

**CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION**  
**STAFF REPORT – El Pueblo**

**AMMENDMENT OF PHASE 1 CRS**

**PZ-20-00022 El Pueblo (motor court) Motel**

**Address: 3120 E. Route 66, Flagstaff**

**DATE: \_\_\_\_\_ **February 8, 2022****

**MEETING DATES: \_\_\_\_\_ **Feb 16, 2022****

**REPORT BY: **Mark Reavis, AICP, NCARB****

**BACKGROUND**

Recently the El Pueblo project has found unexpected site conditions and changed architects for the completion of the project for which the HPC reviewed and approved a Phase 1 Cultural Resource Study on February 19, 2020. The project is also pursuing a second construction phase by adding a substantial motel building toward the back of the site, behind the historic motor court rooms of the original El Pueblo motel. The new motel building in its various conceptual forms was not a component of the Phase 1 Cultural Resource Study review. The review of the overall project by the new architect and property owner has had additional evaluations taken place with preconstruction building preparation completed. The initial pre-construction demolition preparation work for the historic building rehabilitation involved stripping away of the various inappropriate modifications to fenestration and interior modifications. The three lodging buildings have been brought back to the stripped-down essentials of their post WWII configuration (after Johnson sale) with the carport converted into a lodging room that effectively doubled the number of rooms at that period of time. The final modification again doubled the number of rooms to single occupancy units.

The office with its interior stripped has shown significant rot in the framework supporting the exterior skin of the stucco building. The current architect has determined its preservation as impractical. The office building is currently integrated with a dominant route 66 motel sign important to the historic changes of the site in the Route 66 era and features a protecting porch roof on the buildings face.

**PREVIOUS HPC DECISION**

The Phase 1 Cultural Resource Study was accepted by the Heritage Preservation Commission at the February 19, 2020, meeting of the HPC. The review included the preservation and rehabilitation of the 3 motor court lodging buildings and the office building. There were no conditions included with the acceptance of the Phase 1 Cultural Resource Study. The project has had a long history prior to 2020 in acknowledging the importance of the motel as a historic site and efforts to preserve the historic aspects of the site while supporting its economic viability with the integration of new construction.

**REQUEST**

This is a request for the Historic Preservation Commission Review to amend the mitigation for the Phase 1 Cultural Resource report for the El Pueblo (Motor Court) Motel. The request is to allow for the demolition of the motel office building, while retaining the Route 66 significant sign and detailed porch roof structure as a feature along the road frontage. The request is intended to mitigate the loss of the office building with the reconstruction of an interpretive wall feature that matches closely with the location and form of the office's demolished south facing Route 66 façade wall. The reconstructed wall also addresses zoning compliance required for forward-facing design and provides a suitable wall for the mounting of interpretive text, photos and signage.

The future planned interpretation is to call out and explain the significance of the site related to the Nationally significant aspects that took place when Philip Johnson established the Navajo Code Talkers of WWII that served

in the Pacific Theatre at this motel site. The actual interpretation content and installation is not a component of this Phase 1 amendment request. The request is to review the architectural aspects of the proposed interpretive wall evaluating any adverse impacts to the overall historic site requesting amending the Phase 1 Cultural Resource Study to allow for the office demolition.

### **STAFF FINDINGS**

Staff has again reviewed the accepted Cultural Resource Study and found it to be extensive and thorough in establishing the complex of motor court buildings as eligible for individual listing as a National Historic Landmark. The survival of many historic buildings is dependent upon finding appropriate current uses for significant historic properties, which is supported by the guidance provided by the US Secretary of the Interior Standards for Rehabilitation. The "Rehabilitation" Standards have been established to allow for a historic property's use in a similar manner as well as for an adaptive reuse.

### **STAFF RECOMMENDATION**

Staff recommends that mitigation measures be taken that compensates for the demolition of the office building. It is recommended that the mitigation take the form of a historic interpretation wall structure. The new wall structure that incorporates the Route 66 significant sign and front porch is the recommended mitigation for the office demolition. The HPO will work with the property owner in the future in establishing interpretive text, photos and signage placed on the new wall that will be available to both a registered guest as well as an interested traveler in the nationally significant aspects of the WWII Navajo Code Talkers that originated from this motel site.

