



TUCSON  
HISTORIC PRESERVATION  
FOUNDATION

September 24, 2023

Ms. Ellen SaintOnge, Federal Preservation Officer  
Christine Heacock, Deputy Federal Preservation Officer  
Competition and Infrastructure Policy Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: Pima County; A844-100 TUC CAMPBELL Cellular Tower Collocation at 2565 East Camino Juan Paisano, Tucson, AZ; Continuing Section 106 Consultation; Federal Communications Commission (FCC); SHPO-2023-1121(171157)

Dear Mss. SaintOnge and Heacock:

On Behalf of the Tucson Historic Preservation Foundation and our thousands of members and supporters in Southern Arizona we are writing to express our deep concern and objection regarding the recent collocation at an existing communications tower (A844-100 TUC CAMPBELL). This letter is a formal complaint regarding the project and support for the Arizona State Historic Preservation Office dispute of the the exemption of this collocation from Section 106 review.

This project is one of many highly intrusive co-location enlargement projects that are being constructed throughout our region and that are having direct and indirect significant adverse effects on historic resources, leading to the diminishment of our cultural landscapes, individually listed historic properties, sites, historic districts, scenic corridors, historic highways and and other cultural resources.

The “self-reported” exemption to Section 106 under Section IV of the 2001 NPA that allows collocations of antennas on towers constructed after March 16, 2001 that have been previously

reviewed under Section 106 is failing our community and resulting in broad adverse direct and indirect effects that is damaging historic integrity and our unique sense of place.

The project in question is located on Campbell Avenue, a *Scenic Route* designated by Pima County in 1970 and within the 1936 Catalina Foothills Estates Subdivision, a significant early 20th-century planned subdivision constructed by noted developers John and Helan Murphey. The Murphey's celebrating the natural sonoran desert landscape, setting and viewsheds hired master architect Josias Joesler to built out the subdivision with southwestern revival residences for major American luminaries, actors and families including Drexel, Gould, Mayo and Grace. In addition to the listed properties noted by the Arizona State Historic Preservation Office, dozens of significant properties, directly and indirectly impacted by this project are eligible for listing on the National Register of Historic Places under the *Multiple Property Documentation Form: The Single Family Residential Architecture of Josias Th. Joesler and John and Helen Murphey in Tucson and Pima County, Arizona, 1927-1956*. In addition to these properties, Catalina Foothills Estates is the location of many significant mid-twentieth century properties that have been surveyed and recognized by the Modern Architectural Preservation Project of Tucson and the Tucson Historic Preservation Foundation.

This Cellular Tower project was initially reviewed in 2001 with a finding of "no historic properties affected". Twenty years ago, no one could have imagined the negative impacts that two decades of expansions and enlargements would have on the areas historic integrity. The tower is visually intrusive, injecting into a highly sensitive and valued cultural and natural asset area a hulking industrial visual mess that can be seen from a quarter mile away.

We request an investigation to determine if the stipulations of the NPA were properly adhered to, not just for this project but all applicant projects in the City of Tucson and Pima County. We request that the applicant work with the State Historic Preservation Office, the certified local governments, the Tucson Pima County Historical Commission, adjacent property owners and other stakeholders to resolve the adverse effects that has been created by this and other collocations.

Thank you for your attention to our request.



Michael Fassett, President  
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