



City of Austin

Austin Parks and Recreation Department
200 South Lamar Boulevard, Austin, Texas 78704

August 22, 2012

Dear Mr. Stan Bacon and Mr. Fred Bothwell,

On behalf of the Parks and Recreation Department (PAR), I am writing to address the Mt. Bonnell at Covert Park monument replacement and landscape improvements proposal. As you know, the Department has been diligently working with WPSCT to produce a proposal that is acceptable to the West Point Society of Central Texas (WPSCT), PAR and the Historic Landmark Commission. While PAR supports the proposal in concept, the ultimate goal is the development of a proposal that will be likely to receive support from the Historic Landmark Commission.

As you may recall, PAR communicated concerns at an on-site meeting **October 13, 2011** that WPSCT's original proposal would not meet code requirements with respect to City of Austin historic landmarks and was unlikely to receive support from the Historic Landmark Commission. At that time, PAR staff reviewed the city code concerning City of Austin Historic Landmarks with WPSCT and explained the process by which the department works with the Historic Landmark Commission and Historic Preservation Office on improvements to City of Austin Historic Landmarks.

In an effort to elicit input and to verify staff's interpretation of the City of Austin code with regarding historic landmarks, staff attended a presentation on **November 14, 2011** at which WPSCT presented their proposal for an option directly to the Certificate of Appropriateness Committee of the Historic Landmark Commission. In an email to Mr. Bacon dated **December 1, 2011**, PAR communicated that the feedback from the Certificate of Appropriateness meeting indicated that the proposal did not meet code requirements with respect to City of Austin historic landmarks and was unlikely to receive a Certificate of Appropriateness.

In a **January 19, 2012** memo, PAR agreed to work with the WPSCT and pursue the replacement of the monument and landscaping improvements as long as the proposal met the following conditions:

- Design revisions were consistent and addressed HLC's concerns.
- Landscape improvements were determined by staff to be compatible with site, accessibility and maintenance considerations.

Over the last six months, the Department has worked with WPSCT to modify the original proposal in an effort to meet the requirements associated with Certificate of Appropriateness approval. The input from the recent **July 16, 2012** presentation at the Historical Landmark Commission's Certificate of Appropriateness Committee encouraged us to modify the proposal to address and conform to the City of Austin code requirements with respect to City of Austin historic landmarks and the Secretary of Interior's Standards for Rehabilitation.

Additionally, Mr. Bacon and the Department had the opportunity to present the proposal to the Heritage Society of Austin's (HSA), a nonprofit historic preservation stakeholder, on **August 14, 2012**. The HSA has encouraged the Department to adhere to City of Austin code requirements with respect to City of Austin historic landmarks and the Secretary of Interior's Standards for Rehabilitation.

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Reasonable modifications and equal access to communications will be provided upon request.*



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PARD supports the WPSCT in their desire to make improvements at Mt. Bonnell at Covert Park. The current plan contains positive improvements that are both greatly needed and appreciated. However, if indeed this proposal is going to be supported by the Historic Landmark Commission and the historic preservation community and ultimately receive a Certificate of Appropriateness, it is clear that PARD and WPSCT must work together to modify the plan to meet the following key criteria:

City of Austin Code

§ 25-11-243 ACTION ON A CERTIFICATE OF APPROPRIATENESS

(D) In making a determination under this section, the commission shall consider the United States Secretary of the Interior's Standards for Rehabilitation, 35 Code of Federal Regulations Section 67.7(b).

Secretary of the Interior's Standards for Rehabilitation

- Guideline 2—The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
- Guideline 3— Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- Guideline 4—Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- Guideline 5—Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- Guideline 6—Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- Guideline 9—New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- Guideline 10—New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It remains in the best interest of PARD to rectify the damaged historic monument. This remedy should comply with the City of Austin code requirements with respect to City of Austin historic landmarks and the Secretary of Interior's Standards for Rehabilitation. The Department cannot, in good faith, pursue a course of action related to a City of Austin Historic Landmark that does not meet code and further, is not supported by the Historic Landmark Commission or the historic preservation community. It is with this in mind that I ask WPSCT to continue to work with PARD to further modify the proposal.

PARD will withdraw the current Certificate of Appropriateness application and I propose additional work sessions in September to refine the current proposal to include the recent input of the Certificate of Appropriateness committee and the historic preservation community. Assuming a revised proposal for improvements satisfies the requirements outlined above, PARD commits to applying for a new Certificate of Appropriateness from the Historic Landmark Commission in October. However, it is PARD's position



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that if we are unable to develop a plan that meets these requirements, PARD will seek alternate resources to repair the broken monument. We know that the Austin Parks Foundation has pledged grant funding for this project, but has also made it clear that the funding is contingent upon the project's ability to secure approval from PARD.

It is my sincere hope we can continue to work together to improve this most precious park. We will await your decision.

Sincerely,

Kimberly McNeeley, Assistant Director, Parks and Recreation Department

Cc: Bert Lumbreras, Assistant City Manager
Sara L. Hensley, CPRP, Director, Parks and Recreation Department
Marty Stump, Project Management Supervisor, Parks and Recreation Department
Kim McKnight,
Rey Hernandez, Landscape Architect II, Parks and Recreation Department