



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, NW

Washington, DC 20240

SENT VIA EMAIL

June 7, 2024

Jessica Krochtengel
Cabana Design District LP
17014 Preston Bend Drive
Dallas, 75248

PROPERTY: **Cabana Motor Hotel, 899 N. Stemmons Fwy., Dallas, TX**

PROJECT NUMBER: **47829**

APPLICATION: **Part 2**

DECISION: **Review on hold**

Dear Ms. Krochtengel:

The National Park Service has received your Historic Preservation Certification Application (HPCA) Part 2 for this property and has determined that additional information is needed to complete our review. Furthermore, based on the information provided, the project appears to contain treatments that do not meet the Standards. As a result, the review has been placed on hold to allow you the opportunity to provide the requested information and to address problematic treatments as outlined below.

1. **Parking Structure:** Schematic information was reviewed by THC and NPS on a preliminary basis in December 2023/January 2024 related to the proposed concept of utilizing part of the c.1985 non-contributing parking structure for residential units. Our understanding of the proposal at that time, based on the limited information provided, was the existing structure would be retained but altered (“repurposed”) to create four floors of residential apartments. The NPS preliminary comments noted the general concept could meet the Standards provided the new materials and fenestration design were compatible with the character of the hotel complex.

The Part 2 application narrative describes, “*The southern half of the parking deck area will be repurposed to house new apartment units and will maintain the same height as the existing so as to not alter the viewshed of the historic building.*” We note the Part 2 drawings appear to show the south portion of the parking structure will be demolished, and a new building essentially constructed in its place to connect to the remaining parking deck and hotel. The narrative does not describe this level of work.

The c.1985 parking structure is non-contributing and would not meet the Standards if proposed to be constructed as part of a rehabilitation project today. If the south portion is to be demolished, constructing a new building in its footprint will likewise not meet the Standards, as the location and massing has substantial impact to the primary elevation of the historic hotel. NPS will still consider introducing residential units at this location only if the existing parking structure is retained and residential units are constructed to fit within the existing footprint. The fourth level can be fully enclosed as previously agreed to. We understand structural reinforcement may be necessary to achieve this construction.

The proposed scope of work must be revised; please provide the following:

- A. **Updated narrative** clarifying the scope of work and confirmation the structure will not be demolished, but instead will be retained and reused.
- B. **Revised architectural drawings** (demolition and proposed) for the south parking structure.
- C. **Design revisions** to the south “primary” façade are necessary for the parking deck alterations to meet the Standards. The checkerboard pattern utilizing metal screening and glass railings, as well as the varying

sized window and door openings, accentuates the non-contributing building and should be simplified. If balcony space is desired, the new exterior wall should be recessed within the parking structure and utilize a glass curtain wall, or at least a regular pattern of floor-to-ceiling windows in keeping with the fenestration character of the historic hotel. The concrete deck and steel columns would remain, with a simple cable railing at the edge of the structure.

2. **Existing conditions:** We understand the previous owner undertook extensive demolition of what remained throughout the historic hotel. The remaining features and finishes will need to be carefully assessed for retention where possible. Demolition drawings use a typical floor plan for Levels 3-9, and when compared to photographs the drawings do not appear to accurately reflect what remains on each floor. Revised drawings showing accurate existing conditions must be provided to document the true starting condition and extent of previous demolition. We note concern with the proposal for wholesale demolition of all remaining features, including corridor walls. Photographs show a distinct rhythm of plaster walls and modified openings remains on a number of levels. The recommended treatment would be to retain the corridors, group unit entries at openings where hotel room doors had been, and make modifications inboard of the corridors as necessary for unit layouts. At minimum, updated existing plans for each floor must be provided.
 - A. **Corridor reconstruction:** If demolition and reconstruction of corridor walls is determined to be warranted, please confirm the new partitions will match the location and corridor width of the extant historic plaster walls.
3. **Hotel Tower Windows:** A uniform fenestration pattern behind the brise-soleil is a character-defining feature of the hotel tower. We acknowledge a substantial number of windows have been removed and residential use must meet ventilation requirements. The proposed window design staggers the operable windows (with heavier framing) within each masonry opening instead of stacking them. What is the reason for this? Do the operable doors satisfy the ventilation requirement for those locations without needing an operable window adjacent? Please clarify the design intent and limitations that are driving the proposed configuration. We recommend limiting the operability to the door, and a pair of stacked windows matching the door location in other openings – the result would be a more uniform appearance across the building’s east and west elevations. Revised drawings should be submitted as appropriate.
4. **Lanai West Elevation:** The January 2024 preliminary review did not include new window openings on the west elevation of the historic lanai and was limited to the rear elevation of the hotel tower base. The number of new openings at the lanai can meet the Standards but the placement needs to be revised to a regular fenestration pattern, aligning first and second floor windows of matching size. Although a secondary elevation, the length of west façade, the number of windows, and irregular placement creates an incompatible character as currently proposed. Revised elevation and floor plans must be provided, as this may require interior layout revisions. The window size and pattern on the hotel base does not need to match the revised pattern on the lanai.
5. **Lanai East Elevation:** The distinctive pattern of windows and door openings within the exterior masonry wall is character-defining and must be preserved. There appears to be discrepancy between some of the application drawings; demolition drawings show some of the masonry piers between openings will be demolished to enlarge the opening and eliminate the historic fenestration. This treatment does not meet the Standards and must be revised. This could be a condition of the Part 2 approval if necessary.
6. **Rooftop Addition:** As noted in the January 2024 preliminary review, a rooftop addition that is generally the same size as the approved 2018 proposal will conceptually meet the Standards, but sightline studies will be required to confirm visibility of the new proposed design. We note the addition has been enlarged one structural bay to the south. No sightline studies have been provided with the Part 2, therefore NPS is unable to issue an approval for the addition without the necessary documentation. We recommend providing these details with the hold response if available.

We note NPS review of this application is on-going and additional revisions may be necessary as conditions of a Part 2 approval, for a project that otherwise meets the Standards. These will likely include, but are not limited to, masonry work, window and storefront replacement, site work, finish details, etc.

Technical Preservation Services has transitioned to an all-electronic submittal and review process, and the additional information requested must be submitted through the HPCA Electronic Submission SharePoint Site within 30 days of the date of this letter. You will receive a separate email generated by the HPCA Electronic Submission SharePoint Site within one business day giving you access to a project-specific folder in which to upload information when you are ready to submit it. The email will have the following subject line or something similar “[**TPS Admin Staff Name**] shared the folder “**Hold NPS Project #XXXXX, Project Name, Address, State**” with you.” If you do not receive this email, please check your junk folder. All electronic submissions must use the current [Amendment/Advisory Determination form](#), dated “6/2023 v2” in the upper lefthand corner. Please check the first box in Section 2 of the form for additional information submitted in response to a project that was put on hold. You must also submit a copy to the SHPO using the SHPO's electronic-submission process. Contact the individual SHPO office or consult the [TPS webpage](#) with links to the individual SHPO offices and this information.

Requests for extensions of the hold period must be made in writing by notifying TPS Admin Staff via email at nps_tps@nps.gov.” Upon receipt of the requested information, a new 30-day review period will begin. The file will be closed if the request for extension is not made in the allotted time or the additional information is not provided, and work undertaken on the structure will not qualify as a "certified rehabilitation."

For additional information on the electronic application submission system, visit [TPS’s new webpage](#).

Thank you for your attention to this request. If you have any questions, please call me at 202-354-2016.

Sincerely,

David Trayte
Technical Preservation Services

cc: TX SHPO
Cindy Hamilton, 15 W Highland Avenue, Philadelphia, 19118