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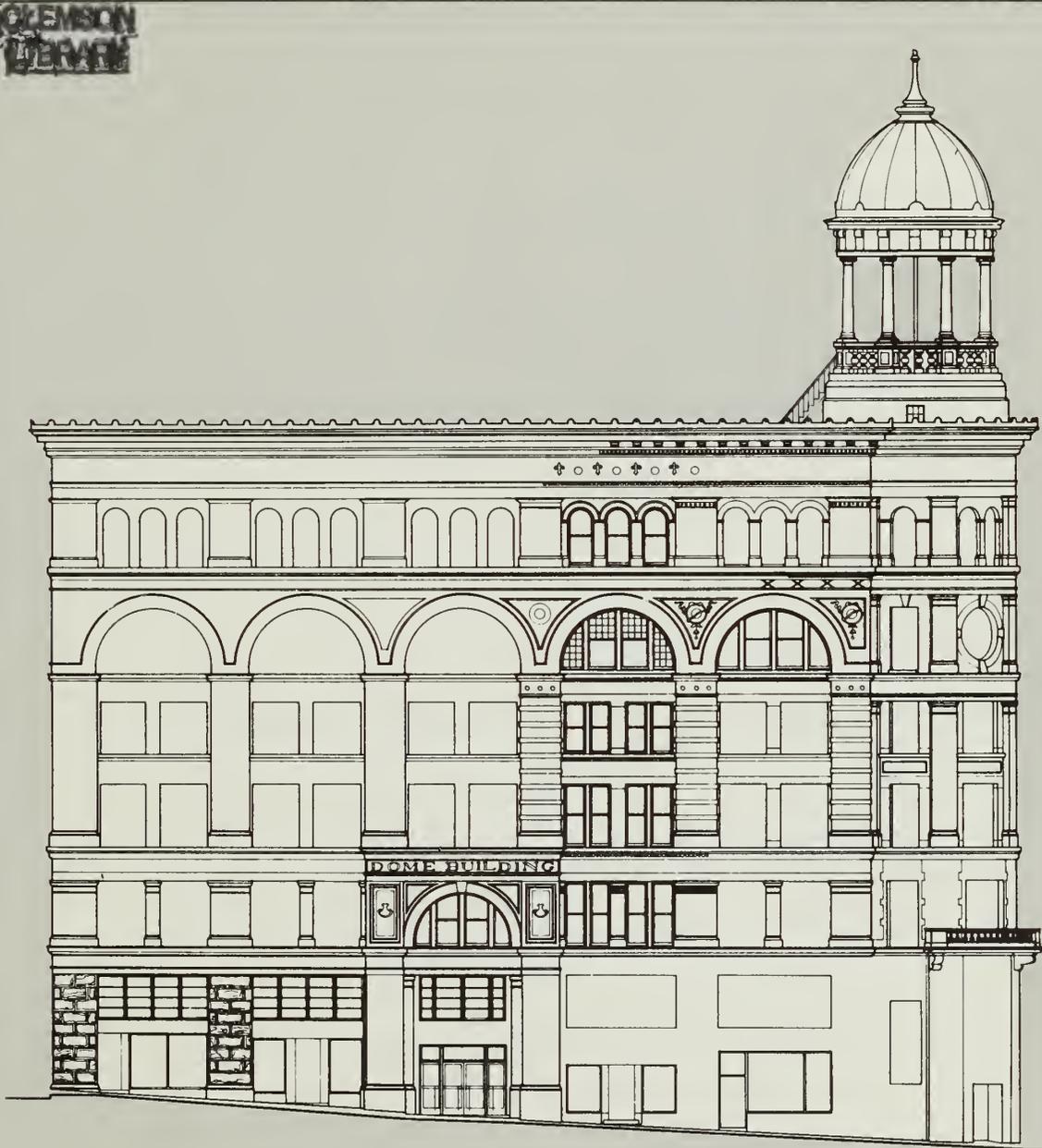
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Technical Preservation Services
Preservation Assistance Division
National Park Service
U.S. Department of the Interior
Washington, D.C.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

**PUBLIC DOCUMENTS
DEPOSITORY ITEM**

NOV 26 1985



Volume II

Cover Illustration: The Times Building (also known as the Dome Building), Chattanooga, Tennessee. Rehabilitated under the historic preservation tax incentives program. Drawing by Judson McIntire for the Historic American Buildings Survey. 1973.

