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**Sent:** Monday, March 28, 2022 4:52 PM  
**To:** Clifford Smith <[Clifford.Smith@sarasotaFL.gov](mailto:Clifford.Smith@sarasotaFL.gov)>  
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**Subject:** Harding Circle HD on St. Armands Key

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Dr. Smith,

At your request, we reviewed the National Register nomination for the Harding Circle HD and the materials from the Sarasota City Commission meeting on March 21, 2022. I spoke with our CLG coordinator, Mariah Justice, and our Tax Credit Coordinator, Dr. Kyra Lucas, about the compatibility of the proposed project, as presented, with the Secretary of the Interior's Standards.

Our initial impression is that the proposed project, while aesthetically pleasing, would not meet the Secretary of the Interior's Standards numbers 2, 9, and 10. Standard 2 states that "the historic character of a property shall be retained and preserved," but this project would completely remake the circle and erase its historic configuration (note: we would need more information on its current design, which dates to the 1960s – over 50 years ago – but was based upon the 1920s original design). Standard 9 states that "new additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property," and Standard 10 states that "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."

The character defining features of the circle are its open, grassy field and native plantings surrounding the perimeter. It also includes four of the twenty contributing historic statues that are part of the district. The complete regrading of the site to facilitate its use as an amphitheater and the wholesale replacement of all the landscaping and statuary could adversely affect the overall design integrity of the district, and such modifications would be difficult to reverse. However, more information is required to determine definitively the impacts of the plan on the district.

This determination is based only upon the preliminary presentation given at the city council meeting. It is not a final decision, nor is it a formal determination under Section 106 or any other regulatory process. We are always open to reconsideration based upon new information.

Note that the Harding Circle Historic District is listed in the National Register for its significance only under Criterion A: Community Planning and Development, and not under Criterion C: Architecture or Landscape Architecture (see attached NR nomination). This should grant your office some leeway in reviewing and approving projects for the Circle. In addition, the central greenspace was historically used for musical entertainment and, according to the nomination, had a bandstand from the 1920s to the 1940s.

Also note that the district boundaries only include the roadways and medians of John Ringling Boulevard and Boulevard of the Presidents out to Washington Drive, in addition to the entirety of Harding Circle and its central park.

We would recommend that your office work with the Business Improvement District to develop a proposed redevelopment plan that meets the community's current needs while preserving the historic integrity of the Harding Circle Historic District.

Let me know if you have any questions about our evaluation.

Sincerely,

Ruben A. Acosta

**Ruben A. Acosta**

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