

# HISTORIC AND DESIGN REVIEW COMMISSION

July 17, 2019

**HDRC CASE NO:** 2019-344  
**ADDRESS:** 104 BEAUREGARD  
**LEGAL DESCRIPTION:** NCB 742 BLK 1 LOT NE 75.4 FT OF 1 & 2  
**ZONING:** RM-4,H  
**CITY COUNCIL DIST.:** 1  
**DISTRICT:** King William Historic District  
**LANDMARK:** Hummel House  
**APPLICANT:** Marlo Montoya/MONTOYA MARLO R  
**OWNER:** Marlo Montoya/MONTOYA MARLO R  
**TYPE OF WORK:** Demolition of rear accessory structure  
**APPLICATION RECEIVED:** May 21, 2019  
**60-DAY REVIEW:** July 20, 2019  
**CASE MANAGER:** Stephanie Phillips  
**REQUEST:**

The applicant is requesting a Certificate of Appropriateness for approval to demolish an existing rear garage structure.

## APPLICABLE CITATIONS:

*Unified Development Code Sec. 35-614. - Demolition.*

Demolition of a historic landmark constitutes an irreplaceable loss to the quality and character of the City of San Antonio. Accordingly, these procedures provide criteria to prevent unnecessary damage to the quality and character of the city's historic districts and character while, at the same time, balancing these interests against the property rights of landowners.

(a) Applicability. The provisions of this section apply to any application for demolition of a historic landmark (including those previously designated as historic exceptional or historic significant) or a historic district.

(1) Historic Landmark. No certificate shall be issued for demolition of a historic landmark unless the applicant provides sufficient evidence to support a finding by the commission of unreasonable economic hardship on the applicant. In the case of a historic landmark, if an applicant fails to prove unreasonable economic hardship, the applicant may provide to the historic and design review commission additional information regarding loss of significance as provided in subsection (c) in order to receive a historic and design review commission recommendation for a certificate for demolition.

(2) Entire Historic District. If the applicant wishes to demolish an entire designated historic district, the applicant must provide sufficient evidence to support a finding by the commission of economic hardship on the applicant if the application for a certificate is to be approved.

(3) Property Located in Historic District and Contributing to District Although Not Designated a Landmark. No certificate shall be issued for property located in a historic district and contributing to the district although not designated a landmark unless the applicant provides sufficient evidence to support a finding by the commission of unreasonable economic hardship on the applicant if the application for a certificate is disapproved. When an applicant fails to prove unreasonable economic hardship in such cases, the applicant may provide additional information regarding loss of significance as provided in subsection (c) in order to receive a certificate for demolition of the property.

*(b) Unreasonable Economic Hardship.*

(1) Generally. The historic and design review commission shall be guided in its decision by balancing the historic, architectural, cultural and/or archaeological value of the particular landmark or eligible landmark against the special merit of the proposed replacement project. The historic and design review commission shall not consider or be persuaded to find unreasonable economic hardship based on the presentation of circumstances or items that are not unique to the property in question (i.e. the current economic climate).

(2) Burden of Proof. The historic and design review commission shall not consider or be persuaded to find unreasonable economic hardship based on the presentation of circumstances or items that are not unique to the property in question (i.e., the current economic climate). When a claim of unreasonable economic hardship is made, the owner must provide sufficient evidence to support a finding by the commission that:

A. The owner cannot make reasonable beneficial use of or realize a reasonable rate of return on a structure or site,



regardless of whether that return represents the most profitable return possible, unless the highly significant endangered, historic and cultural landmark, historic and cultural landmarks district or demolition delay designation, as applicable, is removed or the proposed demolition or relocation is allowed;

B. The structure and property cannot be reasonably adapted for any other feasible use, whether by the current owner or by a purchaser, which would result in a reasonable rate of return; and

C. The owner has failed to find a purchaser or tenant for the property during the previous two (2) years, despite having made substantial ongoing efforts during that period to do so. The evidence of unreasonable economic hardship introduced by the owner may, where applicable, include proof that the owner's affirmative obligations to maintain the structure or property make it impossible for the owner to realize a reasonable rate of return on the structure or property.

(3) Criteria. The public benefits obtained from retaining the cultural resource must be analyzed and duly considered by the historic and design review commission.

