

**Preservation League of New York State's
Comments on "Chautauqua Amphitheater
Historic Rehabilitation Analysis and Scope Report"**

February 2013

At the request of the Chautauqua Institution's Executive Director Thomas Becker and Administrator of Architectural and Land Use Regulations John Shedd, the Preservation League of New York State, through its representative on the Amphitheater Study Group, Tania Werbizky, welcomes the opportunity to provide comments on the above document which was distributed at the February 20, 2013 Amphitheater Study Group meeting. The Preservation League requests that these comments be shared in their entirety with the Study Group, the Board of Directors and others who are engaged in the Amphitheater project.

As background, the Preservation League understood that the Amphitheater project was intended to continue its use and enhance the experience of the performers and audience who use this historic building located in an historic setting. The Preservation League accepted the invitation to serve as a preservation advisor (non-architect) on the Amphitheater Study Group with pride and a keen sense of responsibility to assist in the preservation and use of one of America's treasured landmarks, the Amphitheater. The following observations and suggestions for next steps are made in that spirit. They are offered as a basis for further discussion as the Chautauqua Institution strives to fulfill its educational, religious, musical performance, and other roles and responsibilities as the pre-eminent institution of its kind in the United States as well as a place valued throughout the world.

Preface to Comments

This Preface reviews and summarizes information provided by the Preservation League regarding the landmark status of Chautauqua. In addition, study group members and staff were given copies of the National Historic Landmark nomination mentioned in this section

Chautauqua Institution's National Register of Historic Places Status

Chautauqua is listed in the National Register of Historic Places. The National Register (NR) is our federal government's official list of districts, sites, buildings, structures and objects deemed worthy of preservation. The criteria for evaluation for listing include associations with significant events and/or people; distinctive characteristics of design, method of construction, or high artistic value; and the certainty or possibility that the listed resource is associated with information important to pre-history or history (see <https://www.achp.gov/nrcriteria.html> for the complete criteria statements). In addition, properties that have achieved significance within the past 50 years are generally not considered eligible for NR listing but there are exceptions. This "50 year rule" is important

for both initial listing and addressing changes made to a building over time that have acquired significance in their own right.

The National Register program is overseen by the National Park Service (NPS) but much of the day-to-day responsibility for administering the program is carried out at the state level. In New York State, the NYS Office of Parks, Recreation and Historic Preservation has this charge. Since 1980, this agency has administered a State Register of Historic Places based mostly on the national program. Chautauqua is also listed in the State Register.

Chautauqua was added to the National Register on June 19, 1973 as the Chautauqua Institution Historic District (#73001168 in the National Park Service listings). An historic district consists of a group of resources – buildings, sites, structures and objects – that have been designated as having architectural, historic and/or cultural significance by a governmental entity (local, state or federal). Historic districts range from a row of Brooklyn brownstones to thousands of acres with farmsteads and entire villages as in the Cooperstown/Glimmerglass Region of the state. In Chautauqua's case, the federal (and state) level historic district is described as having 647 buildings on 2,070 acres. Its buildings range from small dwellings to music and educational facilities. Its specific areas of significance are its associations with *education, landscape architecture, religion* and *architecture/engineering* with a range of time periods of significance: 1850-1874, 1875-1899, 1900-1924 and 1925-1949. This is the range of dates when major events occurred that shaped Chautauqua's history as understood in 1973.

A National Register historic district is a geographically definable area with rational boundaries lines (for example, the lines of incorporated municipalities, the property lines of contiguous properties, and/or natural features). According to its NR documents, Chautauqua's district is bounded by the lake, "North and Lowell Avenues and NY 17J." An historic district's buildings and other resources are considered "contributing", thus important for architectural, historic and/or cultural reasons in conveying the significance of each historic district. An historic district can have non-contributing properties, usually included due to adjacency (to avoid irrational boundaries). A non-contributing building may be too altered (due to a loss of architectural features essential to its historic appearance) or too recent to be considered contributing. In an historic district, the vast majority of resources are considered "contributing". The Chautauqua Institution Historic District has very few non-contributing buildings. It is listed in the National Register at the *national* level of significance as opposed to local or state levels.

