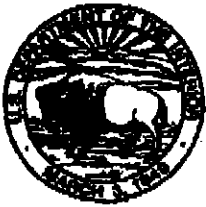


Letters
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Project Tracking Sheet
Citizen Comment Cards



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

H30 (2255)

May 7, 2004 • received 5.13.04

Mr. Scott Lyon
MSR Properties, LLC
7305 East Greenway Road
Scottsdale, AZ 85260

PROPERTY: Hotel Valley Ho, 6850 East Main Street, Scottsdale, AZ
PROJECT NUMBER: (10306)
TAXPAYER ID NUMBER: 04-367-4031

Dear Mr. Lyon:

The National Park Service has reviewed the first phase of your Historic Preservation Certification Application - Part 2 for the above cited project on 02/19/2004 and received payment for the preliminary processing fee on 02/19/2004. After careful evaluation of the proposed project, we determined that some of the proposed alterations to the property are not consistent with the Secretary of the Interior's Standards for Rehabilitation; and contacted the Arizona State Historic Preservation Office to see if revisions to the proposed work could be implemented in order to bring the project into conformance with the Standards. However, based on discussions during our telephone conversation on May 6, 2004, it appears that the project will be moving forward largely unmodified due to a tight construction schedule.

Unfortunately, the project as described in the submitted documentation, does not meet Standards 2 and 9 of the Secretary Standards for Rehabilitation. Therefore, the project does not qualify as a "certified rehabilitation" and is not eligible for the 20% investment tax credit for historic preservation.

According to the draft National Register Nomination submitted with the Part 1, the Hotel Valley Ho meets the qualifying criteria for listing in the National Register of Historic Properties as an "intact example of Organic Modern Architecture" and as a "highly evolved architectural expression of an automobile oriented building." (Section 8, Page 1) The nomination claims that the Hotel Valley Ho also demonstrates exceptional significance under Criterion "G" (for projects achieving significance within the past 50 years) "as a well-preserved, relatively rare example of the tradition of resort building" whose design and use of materials evoke the natural beauty and cultural identity of a particular region. (Section 8, Page 1) Furthermore, the property is also "one of the few intact representatives of an entire era." (Section 8, Page 1)

Among the character-defining features of the Hotel Valley Ho are the sprawling two-story guest wings informally arranged around a pool area. Other features of this property, which are also characteristic of the motor hotel type, are the porte-cochere and a three-story rectangular block of cast-concrete marking the entrance. Situated on axis with Scottsdale's Main Street, the cast concrete block was fitted with the Valley Ho illuminated sign and created "a presence for the building from afar." (Section 8, Page 6) The interior public areas such as the lobby, lounge, restaurant, and ballroom spaces, are also character-defining features of this hotel embodying the design and materials typical of this new hotel type.

These interior spaces along with the grounds surrounding the buildings remain much as they did in the 1950s, contributing to the property's high level of historic integrity.

Nearly all of these character-defining features will be significantly altered as a result of the proposed rehabilitation. The proposed four-story tower addition will substantially alter the existing horizontal character of the complex's massing. The proposed new tower addition will project 4 stories above the existing two-story hotel as well as the existing cast-concrete signage block. This new strong vertical element will have a significant impact on the emphatically horizontal character of the property as it was historically built. The fact that a tower addition of the same size and in the same location as the one proposed might have been envisioned in the initial plan for the hotel does not make it a historic element of the building if it was never built nor does it justify the proposed addition. The new tower addition is not consistent with Standards 2 and 9. Standard 2 states: *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.* Standard 9 states: *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

The proposed interior changes to portions of the lobby, lounge and restaurant space are also not consistent with Standard 2. In spite of changes to the original design, which have not been clearly documented, the interior photographs show many remaining original features and elements characteristic of the building's historic period such as the bar in the cocktail lounge area. The partial drawings showing proposed changes to the lounge area show most of the vestiges of the original design will be removed. Moreover, the new design introduces curvilinear elements that are not consistent with the historic character of the property. It also appears that portions of the existing lobby may also be altered, but documentation showing the existing conditions of all the public areas as well as detail drawings showing all the proposed changes in these areas were not submitted.

