-10 bridges and culverts, ca. 1958 – 1960	Unevaluated, but exempt	<i>Section 106 Exemption Regarding Effects to the Interstate Highway System</i> (Advisory Council on Historic Preservation 2005)	n/a	None
El Paso Natural Gas Pipeline No. 1007	Historic pipeline	Eligible, but exempt	<i>Federal Register</i> 67(66), April 5, 2002	No	None
Franco Ranch Road	Historic roadway	Unevaluated	n/a	Potentially	None
Old Vail Road	Historic roadway	Unevaluated	n/a	Yes	None
Twin Buttes Railroad	Historic railroad	Not eligible	Frye (FHWA) to Jacobs (SHPO), May 23, 2009; SHPO concurrence April 2, 2009	n/a	None
U.S. Highway 80, State Route 80	Historic highway	Eligible	FHWA, ADOT, and SHPO 2002	Yes	None
Irvington Generating Station	Historic generating station	Not eligible	Patel (PDEQ) to Anyon (PCOSC), August 31, 2017; PCOSC concurrence August 31, 2017, and Patel (PDEQ) to Diehl (City), August 31, 2017; City concurrence September 7, 2017 ^b	n/a	None
<i>Archaeological Sites</i>					
AZ FF:8:15(ASM)	Fairbank-Mescal-Tucson Rte., El Paso & Southwestern Railroad grade	Eligible, determined non-contributing within the project area	Gasser (ADOT) to Miller (SHPO), April 26, 1999; SHPO concurrence May 26, 1999.	n/a	None
AZ BB:13:40(ASM)	Huhugam sherd scatter and rock features	Unevaluated	Hollis (FHWA) to Jacobs (SHPO), March 23, 2009; SHPO concurrence April 2, 2009	Potentially, although site likely destroyed	Monitoring

Resource	Resource Type	Eligibility	Consultation	Direct Impacts ^a	Treatment
AZ BB:13:46(ASM)	Huhugam sherd scatter and possible trash mounds	Unevaluated	Hollis (FHWA) to Jacobs (SHPO), March 23, 2009; SHPO concurrence April 2, 2009	Potentially, although site likely destroyed	Monitoring
AZ BB:13:47(ASM)	Huhugam artifact scatter	Unevaluated	Hollis (FHWA) to Jacobs (SHPO), March 23, 2009; SHPO concurrence April 2, 2009	Potentially, although site likely destroyed	Monitoring
AZ BB:13:399(ASM)	Huhugam artifact scatter and rock pile	Unevaluated	Not available	Potentially, although site likely destroyed	Monitoring
AZ BB:13:578(ASM)	Rock features and historic trash scatter	Not eligible	Herein determined	n/a	None
AZ BB:13:666(ASM)	Huhugam artifact scatter and rock pile feature	Not eligible	Herein determined	n/a	None
AZ BB:13:739(ASM)	Historic concrete foundations	Not eligible	Herein determined	n/a	None

^a Impacts apply to both Alternative I and Alternative IV, which share the same project footprint

^b PCOSC = Pima County Office of Sustainability and Conservation; PDEQ = Pima County Department of Environmental Quality

The Southern Pacific Railroad mainline (SPRR) is an historic-age, in-use structure. It has been previously determined eligible for the NRHP [Remington (ADOT) to Jacobs (SHPO), December 8, 2009; SHPO concurrence December 24, 2009]. As proposed, the current project would involve the installation of a new bridge spanning the SPRR in one location and at-grade crossing improvements at another. Neither of the current build alternatives would adversely affect any of the characteristics that make the SPRR eligible for the NRHP.

Twenty-four historic bridges and culverts exist within the project area. All are historic-age, in-use structures. Seventeen of these were previously determined to be ineligible for the NRHP (Clementino [ADOT] to Collins [SHPO] January 12, 2012; SHPO concurrence February 28, 2012). The seven remaining structures have not been evaluated for their NRHP eligibility, but are all associated with the construction of I-10. Per the ACHP's *Section 106 Exemption Regarding Effects to the Interstate Highway System*, I-10 and associated road features, including bridges and culverts, are exempt from Section 106 consideration and require no additional cultural resource attention.

EPNG pipeline number 1007 is an historic-age, in-use structure that predates 1951. While there is some indication that this structure has been determined eligible for the NRHP (SHPO-2006-0174), it has been exempted from further review under Section 106 per the *Exemption Regarding Historic Preservation Review Process for Projects Involving Historic Natural Gas Pipelines* (67

FR 16364). It also bears noting that as proposed, neither build alternative would impact the pipeline.