Chautauqua Institution's National Historic Landmark Status

Chautauqua's significance was recognized again and elevated by its listing as a National Historic Landmark District on June 29, 1989 as the Chautauqua Historic District. The National Historic Landmark (NHL) Program is administered by the National Park Service. According to the National Park Service website (<https://www.nps.gov/nhl>), "National Historic Landmarks are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating

or interpreting the heritage of the United States. Today, fewer than 2,500 historic places bear this national distinction. Working with citizens throughout the nation, the National Historic Landmark Program draws upon the expertise of National Park Service staff who work to nominate new landmarks and provide assistance to existing landmarks.”

Due to its rich heritage and strong track record in preservation, New York State leads the country in the number of NHLs, 270 or over 10% of the nation’s total. Chautauqua’s significance can be viewed as sharing the same distinction as Carnegie Hall, the New York Botanical Gardens, Louis Sullivan’s Guaranty Building and Frank Lloyd Wright’s Darwin Martin House (Buffalo), the Geneseo Historic District, the Roycroft Campus (East Aurora), and several Adirondack Great Camps in receiving the nation’s highest recognition. Chautauqua Institution was joined by the Colorado Chautauqua in Boulder in achieving NHL status on February 10, 2006. (Note: The Lewis Miller Cottage at Chautauqua was named an individual NHL on December 21, 1965. It was included in the subsequent historic district listing).

In all of the official recognitions and honors mentioned above, the Amphitheater is considered “contributing”. The nomination documents go on to describe key properties of the 647-building historic district. It is important to note that the Amphitheater is specifically called out, described, and termed Chautauqua’s “heart”. Additional resources that are presented in these documents as being particularly significant contributing buildings include the Athenaeum Hotel and the Hall of Christ among several others.

It is important to recognize that often in the nomination forms for large historic districts (especially those prepared before the 1990s), significant buildings are identified but not fully described. Since the vast majority of buildings in Chautauqua are “contributing,” one way of seeing the significance of the historic district designation is that the “whole is greater than the sum of its parts.” This concept of “tout ensemble” is associated with the pioneering preservation work of Charleston, South Carolina in its 1930 local historic district designation, the first in the United States. Also, in many historic districts the physical setting is important so historic street patterns, parks, plazas and other landscape features are identified and described as contributing or not. This is true of the Chautauqua designation.

Types of Preservation Projects– Secretary of the Interior’s Standards

The use of the Secretary to be Interior’s Standards was discussed at several early meetings along with other standards such as LEED certification. The Preservation League provided a copy of The Secretary of the Interior’s Standards for Rehabilitation as discussion of the evolving design project continued.

Given Chautauqua’s landmark designations, national significance, and quality of its architecture, the Preservation League approached the prospect of an Amphitheater design project as being a type of historic preservation project that would warrant appropriate “treatment” (or design approach). Due to Chautauqua’s status with the National Park Service, the Preservation League looked to agency guiding documents and experience for

assistance in determining the most appropriate project definition. Help is provided by The Secretary of the Interior's Standards for the Treatment of Historic Properties which "are neither technical nor prescriptive, but are intended to promote responsible preservation practices to help protect our Nation's irreplaceable cultural resources. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed. But once a treatment is selected the standards provide philosophical consistency to the work". (See https://www.nps.gov/history/hps/tps/standardguide/overview/choose_treat.html).

The use of the Secretary of the Interior's Standards for preservation projects is required when work on designated landmark buildings involves federal funding, licensing or some form of agency involvement. In New York State the same is true for state actions. When not mandated, the use of the Secretary of the Interior's Standards represents a "best practices" approach to the stewardship of landmark quality properties.

Four treatment or design approaches are identified by the Standards. In hierarchical order they are briefly described as:

"Preservation (which) places a high premium on the retention and repair of historic fabric through conservation, maintenance and repair. It reflects a building's continuum over time, through successive occupancies, and the respectful changes and alterations that are made."