### **Staff recommended motion: Approve the amended mitigation for the Phase 1 Cultural Resource Study of the El Pueblo Motel by allowing:**

- 1) **the demolition of the office building with construction of an interpretive wall structure that incorporates the Route 66 signage and existing porch roof as mitigation,**
- 2) **Preservation of the remaining historic structures as hotel rooms with an alternative design that meets Secretary of Interior's Standards for Rehabilitation, and**
- 3) **Allow the HPO to review future submittals and the interpretive materials administratively.**

*Note: The new proposed motel structure at the rear of the lot behind the historic buildings and the overall site plan must meet the requirements of the Flagstaff Zoning Code including Site Planning Design Standards and Architectural Design Standard. The Heritage Preservation Commission does not have the ability to influence design of the new structure or to provide exemptions to design standards because this property is not in a historic or landmark overlay district.*

### **INTENT**

The purpose of having Cultural Resource Studies is to ensure that the historic aspect of a resource is fully investigated and that adverse impacts to that resource are mitigated.

## REQUIRED FINDINGS

### 10-30.30.050 Cultural Resources

Cultural resources are an important consideration in an application for development. Professionally prepared cultural resource studies are therefore a requirement of an application for development. The type and format of studies required are determined based on the particular circumstances of the property on which development is proposed. Cultural resource studies assess the significance and integrity of potential resources, major impacts that would result from the proposed work and mitigation measures that could eliminate or offset any major impacts. This section provides detailed requirements for cultural resource studies and explains how such assessments are performed.

#### A. Cultural Resource Studies.

1. **Purpose.** To identify significant cultural resources and potential impacts of proposed development so that mitigation measures can be established for major impacts prior to development of the property.

#### 2. Applicability.

a. Cultural resource studies are required for all public and private developments involving:

- (1) Properties listed on the Flagstaff Register of Historic Places; or
- (2) Properties listed on the Arizona Register of Historic Places; or
- (3) Properties listed on the National Register of Historic Places; or
- (4) Undeveloped land; or
- (5) Structures over 50 years old at the time of application.

b. When warranted by the specific conditions of the site or proposed work, the Historic Preservation Officer may determine that a cultural resource study is not required based on the following conditions:

- (1) The land, while undeveloped, is relatively small, surrounded by development, and unlikely to contain resources; or
- (2) The structure is not significant or lacks integrity; or
- (3) The proposed work is excepted from this division pursuant to Section [10-30.30.020\(C\)\(1\)](#); or
- (4) The proposed work does not have major impacts, diminish the significance or integrity of the resource, is reversible, or is temporary; or
- (5) The structure is post World War II (1945) production housing; or
- (6) Other circumstances under which it is reasonable to conclude that a cultural resource study is not warranted.

c. The requirement to prepare a cultural resource study does not in and of itself mean that the resources are significant (see subsection (B) of this section).

### 3. Specific Application Requirements.

a. **Types of Studies.** Upon consultation with the Historic Preservation Officer and based on the resources that are known or likely to be present, the applicant shall provide an archeological resource study and/or a historic resource study.

b. **Preparation.** Cultural resource studies shall be prepared by professionals qualified in accordance with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation ([36 CFR 61 Appendix A](#)) as currently amended and annotated by the National Park Service.

c. **Report Format.** The Historic Preservation Officer will work with the professional conducting the study to determine which one of the following report formats is appropriate:

(1) **Letter Reports.** A letter report is appropriate when:

(a) Site conditions, historic records, or previous research or studies indicate that cultural resources are not likely to be present; or

(b) The integrity of a cultural resource is already severely compromised; or

(c) The proposed work will not compromise the significance or integrity of the cultural resource; or

(d) When no mitigation measures are warranted.

The report need only demonstrate that one of these conditions exists.

#### Phase 1 Cultural Resource Study

(2) **Phase 1 Cultural Resource Studies.** When a letter report is not appropriate, a Phase 1 Cultural Resource Study shall be prepared. A Phase 1 Cultural Resource Study shall:

(a) Identify the presence of cultural resources;

(b) Evaluate the potential for additional cultural resources being discovered;

(c) Assess the significance of identified and potential cultural resources;

(d) Assess the integrity of identified resources;

(e) Assess identified and potential impacts proposed;

(f) Provide measures to mitigate major impacts on cultural resources; and

(g) Advise whether Phase 2 or Phase 3 Cultural Resource Studies will be required

## DISCUSSION

The El Pueblo is a property eligible for individual listing as a National Historic Landmark. The building is not a contributing structure in a National Register Historic District but would also be contributing if was included in a Route 66 designation. The property is eligible for listing under all 4 national register criteria per HPO determination. The Motel has substantial association under Criteria "C" with Philip Johnston, Marine Recruiter directly associated with this site in instituting the Navajos Code Talkers, utilized in the Pacific during WWII. Significant changes have occurred over time that represent trends as "motor inns" adapted to changes in traveler expectations. When Interstates by-passed most of these roadside motels along Route 66 many were converted to single room occupancy monthly rentals with a more transient occupancy and minimal upkeep and subsequent changes. The El Pueblo shared this reduced occupancy and maintenance with many subsequent modifications.