As evidence that an unreasonable economic hardship exists, the owner may submit the following information to the historic and design review commission by affidavit:

A. For all structures and property:

- i. The past and current use of the structures and property;
- ii. The name and legal status (e.g., partnership, corporation) of the owners;
- iii. The original purchase price of the structures and property;
- iv. The assessed value of the structures and property according to the two (2) most recent tax assessments;
- v. The amount of real estate taxes on the structures and property for the previous two (2) years;
- vi. The date of purchase or other acquisition of the structures and property;
- vii. Principal balance and interest rate on current mortgage and the annual debt service on the structures and property, if any, for the previous two (2) years;
- viii. All appraisals obtained by the owner or applicant within the previous two (2) years in connection with the owner's purchase, financing or ownership of the structures and property;
- ix. Any listing of the structures and property for sale or rent, price asked and offers received;
- x. Any consideration given by the owner to profitable adaptive uses for the structures and property;
- xi. Any replacement construction plans for proposed improvements on the site;
- xii. Financial proof of the owner's ability to complete any replacement project on the site, which may include but not be limited to a performance bond, a letter of credit, an irrevocable trust for completion of improvements, or a letter of commitment from a financial institution; and
- xiii. The current fair market value of the structure and property as determined by a qualified appraiser.
- xiv. Any property tax exemptions claimed in the past five (5) years.

B. For income producing structures and property:

- i. Annual gross income from the structure and property for the previous two (2) years;
- ii. Itemized operating and maintenance expenses for the previous two (2) years; and
- iii. Annual cash flow, if any, for the previous two (2) years.

C. In the event that the historic and design review commission determines that any additional information described above is necessary in order to evaluate whether an unreasonable economic hardship exists, the historic and design review commission shall notify the owner. Failure by the owner to submit such information to the historic and design review commission within fifteen (15) days after receipt of such notice, which time may be extended by the historic and design review commission, may be grounds for denial of the owner's claim of unreasonable economic hardship.

D. Construction cost estimates for rehabilitation, restoration, or repair, which shall be broken out by design discipline and construction trade, and shall provide approximate quantities and prices for labor and materials. OHP shall review such estimates for completeness and accuracy, and shall retain outside consultants as needed to provide expert analysis to the HDRC.

When a low-income resident homeowner is unable to meet the requirements set forth in this section, then the historic and design review commission, at its own discretion, may waive some or all of the requested information and/or request substitute information that an indigent resident homeowner may obtain without incurring any costs. If the historic and design review commission cannot make a determination based on information submitted and an appraisal has not been provided, then the historic and design review commission may request that an appraisal be made by the city.

*(c) Loss of Significance.*

When an applicant fails to prove unreasonable economic hardship the applicant may provide to the historic and design review commission additional information which may show a loss of significance in regards to the subject of the application in order to receive historic and design review commission recommendation of approval of the demolition.



If, based on the evidence presented, the historic and design review commission finds that the structure or property is no longer historically, culturally, architecturally or archeologically significant, it may make a recommendation for approval of the demolition. In making this determination, the historic and design review commission must find that the owner has provided sufficient evidence to support a finding by the commission that the structure or property has undergone significant and irreversible changes which have caused it to lose the historic, cultural, architectural or archeological significance, qualities or features which qualified the structure or property for such designation. Additionally, the historic and design review commission must find that such changes were not caused either directly or indirectly by the owner, and were not due to intentional or negligent destruction or a lack of maintenance rising to the level of a demolition by neglect.

The historic and design review commission shall not consider or be persuaded to find loss of significance based on the presentation of circumstances or items that are not unique to the property in question (i.e. the current economic climate).

For property located within a historic district, the historic and design review commission shall be guided in its decision by balancing the contribution of the property to the character of the historic district with the special merit of the proposed replacement project.

(d) Documentation and Strategy.

(1) Applicants that have received a recommendation for a certificate shall document buildings, objects, sites or structures which are intended to be demolished with 35mm slides or prints, preferably in black and white, and supply a set of slides or prints or provide a set of digital photographs in RGB color to the historic preservation officer. Digital photographs must have a minimum dimension of 3000 x 2000 pixels and resolution of 300 dpi.

(2) Applicants shall also prepare for the historic preservation officer a salvage strategy for reuse of building materials deemed valuable by the historic preservation officer for other preservation and restoration activities.

(3) Applicants that have received an approval of a certificate regarding demolition shall be permitted to receive a demolition permit without additional commission action on demolition, following the commission's recommendation of a certificate for new construction. Permits for demolition and construction shall be issued simultaneously if requirements of section 35-609, new construction, are met, and the property owner provides financial proof of his ability to complete the project.

(4) When the commission recommends approval of a certificate for buildings, objects, sites, structures designated as landmarks, or structures in historic districts, permits shall not be issued until all plans for the site have received approval from all appropriate city boards, commissions, departments and agencies. Permits for parking lots shall not be issued, nor shall an applicant be allowed to operate a parking lot on such property, unless such parking lot plan was approved as a replacement element for the demolished object or structure.

