

CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION

STAFF REPORT

CERTIFICATE OF APPROPRIATENESS
PZ-25-00106-03
ADDRESS: 19 W. Birch Ave.

DATE: April 30, 2026
MEETING DATE: May 20, 2026
REPORT BY: Lauren Clementino

REQUEST

Approve a Certificate of Appropriateness for:

- 1) Demolition of the existing building at 19 W. Birch Ave. (parcel 100-19-004A).
- 2) Design of new hotel and parking garage buildings on parcels 100-19-004A, 100-19-008A, and 100-19-007.

Future signage for the proposed hotel and parking garage is outside the scope of the current Certificate of Appropriateness and will be reviewed separately at a later date in conjunction with sign plan development and sign permit application. A Certificate of No Effect or Appropriateness would be required at that time.

PROJECT BACKGROUND

The current project proposes to construct a new The Graduate hotel and parking garage at 19 W. Birch Ave. utilizing three parcels, 100-19-004A, 100-19-008A, and 100-19-007. All three parcels are located within the Downtown Historic Overlay Zone and subject to the Design Handbook for Downtown Flagstaff.

The Phase 1 Cultural Resource Study for 19 W. Birch Ave. (located on parcel 100-19-004A) found that the building is significant under City of Flagstaff Criterion B and NRHP Criterion A for its associations with the areas of Social History and Government and under City of Flagstaff Criterion D for its architectural qualities. This building had not been previously studied prior to the current project. It is outside of the Railroad Addition Historic District.

The former buildings located at 111 and 123 N. Leroux St. (parcels 100-19-008A and 100-19-007) were previously studied via Letter Report Cultural Resource Studies and determined not to be eligible for listing in the Flagstaff or National Registers of Historic Places due to lack of significance and integrity. The demolition of these buildings was previously approved via Certificates of No Effect and the parcels are currently vacant. These parcels are also outside of the Railroad Addition Historic District.

STAFF RECOMMENDATION

Staff recommends that the Heritage Preservation Commission divide the request into two separate parts and approve separate motions to:

- Require a Certificate of Economic Hardship for the demolition of the existing building at 19 W. Birch Ave.
- Approve a Certificate of Appropriateness for the design of the new hotel and parking garage, conditioned on a future approval of the Certificate of Economic Hardship and/or completion of a Temporary Delay of Demolition.

PAST DECISIONS AND OTHER REVIEWS

Phase 1 Cultural Resource Study

Cornerstone Environmental Consulting, LLC, was contracted by Capri Flagstaff LLC to conduct a Phase 1 Cultural Resource Study for the existing building at 19 W. Birch Ave. This building had not been previously studied. It is located within the Downtown Historic Overlay Zone, but outside of the Railroad Addition Historic District.

At the May 21, 2025 meeting, the Heritage Preservation Commission reviewed a first submittal of the Phase 1 study and moved "to not accept the report and ask for revisions with a further re-evaluation of Flagstaff Criteria B and D and do further research into courts or the role of the courts in the building, social movements, construction methods and processes, and the post-WWII boom in Flagstaff, through documents such as oral histories, historic photos, architectural and City records and NAU newspapers, and to reduce the focus on interior integrity in their assessment."

At the July 16, 2025 meeting, the Commission reviewed the revised submittal of the Phase 1 Cultural Resource Study and selected measures to mitigate the proposed major impact of demolition of the property. The revised Phase 1 Cultural Resource Study found that the building is significant under City of Flagstaff Criterion B and NRHP Criterion A for its associations with the areas of Social History and Government and under City of Flagstaff Criterion D for its architectural qualities. The Commission found and determined that the facts exist as required by Section 10-30.30 of the Zoning Code to approve the study (by a vote of 7-0) with the following conditions:

1. The grammatical corrections noted by Commissioner Westheimer (including correct spelling of the names Robert W. Prochnow and Paul Babbitt Jr. and inclusion of Pat Madden as a source in the References) be incorporated into the Phase 1 to be approved by the Heritage Preservation Officer
2. Completion of a Phase 2 Cultural Resource Study to focus on architectural documentation to include archival grade photography, as-built drawings, and elevation drawings to be reviewed by the Heritage Preservation Commission
3. Interpretive mitigation for the National Register of Historic Places Criteria A significance be developed in conjunction with the Indigenous Commission and reviewed by the Heritage Preservation Commission
4. Malpais rocks be incorporated into the new building, preferably on the exterior, preferably salvaged, to be reviewed by the Heritage Preservation Commission during the Certificate of Appropriateness review
5. Archiving both Cultural Resource Studies, Phases 1 and 2, in a place where they will be publicly accessible, preferably the City of Flagstaff library and/or website

