



May 14, 2026

Mayor and City Councilmembers
of the City of Dallas
c/o Bertram Vandenberg
Interim City Attorney
City Attorney's Office
1500 Marilla Street – Suite 7CN
Dallas, TX 75201

Sent via email to bert.vandenberg@dallas.gov

Re: Notification of claim under Dallas City Charter Chapter XXV, Section 1(C) for the City's potential violations of the requirements in state law concerning the sale or use of City Hall Plaza

Dear Mayor and City Councilmembers:

We represent Save Dallas City Hall Coalition (“Coalition”), which is a Texas nonprofit corporation committed to the preservation and restoration of the historic Dallas City Hall. We write on its behalf to provide the City of Dallas (“City”) with a 60-day notice of claim under Chapter XXV, Section 1(C), of the Dallas City Charter for the City's potential violation of the requirements in the Texas Park and Wildlife Code and the Texas Local Government Code concerning the sale or use of City Hall Plaza.

As the City surely knows, City Hall Plaza is a City park and a public square. In 1967, Dallas voters approved the issuance of “Park Plaza Bonds” to pay for its construction. The City's 2004 Downtown Parks Master Plan and the 2013 Update to that plan recognized that City Hall Plaza is a park. City employees in the City's Park and Recreation Department have maintained much of the plaza for decades. On November 12, 2025, now former City Attorney Tammy Palomino told the City Council during its meeting that the plaza was a park. In addition, the City's Landmark Commission voted unanimously on March 3, 2025, to initiate the historic designation procedure for Dallas City Hall and we believe that the plaza qualifies as a historic site for many of the reasons articulated by members of the Landmark Commission when initiating the procedure to designate City Hall.

Furthermore, City Hall Plaza has long been the City's preeminent public square. Many persons and organizations have assembled there over the years to petition the federal, state, and local governments for redresses of grievances. People also have regularly assembled there for festivals, sporting events, and ceremonies.

The Parks and Wildlife Code prohibits the City from approving any project that requires the use or taking of any park or historic site unless the City determines that there is no feasible and prudent

alternative to the use or taking of the park and the project includes all reasonable planning to minimize harm to the park or historic site:

(a) A . . . municipality of this state may not approve any program or project that requires the use or taking of any public land designated and used prior to the arrangement of the program or project as a park . . . , or historic site, unless the . . . municipality, acting through its duly authorized governing body or officer, determines that:

(1) there is no feasible and prudent alternative to the use or taking of such land;
and

(2) the program or project includes all reasonable planning to minimize harm to the land, as a park . . . , or historic site, resulting from the use or taking.

(b) A finding required by Subsection (a) of this section may be made only after notice and a hearing as required by this chapter.

(c) The governing body or officer shall consider clearly enunciated local preferences, and the provisions of this chapter do not constitute a mandatory prohibition against the use of the area if the findings are made that justify the approval of a program or project.

Tex. Parks & Wild. Code § 26.001. This state law authorizes persons to file a petition seeking judicial review of the City's approval of such a project. *See Id.* at § 26.003.

In addition, the Local Government Code prohibits the City from selling a public square or park unless the City's voters approve the sale at an election:

Land owned, held, or claimed as a public square or park may not be sold unless the issue of the sale is submitted to the qualified voters of the municipality at an election and is approved by a majority of the votes received at the election

Tex. Local Gov't Code § 253.001(b).

Various media reports indicate that the City is considering selling City Hall Plaza or allowing it to be used for a new sports arena or related development. The Coalition demands that the City refrain from doing so unless and until it has first complied with Section 26.001 of the Parks and Wildlife Code and Section 253.001(b) of the Local Government Code.

Chapter XXV of the City Charter provides that "Any resident of Dallas . . . may bring an action against the City of Dallas to require the city to comply with . . . any law of the State of Texas" and may recover "declaratory and injunctive relief against the city; and costs and reasonable attorney's fees, if the court orders injunctive or declaratory relief." That chapter also provides that "resident" includes any corporation which is physically located in or otherwise conducts business in the City of Dallas. We can assure you that the Coalition is physically located in and conducts its business in the City. Furthermore, that chapter provides the city's governmental immunity to suit and from liability is waived to the extent of liability created by city ordinance.

Accordingly, this letter constitutes notice to the City under Chapter XXV of the Coalition's claim that the City and its officials would violate Section 26.001 of the Parks and Wildlife Code and Section

253.001(b) of the Local Government Code if they attempt to sell City Hall Plaza without first complying with those laws.

Sincerely,



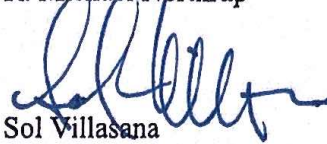
Christopher D. Bowers



Robert J. Miklos



R. Michael Northrup



Sol Villasana

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