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February 4, 2026

Via Email: preservation@austintexas.gov

HISTORIC LANDMARK COMMISSION

CITY OF AUSTIN

301 W. 2nd St.

Austin, Texas

Re: Owner Opposition to Historic Zoning/Designation – 907 E. 13th St.

Dear Commissioners:

I represent the owner of 907 E. 13th St., Bubble Bee LP, and I am writing on its behalf to express its opposition to the proposed historic zoning/designation of its property. My client does not consent to historic zoning/designation of its property and intends to explore all available remedies should its property be designated historic over its wishes. The Structural Assessment Report for the property is included with this letter. My client respectfully requests that the Commission refrain from designating its property historic and allow demolition to proceed.

Sincerely,



Abigail Ventress

ATTORNEY FOR BUBBLE BEE LP

Enclosure

cc: Blayre Peña

STRUCTURAL ASSESSMENT REPORT



Foundation Engineering & Inspection (FEI Engineering)
12219 Tyson Cv. Unit A, Austin TX 78758
(512) 956-1030
FEInspectionLLC@gmail.com
Texas Firm #: 22625

FEI Project Number: 1710
Site Address: 907 E. 13th St.
Austin, TX

Dear Eureka Holdings,

As per your request, a professional engineer from FEI Engineering, Ashkan Ghaeezadeh, P.E., conducted a site inspection at the specified address. The primary objective of the evaluation was to assess the structural integrity of the building and determine the extent of existing damage attributable to age-related deterioration and/or other contributing factors. The assessment was conducted in accordance with nationally recognized interdisciplinary scientific methodologies and engineering practices, consistent with ASTM International standards, including ASTM E2713-25 and applicable related standards. The inspection was carried out on January 07, 2026, and consisted of a visual assessment of accessible interior and exterior components. Observed conditions were documented through field notes and photographic evidence both of which are included within this report.

Please don't hesitate to contact us should have any questions regarding the inspection and this report.

Foundation Engineering and Inspection, LLC

Texas Certificate of Registration F-22625



Ashkan Ghaeezadeh, M.S., P.E.
Principle Engineer



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1) SITE DESCRIPTION AND BACKGROUND INFORMATION

According to records obtained from <https://travis.prodigycad.com>, the subject property is a one-story, wood-framed residential dwelling originally constructed in 1910. The structure has a primary north-facing elevation. The exterior envelope consists of wood siding. The roof system consists of metal panels, and the main structure is supported by a pier-and-beam foundation. The southern portion of the building appears to be an addition constructed on a pier-and-beam foundation at an undetermined date. For the purposes of this report, all directional references are provided from the perspective of an individual standing in front of the property along 13th Street, facing the front of the building.

At the time of the inspection, I was the sole individual present with access to both the interior and exterior of the structure. Prior to the site inspection, a conversation was held with Mr. Roozbeh Payervand, a representative of Eureka Holdings, during which the following was stated:

- Eureka Holdings is seeking to understand the current condition of the property, including any potential safety concerns and the extent of repairs required to bring the structure into compliance with relevant industry standards.

2) DOCUMENT REVIEWED

The following documents were reviewed as a part of this evaluation:

- Public property records from the Travis County Appraisal District, along with a preliminary review of permit applications retrieved via the City of Austin's online permit portal.
- Field notes and site photographs collected during my on-site investigation conducted on January 07, 2026.

No additional documentation was submitted or examined in conjunction with this assessment.

3) SITE OBSERVATION

Observations made during this site inspection followed (but were not limited to) recommendations described in the American Society of Civil Engineers (ASCE) Guidelines for Structural Condition Assessment of Existing Buildings, Standard SEI/ASCE 11-99. During the site investigation, the following pertinent conditions were observed:

- Sagging was observed across all roof slopes on both the main structure and the addition (see Photographs #1 through #3).
- Deterioration of the foundation cover was observed around the perimeter of the structure (see Photograph #5).
- Detached, peeled-back, and missing roof panels were documented (see Photographs #6 and #7).
- Evidence of prior fire-related damage was observed (see Photographs #8 and #9).
- Advanced deterioration was documented along the perimeter foundation beam (see Photograph #10).
- Advanced wood deterioration was observed at wall-to-ceiling, and wall-to-floor framing along exterior wall locations (see Photographs #13, through #17, and #24).
- Improper attachment conditions were observed at wall-to-ceiling connections at multiple locations (see Photographs #18 through #23).
- Efflorescence, likely resulting from prolonged water intrusion through the roof, was observed at wall-to-ceiling junctions and within the attic space (see Photographs #21, #22, and #25).
- Advanced wood deterioration and broken structural elements were observed throughout the pier-and-beam foundation system within the crawl space (see Photographs #26 and #31 through #34).
- Substandard footings, evidence of footing settlement, support elements lacking footings, and rotated footings were observed within the foundation system (see Photographs #27 through #31).