The first condition (addressing grammatical corrections in the Phase 1 report) has been met and the revisions approved by the Heritage Preservation Officer on July 21, 2025. The Phase 2 Cultural Resource Study was submitted for review by the Commission at the May 20, 2026 meeting as a separate Public Hearing item. The current Certificate of Appropriateness application demonstrates the proposed location for the malpais stone in the new design. The final condition (publicly accessible archiving of the

Cultural Resource Studies) will be addressed after the Phase 2 Cultural Resource Study has been approved by the Commission.

Development Review

The Concept Plan for the proposed The Graduate hotel and parking garage was deemed complete through City of Flagstaff Inter-Division Staff review on February 3, 2026. The Site Plan is currently under review. A first round of Inter-Division Staff substantive comments on the Site Plan were provided to the applicant on April 7, 2026. Heritage Preservation Officer comments on the Concept Plan and Site Plan requested that the Certificate of Appropriateness application be submitted to the Heritage Preservation Commission for review after a first round of substantive comments were received and incorporated into the design.

INTENT

The purpose of the Downtown Overlay is laid out in Section 10-40.50.030 of the Zoning Code. The stated purpose is to “promote the preservation and unique character of all structures within the zone.” Properties within the Downtown Overlay are “subject to the Design Handbook for Downtown Flagstaff.” The Design Handbook for Downtown Flagstaff states: “The Historic Preservation Ordinance is designed to preserve and enhance the historic district. This ordinance requires a Certificate of Appropriateness (or No Effect) be granted before any changes are made to the exterior appearance of properties within a designated historic district.”

The purpose of the Downtown Overlay is to review the appropriateness of proposed changes to historic buildings with guidance by the Design Handbook for Downtown Flagstaff: *“This handbook is included as a guide to the Commission in making consistent decisions on the appropriateness of proposed changes. Interpretation should be neither overly strict nor too permissive. In making its decisions, the Commission will consider the historic value of the building, its prominence and significance to the district, the state of physical deterioration, and the economic factors of repair, replacement, or renovation.”*

STAFF REVIEW

Scope of Work

The Certificate of Appropriateness is “appropriate if the proposed work alters a cultural resource but does so in such a way that is compatible with the historic or archaeological character of the resource and all major impacts are mitigated such that the work does not diminish, eliminate, or adversely affect the significance or integrity of the resource.” (Flagstaff Zoning Code 10-30.30.060.E).

Findings

“Prior to the granting of any required approvals or permits and prior to the commencement of any work on a landmark property or within a historic overlay zone, the Heritage Preservation Commission or the Historic Preservation Officer shall review all work proposed and approve or conditionally approve the work in the form of a certificate of no effect, certificate of appropriateness, or certificate of economic hardship” (Flagstaff Zoning Code 10-30.30.060 Development of a Landmark Property and Property within a Historic Overlay Zone).

The Flagstaff Zoning Code 10-30.30.060E states:

Criteria for Approval.

When approving a certification of appropriateness, the Heritage Preservation Commission shall find that:

- a. The proposed work is consistent with the purpose and intent of this division;
- b. The proposed work is compatible with its context:
 - (1) The appropriate context for a landmark or a historic property is the property itself and, to a much lesser extent, the surrounding properties and neighborhood;
 - (2) The appropriate context of work in a historic overlay zone is the significant portions of the property itself, the surrounding properties, and the neighborhood;
- c. The cultural resources associated with the proposed work have been sufficiently sought, identified and evaluated;
- d. Major impacts on cultural resources are sufficiently mitigated; and
- e. The proposed work is consistent with applicable development standards and design guidelines. See also subsection (G) of this section, Development Standards and Guidelines.

Downtown Historic Overlay Design Guidelines

“The Downtown Overlay (DOZ) zone applies to areas of the City subject to the Downtown Historic Design Review Overlay District Guidelines and Design Standards and Guidelines with design review by the Heritage Preservation Commission for the development of properties located within the boundaries of the zone.” (Flagstaff Zoning Code 10-40.50.030 Overlay Zones).

The following Design Handbook for Downtown Flagstaff guidelines for new construction apply to this case:

Design Guidelines for Color

- C1. Use color schemes that will complement other buildings nearby.
- C2. Use color to coordinate façade elements in an overall composition.
- C3. Reserve bright colors for accents only and where evidence demonstrates the historical use of bright colors.

