



July 22, 2026

Historic Preservation Officer
City of Dallas Office of Historic Preservation
Attn: Marcus Watson, Historic Preservation Officer
Attn: Dr. Rhonda Dunn, Project Coordinator
Attn: Raeesa Parvez Patel, Administrative Review
1500 Marilla Street, Room 5CN
Dallas, Texas 75201

Sent via email to marcus.watson@dallas.gov

Sent via email to rhonda.dunn@dallas.gov

Sent via email to raeesaparvez.patel@dallas.gov

Re: Dallas City Hall — Formal Request under Dallas City Code § 51A-4.501(k)(3)(B) and Supplemental Notice under Dallas Charter Chapter XXV, § 1(d)

Dear Historic Preservation Officer and City Officials:

We represent Save Dallas City Hall Coalition (the “Coalition”), a Texas nonprofit corporation committed to the preservation and restoration of Dallas City Hall. This letter serves two related purposes. First, the Coalition is an interested party for purposes of Dallas City Code § 51A-4.501(k)(3)(B) and hereby **formally invokes and initiates the demolition-by-neglect investigation procedure and requests that the Historic Preservation Officer investigate whether Dallas City Hall, located at 1500 Marilla Street, is being demolished by neglect.** Second, pursuant to Chapter XXV, Section 1(d) of the Dallas City Charter, this letter constitutes supplemental notice to the City of the Coalition’s claim that Dallas City Code § 51A-4.501(k)(3)(C) has been or may be violated if, after receipt of this request, the City refuses or unreasonably fails to perform the mandatory duties prescribed by that subsection. This request concerns the City Hall structure and any associated structures or components within the property subject to the predesignation moratorium, including garage, plaza, drainage, and structural components to the extent they are included within that property or cause or contribute to deterioration of City Hall.

I. Statutory basis and status of the property

On March 3, 2025, the Dallas Landmark Commission voted unanimously to initiate the historic-designation procedure for Dallas City Hall. Based on the City records presently available to the Coalition, that process remains pending and City Hall remains subject to the predesignation moratorium in § 51A-4.501(c). If the City contends that the moratorium has terminated, please identify in writing the specific terminating event, the date it occurred, the body or official that acted, and the document memorializing the action.

Section 51A-4.501(k)(2) provides that “[n]o person shall allow a structure to deteriorate through demolition by neglect” and that all structures subject to the predesignation moratorium “must be preserved against deterioration and kept free from structural defects.” The listed defects include, among others: deteriorated or ineffective waterproofing of exterior walls, roofs, foundations, or floors; conditions rendering a structure structurally unsafe or not properly watertight; deterioration of exterior features that could create a hazardous condition; and deterioration or removal of unique architectural features. See Dallas City Code § 51A-4.501(k)(2)(H), (J), (K), and (L).

The procedure is initiated by a request from an interested party. Subsection (k)(3)(B) states: “Any interested party may request that the historic preservation officer investigate whether a property is being demolished by neglect.” Upon receipt, subsection (k)(3)(C) provides that the Historic Preservation Officer “shall” meet with the property owner or the owner’s agent with control of the structure, inspect the structure, discuss resources available to finance necessary repairs, and prepare a report for the Landmark Commission addressing the structure’s condition, needed maintenance and stabilization, available financing resources, and the time needed to complete repairs.

II. Conditions warranting investigation

The City’s own public presentations identify conditions that warrant the requested investigation. At the October 21, 2025 Finance Committee briefing concerning the state of Dallas City Hall, City staff described and displayed, among other things:

- interior water infiltration, including water infiltration over telecommunications areas;
- a failed interior gutter system;
- water infiltration over electrical infrastructure in the parking garage;
- water infiltration from the roof and active water infiltration in the garage;
- a failed storm drain in the plaza; and
- prior garage cracking and concrete spalling that required emergency structural repairs.

Those publicly reported conditions implicate, at minimum, the waterproofing and watertightness provisions in § 51A-4.501(k)(2)(H) and (J), and warrant inspection for additional defects under subsections (A) through (L). They also warrant a current assessment of whether recurring water intrusion, concrete deterioration, failed drainage, or deterioration of exterior or unique architectural features threatens preservation of the structure. The Coalition’s May 12, 2026 Chapter XXV notice provided the City additional detailed notice of the demolition-by-neglect allegations and is enclosed with this request.

This request does not ask the Historic Preservation Officer to prejudge the ultimate result. The purpose of the requested investigation is to determine, on an adequate technical and administrative record, whether demolition-by-neglect conditions exist and what maintenance, stabilization, and repairs are required. For avoidance of doubt, the inquiry prescribed by § 51A-4.501(k)(3)(C) is a condition- and repair-specific inquiry concerning the repairs needed to maintain and stabilize the structure; the total cost of comprehensively modernizing City Hall, relocating City operations, financing another facility, demolishing the building, or redeveloping the site is not a substitute for that required analysis.