4) DISCUSSION AND ENGINEERING EVALUATION

Roof

During the exterior inspection, pronounced sagging was observed across roof slopes. Excessive deflection of the roof planes is generally indicative of inadequate structural capacity within the roof framing system. Such conditions may result from original design or construction deficiencies, long-term deterioration associated with prolonged environmental exposure, or acute loading events such as wind or snow.

The observed sagging is considered symptomatic of underlying structural deficiencies that adversely affect the intended load path and overall stability of the roof system. In addition, evidence suggests prolonged roof leakage, which has likely contributed to deterioration of structural framing members. As a result, the roof system does not appear to be performing as intended, and corrective measures are required to restore structural integrity and compliance with applicable building codes and safety standards.

Other contributing factors may be present; however, a full attic inspection could not be performed due to limited and unsafe access. This limitation was imposed as a precaution based on concerns regarding potential structural instability. Nevertheless, given the apparent age of the structure and consistent with professional experience on similar buildings, it is anticipated that significant rehabilitation or partial to full replacement of the attic framing system will be required to achieve structural adequacy and code compliance. A comprehensive structural evaluation should be conducted once safe access to the attic is established to confirm the extent of necessary repairs or upgrades.

Wall and ceiling framing and Lateral bracing system

Significant structural deficiencies were observed throughout the building envelope and primary framing systems. The ceiling and wall framing across the residence, and particularly within the addition, exhibited advanced wood decay and deterioration consistent with prolonged moisture exposure. Evidence of chronic moisture intrusion included material degradation, loss of cross-sectional capacity, and conditions conducive to biological growth. Additionally, existing structural attachment and connection details were observed to be substandard and inadequate, contributing to ineffective load transfer and a reduction in overall structural integrity.

No evidence of a lateral force-resisting system—such as structural sheathing, let-in bracing, or diagonal bracing—was identified during the inspection. Based on observed construction methods and conditions, it is the professional opinion of the undersigned that such systems were likely omitted from the original construction. The absence of a defined lateral bracing system constitutes a significant structural deficiency, substantially reducing the structure's ability to resist wind and seismic loads and increasing the risk of global instability. Corrective action is strongly recommended.

Collectively, the deficiencies described above represent a critical compromise to the structural integrity and load-resisting capability of the building. In its current condition, the structure cannot be considered safe for continued occupancy or use until a comprehensive structural evaluation is performed and appropriate remedial measures are implemented to address the noted deficiencies and restore compliance with applicable building codes and accepted engineering standards.

A comprehensive evaluation of the floor framing and foundation system within the crawl space identified multiple critical and systemic deficiencies, including, but not limited to, the following:

- Improper and substandard footing systems, including the use of tree trunks and concrete masonry units (CMUs) placed directly on native soil without engineered footings, as well as footings that have experienced settlement, rotation, and lateral displacement.
- Rotated, leaning, and structurally compromised support posts and beams, indicating loss of load-bearing capacity and ineffective load transfer to the foundation system.
- Direct wood-to-soil contact without the presence of moisture barriers or separation, significantly increasing susceptibility to moisture intrusion, decay, and biological degradation.
- Widespread wood deterioration, including advanced decay and microbial growth, affecting primary structural members throughout the crawl space.
- Inadequate crawl space ventilation contributing to accelerated deterioration of wood framing components.
- Undersized and underdesigned floor beams exhibiting excessive deflection, inconsistent with acceptable serviceability and structural performance criteria.

Collectively, these deficiencies have resulted in noticeable and widespread floor unevenness throughout the structure. The conditions described above were observed consistently across the entire crawl space, indicating a systemic failure rather than isolated localized issues. Given the extent, severity, and pervasive nature of the observed deterioration, effective remediation would require substantial reconstruction of the floor framing system and replacement of most, if not all, foundation elements. Such corrective measures are necessary to restore structural stability, reestablish proper load paths, and achieve compliance with current building codes and accepted engineering standards.