Design Guidelines for New Buildings

- N1. Align the façade of the new building with the established set-backs of the area.
- N2. New buildings should appear similar in mass and scale with historic structures in the area.
- N3. Use building forms that match those used traditionally.
- N4. Use roof forms that match those used historically.
- N5. Use building materials that are similar to those employed historically for all major surfaces.
- N6. Orient the main entrance of the building to the street.
- N7. Use window sizes and proportions similar to those found traditionally in the district.
- N8. Respect porches, awnings and balconies.
- N9. Be aware of floodplain regulations.

Site Design Guidelines

- SD1. Maintain the alignment of the buildings at the sidewalk edge.

- SD2. Locate planting in traditional areas of the site.
- SD3. Plan parking lots so that the visual impact of large paved areas is reduced.
- SD4. Screen service equipment and trash containers from public view.

Basis of Report

The information in this summary report was derived from the application to the Heritage Preservation Commission, the Flagstaff Zoning Code, and the Design Handbook for Downtown Flagstaff.

Evaluation of Effects

Demolition of the Existing Building

Demolition of the existing building at 19 W. Birch Ave. is a major impact. Per Flagstaff Zoning Code 10-30.30.050.D, “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.” Demolition, or “Physical destruction or damage to all or part of the resource” is defined as a major impact.

Design of New Hotel and Parking Garage Buildings

Design Guidelines for Color

- C1. Use color schemes that will complement other buildings nearby.

The design guidelines call for use of colors used by other buildings within the block and for the natural colors of brick and stone to dominate the street. Brick is used as a primary material in compliment to the adjacent brick CenturyLink building, Residence Inn by Marriott Flagstaff located within the same block across Beaver St., National Bank of Arizona across Birch Ave., and the Hopi Building across Leroux St. The use of stucco is supported by its use in the buildings from 101-109 N. Leroux St and the National Bank of Arizona. Malpais stone and limestone are also incorporated into the hotel façade.

- C2. Use color to coordinate façade elements in an overall composition.

Per the design guidelines, base paint colors for the background wall surfaces are muted earth tones (light gray for the majority, and tan for the minority). As called for in the design guidelines, darker contrasting colors are limited to window frames, sills, moldings, and cornices.

- C3. Reserve bright colors for accents only and where evidence demonstrates the historical use of bright colors.

No bright colors are proposed. Colors are natural materials and earth tones, as called for in the design guidelines.

Design Guidelines for New Buildings

- N1. Align the façade of the new building with the established set-backs of the area.

Building facades follow established setback requirements and utilize a minimal landscape buffer of 5 feet as required by the Flagstaff Zoning Code Division 10-50.60: Landscaping Standards.

- N2. New buildings should appear similar in mass and scale with historic structures in the area.

Per the design guidelines, the hotel façade surface has been subdivided through use of varying materials: brick, malpais stone, limestone, stucco, and glass. The parking garage façade surface has been subdivided through use of varying materials: brick and precast concrete with different textures. Both buildings are further subdivided via use of massing articulation (recesses) to divide the façades.

The design guidelines state that in general downtown buildings are two to four stories in height and that a maximum building height limit of 55 feet is recommended. However, a maximum of 60 feet is allowed. The proposed buildings are 60 feet in height and meet the building height requirement per the design guidelines and the underlying zoning (Central Business).

- N3. Use building forms that match those used traditionally.

Proposed buildings use simple rectangular forms, meeting the stated preference in the design guidelines.

- N4. Use roof forms that match those used historically.

Proposed roof forms are flat, meeting the design guidelines. All surrounding buildings in this block also employ flat roofs.

- N5. Use building materials that are similar to those employed historically for all major surfaces.

The design guidelines state that brick and stone are appropriate materials for large surfaces. Brick is used as a primary material for both buildings. Malpais stone and limestone are also used as primary materials for the hotel building.

The design guidelines also state that new materials may be used if their appearances are similar to those of historic materials such as brick and native stone. The parking garage design employs use of sandblasted concrete to mimic masonry. The hotel design employs use of Hardie panels to mimic wood.

In Flagstaff Zoning Code Division 10-50.20: Architectural Design Standards, stucco and untreated concrete are considered appropriate as secondary materials (being used in less than 25% of the façade). The provided calculations in the Architectural Plans demonstrate that these materials fall within the secondary material requirements.

- N6. Orient the main entrance of the building to the street.