III. Formal request and requested statutory steps

Pursuant to § 51A-4.501(k)(3)(B) and (C), the Coalition requests that the Historic Preservation Officer take the following actions:

1. Open, acknowledge, and commence the investigation. No later than fourteen (14) calendar days after the City’s receipt of this letter, please send written confirmation by reply email to the transmitting counsel and to info@savedallascityhallcoalition.com stating: (a) the date this request was received; (b) that a demolition-by-neglect investigation has been opened and the subsection (k)(3)(C) process has commenced; (c) the assigned Historic Preservation Officer or staff lead; and (d) any case or tracking number.

2. Schedule the owner meeting and inspection. Please meet with the City of Dallas, acting through the City Manager’s Office, Facilities and Real Estate Management, and any other agent with control of City Hall, and schedule a comprehensive inspection. Within the same fourteen-day period, please provide confirmed or proposed dates for the owner meeting and inspection, identify the anticipated City participants, and state the earliest practicable inspection date. If final dates cannot be confirmed within fourteen days, please provide the proposed dates and a definite date by which the schedule will be finalized.

3. Use an inspection scope sufficient to evaluate all enumerated defects. The inspection should include the areas and conditions identified in Attachment A and any additional condition that may constitute a defect under § 51A-4.501(k)(2)(A)-(L). It should include appropriate non-destructive testing, moisture mapping, photographs, measurements, and consultation with qualified structural, building-envelope, roofing, drainage, electrical-safety, and preservation professionals as reasonably necessary.

4. Review the relevant maintenance and condition record. Please review the City's facility-condition assessments, engineering and architectural reports, roof and envelope studies, garage reports, work orders, leak and incident logs, photographs, repair records, consultant drafts and final reports, deferred-maintenance lists, and current or proposed repair plans. The review should distinguish temporary mitigation from permanent correction and identify recurring conditions.

5. Discuss available financing resources. As subsection (k)(3)(C) requires, please discuss and identify resources potentially available for the necessary maintenance, stabilization, and repairs, subject to legal availability. The report should address existing and previously designated City Hall repair appropriations and balances, bond proceeds, federal recovery or grant funds, including amounts later reduced, repurposed, or reallocated, garage- or parking-related funds, insurance proceeds, the historic preservation fund described in § 51A-4.501(m), and other public, private, state, or federal preservation resources.

6. Prepare the required report for the Landmark Commission. The report should separately address: (a) the present condition of the structure; (b) repairs needed to maintain and stabilize it; (c) resources available to finance those repairs; and (d) the amount of time needed to complete them. The report should identify each observed condition, its location, supporting evidence, applicable subsection of § 51A-4.501(k)(2), recommended interim stabilization, recommended permanent repair, and proposed schedule. In preparing the report, the Historic Preservation Officer should independently evaluate the relevance of prior City and consultant materials and base each finding on the current inspection record and source-documented information. The report should not adopt, repeat, or rely upon any aggregate, rough-order-of-magnitude, planning-level, public-facing, or summary figure unless it identifies the figure's author, date, purpose, scope, estimate class, basis date, underlying quantities, unit costs, escalation, contingencies, markups, exclusions, stated limitations, and the qualifications and role of each person or consultant supplying the analysis, and explains how the figure relates to the specific repairs found necessary. A cost range should not be converted into, summarized as, or publicly presented as a single high-end number without disclosure and explanation.

The report should separately identify and should not combine: (a) immediate protective or stabilization work; (b) repairs necessary to correct each condition identified under § 51A-4.501(k)(2); (c) discretionary modernization, expansion, programmatic improvements, full-building code upgrades, or replacement; and (d) relocation, temporary-occupancy, tenant-improvement, financing, operating, demolition, land-development, or redevelopment costs. Any composite figure should be disaggregated into those categories. Material differences from prior City or consultant estimates should be reconciled in writing.

The calculations, cost worksheets, quantity takeoffs, assumptions, native source files, photographs, test results, inspection notes, and other nonprivileged supporting materials should be retained with the administrative record and made available with the report. If the report includes any comparative feasibility, cost-effectiveness, or lifecycle-cost conclusion beyond the minimum statutory inquiry, that analysis should be clearly identified and separated from the subsection (k)(3)(C) report and should use equivalent assumptions, time periods, financing treatment, escalation, contingencies, operating costs, and lifecycle-cost categories for each alternative considered.

