



TUCSON  
HISTORIC PRESERVATION  
FOUNDATION

February 6, 2026

Helen Erickson, Chair  
Tucson–Pima County Historical Commission  
Historic Landscape Subcommittee  
Planning and Development Services Department  
Historic Preservation Office  
City of Tucson  
201 N. Stone Ave., 3rd Floor  
Tucson, AZ 85701

**Re: Turnkey Sculptures by Charles Clement – National Register–Based Evaluation of Public Sculpture, Integrity, and Disposition**

Dear Chair Erickson and Members of the Historic Landscape Subcommittee,

On behalf of the Tucson Historic Preservation Foundation (THPF), acting in coordination with the Charles Clement Estate, we submit this letter to provide a preservation-based framework for the Committee’s review of the *Turnkey* sculptures by Charles Alfred Clement. This letter supplements the Charles Clement Estate report dated February 4, 2026 and is intended to ensure that the Committee’s deliberations, and any resulting recommendation, are firmly grounded in the evaluative criteria and integrity standards of the National Register of Historic Places.

The integrity of the *Turnkey* sculptures’ association with Charles Clement has been materially compromised. The proposal to relocate the deaccessioned elements to the Bondante House, the only surviving property directly associated with Clement, creates a meaningful opportunity to restore a critical element of integrity through accurate stewardship, interpretation, and association.

As detailed below, the Tucson Historic Preservation Foundation has completed a comprehensive National Register, based evaluation of the *Turnkey* sculptures. It is with

professional regret that we conclude the work no longer retains sufficient integrity to convey its historic and artistic significance as the unified artwork conceived by Charles Clement.

By way of background, the Tucson Historic Preservation Foundation is the holder of the Charles Clement intellectual property and copyright and is working in tandem with the Charles Clement Estate on matters relating to the identification, preservation, and appropriate disposition of Clement's work. Our interest in this matter is therefore not merely advisory, but directly tied to the accurate representation and long-term stewardship of the artist's legacy.

The National Register of Historic Places recognizes public sculpture as an object, a distinct property type subject to evaluation under the same four Criteria (A–D) used for buildings, structures, sites, and districts. As established by the National Park Service, eligibility depends not only on demonstrated significance within a defined historic context, but also on whether the resource retains sufficient integrity to convey that significance. Integrity is evaluated through seven aspects: location, design, setting, materials, workmanship, feeling, and association.

For objects, including public sculpture, and particularly for site-specific sculptural works, integrity of location, setting, and design is central. Sculpture conceived for a specific architectural, spatial, or social context derives much of its meaning from that context. When such a work is relocated, fragmented, or altered, the evaluation must address whether those actions have severed the essential relationships that allow the work to communicate its significance.

Applying this framework to the *Turnkey* sculptures, the threshold issue for National Register eligibility is not whether individual elements retain integrity in isolation, but whether the work as a whole retains sufficient physical and contextual integrity to convey its historic and artistic significance as a unified artwork conceived by Charles Clement. As documented in the record before the Committee, the *Turnkey* sculptures were removed from their original site sometime between approximately 1995 and 2005, divided into separate groupings, altered through repainting and surface treatment, and four of the original sixteen elements, representing twenty-five percent of the work, are now missing and unaccounted for.

**These actions have adversely affected all seven aspects of integrity. Integrity of location has been lost through removal from the original site. Integrity of setting has been lost through placement in environments unrelated to the architectural and social framework for which the work was conceived. Integrity of design has been compromised through fragmentation and the loss of original elements intended to function as a unified ensemble. Alterations to surface finishes and physical damage affect integrity of materials and workmanship. Collectively, these changes have fundamentally eroded integrity of feeling and association.**

The cumulative loss across all seven aspects of integrity renders the work incapable of conveying the significance of the unified artwork Charles Clement created.

As a result, proposals to relocate and or contextualize the remaining elements through signage or interpretive materials do not resolve the underlying integrity deficiencies. National Register

guidance is explicit that integrity is evaluated through the physical qualities of a resource and its ability to convey significance as experienced, not through explanatory narratives alone. Interpretation may assist public understanding, but it does not restore lost location, setting, design, or missing elements, nor does it reconstitute a unified work from fragments. Under these circumstances, relocation to a park or other public location accompanied by interpretive signage would not cure the preservation problem and would instead perpetuate public misrepresentation of the work.

There is an additional issue the Committee should address directly in its findings. Continued public display of altered and fragmented elements as the Turnkey work risks misrepresentation of the artist's intent and harm to Charles Clement's reputation. When a materially compromised configuration is presented as an intact artwork, the public is led to attribute the current condition, appearance, and meaning to the artist rather than to subsequent actions taken without his involvement. From a preservation standpoint, this is a matter of accurate representation of the historic resource being interpreted.

The Foundation therefore proposes that the surviving fragments be deaccessioned and installed, interpreted, and stewarded at the Bondante House, the only extant property directly associated with Charles Clement and designed by him in 1956 for his family. The Bondante House is owned by the Foundation, was fully restored in 2025, contains numerous works by Clement, and is anticipated to be the subject of a forthcoming Tucson Historic Landmark nomination, which would provide long-term regulatory oversight under City of Tucson historic zoning. This setting allows accurate interpretation, educational use, and controlled public access, while ending the continued public misrepresentation of the work.

Accordingly, we respectfully request that the Committee recommendation explicitly reflect the integrity findings discussed above and recommend to the Arts Foundation, its committees and the City of Tucson that: **the *Turnkey* sculptures (including the missing 4 works should they be located) be deaccessioned from the City's public art collection and returned to the the Tucson Historic Preservation Foundation acting in coordination with the Charles Clement Estate.**

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Demion Clinco', followed by a period.

Demion Clinco, CEO  
Tucson Historic Preservation Foundation