In addition, new construction and other proposed alterations would also have a substantial impact on the landscape areas surrounding the buildings and main pool. Of these changes, the most dramatic are the new landscaping and additional structures around the main pool. As stated in the nomination, the principal characteristics of the historic landscape consisted of "large expanses of grass with occasional oasis-like plantings." The new landscape design along with new trellis and cabana structures around the pool area give the space a cluttered and complicated character that is in contrast to the openness and simplicity of the historic design.

Another characteristic aspect of the hotel's designed setting is the lack of formal transitional elements between the buildings and the surrounding landscape, particularly around the perimeter of the complex. The proposed zigzag shaped privacy wall along the curved southeast wing not only creates an uncharacteristic new type of outdoor space in the property, but also alters the historic view of the building. These alterations are also inconsistent with Standards 2 and 9.

Should you consider making changes to the proposed work in order to obtain certification, our office would be happy to offer guidance on how to bring the project into conformance with the Standards. This decision of certification cannot be appealed. Because the property is not yet a "certified historic structure," you must seek a final certification of significance as the next step rather than appeal this denial of certification of the rehabilitation

In limited situations, however, an administrative review of this decision may be performed at the discretion of the Chief Appeals Officer. Requests for administrative review should be addressed to the Chief Appeals Officer, Cultural Resources, National Park Service, 1849 C Street, NW, Org. 2270, Washington, D.C. 20240. The enclosed Federal regulations governing the investment tax credit program provide additional information about the administrative review process in section 67.10.

Section 67.7 cites the Secretary of the Interior's Standards for Rehabilitation. A copy of this letter will be sent to the IRS.

If you have any questions about the review of the application, please contact Antonio Aguilar of this office at (202) 354-2032.

Sincerely,



Sharon C. Park, FAIA, Chief
Technical Preservation Services

Enclosure

cc: IRS
AZ SHPO

OPTIONAL FORM 99 (7-00)

001

FAX TRANSMITTAL		# of pages ▶ 2
To BOB FRANKENBERGER	From ANTONIO AGUILAR	
Dept./Agency	Phone # 202-354-2032	
Fax # 602-542-4180	Fax #	

NSN 7040-01-317-7388 5098-101 GENERAL SERVICES ADMINISTRATION

DRAFT

H30 (2255)

April 5, 2004

Mr. Scott Lyon
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 7305 East Greenway Road
 Scottsdale, AZ 85260

PROPERTY: **Hotel Valley Ho, 6850 East Main Street, Scottsdale, AZ**
 PROJECT NUMBER: **(10306)**
 TAXPAYER ID NUMBER: **04-367-4031**

Dear Mr. Lyon:

The National Park Service has reviewed the first phase of your Historic Preservation Certification Application – Part 2. After careful evaluation of the proposed project, we have determined that the proposed rehabilitation does not meet Standards 2 and 9 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, this project does not qualify as a "certified rehabilitation" and is not eligible for the 20% investment tax credit for historic preservation.

According to the draft National Register Nomination submitted with the Part 1, the Hotel Valley Ho meets the qualifying criteria for listing in the National Register of Historic Properties as an "intact example of Organic Modern Architecture" and as a "highly evolved architectural expression of an automobile oriented building." (Section 8, Page 1) The nomination claims that the Hotel Valley Ho also demonstrates exceptional significance under Criterion "G" (for projects achieving significance within the past 50 years) "as a well-preserved, relatively rare example of the tradition of resort building" whose design and use of materials evoke the natural beauty and cultural identity of a particular region. (Section 8, Page 1) Furthermore, the property is also "one of the few intact representatives of an entire era." (Section 8, Page 1)

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