TEXAS HISTORICAL COMMISSION

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May 23, 2011

Laura Esparza, Division Mgr., Cultural Affairs Division City of Austin, Parks and Recreation Department 1110 Barton Springs Road Austin, TX 78704

Re: Response to "Evaluation of Documentation Related to the Proposed Landscape Restoration for the Elisabet Ney" Museum; Elisabet Ney Home and Studio, Austin, Travis County (NR, RTHL, SAL)

Dear Ms. Esparza:

Thank you for sending the above-referenced report produced by the city regarding the on-going Elisabet Ney Museum landscape project. This letter represents the comments of the Executive Director of the Texas Historical Commission.

The review staff, led by Caroline Wright, has reviewed the project documentation provided and offers the following comments.

First, it must be noted that the Elisabet Ney Home and Studio is NOT a National Historic Landmark. The THC believes that the property is eligible for designation as an NHL; however, to our knowledge no one has discussed the potential eligibility of the property with the section of the National Park Service that oversees NHLs. As previously stated, THC has determined Formosa to be eligible for listing in the National Register of Historic Places at the national level of significance for the period of Ney's life, and eligible at the local level of significance through 1941 for its association with the Texas Fine Arts Association. Our determination of eligibility remains unchanged with the information presented in the research document prepared for the city. We feel that the current, out-dated National Register nomination should be updated to reflect both of these areas and periods of significance and look forward to working with the city and their chosen consultant to see that work completed.

Restoration is not a preservation approach that is taken lightly. Restoration is deemed appropriate only when a single portion of a property's history is considered to be the primary period of significance in the property's history and when the proposed work will meet the Secretary of the Interior's Standards for Restoration. The application by the City of Austin for funding of a restoration plan by the Save America's Treasures program, along with the plan itself once completed, was approved because of the greater significance of the period of Ney's life compared to later periods in the history of the property and because enough documentary evidence exists to enable a restoration that meets the Standards. This decision does not diminish the later history of the property, but recognizes that Elisabet Ney was an internationally-known sculptor and that this property is directly related, in a significant way, to her work and her life, much of which was spent in her landscape. This site, unlike many others, is uniquely suited as a landscape restoration project because of that connection.

Choosing to restore the property to a later date, or to follow the Standards for Rehabilitation, which would encompass all changes made to the property prior to 1941 or even today, would also be an appropriate approach to treatment of the property. Either decision will affect interpretation of the site, which must be weighed as the final decision is made. Retaining the stone wall and crepe myrtle trees means that the kitchen garden cannot be restored to its historic location and the post and wire fence, which was an integral part of the property in Ney's life, can also not be fully reconstructed. Both of these elements can be installed elsewhere on the site, however and can still be interpreted through other means. Removing the stone wall would alter the property significantly from its current appearance, as it has always been known to its neighbors, but the lack of the wall



would not prohibit visitors from learning about the history of the property after Ney's death. In fact, there is a stone tablet installed inside the studio in honor of the founder of the TFAA that will remain in place. Additionally, the stone wall could be reconstructed either on the northern portion of the property, which will not be a strict restoration, or on neighboring Shipe Park. It appears that there is not enough documentary evidence regarding the appearance of the property during the TFAA's occupation to discuss restoration of the property to that time period, though the period of Ney's life is well documented.

In regards to interpretation as proposed in the research document, it should be noted that the museum has installed signage explaining the prairie grass restoration project to explain the appearance of the grass and the intermediary fencing on the property.

As THC has also said, we do not feel that the restoration plan should be amended as has been discussed. That document was researched and written with one distinct goal and it is not appropriate to simply amend it to produce a different outcome without completing similarly extensive research and planning as went into the original plan. We agree with the proposal that the new research document along with citizens' concerns and responses should be instead written as an official response to the plan which can be appended to it and which the city can use as a basis for future steps. It is important for the city and all parties to recognize that if the decision is made to undertake a different approach to the treatment of the landscape project, that additional research and designing will likely need to be undertaken by a landscape architect versed in historic landscapes to produce new plans to replace the restoration plan.

Thank you for your interest in the cultural heritage of Texas, and for the opportunity to comment on this project. We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. If you have any questions concerning our review or if we can be of further assistance, please contact Caroline Wright at 512/463-6214.

Sincerely,

Caroline Wright, Project Reviewer, for: Mark Wolfe, State Executive Director