7. Submit the report to the Landmark Commission and provide notice. Please place the report before the Landmark Commission at the earliest meeting reasonably practicable after completion, provide the Coalition advance notice of the agenda date, and provide the Coalition a copy of the report and its nonprivileged supporting materials when issued.

8. Permit informed participation. Please provide counsel reasonable advance notice of the inspection and permit one or more designated Coalition architects, engineers, or preservation professionals to observe portions of the inspection that can safely and lawfully be observed. If the City declines, please state the reason and provide a written inspection protocol and complete photographic record.

9. Provide a written determination if the request is refused or limited. If the City contends that the Historic Preservation Officer lacks authority, that the property is no longer covered, that the Coalition is not an interested party, or that any mandatory step prescribed by § 51A-4.501(k)(3)(C) will not be performed, please include in the fourteen-day written confirmation a determination identifying the factual and legal basis, the responsible decisionmaker, and the administrative review or appeal procedure, if any.

IV. Preservation of evidence and urgent stabilization

Please preserve all evidence relevant to the investigation, including inspection notes, photographs, video, testing data, measurements, drafts, reports, work orders, maintenance records, permits, communications, and metadata. The Coalition's June 16, 2026 preservation demand remains in effect. Nothing in this request asks the City to delay emergency protection, stabilization, or repairs. Any urgent work should proceed promptly after the pre-work condition has been documented, and the Historic Preservation Officer should retain a complete record of the condition, scope, method, and result of the work.

V. Supplemental notice under Dallas Charter Chapter XXV — Proposition S

Pursuant to Chapter XXV, Section 1(d) of the Dallas City Charter, this letter also constitutes notice to the City of Dallas that, upon receipt of this request, the City has mandatory duties under Dallas City Code § 51A-4.501(k)(3)(C). Those duties include having the Historic Preservation Officer meet with the property owner or the property owner's agent with control of Dallas City Hall, inspect the structure, discuss the resources available for financing any necessary repairs, and, after the meeting, prepare a report for the Landmark Commission concerning the condition of the structure, the repairs needed to maintain and stabilize the structure, the resources available for financing those repairs, and the amount of time needed to complete the repairs.

The Coalition further gives notice that it contends subsection (k)(3)(C) would not be satisfied by substituting aggregate modernization, relocation, financing, operating, demolition, or redevelopment figures prepared for a different policy purpose for the required condition-specific determination of the repairs needed to maintain and stabilize City Hall, or by materially obscuring that determination through the combination of statutory repair costs with unrelated project costs.

If the City refuses to recognize or process this request, refuses to perform any of the mandatory acts prescribed by § 51A-4.501(k)(3)(C), or unreasonably delays those acts so as to impair the demolition-by-neglect procedure or the protections afforded by the predesignation moratorium, the Coalition contends that the City has violated or may violate § 51A-4.501(k)(3)(C). Such conduct would be in addition to the continuing violations of § 51A-4.501(k)(2) reasonably described in the Coalition's May 12, 2026 notice.

This supplemental notice supplements and does not withdraw, replace, supersede, or restart the Coalition's May 12, 2026 Chapter XXV notice. The Coalition preserves the original notice date and all claims and remedies reasonably described in that notice. Any Chapter XXV claim based specifically on a post-request refusal or unreasonable failure to perform the duties prescribed by § 51A-4.501(k)(3)(C), however, will be treated as subject to the 60-day notice period measured from the City's receipt of this supplemental notice.

VI. Fourteen-day written confirmation and reservation of rights

To start and document the subsection (k)(3)(B)-(C) process, the Coalition requests the written confirmation described above no later than fourteen (14) calendar days after the City receives this letter. The confirmation should state the City's receipt date, the case or tracking number, the assigned official, the status of the owner meeting and inspection, the confirmed or proposed dates for those steps, the anticipated timetable for the Historic Preservation Officer's report, and any refusal or limitation with the supporting factual and legal basis. Please send the confirmation by reply email to the transmitting counsel and to info@savedallascityhallcoalition.com.

The requested fourteen-day period applies to written confirmation and commencement of the statutory process, not to completion of the inspection or report. The Coalition does not contend that § 51A-4.501(k)(3)(C) expressly establishes a fourteen-day deadline. Failure to provide the requested confirmation within fourteen days will not, standing alone, establish liability, but it may constitute evidence of a refusal or unreasonable delay when considered with the City's conduct and the time-limited predesignation moratorium.

Because the predesignation moratorium is time-limited and, absent an earlier terminating event, would reach the two-year date on March 3, 2027, prompt action is essential. If this request is delivered to a person who is not the official serving as Historic Preservation Officer, please immediately forward it to that official and include confirmation of the forwarding in the fourteen-day response. This request and supplemental notice do not waive any rights under Chapter XXV, the Texas Open Meetings Act, the Texas Public Information Act, the Dallas Development Code, or any other applicable law.