Franco Ranch Road is an historic-age, in-use structure that has not been evaluated for NRHP eligibility. The northernmost 1,788 feet (ca. 9 percent) of Franco Ranch Road intersects with the current project area. That portion of Franco Ranch Road within the project area has been altered substantially, including widening and realignment, which has diminished that portion of the road's integrity of location, materials, workmanship, and design. Thus, while the road has not been formally assessed, the portion of the road within the project area would not contribute to the road's overall NRHP eligibility if it were assessed at a later date and found to be eligible.

The Old Vail Road is an historic-age, in-use structure dating at least to 1929. Despite its name, the roadway may have served primarily as an access route for work along the adjacent SPRR. Approximately 20 miles of the structure have been recorded. Parts of the road have been abandoned, but those segments within the project area (ca. 3,529 feet) remain in use. Previous recorders recommended that the structure was NRHP-ineligible, but it has not been formally assessed. Within the project area, the road has been heavily modified over time. Neither build alternative, if chosen, would affect the road's overall location, setting, feeling, or association. However, integrity of materials, workmanship, and design may be diminished. Because these changes would impact less than 4 percent of the road's overall length, ADOT has determined that the current build alternatives would not adversely affect any of the characteristics making the Old Vail Road eligible for the NRHP if it were assessed at a later date and found to be eligible.

US Highway 80 (US80) is recognized as part of the Historic State Highway System (HSHS) per the *Interim Procedures for the Treatment of Historic Roads* agreement among the Federal Highway Administration, ADOT, and SHPO (November 15, 2002) and is therefore eligible for the NRHP under Criterion D. Within the project limits, the US80 alignment and I-10 are coterminous; the construction and continuous maintenance of I-10 has systematically obliterated all parts of US80 dating to the HSHS period of significance (i.e., 1912 – 1955). Thus, the proposed project would not negatively impact the US80 alignment or any NRHP-eligible characteristic thereof.

Site number AZ EE:3:74(ASM), the Fairbank-Mescal-Tucson Railroad grade, previously was determined eligible for the NRHP (SHPO-2007-1619). The portion intersecting with the current project area, however, was determined to be a non-contributing element (Gasser [ADOT] to Miller [SHPO], April 26, 1999; SHPO concurrence May 26, 1999).

Sites AZ BB:13:40(ASM), AZ BB:13:46(ASM), and AZ BB:13:47(ASM) were recorded as Huhugam sherd scatters, accompanied by two thermal features, possible trash mounds, and no features, respectively. None have been assessed for NRHP eligibility and all three likely were destroyed during the construction of I-10. Because they have not been thoroughly investigated, however, monitoring would be required if ground disturbing work were conducted within site boundaries.

Site AZ BB:13:399(ASM) was recorded as a concentration of fire-cracked rock (FCR), accompanied by a light lithic scatter, with nothing to suggest subsurface deposits. The site was not assessed for NRHP eligibility. A recent site visit by ADOT's Cultural Resources Program Manager, Kris Powell, failed to locate any features or artifacts. A comparison of the original site sketch map and modern aerial imagery suggests that the realignment of Franco Ranch Road likely obliterated the site. Nevertheless, and because the site has not been thoroughly investigated, monitoring would be required if ground disturbing work were conducted within the site's boundary.

Site AZ BB:13:578(ASM) consists of three FCR concentrations and a light scatter of historic trash. The site had not been previously assessed for NRHP eligibility. In connection with this project, ADOT's Cultural Resources Program Manager, Kris Powell, conducted a recent site visit. Powell's observations were consistent with those of the original recorders, but noted also that the area has been heavily disturbed. No indication of subsurface deposits was identified and no information exists to suggest that the site's historic component is associated with a particular individual, significant event, or outstanding workmanship. Though lacking slag or visible ash, the FCR concentrations may represent thermal features. A multitude of prehistoric thermal features have been excavated in the Tucson Basin, and their contents (including macrobotanical samples) analyzed. Historic artifacts observed at the site are sparse, nondescript, and typical of early twentieth century refuse. Thus, it is highly unlikely that further investigation at AZ BB:13:578(ASM) would contribute to our understanding of regional history or prehistory, leading ADOT to determine that AZ BB:13:578(ASM) is not NRHP-eligible.

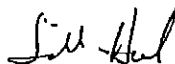
Site AZ BB:13:739(ASM) consists of concrete foundations associated with a succession of mobile home parks that operated between the 1940s and 1980s. The site was recorded by Tierra Right of Way Services, Ltd. in 2006, as reported in Doak (2006), and at that time recommended ineligible for the NRHP. Research by Doak (2006) identified no nexus between this site and historically significant persons, events, workmanship, or information potential. He noted nearly identical sites in the same general area. Given the 40-year window of mobile home-related activity at this location, Doak (2006) was unable to confirm that any of the foundations were, in fact, historic in age. Based on Doak's (2006) thorough recordation, ADOT has determined that the site is not NRHP-eligible.