(e) Issuance of Permit. When the commission recommends approval of a certificate regarding demolition of buildings, objects, sites, or structures in historic districts or historic landmarks, permits shall not be issued until all plans for the site have received approval from all appropriate city boards, commissions, departments and agencies. Once the replacement plans are approved a fee shall be assessed for the demolition based on the approved replacement plan square footage. The fee must be paid in full prior to issuance of any permits and shall be deposited into an account as directed by the historic preservation officer for the benefit, rehabilitation or acquisition of local historic resources. Fees shall be as follows and are in addition to any fees charged by planning and development services:

0—2,500 square feet = \$2,000.00

2,501—10,000 square feet = \$5,000.00

10,001—25,000 square feet = \$10,000.00

25,001—50,000 square feet = \$20,000.00

Over 50,000 square feet = \$30,000.00

NOTE: Refer to City Code Chapter 10, Subsection 10-119(o) regarding issuance of a permit.

(f) The historic preservation officer may approve applications for demolition permits for non-contributing minor outbuildings within a historic district such as carports, detached garages, sheds, and greenhouses determined by the historic preservation officer to not possess historical or architectural significance either as a stand-alone building or structure, or as part of a complex of buildings or structures on the site.



(Ord. No. 98697 § 6) (Ord. No. 2010-06-24-0616, § 2, 6-24-10) (Ord. No. 2014-04-10-0229, § 4, 4-10-14)(Ord. No. 2015-10-29-0921 , § 2, 10-29-15)(Ord. No. 2015-12-17-1077 , § 2, 12-17-15)

## **FINDINGS:**

- a. The primary structure located at 104 Beauregard is a 2-story single-family home constructed in approximately 1910 in the Neoclassical style. It is a contributing structure within the King William Historic District. The property contains a rear accessory structure, also constructed circa 1910, which is also contributing to the King William Historic District. The applicant has requested approval to demolish the rear accessory structure.
- b. DEMOLITION – The applicant is requesting approval for the demolition of the rear accessory structure only. There are not replacement plans proposed at this time. In general, accessory structures contribute to the character of historic properties and the historical development pattern within a historic district.
- c. CONTRIBUTING STATUS – The existing rear accessory structure as a one story, multiple bay garage and storage structure constructed in 1910 featuring wooden carriage doors. The structure appears on the 1911-1951 Sanborn Map. On May 28, 2019, staff conducted a site visit to evaluate the condition of the structure. While several original materials exist and the original footprint appears to be intact, the structure has undergone several ill-executed modifications over the years and has significantly deteriorated, particularly the roof, which has collapsed and is overgrown with greenery. While staff finds that the structure is rapidly deteriorating, the structure is still contributing to the district.
- d. UNREASONABLE ECONOMIC HARDSHIP – In accordance with UDC Section 35-614, no certificate shall be issued for demolition of a historic landmark unless the applicant provides sufficient evidence to support a finding by the commission of unreasonable economic hardship on the applicant. In the case of a historic landmark, if an applicant fails to prove unreasonable economic hardship, the applicant may provide to the historic and design review commission additional information regarding loss of significance. In order for unreasonable economic hardship to be met, the owner must provide sufficient evidence for the HDRC to support a finding in favor of demolition. In the submitted application, the applicant has indicated that the structure no longer serves a purpose and poses a safety and health hazard due to its deteriorated condition. The applicant indicated that she attempted to collect reasonable costs for repair and restoration as outlined in the submitted bid from a contractor. Staff finds that evidence for UDC Section 35-614(b) has been met based on the documentation provided.
- e. LOSS OF SIGNIFICANCE –In accordance with UDC Section 35-614(c), demolition may be recommended if the owner has provided sufficient evidence to support a finding that the structure has undergone significant and irreversible changes which have caused it to lose the historic, cultural, architectural or archaeological significance, qualities or features which qualified the structure or property for such designation. Staff finds that a loss of significance may have occurred due to modification over time and substantial deterioration of original materials.

