

Subject: FW: Sankey Park Bandstand
Date: Friday, August 21, 2020 at 4:05:01 PM Pacific Daylight Time
From: Angela Clegg
To: Raymond Towry, Brandon Neish, Greg Springman, Blair Larsen, Lagea Mull
Attachments: image001.png, image002.png, image003.png, image004.jpg, image005.jpg

Jason's response below. I told him that we would discuss the options internally and then form a plan for public input. As he said below and emphasized on the phone, he will help us walk through any step that is needed, including the public discussion piece.

Again, there is no option that is forbidden. Some options will require more mitigation than others. We talked about some other scenarios, but I feel it would be beneficial for us to have a meeting and discuss it in more detail than to send multiple emails.

Let me know how you would like to move forward from here (next steps)



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From: ALLEN Jason * OPRD <Jason.Allen@oregon.gov>
Sent: Friday, August 21, 2020 3:55 PM
To: Angela Clegg <aclegg@sweethomeor.gov>
Subject: Sankey Park Bandstand

Hi Angela,

Thanks for the call today, I appreciate you filling me in on the details of the situation and orienting me with regard to this very interesting structure. Here's an overview of what we discussed in terms of options for going forward. As I mentioned, the regulation we're operating under in Oregon Revised Statute (ORS) 358.653, which, for all its merit in intention, does not have any implementing rules. Because of that, we look to the federal regulation, the Section 106 of the National Historic Preservation Act, and it's implementing regulation (36 CFR 800) to inform the process. I want to start by being clear that neither of these regulations is intended to STOP a project, and in reality, neither of them can do that. It also doesn't allow our office, or any other agency to dictate the course of action – this is an entirely local decision, and we respect that the best decision for the community will be made at the community level. That said, from a historic preservation perspective, there are better outcomes and less-better outcomes, as they relate to the historic building, and

the regulations encourage adoption of the better outcomes by incorporating a mitigation element if the less-better outcomes end up being selected. From a reality standpoint, there are a lot of inputs that the community must consider in deciding the best path forward, but for the purposes of our review, we have to keep our focus on the inputs that relate specifically to the preservation of the historic building. If we end up in a spot where mitigation becomes a necessary part of the project (in the regulatory language, an “adverse effect” to the historic structure is found to result from the project), we do try to create mitigation that is of benefit to the project, and aligns with the goals of the project to the extent possible. What mitigation looks like is a matter of consultation, but there are guidelines that provide us with sideboards to keep things reasonable and relevant. That’s for later, though.

In our conversation, I sort of laid out a spectrum of approaches that the community is likely to consider, based on what you had said the conversations were revolving around. Most of those were based in basic questions like, repair/vs replace, engineering considerations, cost, and whether the bandstand in its current location continues to serve the function the community wishes it to. With those considerations in mind, here were the broad approaches I mentioned, in the order of what’s best from a historic preservation perspective only. These do not include the other considerations that will, along with these, guide the community decision.

Best

1. Repair the building in-kind, as it is today. This means repairing existing materials to the extent possible, and replacing with exact match the pieces that cannot be repaired. Continue to use the bandstand as.
2. Repair the building, adding engineering values to strengthen the building. This means inserting steel or other materials in such a way as to make the building appear as though it is unchanged, while still providing improved structural strength. This could be things like inserting steel members among the roof structure in as sneaky a way as possible, painting the pieces black or dark brown to help them hide, or boring out the log posts and inserting steel posts, such that the steel bears the weight of the roof structure, and the wood becomes a sheath around it. Continue to use the bandstand as the primary performance stage.

Very Good

3. Doing either #1 or #2, and constructing a new amphitheater to be the primary venue for performances. Continue using the bandstand as a stage, secondarily to the new amphitheater, or repurposed for some other use that does not require alteration, like as a picnic shelter.

Good

4. Doing 1 or 2, and moving the bandstand to another, nearby location in the park, and keeping the bandstand in use as a performance stage.
5. Doing 1 or 2, and moving and/or repurposing the bandstand to some other use.

Less good

6. Making alterations to the bandstand that are conspicuous, change the design or size of it, or that change the overall character of the structure.

Bad

7. Demolishing the bandstand.

If the community selects 1 through 5, I think we can avoid an adverse effect (perhaps with some careful design work if alterations are a part of that), and avoid mitigation. Like I said, though, if mitigation does become necessary, we are interested in ways of doing that which would support the community effort. For example, documentation of the Bandstand before it gets demolished or significantly altered, perhaps a bit of memorialization or interpretation talking about the bandstand, the CCC and its work here and around Sweet

Home, and an approach that looks to salvage key elements of the bandstand to incorporate into the new stage (such as using the façade as the backdrop for the stage, etc.).

As you're having that discussion at the community level, please feel free to reach out if you have questions, concerns, or want to bounce some ideas around. We're here to help you through the process, but we may also be able to provide some information from our experience and expertise that may help the decision-making process.

Cheers, and have a great weekend,

-Jason



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