It was up to the original architect Karl Eberhard to carefully make design decisions with consideration that these modifications over time have or have not gained significance "in their own right" and what aspects should be retained and those reversed. The proposal that was reviewed and accepted by the Heritage Preservation Commission for the El Pueblo Motel had significant additions to the historic units. These additions to the original motor court configuration were with the intent to meet the modern needs of the traveler. Under the general guidance of the Secretary of the Interior's Standards for Rehabilitation these design changes were approved by the HPC. The plans called for a reduction in room count from 22 to 14 rooms, addition of modern bathrooms and extended courtyards at the front and back of the motel units. The project was not submitted as a Federal Historic Preservation Tax Act project and will not be reviewed by the US Department of the Interior National Park Service for compliance with Secretary of the Interiors Rehabilitation Standards. The Cultural Resource Study accepted by the HPC calls out justifications for retention of historic aspects as well as justification of new stylistic rehabilitation modifications.

The HPC and the original architect and the HPO discussed in great detail the impacts to the property with stylistic changes from the simpler detailing of the 1940 "Territorial" style to a shift to a more Spanish Colonial styling in details such as the utilization of more clay tile accents and additions such as courtyard walls and exterior additions to accommodate modern expected facilities for travelers. It is a positive aspect that the facility is being returned to its original use as a motel from the last conversion to single room occupancy apartments. This is in compliance with SOI Rehabilitation Standards #1 utilization for historic purpose. That the Resource study acknowledges SOI Standard #4 changes over time that have acquired historic significance in their own right shall be retained. SOI Standard #3 does note that a property is a physical record of time, place and use but cautions one to not create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings. The submitted plans look toward the "feel" of the original buildings motor court car port with larger fenestration at this location.

It is important that the economic viability of the project be maintained and that both the 3 remaining motor court buildings be retained and preserved well into the future. There is a balance required between Heritage Preservation as well as currently established zoning compliance reviews with this project. It is essential that both the historic preservation of the historic lodging rooms take place along with the development of the larger motel to be placed toward the back of the site. The larger motel building is presented in a site plan and a primary elevation to assist the HPC in understanding the larger project, but that inclusion is not part of the HPOs Cultural Resource Study amendment review.

The historic rehabilitation of the 3 motor court buildings still intends to follow the architect's (Eberhard) design and is being presented for construction planning review in conjunction with the new larger motel. The historic

rehabilitation still proposes to follow the architectural concepts previously presented to the HPC as graphic drawings for the 3 historic motor court lodging buildings. The Phase 1 Cultural Resource Study is being amended because of deteriorated conditions found after the office building's interior was stripped and with the office's structural condition evaluated. It was found that significant structural and deterioration problems existed with the building. The office has had significant modification over time with internal reconstruction and additions over many years.

It is unknown if the office demolition and other proposed changes to the form of the complex of these buildings known as the El Pueblo (motor court) Motel will lessen the ability for listing of the property under certain NPS criteria but since the project is not seeking NPS review this is not an issue currently. It is the HPO opinion that the proposed previously reviewed modifications and demolition of the office are not of a nature that the project will no longer be eligible for individual listing in the Nation Register as a site if this listing is sought in the future. The focus of the property's significance will remain in its form/configuration as a motor court on Route 66 and its major ties with its association with the Navajo Code Talkers.

It is also the intent that with future interpretation installed on and within a new wall structure and the availability of on-site exterior pull-in location that aspects of the site history can be shared with the public. Interpretive wall installations further allows for mitigation of any lost integrity with the past and currently proposed modification to be returned to the public through written text and photos. The HPO will work with the property owner in preparing the interpretive text and photos for the required interpretive wall to be constructed. The HPO will assist with seeking potential grant funding for the professional interpretation. If requested in the future the property may still be submitted for individual listing in the National Register of Historic Places. Such listing would help ensure its long-term survival and promote its historic use and its Nationally significant place in history as an associated site for the Navajo Code Talkers. Such listing would potentially allow for an individual "brown" National Historic Landmark sign on Route 66.

### **PROPOSED CHANGES**

The project proposes to demolish the office building structure that includes its 4 walls and roof and replacing it with a new structurally stable interpretive wall feature at the former front wall location. The new interpretive south wall is a reconstruction that will incorporate the existing office's historic Route 66 sign and decorative porch roof feature.