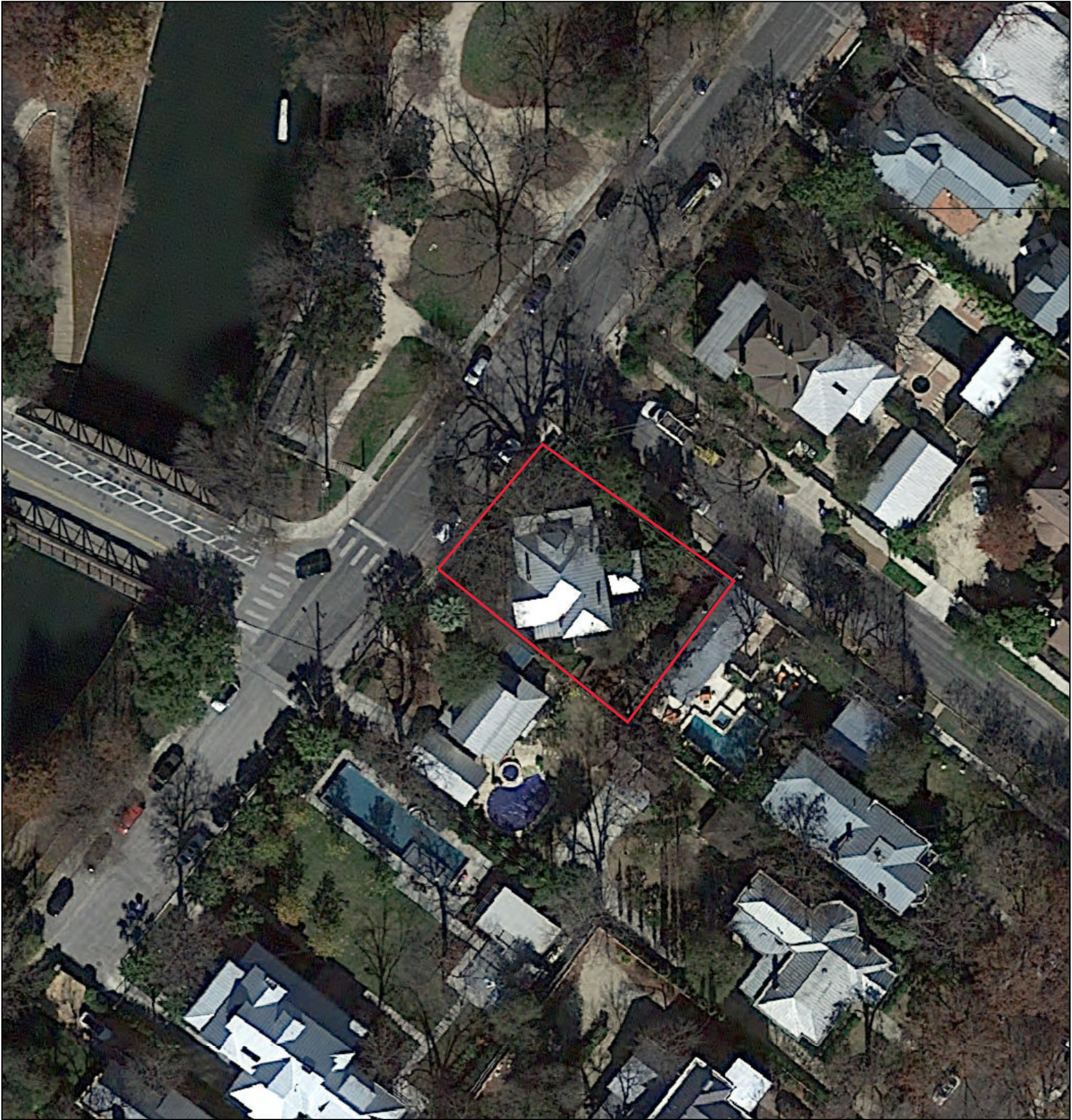
## **RECOMMENDATION:**

Staff recommends approval of the demolition based on findings c through e with the following stipulation:

- i. That materials from the historic accessory structure including salvageable wood siding, wood doors and carriage doors be salvaged and stored for use on site in future construction or donated or sold to a new end user. A salvage plan is required to be submitted to OHP staff prior to the issuance of a Certificate of Appropriateness.