5) CONCLUSION

Based on the information gathered from the day of the inspection, and our subsequent engineering evaluation, it is FEI's professional opinion that:

1. The overall structural integrity of the building has been severely compromised due to widespread deficiencies affecting multiple primary load-bearing systems. These areas of concern include, but are not limited to:
 - a. Exterior wall framing – Exhibiting displacement, inadequate attachment conditions, and advanced wood decay, resulting in reduced load-carrying capacity and compromised load transfer.
 - b. Floor framing and foundation system – Impacted by widespread deterioration, undersized structural members, and inadequate, failed, or improperly constructed footings, adversely affecting support and overall stability.
 - c. Roof framing system – Demonstrating excessive deflection, advanced wood deterioration, and deficient attachment details, indicative of insufficient structural capacity and compromised performance.
 - d. Lateral force-resisting system – No lateral bracing or shear-resisting elements were identified, representing a critical deficiency in the structure's ability to resist wind and seismic loads.
2. No effective lateral bracing system was identified during the inspection. The absence of such a system critically undermines the structure's ability to resist lateral loads, leaving it highly susceptible to wind and seismic forces and posing a significant life safety concern.
3. Restoring the structure to an adequate and code-compliant condition would necessitate near-total reconstruction of the foundation, framing systems, and the addition of a properly engineered lateral force-resisting system. Given the scope and complexity of work required, as well as the safety risks involved with rehabilitation, full demolition and reconstruction of the structure is strongly recommended.
4. The undersigned reserves the right to revise or supplement the findings and conclusions herein should additional data or access to concealed structural elements become available.

IMPORTANT LIMITATIONS:

The contents of this report are intended solely for the use of the client identified within this document and its designated representatives. It is specifically prepared in response to the client's request for professional engineering services and is not intended for use by any third parties. Any reliance on this report by parties other than the client is strictly prohibited and done so at their own risk. FEI Engineering accepts no responsibility or liability for unauthorized use, misinterpretation, or distribution of this report or any of its contents.

All findings, evaluations, analyses, and professional opinions provided herein are based on the information and documentation made available to FEI Engineering at the time of the investigation. The contents have been prepared using accepted industry standards and represent the judgment of the licensed professional within a reasonable degree of engineering certainty. It should be noted that conditions not visible, accessible, or disclosed at the time of the assessment may affect the accuracy of the conclusions presented. FEI Engineering reserves the right to revise or amend this report if additional information becomes available or if site conditions change.

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FEI Engineering is grateful for the opportunity to provide services on this project. We trust that this report fulfills the scope of work as agreed. Should there be any questions regarding the findings or should additional consultation be required, please do not hesitate to contact our office for further assistance.

APPENDIX A: PHOTOGRAPHS



Photo 1

Overview of the front (north) elevation.



Photo 2

Overview of the right (west) elevation.



Photo 3

Overview of the rear (south) elevation.



Photo 4

Overview of the left (east) elevation.



Photo 5

Exterior view showing cracked concrete and deterioration of the foundation cover.



Photo 6

Roof view. Detached and peeled roof panels observed, consistent with wind-related uplift from an elevated wind event.



Photo 7

Roof view. Detached and missing roof panels observed, consistent with wind-related uplift from an elevated wind event.



Photo 8

Exterior view. Evidence of prior fire-related damage observed.



Photo 9

Exterior view. Evidence of prior fire-related damage observed.



Photo 10

Exterior view showing advanced deterioration of the foundation beam.



Photo 11

Interior overview of the addition portion of the structure.



Photo 12

Interior overview of the structure.



Photo 13

View of wall-to-ceiling framing showing advanced wood deterioration along the exterior wall.



Photo 14

View of wall-to-ceiling framing showing advanced wood deterioration along the exterior wall.



Photo 15

View of wall-to-ceiling framing showing advanced wood deterioration along the exterior wall.



Photo 16

View of wall-to-ceiling framing showing advanced wood deterioration along the exterior wall.



Photo 17

View of wall-to-floor framing showing advanced wood deterioration along the exterior wall.



Photo 18

View of wall-to-ceiling framing showing improper attachment conditions.



Photo 19

View of wall-to-ceiling framing showing improper attachment conditions.



Photo 20

View of wall-to-ceiling framing showing improper attachment conditions.



Photo 21

View of wall-to-ceiling framing showing improper attachment conditions.



Photo 22

View of wall-to-ceiling framing showing efflorescence, likely resulting from prolonged water intrusion through the roof.



Photo 23

View of wall-to-ceiling framing showing improper attachment and advanced wood deterioration.



Photo 24

View of wall-to-ceiling framing showing improper attachment and advanced wood deterioration.



Photo 25

View of attic roof framing showing efflorescence, likely resulting from prolonged water intrusion through the roof.



Photo 26

Crawl space view showing advanced wood deterioration (typical).



Photo 27

Crawl space view showing loose support elements lacking attachment to the framing.



Photo 28

Crawl space view showing loose and rotated support elements lacking footings (typical condition).



Photo 29

Crawl space view showing substandard footing and a rotated beam (typical).



Photo 30

Crawl space view showing substandard footing (typical).



Photo 31

Crawl space view showing substandard footing and advanced wood deterioration (typical).



Photo 32

Crawl space view showing advanced wood deterioration (typical).



Photo 33

Crawl space view showing advanced wood deterioration (typical).



Photo 34

Crawl space view showing broken floor joist.