"Rehabilitation emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work. (Both Preservation and Rehabilitation standards focus attention on the preservation of those materials, features, finishes, spaces, and spatial relationships that, together, give a property its historic character.)"

"Restoration focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods."

"Reconstruction establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials."

The NPS documents go on to say that "choosing the most appropriate treatment for a building requires careful decision-making about a building's historic significance, as well taking into account a number of other considerations" (summarized as):

- "Relative importance in history. Is the building a nationally significant resource? National Historic Landmarks, designated for their "exceptional significance in American history," or many buildings individually listed in the National Register often warrant Preservation or Restoration (treatments)."
- "Physical condition. What is the existing condition – or degree of material integrity – of the building prior to work? Has the original form survived largely intact or has it been altered over time? Are the alterations an important part of the building's history?"
- "Proposed use. An essential, practical question to ask is: Will the building be used as it was historically or will it be given a new use? Many historic buildings can be adapted for new uses without seriously damaging their historic character."

- “Mandated code requirements. Regardless of the treatment, code requirements will need to be taken into consideration. But if hastily or poorly designed, a series of code-required actions may jeopardize a building’s materials as well as its historic character. Alterations and new construction needed to meet accessibility requirements under the Americans with Disabilities Act of 1990 should be designed to minimize material loss and visual change to a historic building.”

The Amphitheater Design Approach and Relationship to the Secretary of the Interior’s Standard for Rehabilitation

Given the above definitions and guidance, it appeared to the Study Group and Institution staff that the design project proposed for the Amphitheater came closest to being a “rehabilitation” project and that the ten guiding principles of the Secretary of the Interior’s Standards, although not mandated, would be applied. Economic and technical feasibility would also be taken into consideration.

Over 2012, each meeting revealed considerable progress in addressing the stated need for upgrading the performance space and experience for both the audience and a wide variety of performers, from a solo reader to a full orchestra. Discussion of preservation practice and the physical changes proposed for the Amphitheater also continued. When the document “Chautauqua Amphitheater Historic Rehabilitation Analysis and Scope Report” was distributed at the end of the February 20, 2013 meeting, the question of whether or not the Amphitheater project could be considered a rehabilitation project was raised. Amphitheater Study Group members were asked to respond to the Report including a consideration of the project definition or type.

The Preservation League’s View

For the Preservation League, the incremental changes to the evolving redesign of the Amphitheater have raised significant questions regarding project impact on:

- the building’s historic character (Sec. of the Interior’s Standard 2),
- the changes that have acquired historic significance in their own right (Standard 4), and
- the retention of distinctive features, finishes, construction techniques or examples of craftsmanship that characterize the building (Standard 5).

A key challenge is that there has not been a complete identification of the distinctive features that give the Amphitheater its unique historic character. Elements such as the roof form, the shape and rake of the bowl, the quality of light through the clerestory windows (and the windows themselves) have been discussed but a definitive list of character-giving features, spaces and historic fabric has not yet been prepared.

Typically in a preservation project there are several steps taken prior to identifying the treatment option or design approach to be taken. These can be summarized as:

1. "*Historical Background and Context* – a brief history of the building and its context, its designers and builders, and persons associated with its history and physical development."
2. "*Chronology of Development and Use* – a description of original construction, modifications, and uses, based on historical documentation and physical evidence."
3. "*Physical Description* – a description of elements, materials, and spaces of the building, including significant and non-significant features, original and non-original of the building."
4. "*Evaluation of Significance* – a discussion of significant features, original and non-original materials and elements, and identification of the period(s) of significance (if appropriate)." And
5. "*Condition Assessment* – a description of the condition of building materials, elements, and systems and causes of deterioration, and discussion of materials testing and analysis (if performed as part of this study)."