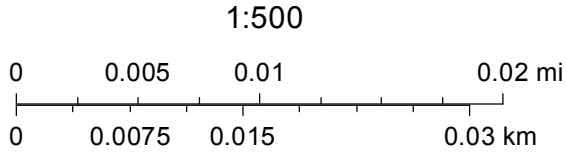


City of San Antonio One Stop



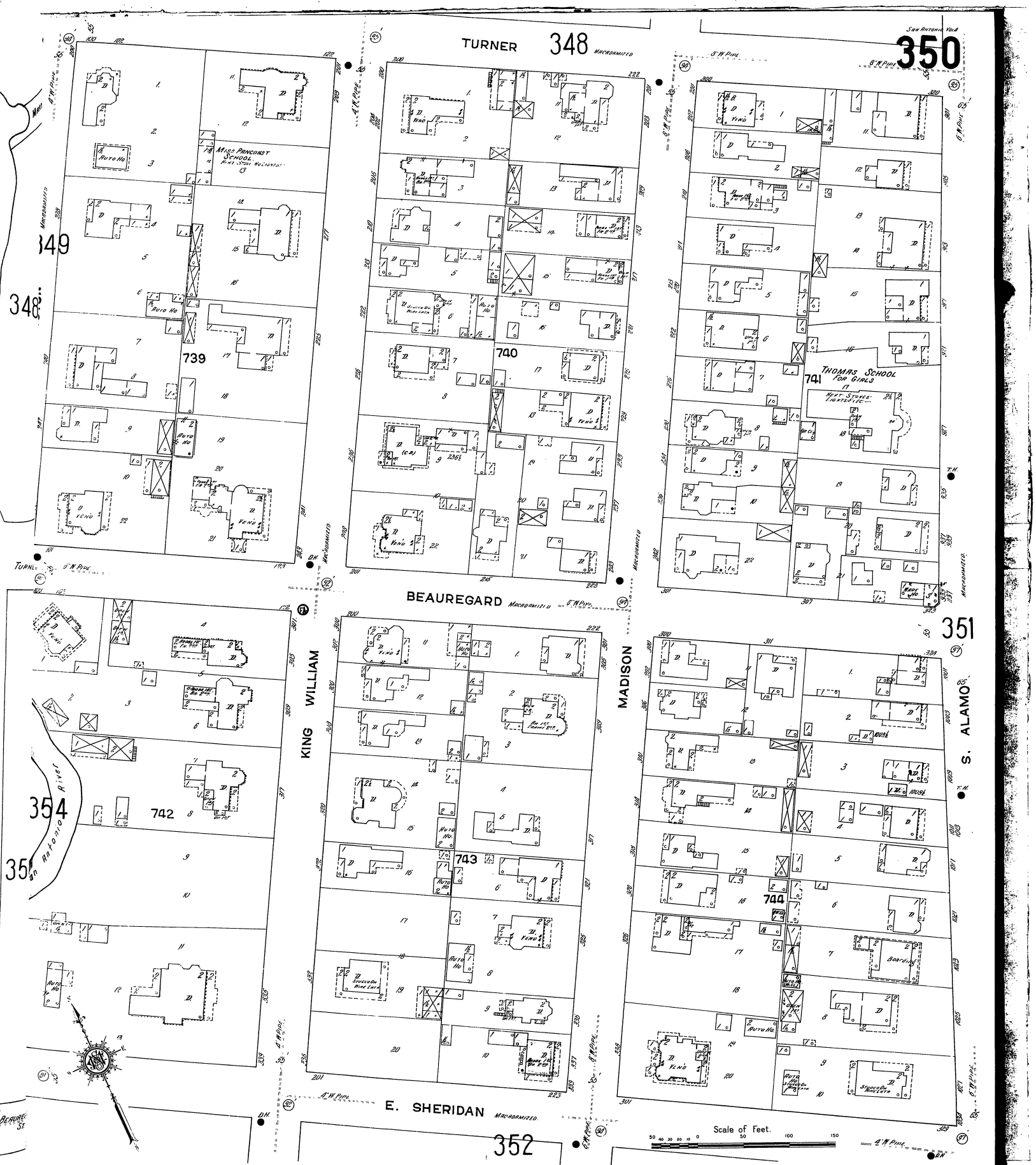
July 12, 2019

— User drawn lines



CoSA







May 28, 2019 at 4:27 PM  
104 Beauregard  
San Antonio TX 78204  
United States





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104 Beauregard  
San Antonio TX 78204  
United States





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252-312 Washington  
San Antonio TX 78204  
United States





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San Antonio TX 78204  
United States





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San Antonio TX 78204  
United States































**SWAMP**  
SOLID WASTE  
MANAGEMENT



# My Three Sons Carpentry

6803 Breeden  
San Antonio, Texas 78216  
(210)777-5934

Estimate:

Rear Detached Garage  
104 Beauregard  
San Antonio, Texas 78204

Dear Ms. Montoya:

Thank you for the opportunity to bid on your project at 104 Beauregard. As discussed the garage is in extremely poor condition and a hazard. It is an economic hardship to you to try to rebuild the garage as it stands since there is no foundation nor roof and the roof joist are almost non-existent. The walls would have to be temporarily shored and raised to build a foundation below and wall studs would have to be entirely replaced since the ones there have been exposed to the elements for years. It would be difficult to impossible to shore walls and rebuild that is why price will be high because there are two of the four walls directly on property line and there is no room to place wall shores. We cannot place shores inside since we also have to build new foundation since there is only dirt as a foundation now.

Rebuild new structure Estimate:

Roof  
Decking  
Foundation  
Walls  
Doors  
**\$60,000 Total**

Save existing Garage Estimate:

Roof  
Decking  
Foundation  
Walls  
Raise Walls for new foundation  
Shoring for walls  
Shoring for roof  
Replace rotten wood  
Salvage wood siding  
Salvage doors/ rails  
**\$85,000 Total**

If you have any questions feel free to call me.

Sincerely,  
*Luis Elizondo*  
Owner



Part I: Identifying Information: Items 1., 2., 3.