Site AZ BB:13:666(ASM) was recorded in 2001 as three rock pile features and a light scatter of Hohokam artifacts. Prior to this project, the site had not been assessed for its NRHP eligibility. ADOT Historic Preservation Specialist Dr. Will Russell recently visited the site and encountered a single convincingly-anthropogenic rock concentration and a light artifact scatter with no indication of subsurface deposits. The sparse surface assemblage consists largely of flaked stone, with some plainware sherds. The type and density of artifacts are inconsistent with a habitation site, instead suggesting limited and ephemeral use, not unlike a multitude of similar sites throughout central and southern Arizona. Thus, it is highly unlikely that further investigation at AZ BB:13:666(ASM) would contribute to our understanding of regional prehistory, leading ADOT to determine that AZ BB:13:666(ASM) is not NRHP-eligible.

Based on the above, if either of the two build options is selected as a result of the environmental assessment, ADOT has determined that the project would have "no adverse effect" on historic properties.

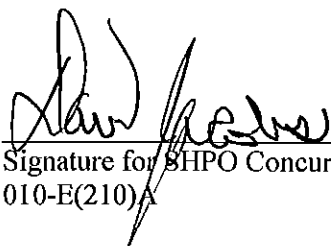
Please review the enclosed report and the information provided in this letter. If you find the report adequate, agree with ADOT's determinations of resource eligibility, and agree with ADOT's finding of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact ADOT Historic Preservation Specialist Dr. Will Russell at (602) 712-8633 or e-mail wrussell@azdot.gov.

Sincerely,



Jill Heilman

Historic Preservation Team Lead


Signature for SHPO Concurrence
010-E(210)A

1 AUG 19
Date

Enclosure

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CITY OF TUCSON HISTORIC PRESERVATION PROGRAM

PLANNING AND DEVELOPMENT SERVICES

August 19, 2019

Jill Heilman
Historic Preservation Team Lead
Arizona Department of Transportation
1611 West Jackson Street
Phoenix, AZ 85007

**RE: 010-E(210)A
TRACS No. 010 PM 260H7825 01L
I-10; Jct. I-19 to SR 83 and SR210, Golf Links to I-10
Initial Section 106 Consultation**

Dear Ms. Heilman:

Thank you for the opportunity to comment on the project noted above. The City of Tucson Historic Preservation staff has reviewed the built environment survey completed by Jacobs Engineering Group Inc. and has the following comments.

- The Period of Significance only went to 1967. This date put the buildings evaluated at 49 years of age. Given the length of time that it will take to start/complete the work shouldn't the Period of Significance be extended?
- 305 East Benson Highway—This property seemed to be dismissed due to the loss of the 1947-1948 portion, the boarded condition of the Spanish Trail building and the use. The 1960s construction has merit and should be reconsidered under A and C for its association with the car culture and its Mid-Century Modern design.
- 310 East Benson Highway—The text indicates that the sign was either constructed or changed. It is not clear if the sign was present while the building was the Pickwick and modified to the Silver Saddle or if it was an entirely new sign. This should be clarified and addressed.
- 314 East Benson Highway—It appears that this building is being considered ineligible due to inaccessibility. It was also dismissed due to new construction (Lazy 8 Motel). The Lazy 8 Motel appears like it is on a separate lot and does not impact the other buildings on the site. This building appears to be intact and should be considered eligible under A and C.
- 5383 East Benson Highway—The Triple T has to be one of the few remaining Mid-Century Modern truck stops remaining in Tucson. The modifications are minimal and do not detract from the overall design and character-defining features. This building should be reclassified under C as a good example of a Contemporary style building in a commercial use.

If you have any questions, please let me know.

Sincerely,

Jodie Brown, AICP
Historic Preservation Officer

201 N. Stone Ave., 3rd Floor • P.O. Box 27210 • Tucson, AZ 85726-7210
(520) 837-6968 • www.tucsonaz.gov/historic-preservation

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September 17, 2019

In Reply Refer To:

010-E(210)A
TRACS No. 010 PM 260 H7825 01L
I-10; Jct. I-19 to SR 83 and SR 210, Golf Links to I-10
Continued Section 106 Consultation
"no adverse effect"
Section 4(f) *de minimis*
Amendments to Historic Property Inventory Forms

Dr. David Jacobs, Compliance Specialist
State Historic Preservation Office
1100 West Washington St.
Phoenix, Arizona 85007

RE: SHPO-2019-1387

Dear Dr. Jacobs:

The Arizona Department of Transportation (ADOT) is planning improvements along Interstate 10 (I-10) between milepost (MP) 260.79 and MP 272.30, and an extension of State Route (SR) 210 along Alvernon Way, from I-10 to the existing SR 210, in and adjacent to the cities of Tucson and South Tucson, Pima County, Arizona. The project would occur within

- ADOT-owned right-of-way (ROW)
- State trust land managed by the Arizona State Land Department (ASLD)
- Land owned by the Arizona Board of Regents (ABOR)
- US Department of Defense land upon Davis-Monthan Air Force Base (DOD/DM)
- City of Tucson (City)-owned ROW
- Pima County (County)-owned land and ROW
- Union Pacific Railroad (UPRR)-owned land
- Private property

Because this project would employ federal funds, it is considered an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 *et seq.*). The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by ADOT pursuant to 23 U.S.C. § 327 and a memorandum of understanding, dated April 16, 2019 and executed by the Federal Highway Administration and ADOT.

Consulting parties for this project are the Ak-Chin Indian Community, the Arizona State Historic Preservation Office (SHPO), ASLD, the Arizona State Museum (ASM), the County, the City, the DOD/DM, the Gila River Indian Community, the Hopi Tribe, the Pascua Yaqui Tribe, the Salt

River Pima-Maricopa Indian Community, the Tohono O'odham Nation (Four Southern Tribes lead), the Tonto Apache Tribe, UPRR, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

Previous consultation described project alternatives, defined the project area, identified consulting parties, circulated an historic built environment report (Ingwersen et al. 2019), and arrived at a determination of “no adverse effect” (Heilman [SHPO] to Jacobs [SHPO], July 24, 2019; SHPO concurrence, August 1, 2019). During initial Section 106 consultation, the City provided five comments:

1. The City suggested that for the contextual evaluation of historic built environments, the period of significance should be extended to a point 50 years ago.
2. With regard to the property at 314 East Benson Highway, the City commented that the building appears to be intact and should be considered eligible under National Register of Historic Places eligibility criteria A and C.
3. With regard to the property at 310 East Benson Highway, the City commented that it is not clear if the Silver Saddle Restaurant sign was present while the building was the Pickwick Restaurant and modified to the sign or if it was an entirely new sign.
4. With regard to the property at 305 East Benson Highway, the City advised that the 1960s construction has merit and should be reconsidered under [NRHP eligibility criteria] A and C for its association with the car culture and Mid-Century Modern design.
5. With regard to the property at 5383 East Benson Highway, the City commented that the Triple T is one of the few remaining Mid-Century Modern truck stops remaining in Tucson. The modifications are minimal and do not detract from the overall design and character-defining features. This building should be reclassified under NRHP eligibility criterion C as a good example of a Contemporary style building in a commercial use.

City comments 1, 2, and 3 were resolved during a teleconference on September 10, 2019. Specifically, the buildings at 314 East Benson Highway have been significantly modified and are not eligible. Research on the 310 East Benson property could not determine whether the sign was present during the building's operation as the Pickwick Restaurant. The Historic Property Inventory Forms (HPIF) for these properties were amended to clarify these points.

The property at 305 East Benson Highway is not within the project area of potential effects. Because ADOT and City differ on their opinion regarding NRHP eligibility, ADOT is considering this property unevaluated for the purposes of this project.

ADOT reassessed the property at 5383 East Benson Highway. This reevaluation confirmed that while the Triple T truck stop does have elements of the Contemporary style, it may not be the best example of a Mid Century Modern truck stop. ADOT agrees with the City that the property is NRHP-eligible under Criterion C. The proposed project activities would not impact the historic architecture. However, a portion of the property would be incorporated into the

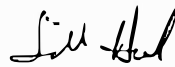
expanded transportation ROW for the project. The HPIF for this property has been amended to provide clarity.¹ It is enclosed here for your records, and has been appended to the report by Ingwersen and others (2019).

ADOT has determined that the initial finding of "no adverse effect" remains appropriate.

At this time, in consideration of its finding of "no adverse effect," ADOT is informing SHPO of its determination to make a *de minimis* impact finding in accordance with Section 4(f) of the United States Department of Transportation Act with regard to the property at 5383 East Benson Highway.

Please review the information provided in this letter. If you agree with ADOT's amended approach to NRHP eligibility, and agree with ADOT's continued finding of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact ADOT Historic Preservation Specialist Dr. Will Russell at (602) 712-8633 or e-mail wrussell@azdot.gov.

Sincerely,



Jill Heilman
Historic Preservation Team Lead



Signature for SHPO Concurrence
010-E(210)A

22 Oct 19
Date

Enclosure

¹ Although the property at 5383 East Benson Highway has been determined eligible, the amended and enclosed HPIF for the property continues to reflect the professional opinions of three architectural historians meeting the Secretary of the Interior standards (36 CFR 61).

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