



December 4, 2017

Jeffrey Weldon  
City Manager  
City of Brookings  
PO Box 270  
Brookings SD 57006

**RE: SDCL 1-19A-11.1 Consultation**

Project: 161205001S – Demolition of Municipal Armory, 221 Main Avenue, Brookings  
Location: Brookings County  
(COB)

Dear Mr. Weldon:

Thank you for the opportunity to comment on the above referenced project pursuant to South Dakota Codified Law 1-19A-11.1. The South Dakota Office of the State Historic Preservation Officer (SHPO) would like to provide the following comments concerning the effect of the proposed undertaking on the non-renewable cultural resources of South Dakota.

On November 15, 2017, we received your case report regarding the above referenced project to demolish the Municipal Armory located at 221 Main Avenue. As noted, the Armory is a contributing resource in the Brookings Commercial Historic District, which is listed on the National Register of Historic Places. State law (SDCL 1-19A-11.1) outlines a specific process which must be followed prior to any governmental action that may encroach upon, damage, or destroy any historic property in the National or State Registers of Historic Places.

Based on the information provided in the case report, the SHPO has determined that the demolition of the Armory will destroy a historic property. Therefore, the next step is to determine if all feasible and prudent alternatives have been considered and that all possible planning to minimize harm to the historic property has been considered prior to demolition.

Upon review of the information submitted, it is the opinion of the SHPO that feasible and prudent alternatives to demolition and all possible planning to minimize harm to the historic property have not been fully explored. In particular, the SHPO notes the following:

- The City of Brookings states that the Armory location is needed for open/green space for the community. However, the 2030 Park Master Plan, written by the City of Brookings, does not include the Armory site as part of its future parks, nor is a downtown open/green space identified as a need for the community. Therefore, it is not

clear why the City of Brookings desires to build a park at this location when it has not been included as part of the 2030 Park Master Plan.

- The City of Brookings asserts that the Armory “generates little or no economic activity for the district, downtown, and the community.” From the information submitted, it appears that the Armory does not generate revenue because the City does not charge fees for usage of the facility.
  - Did the City take into account possible income from the facility if user fees were charged in the future?
  - Did the City consider the economic impact if the building were sold to a private entity for a new use, so that the building could be a revenue-generator for the district, the downtown, and the community?
  - The City does not explain how an open/green space would generate revenue for the district, the downtown, and the community.
  - An open/green space would most likely be usable only seasonally, while the Armory could be used year-round, regardless of weather.
- The City of Brookings claims that it “has taken reasonable and prudent steps to maintain the structure for basic functionality.” The city goes on to note that the roof has been patched and exterior masonry repair and painting have been done in recent years. However, does the City have a maintenance plan for the facility to show that the building has been subject to the same level of maintenance and repair as other city-owned buildings? Brookings city ordinance Sec. 46-42 prohibits “deterioration by neglect.”
- In the case report, the City of Brookings does not appear to take into account the anticipated annual maintenance and operations costs for the proposed open/green space, including snow removal, lawn care, and maintenance for the possible arbor and roofed structures.
- The City of Brookings asserts that the Armory “is not dependably ADA accessible or compliant due to chronic mechanical failures with the chair lift. Since accessibility is compromised by design, there is no feasible manner in which to achieve full compliance with regard to accessibility standards.” Many historic buildings face accessibility challenges, such as front entry steps, lack of elevators, or steep staircases. However, specialists familiar with accessibility issues could help the City develop a plan to make the building accessible without compromising the integrity of the building. Has the City worked with the Brookings Committee for People Who Have Disabilities or with design professionals who can provide input on accessibility concerns?
- Finally, the case report notes that the City of Brookings received two proposals in response to its “Request for Statements of Interest” issued on September 11, 2015, which explored economic adaptive reuse of the armory. The two proposals were considered at the City Council meeting on March 22, 2016, but action was “tabled to April 26 to allow public review and receive feedback on the two proposals.” At the City Council meeting on April 26, 2016, however, City Council tabled the two adaptive use proposals and instead directed city staff to “analyze viable downtown green space and gathering space options including the feasibility of the Armory site...” What are the reasons the City Council did not take action on either adaptive use proposal? What prompted the City Council to direct staff to evaluate sites, including the Armory, for use

as green space, when the 2030 Park Master Plan did not identify downtown green space as a community need? While it is the City Council's purview to make such decisions, an explanation would help our office understand more clearly if all feasible and prudent alternatives were actually considered for adaptive reuse of the armory prior to determining demolition as the only viable option.

We appreciate the case report inputs that the City of Brookings has provided to our office, but we recommend more study and analysis to ensure all feasible and prudent alternatives have been considered prior to having an adverse impact on the historic building.

As you take these comments into consideration, please remember that under State law our office only provides comments and recommendations pertaining to preservation standards, and the City of Brookings will ultimately determine whether to issue the necessary permits for this demolition. Their decision is based on consideration of all feasible and prudent alternatives, including economic practicability. If the City proceeds with the issuance of the permits, then ten days' notice to our office by certified mail is required for our files along with a record of factors considered in making this decision.

If you have any questions or concerns, please contact Kate Nelson at (605) 773-6005. Your concern for the non-renewable cultural heritage of South Dakota is appreciated.

Sincerely,

Jay D. Vogt  
State Historic Preservation Officer



Kate Nelson  
Restoration Specialist

CC: Shari Thornes, Brookings City Clerk  
Angela Boersma, BHPC Chair