

**HISTORIC LANDMARK COMMISSION**  
**APPLICATION FOR A CERTIFICATE OF APPROPRIATENESS**  
**APRIL 22, 2019**  
**C14H-1974-0028**  
**MOONLIGHT TOWERS**  
**VARIOUS LOCATIONS**

**PROPOSAL**

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Restore nine Moonlight Towers and reconstitute three Moonlight Towers, including use of replacement leg and horizontal members as needed with milled steel parts.

**ARCHITECTURE**

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50' high steel towers, each topped with six lamps.

**PROJECT SPECIFICATIONS**

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All existing components will be visually inspected and non-destructively tested. Passing components will be painted and used in the re-installation of the tower, while components failing the structural inspection will be replaced with new milled steel parts.

Steel parts are proposed to be milled rather than cast, with steel comparable to the original material. See explanation dated March 27, 2019 for an explanation of the original casting process and the proposed milling process.

Austin Energy is prioritizing maintaining a maximum percentage of original tower members in each of the remaining towers. That said, it is anticipated that each of the twelve towers will have slightly more than 40 percent historic material remaining after all towers are restored. This accounts for a 40 percent failure rate on nine towers that are still standing, as well as complete reconstruction of three towers that have been consumed for parts to restore five other towers (work completed).

No restoration strategy explaining how original and replacement members will be interspersed has been provided to date.

**STANDARDS FOR REVIEW**

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The Secretary of the Interior's Standards for Rehabilitation are used to evaluate projects on historic landmarks. The following standards apply to the proposed project:

- 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.*

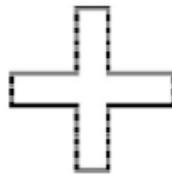
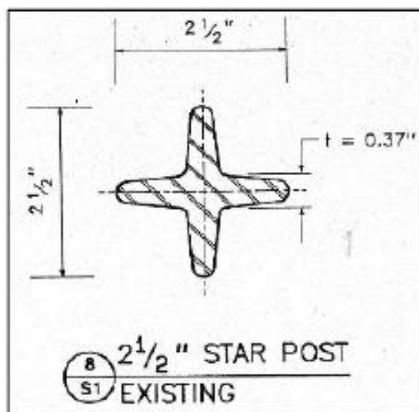
The proposed project will preserve the historic character of the Moonlight Towers and retain their distinctive features, spaces, and spatial relationships. Though the milled members have a slightly different profile than the originally cast star posts, the two appear to be identical from six feet away, and most of the towers are viewed from a much greater distance.



As viewed from 6 feet away: Square tubes (left); original tower section (right)

- 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.*

Original tower members that pass the structural inspection will be reused. Original members that fail the structural inspection will be replaced in-kind with steel members with an extremely similar profile.



Original star post cross-section (left); proposed milled member cross-section (right)

The project meets the applicable standards.

**COMMITTEE RECOMMENDATIONS**

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Not reviewed.

**STAFF RECOMMENDATION**

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Approve the proposal for milled replacement members; authorize staff to administratively approve a strategy for tower restoration and reconstitution.