## Lead-Based Paint Risk Assessment Report

RECEIVED DEC 30 2002

For the Dwelling Located at:

104 Beauregard  
San Antonio, Texas

Prepared For:

Ms. Myrna Esquivel  
Department of Housing and Community Development  
1400 S. Flores Street  
San Antonio, Texas 78204

By:

Robert E. Whiting, Certified Risk Assessor  
2506 Lovetree  
San Antonio, Texas  
(210) 494-0617

Texas Certification No. 2070179

December 28, 2002



## Summary

### Part I: Identify Information

A lead-based paint risk assessment and inspection was conducted at 104 Beauregard, San Antonio, Texas, and is owned by Mrs. Montoya. Ms. Myrna Esquivel, Department of Housing and Community Development, 1400 S. Flores, San Antonio, Texas, contacted Mr. Robert E. Whiting, Texas Certified Lead Hazard Risk Assessor, Certification Number 2070179, to conduct the inspection and risk assessment. The inspection and assessment was conducted on December 16, 2002. No previous lead inspection or risk assessment was conducted for this residence. One of the children who reside in the dwelling and is under the age of six years old was found to have an elevated blood level.

### Part II: Results

#### 4. List of location and Type of Identified Lead Hazards

The residence was built in 1905. The building's interior and exterior paint are in poor condition. The risk assessment showed that lead-based paint hazards exists in the following locations:

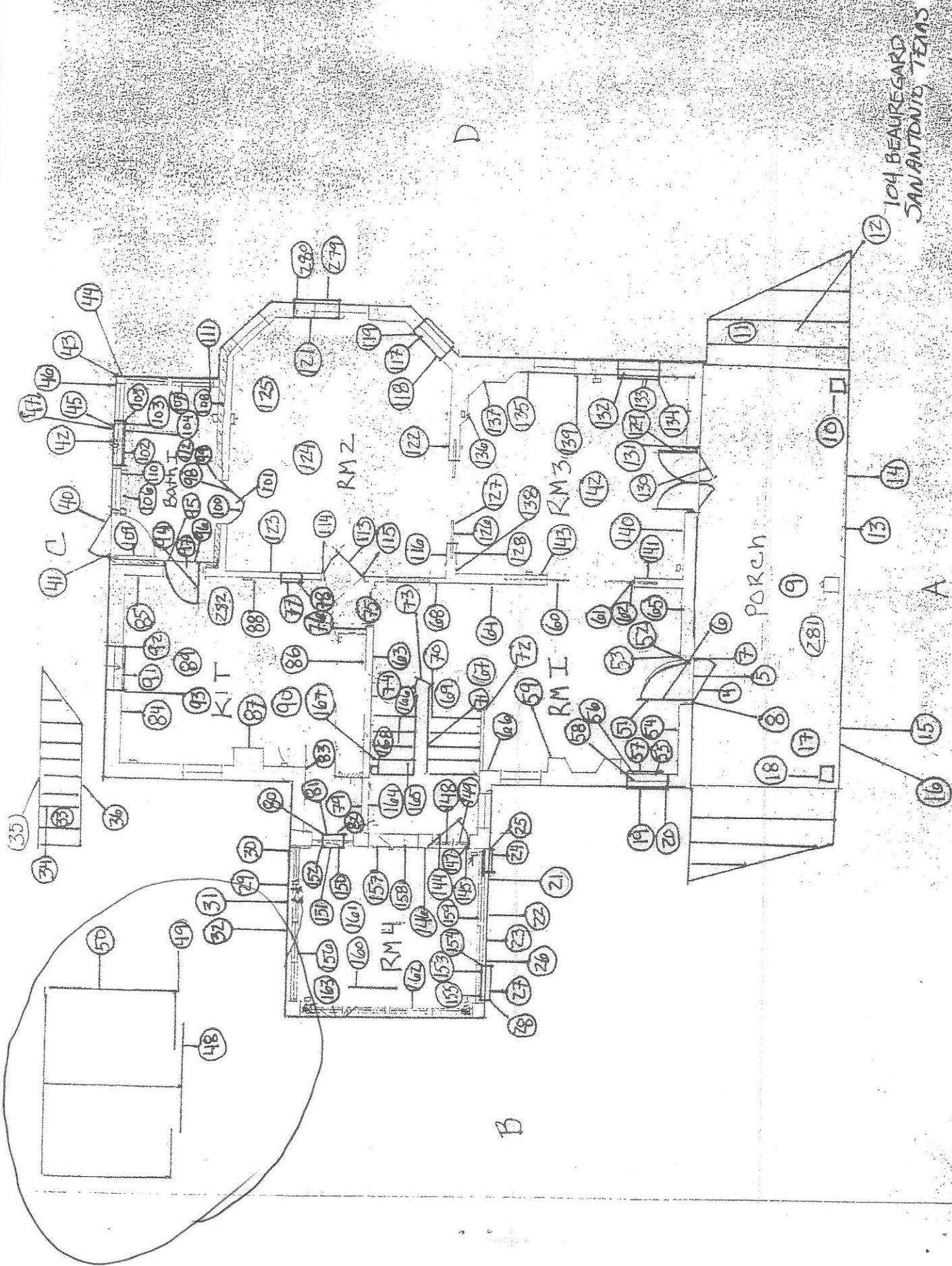
- a. Deteriorated lead-based paint on the exterior door threshold.
- b. Deteriorated lead-based paint on the exterior door jamb.
- c. Lead-based paint on the exterior front door header.
- d. Lead-based paint on the exterior porch columns.
- e. Lead-based paint on the exterior porch upper trim and joist.
- f. Lead-based paint on the porch ceiling.
- g. Deteriorated lead-based paint on the exterior window sill of Room 1.
- h. Lead-based paint on the exterior window sash of Room 1.
- i. Lead-based paint on the exterior soffit of Room 4.
- j. Lead-based paint on the exterior trim of Room 4.
- k. Deteriorated lead-based paint on the exterior sill and sash of Room 4.
- l. Deteriorated lead-based paint on the exterior porch door.
- m. Lead-based paint on the exterior porch header.



