



TUCSON  
HISTORIC PRESERVATION  
FOUNDATION

**THPF WP Compliance Review of City of Tucson Demolition Procedures and Required Transmittal of Documentation  
January 2019**

**Executive Summary**

This white paper reviews the history, repeal, and replacement of the City of Tucson's demolition controls for older buildings within the former 1953 city limits, formerly known as the "Historic Central Core." The analysis focuses on the citywide requirements adopted after 2009, including the current mandate in the Unified Development Code (UDC) Section 3.12.1 that the Historic Preservation Officer must transmit copies of required architectural documentation for each demolition of a fifty-year-old or older building to the Tucson-Pima County Historical Commission. Based on review of current commission records and recent demolition activity, the required transmittal of these documentation packets does not appear to be occurring. This represents a gap between adopted policy and administrative practice. The result is that the commission is not receiving documentation necessary to fulfill its own statutory obligation to maintain a record of lost historic resources and to report accurately to the City of Tucson and Pima County.

**Background and Legislative History**

**A. Creation of the "Demolition in the Historic Central Core" Rule (2007)**

In June 2007 the Mayor and Council adopted Ordinance 10417, which added Section 3303.7, "Demolition in the Historic Central Core," to the Tucson Building Code. The provision applied to buildings forty-five years old or older in the area that reflected Tucson's 1953 city limits. A demolition permit required a city-commissioned study, Historical Commission review, and a possible delay of up to one hundred eighty days for preservation consideration.

**B. Repeal of Section 3303.7 (2009)**

On 13 January 2009 the Mayor and Council conducted a public hearing and adopted Ordinance 10625, repealing Section 3303.7. The repeal eliminated the special demolition review for the Historic Central Core and directed staff to initiate a Land Use Code amendment that would focus on documentation rather than delay.

#### C. Replacement Policy: Architectural Documentation (2010)

On 13 April 2010 the Mayor and Council adopted Ordinance 10776, adding Land Use Code Section 5.3.11, "Architectural Documentation Prior to Demolition of Historic Buildings." This established a citywide requirement that any building fifty years old or older scheduled for demolition must be documented prior to issuance of a demolition permit. The documentation level, minor or full, depended on National Register status or eligibility.

#### D. Current Law: UDC 3.12.1

When Tucson replaced the Land Use Code with the Unified Development Code, the demolition documentation requirement was carried forward verbatim as UDC 3.12.1. The core requirements remain unchanged. The section continues to require architectural documentation for any demolition of a building fifty years old or older, with additional review required for properties within Historic Preservation Zones or the Rio Nuevo District.

### **Current Legal Requirement for Transmittal to the Historical Commission**

UDC 3.12.1(G) contains a specific directive:

1. After a demolition permit involving a building fifty years old or older has been approved, the Historic Preservation Officer must retain one copy of the required documentation as a record of a lost historic resource.
2. The Historic Preservation Officer must also forward one copy to the Tucson-Pima County Historical Commission.

This provision ensures that the Historical Commission holds a cumulative, permanent record of historic buildings that have been demolished within Tucson city limits. It also provides the commission with the information needed to complete its annual report, to track losses of the built environment, and to evaluate long-term preservation needs.

### **Findings: Required Transmittal Is Not Being Performed**

A review of recent demolition activity, commission minutes, and publicly accessible files indicates that the required transmittal has not occurred. Specific observations:

1. The Historical Commission has not received documentation packets for demolitions of fifty-year-old or older buildings, including properties outside HPZs and properties that did not trigger Rio Nuevo review.
2. The commission has not been provided with an annual summary of demolitions, and no record exists indicating the receipt of individual UDC 3.12.1 documentation packets.
3. The HPO office has not presented demolition documentation or an inventory of lost historic resources as part of its regular reports to the commission.

This constitutes a failure to comply with the explicit requirement in UDC 3.12.1(G). The absence of this documentation means the commission is unable to monitor demolition trends, identify emerging risks to older neighborhoods, and fulfill its responsibility to maintain a record of lost historic resources.

### **Implications for Preservation Governance**

The lack of transmitted documentation affects multiple areas:

1. Incomplete Historic Record  
Without documentation of demolished buildings, the commission cannot maintain an accurate archive or produce credible annual reporting.
2. Loss of Data Needed for Policy Evaluation  
The city cannot evaluate preservation outcomes or neighborhood impacts without a consistent record of demolished historic-age structures.
3. Reduced Transparency  
Public accountability is hindered when demolition documentation does not reach the city's designated preservation oversight body.
4. Impaired Long-term Planning  
Preservation planning relies on understanding losses over time. Missing records prevent accurate assessment of cumulative effects.

### **Recommendations**

1. Immediate Compliance with UDC 3.12.1(G)  
The Historic Preservation Officer should resume forwarding copies of all demolition documentation packets to the Historical Commission.
2. Creation of a Standard Reporting Procedure  
A written internal directive should establish the process, timing, and format for transmittal to the commission.
3. Annual Summary Report  
Although not codified, staff should prepare an annual summary of demolitions of buildings fifty years old or older as part of the regular staff report to the commission. This practice would align with commission reporting obligations and improve transparency.
4. Digital Archive Access  
Transmitted documents should be archived and made accessible to commissioners, staff, and the public, consistent with records law.
5. Review of Demolition Activity Since 2010  
Staff should create a backlogged summary for all demolitions since Ordinance 10776 was adopted to re-establish a baseline.

### **Conclusion**

The repeal of the former "Historic Central Core" demolition-delay system and the adoption of a citywide documentation requirement represented a major policy shift intended to ensure that Tucson's historic fabric would be recorded before loss. The Unified Development Code requires that the Historic Preservation Officer transmit documentation of each such demolition to the Tucson-Pima County Historical Commission. At present, that requirement is not being met.

Restoring compliance will strengthen the city's preservation program, improve public accountability, and provide the commission with the tools it needs to carry out its statutory responsibilities.