

**CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION  
STAFF REPORT – May Hicks Home**

**Cultural Resource Study – Phase 1 and 2**

**PZ- 22-00059**

**Address: 13 S Leroux.**

**DATE: May, 5<sup>th</sup> 2022**

**MEETING DATE: May 18th, 2022**

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

**BACKGROUND**

The proposed demolition of the residential structure known as the May Hicks Curtis House is proposed as a needed land parcel for a larger multi story housing development. The new housing development is on a currently vacant parcel of land fronting Phoenix Ave. For the proposed development to meet development requirements such as parking and flood provisions the developer determined that the Hicks home was to be demolished and made the request with a submission for HPC review. The new development calls for the preservation and incorporation of the significant (National Register Property) Hicks Rooming House into their development plans. It should be noted that the Hicks Rooming House (7 W Phoenix) parcel # 100041016A was included in the Railroad Addition Historic District while the May Hicks Curtis House parcel #1004101B is included in the Southside Historic District. The Heritage review of the May Hicks House is being reviewed individually because it is in a separate district. Heritage Review of the Phoenix development has proceeded further in its reviews and may include additional requirements.

Of note is that the small home associated with May Hicks has a direct association with a significant Flagstaff woman and her contributions to the community as well as the State of Arizona. May Hicks is directly attributed to the development of the first physical version of the Arizona State Flag, per noted qualifying research within the Cultural Resource Study. The surviving original Arizona State Flag that is on display in the State Capital notes her skill as a seamstress and her support of her fiancé and to be her future husband who served in the Arizona National Guard. May Hicks is also noted for here extensive involvement within the community and its various organization. She was a College graduate in music and then as the Assistant Postmaster for Flagstaff in 1906. She can also be attributed to an extensive collection of early Flagstaff era photo images. The home and its west addition, originally one large room with many more windows than the original home tends to also support its use for both sewing and photography activities of Hicks. The house is associated with events that contribute to patterns of our local history as well as its distinctive architectural aspects of a Flagstaff style bungalow style with unique eve detail and the use of typical residential materials of construction and later typical stucco surfacing over wood. The property is listed in the National Register of Historic Places as a Contributing Property of the Southside District.

May Hicks is also directly linked to 2 rooming houses on Phoenix Ave owned and operated by her mother. The Hicks Rooming house and St Anne’s Apartments providing lodging on the main route for travelers along this original segment of the National All Tails Highway and later as this highly intact segment of the original alignment of Route 66.

**PREVIOUS HPC DECISIONS**

This property has not had a previous HPC review except for listing within the Southside National Register District.

### **REQUEST BY APPLICANT**

This is a request by the applicant for review and accept the Phase 1 and 2 Cultural Resource Study (CRS) as full mitigation provided by the CRS. The Study was commissioned by Clayton Companies of Scottsdale, AZ and prepared by Cornerstone Environmental Consulting, LLC of Flagstaff AZ.

### **STAFF RECOMMENDATION**

**Approval with Condition:** Accept the combined Phase 1 & 2 Cultural Resource Study with the condition of additional mitigation. Applicant is to finalize appropriate mitigation by working in conjunction with the Heritage Preservation Officer (HPO). 10-30.30.030 General Provisions “Concurrent Development Application\_Review” will allow for the continued review of the proposed new construction as mitigation is finalized.

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

- 1) The Commission could approve the Phase 1 and 2 Cultural Resource Study with the study submitted as mitigation -or-
  - 2) The Commission could approve with condition the submitted Phase 1 and 2 Cultural Resource Study with additional mitigation that includes a recommendation stated in this HPO Staff Report -or-
  - 3) The Commission could request in addition to the Staff recommendations additional modifications and requirements to the Cultural Resource Study and include them as conditions of approval – or –
  - 4) Deny and request resubmittal.
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### **HPO Recommended Motion:**

***Approve with condition the submitted Cultural Resource Study as a Phase 1 and 2 Study meeting submission requirements of historic research and property recordation. As a condition of approval, the applicant shall provide onsite mitigation on the subject parcel or integrated with the new development to provide a physical installation, that is accessible to the public, that acknowledges the achievements and contributions of May Hicks an instrumental woman in Flagstaff and State History with finalized mitigation to be monitored for compliance by the HPO.***

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## **Findings and Discussion**

### **INTENT**

Flagstaff Municipal Code, Division 10-30.30 Heritage Preservation intends that preservation of the City's heritage is in the interest of the health, economic prosperity, education, cultural enrichment, and general welfare of the public. That Cultural resources shall be considered when demolition is proposed. Professionalism is required in the preparation of cultural resource studies when new development is proposed that destroys the historic resource that is considered as an adverse effect which is a major impact to the heritage resource.