- n. Deteriorated lead-based paint on exterior storage shed.
- o. Deteriorated lead-based paint on door components of Kitchen.
- p. Deteriorated lead-based paint on window components of Kitchen.
- q. Deteriorated lead-based paint on door components of Bath 1.
- r. Deteriorated lead-based paint on wall and ceiling of Bath 1.
- s. Deteriorated lead-based paint on window shutter of Room 2.
- t. Lead-based paint on door components of Room 4.
- u. Lead-based paint on stair riser of Room 4.
- v. Lead-based paint on window components of Room 4.
- w. Lead-based paint on upper wall of Room 4.
- x. Deteriorated lead-based paint on floor of Room 4.
- y. Deteriorated lead-based paint on newel-post of stairs adjacent to Room 4.
- z. Deteriorated lead-based paint on door jamb of Bath 2.
- aa. Deteriorated lead-based paint on window components of Bath 2.
- bb. Deteriorated lead-based paint on ceiling and crown-molding of Bath 2.
- cc. Lead-based paint on door components and baseboards of Kitchen.
- dd. Lead-based paint on window components of Kitchen.
- ee. Lead-based paint on door components of Bath 3.
- ff. Deteriorated lead-based paint on window components of Bath 3.
- gg. Lead-based paint on wood lower wall of Bath 3.
- hh. Lead-based paint on upper wall and ceiling of Bath 3.
- ii. Lead-based paint on door of upstairs hall.
- jj. Deteriorated lead-based paint on door components of Room 5.