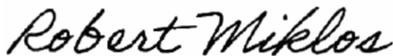
Sincerely,



Christopher D. Bowers



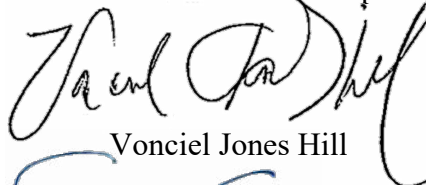
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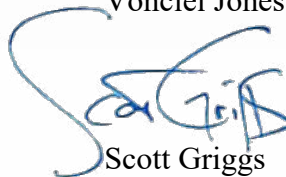
Robert J. Miklos



R. Michael Northrup



Vonciel Jones Hill



Scott Griggs

cc: Bertram Vandenberg, City Attorney, via email at bert.vandenberg@dallas.gov

ATTACHMENT A

Preliminary Conditions and Requested Scope of Investigation

This attachment identifies known or publicly reported conditions to be investigated. It is not exhaustive and does not limit the Historic Preservation Officer's obligation to investigate any condition within § 51A-4.501(k)(2)(A)-(L) discovered during the inspection or records review.

Area / condition	City-reported or alleged information	Potentially relevant Code provisions	Requested inspection and report scope
Roof, exterior envelope, foundations, and floors	City staff publicly reported water infiltration from the roof and interior water intrusion. The Coalition has alleged deteriorated or ineffective waterproofing and recurring leakage.	§ 51A-4.501(k)(2)(E), (H), (I), and (J)	Inspect roof assemblies, membranes, joints, flashings, drains, exterior walls, windows and doors, foundation/floor waterproofing, sealants, penetrations, and all known leak paths. Map moisture and distinguish active, intermittent, and previously repaired conditions.
Interior gutter and storm-drainage systems	City staff publicly described a failed interior gutter system and a failed storm drain in the plaza, together with active water infiltration.	§ 51A-4.501(k)(2)(H), (J), and (K)	Inspect gutters, leaders, scuppers, drains, piping, plaza drainage, discharge points, overflow paths, and related structure. Identify failures, blockages, corrosion, temporary patches, and conditions that permit water to enter or damage the structure.
Water intrusion near electrical and telecommunications infrastructure	City staff publicly described water infiltration over telecommunications areas and over electrical infrastructure in the parking garage.	Primarily § 51A-4.501(k)(2)(H), (J), and (K); other building and safety codes may also apply	Document the source and path of water, affected structural and architectural materials, corrosion or deterioration, recurrence, and needed immediate protection and permanent correction. Coordinate with qualified safety professionals without limiting the historic-preservation investigation.
Parking garage and connected structural components	City staff described active garage water infiltration and prior cracking and concrete spalling that required emergency structural repair.	§ 51A-4.501(k)(2)(A)-(E), (H), (J), and (K), as applicable	Inspect slabs, beams, columns, supports, joints, reinforcing-steel corrosion, cracking, spalling, drainage, waterproofing, prior repairs, and movement. Determine whether further stabilization or continuous monitoring is needed.
Exterior and unique architectural features	Dallas City Hall is a distinctive civic work with original exterior, structural, plaza, and interior architectural features. Water intrusion and deferred maintenance may affect those features even where damage is not yet visible from public areas.	§ 51A-4.501(k)(2)(G), (I), (K), and (L)	Inspect original concrete, finishes, joints, façade components, entrances, plaza/approach elements within the covered property, and other character-defining features for deterioration, removal, incompatible repair, staining, corrosion, cracking, displacement, or loss.
All other enumerated defects and concealed or recurring conditions	The public presentation and prior notices are not a substitute for a complete inspection. Concealed conditions may exist in inaccessible areas or behind finishes.	§ 51A-4.501(k)(2)(A)-(L)	Inspect any area reasonably indicated by records, testing, observed damage, staff reports, or expert judgment. Identify the need for additional invasive or non-invasive investigation and state any limitation that prevents a reliable conclusion.

Requested documentation in the report: For each material condition, identify the location, date observed, photographs or test results, likely source or cause, risk to preservation, interim stabilization, permanent repair, estimated schedule, and any additional investigation required. The report should expressly identify any portion of the property that staff did not inspect and the reason.

For every cost estimate, identify the estimate's source, author, date, purpose, estimate class, basis year, scope, quantities, unit rates, escalation, contingencies, soft costs, markups, exclusions, uncertainty range, and supporting calculation. State separately whether each cost is necessary to correct a condition under § 51A-4.501(k)(2), is an optional modernization or programmatic improvement, or concerns relocation, financing, operations, demolition, or redevelopment.