## Required Findings for:

### **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: (5) Structures over 50 years old at the time of application.

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:

(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.

(3) **Phase 2 Cultural Resource Studies.** A Phase 2 Cultural Resource Study is required when major impacts are proposed for a significant resource that has integrity and when no other mitigation measures are proposed that would maintain the significance and integrity of the resource. A Phase 2 Cultural Resource Study includes all of the contents of a Phase 1 Cultural Resource Study plus complete text descriptions, as-built plans, and archival grade photography that fully document all physical aspects of the resource(s), including its setting.

### **10-30.30.050 Cultural Resources**

**10-30.30.050 Cultural Resources, A. Cultural Resource Studies, 4. Process.** a. Heritage Preservation Commission Review. The Heritage Preservation Commission shall review and accept cultural resource studies, and may approve or conditionally approve proposed mitigation measures. Alternatively, the Heritage Preservation Commission may require additional research, documentation, or mitigation measures prior to acceptance.

B. Determination of Significance of Cultural Resources. The criteria for determining the significance of a cultural resource is based on the potential of the cultural resource to contribute to our understanding of the past. 1. A cultural resource is significant if: a. It is listed or eligible as a National Historic Landmark, or for the National Register of Historic Places, or the Arizona Register of Historic Places; or b. It is associated with events or persons in the architectural, engineering, archeological, scientific, technological, economic, agricultural, educational, social, political, military, or cultural annals of the City, the State of Arizona, or the United States of America; or c. It represents the work of, or for, an important individual; or d. It embodies distinctive characteristics of type, period, region, artistic values or methods of construction, including being the oldest of its type or the best example of its type; or e. It has yielded, or may be likely to yield, information needed for scientific research, such as important archaeological resources.

C. Determination of Integrity. Integrity is the ability of a property to convey its significance and is based on significance, i.e., why, where, and when a property is important. Integrity is the authenticity of a property's physical identity clearly indicated by the retention of characteristics that existed during the property's period of significance. Ultimately, the question of integrity is answered by whether or not the property retains the identity for which it is significant. 1. Historic properties either retain integrity (convey their significance) or they do not. 2. The historic physical features that represent the significance of a property must remain and must be visible enough to convey their significance. However, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain sufficient physical features, historic character, and appearance that enable it to convey its historic identity and the reasons for its significance. 3. To retain historic integrity a property will always possess several, and usually most, of the following seven aspects of integrity: a. Location. The place where the historic property was constructed or the place where the historic event occurred. b. Design. The combination of elements that create the form, plan, space, structure, and style of a property. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. c. Setting. The physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. d. Materials. The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance. e. Workmanship. The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. f. Feeling. A property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. g. Association. The direct link between an important historic event or person and a historic property. 4. Integrity is not the same as condition. Integrity relates to the presence or absence of historic materials and character-defining features. Condition relates to the relative state of physical deterioration of the property. Integrity is generally more relevant to the significance of a property than condition. However, if a property is in such poor condition that original materials and features may no longer be salvageable, then the property's integrity may be adversely impacted and compromised. 5. To be considered authentic, a property must incorporate a substantial amount of the original features and materials. While new material can exactly copy significant features, if too much historic material is replaced with new material, the integrity of the property is lost and integrity can never be recreated. The precise replication of features with new materials may produce a building that looks like

a historic building, but without substantial retention of actual historic materials, the integrity of the property is lost.