The main entrance of the hotel is oriented to Beaver St. The main pedestrian entrance to the parking garage is oriented to Leroux St. The main vehicular entrance of the parking garage is oriented to the alley to emphasize the pedestrian experience from the primary street over the vehicular.

- N7. Use window sizes and proportions similar to those found traditionally in the district.

Ground floor windows replicate sizes and proportions similar to those utilized on neighboring buildings and throughout the zone. Upper story windows are larger than those used traditionally, although employ light divisions to break up the sizing. Windows are also utilized to break up the bulk and mass of the building. If smaller windows sizes were required, the building design may result in greater bulk in appearance.

- N8. Respect porches, awnings and balconies.

The design guidelines state that these elements may be considered in new construction where elements compliment surrounding historic buildings. The proposed design does not utilize awnings or balconies. A recessed entry porch is integrated into the hotel design. Recessed entries are found in the surrounding buildings, and a recessed entry porch is also integrated into the neighboring Residence Inn by Marriott Flagstaff.

- N9. Be aware of floodplain regulations.

FEMA flood zone designations are depicted on the Civil Plans and the design incorporates required flood mitigation measures.

Site Design Guidelines

- SD1. Maintain the alignment of the buildings at the sidewalk edge.

Building facades incorporate a minimal landscape buffer of 5 feet as required by the Flagstaff Zoning Code Division 10-50.60: Landscaping Standards. As preferred in the guidelines, buildings are not set back from the street and do not site parking in front.

- SD2. Locate planting in traditional areas of the site.

Plantings are located in the traditional landscape buffer area along the sidewalk, as well as in the pedestrian alleyway located between the two buildings.

- SD3. Plan parking lots so that the visual impact of large paved areas is reduced.

No parking lots or large paved areas are included in the proposed design. Parking garages are not addressed in the design handbook and there are no design guidelines specific to parking garages. The design of the parking garage building was reviewed as a building under the applicable design guidelines for new buildings.

- SD4. Screen service equipment and trash containers from public view.

All service equipment and trash containers are depicted as on the interior or screened from view.

COMMISSION OPTIONS

- 1) The Commission can follow the recommendation to divide the request into two separate parts and approve the two separate recommended motions;
- 2) The Commission can approve the Certificate of Appropriateness for both the demolition and the design without additional conditions;
- 3) The Commission can approve the Certificate of Appropriateness for both the demolition and the design with additional conditions related to the standards and guidelines applicable to the case;
- 4) The Commission can request additional information and continue to a date certain; or
- 5) The Commission can deny the application for both the demolition and the design and require a Certificate of Economic Hardship.

STAFF CONCLUSION:

Staff recommends that the Heritage Preservation Commission require a Certificate of Economic Hardship for the demolition of the existing building at 19 W. Birch Ave. The Commission has previously approved a Phase 1 Cultural Resource Study that found this building to be a significant cultural resource. Per Flagstaff Zoning Code 10-30.30.060.E, a Certificate of Appropriateness “is appropriate if the proposed work alters a cultural resource, but does so in such a way that is compatible with the historic or archaeological character of the resource and all major impacts are mitigated such that the work does not diminish, eliminate, or adversely affect the significance or integrity of the resource.” Demolition of this building is a major impact. Although mitigation measures for the demolition were previously approved by the Commission, the demolition will still result in an adverse effect to this cultural resource.

A Certificate of Economic Hardship requires a separate application and public hearing process. Per the Flagstaff Zoning Code Division 10-30.30: Heritage Preservation, submittal requirements would include demonstration that an economic hardship exists (a lack of reasonable use or return, a substantial reduction in the value, or a substantial burden); preservation is economically infeasible; the economic hardship is not a self-created hardship; alternative development has been fully explored; and alternative financing has been fully explored. Approval is appropriate if the proposed work, including demolition and appropriate mitigation measures, will deprive the property owner of reasonable use of or a reasonable economic return on the property; or, will result in a substantial reduction in the economic value of the property; or, will result in a substantial economic burden on the property owner because the property owner cannot reasonably maintain the property in its current form.

Staff recommends that the Certificate of Appropriateness for the design of the new hotel and parking garage be approved, conditioned on a future approval of the Certificate of Economic Hardship and/or completion of a Temporary Delay of Demolition. The proposed hotel and parking garage design meet the Design Handbook for Downtown Flagstaff guidelines and the findings required by the Zoning Code, and it is appropriate for the Commission to approve a Certificate of Appropriateness based on the findings.