# FIRST FLOOR PLAN





## Continued, 104 Beauregard, San Antonio, Texas

No	Room	Side	Strc	Feat	Cnd	Sub	PbL(mg/cm <sup>2</sup> )	PbL(+/-)	RES	PbK	PbK(+/-)	Date	Note
30	Outside-0	C	Ext-Wall	Siding	Peeling	Wood	0.1	0.28	NEG	-0.1	0.8	12/16/02	
31	Outside-0	C	Window	Sill-Ext	Peeling	Wood	0.43	0.24	NEG	0	1.3	12/16/02	
32	Outside-0	C	Window	Sash-Ext	Peeling	Wood	>>5.0	1.4	POS	21.7	5.9	12/16/02	
33	Outside-0	B	Stairs	Tread	Solid	Wood	0.01	0.24	NEG	0.3	1.1	12/16/02	
34	Outside-0	B	Stairs	Riser	Solid	Wood	0	0.02	NEG	-0.9	2	12/16/02	
35	Porch-0	O	Porch	Rail-cap	Solid	Wood	0.05	0.12	NEG	-0.5	1.5	12/16/02	
36	Porch-0	A	Porch	Baluster	Solid	Wood	0	0.14	NEG	0.5	0.9	12/16/02	
37	Porch-0	C	Door	Door	Peeling	Wood	4.15	1.95	POS	8.8	3.4	12/16/02	
38	Porch-0	D	Door	Jamb	Peeling	Wood	0.16	0.22	NEG	0	1.4	12/16/02	
39	Porch-0	C	Door	Header	Solid	Wood	1.11	0.18	POS	1.4	0.6	12/16/02	
40	Porch-0	C	Door	Door	Peeling	Wood	0.01	0.04	NEG	0.8	0.9	12/16/02	
41	Porch-0	C	Door	Jamb	Chalking	Wood	0	0.02	NEG	0.5	1.1	12/16/02	
42	Outside-0	C	Ext-Wall	Siding	Solid	Wood	0.04	0.1	NEG	-0.2	1.2	12/16/02	
43	Outside-0	D	Ext-Wall	Corner brd-Lft	Solid	Wood	0.01	0.03	NEG	0	1.1	12/16/02	
44	Outside-0	D	Ext-Wall	Dripboard	Solid	Metal	0.1	0.24	NEG	0.9	1.5	12/16/02	
45	Outside-0	C	Window	Sill-Ext	Peeling	Wood	0.12	0.17	NEG	-0.4	1.2	12/16/02	
46	Outside-0	C	Window	Sash-Ext	Peeling	Wood	0.21	0.31	NEG	0.4	0.8	12/16/02	
47	Outside-0	C	Window	Header	Solid	Wood	0	0.02	NEG	-0.1	1.1	12/16/02	
48	Outside-0	A	Shed	Door	Peeling	Wood	>>5.0	1.1	POS	18.2	4.9	12/16/02	
49	Outside-0	A	Shed	Siding-Upr	Chalking	Wood	>>5.0	1	POS	13.6	4.2	12/16/02	
50	Outside-0	D	Shed	Siding	Peeling	Wood	>>5.0	1.23	POS	19	5.6	12/16/02	
51	Room-1	C	Door	Door	Peeling	Wood	0.23	0.32	NEG	0	0.9	12/16/02	
52	Room-1	B	Door	Jamb-Lft	Peeling	Wood	0.36	0.31	NEG	0.6	1.5	12/16/02	
53	Room-1	C	Door	Casing-Lft	Peeling	Wood	0.14	0.23	NEG	-0.5	1.5	12/16/02	
54	Room-1	C	Wall	Baseboard	Peeling	Wood	0.1	0.18	NEG	0.5	1.5	12/16/02	
55	Room-1	D	Window	Stool	Chalking	Wood	0.13	0.22	NEG	0.2	1.6	12/16/02	
56	Room-1	D	Window	Casing-Rht	Solid	Wood	0.12	0.23	NEG	-0.1	1.2	12/16/02	
57	Room-1	D	Window	Sash-Lwr	Peeling	Wood	0.15	0.22	NEG	0	1.2	12/16/02	
58	Room-1	D	Window	Screen-Sash	Peeling	Wood	0.15	0.4	NEG	0.5	1.3	12/16/02	
59	Room-1	D	Fireplace	Mantle	Peeling	Wood	0.2	0.22	NEG	-0.1	1	12/16/02	
60	Room-1	B	Sliding	Door	Peeling	Wood	0.14	0.19	NEG	-0.6	0.9	12/16/02	
61	Room-1	C	Door	Jamb-Lft	Peeling	Wood	0	0.02	NEG	0.1	1.1	12/16/02	
62	Room-1	B	Door	Casing-Rht	Peeling	Wood	0	0.02	NEG	-0.6	1.5	12/16/02	



Shipped by Robert E. Whiting Received by (See Laboratory Chain Of Custody)HUD Standards: 40 µg/cm<sup>2</sup> (Floors), 250 µg/cm<sup>2</sup> (interior window sills) 400 µg/cm<sup>2</sup> (window troughs)

## 12. Soil Sampling Results (Form 5.5)

**Form 5.5**  
**Field Sampling Form for Soil**  
(Composite Sampling Only)Name of Risk Assessor Robert E. Whiting, Texas Risk Assessor Number 2070179  
Name of Property Owner Mrs. Montoya  
Property Address 104 Beauregard, San Antonio, Texas

Sample Number	Location	Bare or Covered	Lab Result (ppm)
11	Dripline	Bare	2770 ppm
12	Yard	Bare	1800 ppm

Note: A soil-lead hazard for play areas frequented by children under 6 years of age shall be bare soil with lead equal to or exceeding 400 micrograms per gram. For other areas, soil-lead hazards shall be bare soil that totals more than 9 square feet (0.8 square meters) per property with lead equal to or exceeding 2,000 micrograms per gram.

Collect only the top ½" of soil

Total Number of Samples This Page 2Page 1 of 1Date of Sample Collection 12 / 16 / 02 Date Shipped to Lab 12 / 16 / 02Shipped by Robert E. Whiting Received by (See Laboratory Chain Of Custody)

## 13. Other Sampling Results – See XRF Testing Report

Part III: Lead Hazard Control Plan

## 14. Lead-Based Paint Policy Statement (Not Applicable to Homeowners).

15. Name of Individual in Charge of Lead-Based Paint Hazard Control Program  
Ms. Myrna Esquivel, Neighborhood Action Department, 1400 Flores Street, City of San Antonio, Texas

## 16. Recommended Changes to Work Order System and Property Management - NA

Paint chips and accumulated dust on floors should be cleaned up using wet methods such as mopping or cleaning with wet rags.