**D. Determination of Major Impacts to Cultural Resources.** Impacts to resources are major when they directly or indirectly alter or destroy any of the characteristics that make the resource significant, including when they may diminish the integrity of the resource including its location, design, setting, materials, workmanship, feeling or association.

**E. Mitigation Measures.** 1. **Purpose.** To the greatest extent feasible, mitigation measures minimize or offset major impacts on resources with a general threshold of reducing the impacts to a level that is less than a major impact. 2. **Applicability.** All proposed work that will or may have a major impact on a significant cultural resource, as determined by an appropriate cultural resource study, shall incorporate mitigation measures. 3. **Professional Design Required.** The preparer of a cultural resource study shall design the appropriate mitigation measures. These may include alternative projects, alternative designs, additional work, or other means. The appropriate type and scope of measures varies depending on the cultural resource and impacts, and shall be recommended based on the professional expertise of the preparer and the following:

b. **For Identified Major Impacts.** The following mitigation measure designs are presented in order of general preference: (1) Avoidance of significant cultural resources or impacts by not taking a certain action or parts of an action; (2) Preservation of cultural resources in place; (3) Minimizing major impacts by limiting the degree or magnitude of the action and its implementation; (4) Allow other parties to acquire cultural resources, cultural resource sites, or conservation easements; (5) Data recovery.

**10-30.30.030 General Provisions D. Concurrent Development Application Review.** At the applicant's option, development proposals that require an approval pursuant to this division may proceed concurrently with other development reviews and processes. However, no permit shall be granted, and no work shall commence, until an approval pursuant to this division has been granted and mitigation measures have been incorporated into the final design and documentation of the development

***NOTE: the aforementioned are excerpts from the Municipal Code 10-30.30 Heritage Preservation.***

## **DISCUSSION**

### **COMMUNICATION BACKGROUND**

The housing project on Phoenix Ave adjacent to and including the preservation of the Hicks Rooming House (7 W Phoenix) had early discussions with the HPO regarding overall Heritage Review. This discussion with the HPO was with the previous architect and the current architect and the developer and continues with discussions of compatibility and compliance. Concerns of the historic aspects of the May Hicks home were expressed and the HPO made recommendations regarding preservation of the home, preservation of the home by reuse on the site and offering it to be moved. The applicant made a concerted effort to offer the home to the Townsite Community Land Trust who after inspection declined to take the home on as a project to be relocated from the site.

The HPO visited the site with the consultant and has noted its historic configuration as well as the early age of the structure and construction techniques and some of the aspects of floor plan configuration, deterioration, and system installation with an emphasis on non-compliant plumbing.

A combined Phase 1 and Phase 2 Cultural Resource Study was submitted by the Consultant for the developer. The Consultant called out the Phase 2 Study Report as being acceptable as mitigation and no further mitigation is proposed by the Consultant or the Developer. The HPO has reviewed and consider if the study is appropriate mitigation per requirements of the Municipal Zoning Code 10-30.30. Phase 2 Studies have been considered in some instances as appropriate and full mitigation because their extensive recordation includes photos (interior & exterior), full set of drawings (elevations, floor plans) and extensive historic research that is conducted prior to any demolition. Below is an excerpt from the study.

The proposed future development requires the complete demolition of the MHCH. Under the Flagstaff Zoning Code, a Phase 2 Historic Resource Study is considered appropriate mitigation for direct impacts on a significant building resulting from substantial modern construction. This mitigation includes extensive photography, archival research, measured drawings, and text descriptions of architectural elements at 13 S. Leroux Street.

There have also been instances where additional mitigation has been determined to be appropriate as recommended by the HPO and/or the HPC.

**MITIGATION:** Provide required appropriate and substantial mitigation per 10-30.30.050 Cultural Resources E. Mitigation Measures and other applicable requirements.

#### **10-30.30.050 Cultural Resources**

##### **E. Mitigation Measures.**

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b. **For Identified Major Impacts.** The following mitigation measure designs are presented in order of general preference:

- (1) Avoidance of significant cultural resources or impacts by not taking a certain action or parts of an action;
- (2) Preservation of cultural resources in place;
- (3) Minimizing major impacts by limiting the degree or magnitude of the action and its implementation;
- (4) Allow other parties to acquire cultural resources, cultural resource sites, or conservation easements;
- (5) Data recovery.