In the case of the Amphitheater, research in the Institution's extensive archive provided valuable information for items 1 and 2 above. In particular, the Chautauqua Institution is to be commended for the professional care given to its archival collection. Documents used to create a chronology of building changes have proven to be most helpful to understanding alterations, especially those that pre-date 1962 (the 50 year mark when considering changes that may have achieved significance in their own right). This directly relates to preparing a physical description and determining what remains that expresses this historic building's essential qualities. Simply put: What elements, materials and spaces gave the Amphitheater its unique character and identity and therefore should remain or receive only minimal alteration?

In considering whether the current design approach provides a preservation outcome, the Chautauqua Institution has made a commitment to keeping the Amphitheater the focal point of its public gatherings and programs. Thus, it would seem that the Secretary of the Interior's Standard 1, that "a property shall be used as it was historically or be given a new use that requires minimal changes to its distinctive materials, features, spaces and special relationships", is at least partially met. The intention is that the Amphitheater, Chautauqua's "heart", will remain the Amphitheater, a place for religious services, lectures, and a wide variety of musical performances. However, given the architectural program that calls for numerous technological upgrades, an increase in audience capacity, greater accessibility, more useable back-of-house facilities, and other alterations, the Amphitheater will experience considerable changes.

At present, the incremental changes including (but not limited to) deepening the bowl, extending and thus altering the roofline, removing posts, benches and the ceiling, and altering the floor surface material suggest that the final product will be a significant redesign of the Amphitheater. The impact is cumulative. The building's spirit may be retained but much historic fabric (50 years old and older) including original features will be lost or greatly altered. Therefore, "rehabilitation" as defined by the National Park

Service does not seem to be the appropriate term at this time. This is not to say that the goal of enhancing the experience of the Amphitheater performers and audience might not be met per the Institution's vision. However, the architectural integrity of this National Historic Landmark building will be compromised.

Next Steps for Consideration

Given the detailed descriptions provided above and the Preservation League's conclusion that its current state of design, the Amphitheater does not reflect the National Park Service definition of a rehabilitation project, the Preservation League offers the following for consideration if there is a desire to determine how the building's distinctive, character-giving features can be more fully identified, retained, repaired and incorporated into a *preservation* project:

1. Invite the participation of a preservation architect with a proven track record of working with National Historic Landmarks and the Secretary of the Interior's Standards. The preservation architect would visit the site, review the *historic background* and *chronology of changes* already prepared, reviews *conditions statements* already prepared (possibly expand as needed to address integrity) and *identify and describe* the Amphitheater's character-given features that should be retained. These tasks generally reflect the first half of a typical historic structure report (or HSR).
2. Go beyond the tasks described above and complete a full historic structure report. The preservation architect would be asked to prepare the following section and its sub-sets: ***Treatment and Work Recommendations***. This section presents the historic preservation objective and selected treatment (preservation, rehabilitation, restoration, or reconstruction), requirements for work, and recommended work that corresponds with the defined treatment goal.
 - Historic Preservation Objectives* – a description and rationale for the recommended treatment and how it meets the project goals for use of the building, e.g., rehabilitation for a new use, restoration for interpretive purposes, etc.
 - Requirements for Work* – an outline of the laws, regulations, and functions; requirements that are applicable to the recommended work areas (e.g., life safety, fire protection, energy, conservation, hazardous materials abatement, and handicapped accessibility).
 - Work Recommendations and Alternatives* – a presentation of tasks recommended to realize the proposed treatment approach; evaluation of proposed solutions; and description of specific recommendations for work, including alternate solutions, if appropriate. (For a full description of the requirements and uses of an HSR please see: <http://www.aps.gov/history/hps/tps/briefs/brief43.htm>).

Final Thoughts

For over the past year and a half, the Preservation League of New York State has been impressed with the dedication, drive, hard work and collegial spirit of the

Amphitheater Study Group and Chautauqua Institution staff members. As has been stated several times at the meetings, the effort to advance the project has been herculean. The Preservation League values our working relationship with the Chautauqua Institution and appreciates its standards of excellence in its many endeavors. The Preservation League offers its assistance in moving the Amphitheater project to a successful conclusion that more fully respects its history, preserves its unique character, and celebrates its landmark status.

March 25, 2013