

October 6, 2025

Attention: Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701

Subject: Tyler & Moore Grocery Company Buildings
416 North Broadway, Tyler, Smith County

The above historic properties, currently under rehabilitation, were constructed between approximately 1912 and 1917 and served as major distribution centers for wholesale grocery operations in downtown Tyler for much of the twentieth century. The Tyler Grocery Building and the Moore Grocery Building are both individually listed in the National Register of Historic Places for their significance to the commercial and industrial development of Tyler and East Texas. These substantial brick warehouse buildings, with their large multi-light windows and utilitarian industrial design, are representative of early twentieth-century mercantile architecture. Both retain a high degree of exterior integrity and continue to convey their original function and architectural character within the historic downtown core.

The TDHCA requirement for insect screens on all operable windows is of concern to our office, in accordance with our ongoing review of the project for the Texas Historic Preservation Tax Credit program and the Federal Rehabilitation Tax Credit program, both of which require projects to meet the Secretary of the Interior's Standards for Rehabilitation.

We have reviewed historic documentation and photographs of both the Tyler Grocery and Moore Grocery Buildings and have concluded that window screens were not historically present. These buildings were designed for industrial use, where ventilation was provided through large operable sash windows without the use of screens. Installation of window screens would present a difficult design challenge and would detract from the industrial character of the buildings. Our office's opinion is that neither half-height nor full-height window screens are recommended for these significant historic properties.

We note that the applicant proposes to repair and retain the historic wood windows wherever feasible. In locations where deterioration is too advanced to allow repair, compatible aluminum replacement windows will be installed to match the historic units in configuration and profile. This approach is consistent with the Standards for Rehabilitation. However, the Standards do not permit further alteration that would diminish the integrity of the historic window openings or introduce non-historic features.

It does not appear that these industrial-style windows could be retrofitted with screens without adding an entirely new frame assembly or mounting hardware to contain them. Adding such assemblies would further alter the window appearance and constitute an additional departure from the historic design. Such work would further damage the character of the buildings and would not meet the Secretary of the Interior's Standards for Rehabilitation, therefore threatening the project's compliance with the tax credit programs.

In summation, our office does not recommend window screens for the Tyler Grocery Building or the Moore Grocery Building, and we support the applicant in their request that TDHCA waive this requirement.

Sincerely,



Valerie Magolan
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