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Re: Certificate of Appropriateness for Royal Arch Masonic Lodge at 311 W. 7th Street

Dear Chair,

Preservation Austin respectfully requests that the Historic Landmark Commission work with owners of the Royal Arch Masonic Lodge at 311 W. 7th Street to bring their re-development plans in line with the Secretary of the Interior's Standards. The owner's June 24 Certificate of Appropriateness application shows the loss of all but the building's exterior walls, a significant modification to its prominent east façade, and construction of a tower within its historic footprint. We feel strongly that this project, as presented, does not meet the requirements of either the Standards or City Code as they apply to this City of Austin Landmark and National Register-listed property.

Section 25-11-243 of the City Code states that when taking action on a Certificate of Appropriateness the Historic Landmark Commission, "shall consider the United States Secretary of the Interior's Standards for Rehabilitation, 36 Code of Federal Regulations Section 67.7(b)." The Secretary of the Interior's Standards (SOI Standards) state the following:

- 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. (emphasis added).
- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. (emphasis added).
- 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. (emphasis added).

"The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings" further provides recommendations for applying the SOI Standards including (1) constructing new additions that result in the least possible loss of historic materials; (2) are subordinate to the historic building; (3) are set back from the wall plane of the historic building: (4) are inconspicuous when viewed from surrounding streets: (5) are limited to one additional story in height: (6) appear as a separate building; (7) and do not negatively affect the building.

In designating the Royal Arch Masonic Lodge, both the City of Austin and the National Park Service acknowledged its significance to our community for its association with Texas architects J. B. Davies and W. E. Ketchum, for its early twentieth-century Beaux-Arts architecture, and for its contribution to Austin's social history for its long and continued use as a Masonic Lodge.

We appreciate that property owners' needs may change over time, and understand that large towers will be constructed adjacent to historic buildings in Austin's urban downtown. However, Landmark designation is intended to protect the properties our community identifies as significant, so that their historic materials and integrity are not compromised over time. We understand that your decisions are not always easy ones; however, ensuring that the Historic Landmark Commission applies consistent standards to review, as directed by City Code, is vital to the integrity of that decision-making process.

We would be pleased to work with the owners as well to find a solution that meets the SOI Standards and maintains the Royal Arch Masonic Lodge in its historic form.

Thank you for your service to the community.

Janessa Mashrath

Sincerely,

Vanessa McElwrath

President of the Board of Directors

Cc:

Members of the City of Austin Historic Landmark Commission Steve Sadowsky, City of Austin Historic Preservation Office