Data recovery is what was chosen by the consultant as recommended full mitigation. Additional mitigation has in past review been recommended by the HPO and has also been recommended by HPC members and made a requirement of approval. The determination of the Consultant that the Cultural Resource Study is sufficient mitigation can be amended by the HPC. The HPO is recommending additional mitigation to be included at the site or incorporated into the new development that acknowledges the achievements of May Hicks and here involvement in early Flagstaff History and the State of Arizona. Considering the underrepresentation of women in the history of Flagstaff it is ever more important that the history and accomplishments of May Hicks be shared and acknowledged with the public.

#### **POTENTIAL MITIGATION PRODUCT(S)**

Appropriate physical mitigation installation that return the lost value of the resource back to the public can be varied with many options. The most important aspect being the installations longevity and the quality of the interpretation of the resources and persons history. Several options are being presented as a starting point for mitigation compliance as follows:

- At a minimum all installation shall include interpretive text and photos in a permanent plaque installation that includes links to additional history. In addition to an interpretive plaque, a graphic or physical recognition of May Hicks' contribution to the AZ State Flag.
  - A two-flagpole installation with one flagpole for the Arizona State Flag.
  - A single flagpole installation for 2 flags (one AZ State Flag)
  - An artistic interpretation of the flag such as in a mosaic form.
  - A mural installation of May Hicks and other related images such as the inclusion of the AZ Flag.

**HISTORIC ERA INTEGRITY**

The Heritage Preservation Officer Mark Reavis, AICP, NCARB has reviewed the property and determined the building retains historic integrity and eligibility to both the National Register and Local Register. Cultural Resource requirement of Municipal Code 10-30.30.050. 5. Required Recommendations by the Report Preparer, and made a determination of Integrity.

**ARCHITECTURAL DISCRIPTION & History:**

This circa 1911 aspects of the homes architecture and relationship to it use history are fully described and noted in the Phase 2 study. The provided recordation includes extensive photos and measured drawings that fully describe the architectural aspects of the home. Please note that sheet A-2 of the measured drawings is utilizing laser measuring and imaging technology to produce the elevation drawings. The Cultural Resource Study has uncovered extensive information about the extraordinary life of May Hicks and her important place within the early history of Flagstaff as well as the State of Arizona.

**Basis of Report:**

The information in this summary report was derived from the application to the Heritage Preservation Commission, the prepared Cultural Resource Study, requests for additional information, a site visit, the Flagstaff Municipal Code - Zoning Code Heritage Preservation, and the and Federal US Secretary of the Interior's Standards for professional requirements and reporting.

**Evaluation of Effects**

The proposed demolition of the historic property is an "adverse effect" and requires the preparation of a Cultural Resource Study. Applicants are to consult with the Heritage Preservation Officer who bases his/her initial determination of significance on 5 local criteria (*10-30.30.050 Cultural Resources - 5. Required Recommendations by Report Preparer -B Determination of Significance of Cultural Resources*). Looking at the home's known or understood significance determines the extent of the required study. Initial investigation of the resource reviled its significance in the community as a unique resource with an extended history associated with a person.

**Evaluation of Report:**

The Cultural Resource Study provided insight into the historic integrity of the home. The Phase 1 and 2 Cultural Resource Study as proposed mitigation covers the physical architectural aspects of the home but does not fully mitigate the association of May Hicks with the home. The HPO feels that additional mitigation is required to return the lost value of the home back to the public with acknowledgement of the contributions of May Hicks to the Flagstaff community and the State of Arizona.

**Consideration of past studies:**

Staff has looked toward past studies and did find similar situations that required both Phase 1 reporting with mitigation and an example of recent full recordation of a Phase 2 Study. The SCA Paper Cultural Resource Study with mitigation is an HPC accepted example of a Phase 1 Study with mitigation. The David Babbitt home is the example of a Phase 2 Cultural Resource Study with full recordation in a HABS format. The proposed demolition and total loss of the resource dictated full recordation as well as additional mitigation requirements for a significant Flagstaff person in the City's early development.