



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240



June 25, 2013

[REDACTED]

Re: **De Anza Motor Lodge, 4301 Central Avenue NE, Albuquerque, New Mexico**
Project Number: **26892**

Dear [REDACTED]:

I have concluded my review of your appeal of the decision of Technical Preservation Services (TPS), National Park Service, denying certification of the rehabilitation of the property cited above. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank [REDACTED] for speaking with me in a conference call on April 24, 2012, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the proposed rehabilitation of the De Anza Motor Lodge is not consistent with the historic character of the property, and that the project does not meet Standards 2, 4, and 6 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on April 10, 2013, by TPS is hereby affirmed.

Built in 1939, and modified several times, most notably in 1958 and again in 1963/64, the De Anza Motor Lodge was listed in the National Register of Historic Places on April 30, 2004. The proposed rehabilitation of this "certified historic structure" was found not to meet the Standards for Rehabilitation owing to the planned demolition of the canopies projecting over the guest rooms, the sandstone-faced pylons at the main entry, and the painted wooden sunscreens. Also cited was the addition of landscaping elements such as fences and trees.

Regarding the features to be demolished, I find that they are constituent elements of this property's historic character. I agree with TPS that their demolition would cause the rehabilitation to contravene Standard 2. 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." This is true most especially of the prominent canopies, but also of the pylons. The loss of the painted wooden sunscreens is regrettable, but their loss would be acceptable within the limits of change contemplated by the Standards, and would not cause the entire rehabilitation to fall short of the minimum required for certification. However, the loss of the canopies and pylons is another matter.

The principal argument you make for their demolition is that the motor court reached its zenith ca. 1958 – 1959, and thus that the features added in the early-mid 1960s do not contribute to the property's significance. As your letter to me of April 11, 2013, states: "... it was in 1958 that the De Anza Motor Lodge reached its zenith.... The infrastructure that we see today was complete: a porte-cochere, swimming pool, the Turquoise Cafe, and 67 motel units contained in two L-shaped additions and a two-story addition. The important Zuni murals were also painted between 1957 and 1959. By then, the original 1939 buildings had lost much of their Spanish Pueblo Revival details and its original character as an early auto court. The late 1950's motel presented a more streamlined, modernized face in its attempt to keep pace with surrounding development, and new, larger scale motels being developed in the neighborhood...." [page 4]. Based on this premise, you argued that the 1960s changes not only did not add to the property's significance, but detracted from it. Therefore, they could thus be demolished without harm to the property's significance. However, I note that these elements were added within the period of significance ending in 1964 (as recently updated by the National Register of Historic Places), and that the De Anza Motor Lodge has had these elements—especially the canopies—for a much longer period than it maintained the appearance given it in the late 1950s, which lasted only about five to six years. Indeed, it is a longer period than the motor lodge had existed from its construction in 1939.

But the property is also significant for its historic association with C.G. Wallace, a notable figure in the Albuquerque area known not only for his prominence as the owner of the De Anza Motor Lodge, but for his dedication to Zuni Pueblo and to the Zuni people, their language, their culture, and their jewelry, which he traded and promoted extensively. He oversaw the changes to the motor lodge, both in the late 1950s—which this proposal aims to retain—and in the 1960s.

The information presented in your appeal suggests that the 1963/64 modifications were less the "specific preferences of C.G. Wallace himself, but rather the preferences of the motel professionals who came along with the rise of the chains...." [April 11, 2013, letter, page 6]. I do not find this to be convincing, given Wallace's decades-long involvement in the motel business: "This quest for improving motel service and appearance also prompted Wallace to become involved with M.K. Guertin, a Long Beach, California motel operator and promoter, who pioneered the development of referral chains... within a loose federation.... First termed the 'US 66 Hiway Association'... the association expanded to include other highways, in 1951, the chain was renamed Western Motels, Inc. and became popularly known as Best Western." [National Register of Historic Places Continuation Sheet, Section 8, Page 13]. Moreover, as the passage from your letter quoted above notes, the 1950's changes overseen by Wallace were meant to "keep pace with... larger scale motels" that were then becoming more common. Given that these changes were dictated by Wallace's desire to keep pace with prevailing changes in the motel industry, it is inconsistent to dismiss the large-scale modifications he made in the 1960's because these were dictated by the same purpose. Considering this record, I agree with the statement in the National Register Supplementary Listing Record for the property that the "remodeling done in the early 1960s is significant in the context of Wallace's ownership and promotion of the property, and that this was recognized in the original nomination."

Because the changes made in the 1960s had acquired significance, I also find that the proposed rehabilitation falls short of Standard 4. I further note that the proposed rehabilitation would retain some of the 1960s features that you argue diminishes the property's significance—notably the stone pylon at

the southwest corner of the site. Selective retention of certain features and demolition of other features from the same period is not consistent with Standard 4. Standard 4 states: "*Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*"

Nor is there convincing evidence in the record that demolition of these features—the canopies in particular—is justified by the level of deterioration shown in the photographs. Yet even if they were so deteriorated, the proposed rehabilitation would not reinstate them, thus causing the project to fall short of Standard 6 as well. Standard 6 states: "*Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*"

With regard to the landscaping, I agree with the previous decision in part. I do not agree that the plantings proposed will further detract from the character of the motor lodge. Consequently, the proposed plantings have not entered into my decision. However, adding fencing to each motel unit in order to create a "front yard" would give the property a pronounced domestic character that would contrast sharply with its historic commercial character. The individual-unit fencing would therefore also contravene Standard 2, quoted above.

Finally, I note the argument that the current proposal for the rehabilitation of the De Anza Motor Lodge should be approved on the grounds of economic feasibility. Department of the Interior regulations governing the program state: "The Standards [for Rehabilitation] shall be applied taking into consideration the economic and technical feasibility of each project..." [36 CFR 67.7(a)] However, I do not find the arguments adduced in the materials submitted convincing that this proposal is the only feasible opportunity to return the property to use. Moreover, the passage quote above continues as follows: "...in the final analysis, however, to be certified, the rehabilitation project must be consistent with the historic character of the structure(s)..."

Because I find that the project is not consistent with the historic character of the De Anza Motor Lodge, I must affirm the previous decision.

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the April 10, 2013, denial that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

cc: SHPO-NM
IRS