### **DESIGN CRITERIA**

The US Secretary of the Interior Standards for Rehabilitation is being used to evaluate the compatibility of new construction within the context of a historic site. The listed 10 standards do not provide specific guidance regarding the demolition of the office. There is supplemental guidance in the application of the Standards for Rehabilitation. The Secretary of the Interior Standards does address Cumulative Effect and Historic Character and explains that projects can meet the Standards when the overall effect of all work on the property is consistent with the property's historic character. This is applicable when evaluating the preservation of the historic motor court building against the loss of the office building that is mitigated by the reintroduction of a southern interpretive wall.

### **BASIS OF REPORT**

Requirements for a Phase 1 Cultural Resource Study and efforts to mitigate any adverse effects to a historic property.

### **EVALUATION OF EFFECT**

The HPO has made the determination that the loss of the office building is not a major adverse effect to the historic significance of the site and is mitigated by the construction of the similar form of a new interpretive wall and the retention of the historic Route 66 sign and existing decorative porch roof.

### **CONSIDERATION OF PAST APPROVALS**

Most projects require some modification when destructive preparation of a historic structure is undertaken. Projects are closely monitored by the HPO to meet the intent of the approval by the HPC. With the project proceeding with zoning review for the phase 2 motel the modification of what was approved in the HPC review of the Phase 1 Cultural Resource Study differed with the original retention of the office building. Uncovering of significant problems has typically been handled by the HPO. In this instance, the applicant and HPO and Current Planning Staff made a determination that the demolition was a substantial change and required HPC review and approval.

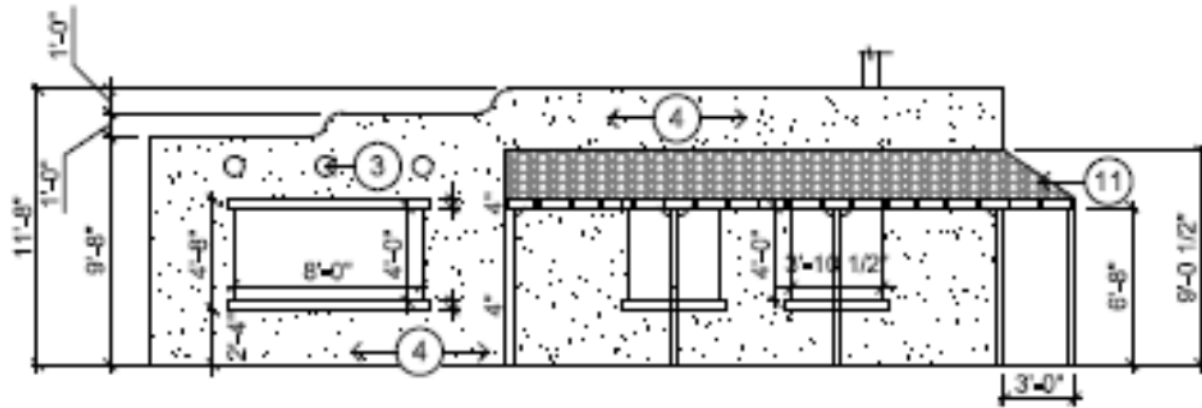
### **OPTIONS FOR COMMISSION DECISION-MAKING:**

The Historic Preservation Commission (HPC) may:

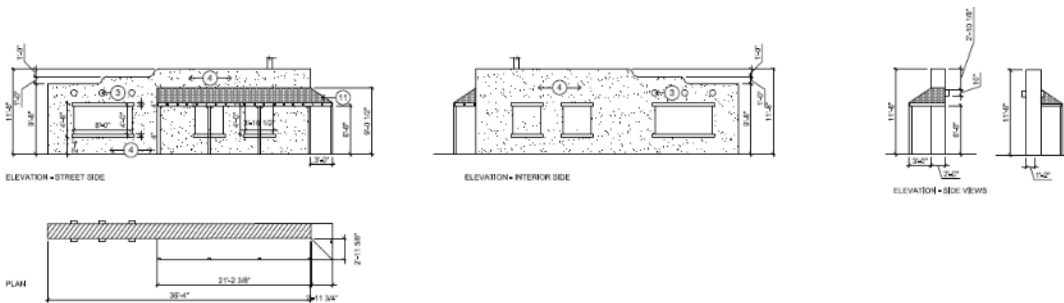
- (1) Approve the amended Phase 1 Cultural Resource Study with the demolition of the office building with the required mitigation of an interpretive wall and preservation of the Route 66 sign and detailed porch roof – or –
- (2) The Commission could request modifications to the proposal and include them as conditions of approval – or –
- (3) Continue the HPC review to a date certain and ask the applicant to come back with a modified proposal that meets those conditions.

### **ATTACHMENTS:**

Architectural plan concept for proposed reconstructed south wall as interpretive wall feature.



ELEVATION - STREET SIDE



INTERPRETIVE FEATURE WALL