INTRODUCTION

375
"Interpreting the Standards" bulletins were initiated in April 1980 by the Preservation Assistance Division (then Technical Preservation Services Division) to explain rehabilitation project decisions made by the National Park Service, U. S. Department of the Interior. Rather than describe every aspect of the overall rehabilitations in great detail, the bulletins focus on specific issues--alterations to storefronts, through-the-wall air conditioning, interior alterations--that posed problems in the review process. To this extent, then, the bulletins tend to emphasize limited aspects of a project and de-emphasize other aspects of the work that posed no special concerns or that were noteworthy or innovative.

AD
Issued at intervals to program administrators in National Park Service regional offices and State historic preservation offices, the first 43 "Interpreting the Standards" bulletins were collected in a single volume in 1982. Since then, 32 additional bulletins have been issued. The present compilation includes these bulletins, bringing the total to 75.

"Interpreting the Standards" bulletins are designed for use primarily by program administrators at the State and Federal level who make recommendations and decisions on rehabilitation projects. The bulletins are case-specific and are not necessarily applicable beyond the unique facts and circumstances of each case. Many of the bulletins present projects denied certification by National Park Service regional offices that were later appealed to the Chief Appeals Officer. While the final decisions in these cases have been incorporated into the discussions of such projects, appeal decisions are individual and are made on the facts and circumstances specific to the project, including information on aspects of a project that are not treated in the bulletin itself. Consequently, care should be taken not to consider portions of appeal decisions quoted as directly applicable to other projects of a generally similar nature. Appeal decisions do not accumulate as precedent in the legal sense. The procedures for obtaining certifications of rehabilitation are explained in Title 36 of the Code of Federal Regulations, Part 67. These regulations control in the event of any inconsistency with these bulletins.

The following ten Standards for Rehabilitation are used by the Secretary of the Interior to determine if a rehabilitation project qualifies as "certified rehabilitation" pursuant to sections 48(g), 167(o), and 191 of the Internal Revenue Code. The Standards comprise the sole regulatory basis for determining whether or not a rehabilitation is consistent with the historic character of the structure or the district in which it is located. The applicable Standards as well as project conformance or nonconformance to those Standards are referenced at the top of each bulletin in italics.

1. Every reasonable effort shall be made to provide a compatible use for a property which requires minimal alteration of the building, structure, or site and its environment, or to use a property for its originally intended purpose.
2. The distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.

3. All buildings, structures, and sites shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create an earlier appearance shall be discouraged.

4. Changes which may have taken place in the course of time are evidence of the history and development of a building, structure, or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.

5. Distinctive stylistic features or examples of skilled craftsmanship which characterize a building, structure, or site shall be treated with sensitivity.

6. Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.

7. The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.

8. Every reasonable effort shall be made to protect and preserve archeological resources affected by, or adjacent to any project.

9. Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historical, architectural or cultural material, and such design is compatible with the size, scale, color, material, and character of the property, neighborhood or environment.

10. Wherever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.

Bulletins are arranged in order of issuance. The number assigned to each is composed of the fiscal year in which the bulletin appeared and an overall cumulative number (e.g., 83-046, 85-072). Each bulletin bears the name of the author. The index provided at the end of this volume references all bulletins in the series. It keys the bulletins to particular Standards and to such topics as Abrasive Cleaning, Roof Alterations, and Windows. A looseleaf format has been followed in order to allow for easy removal for xeroxing as well as for easy insertion of future supplements.

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Additional information and guidance on technical preservation and rehabilitation techniques for historic buildings may be found in the Preservation Briefs, Technical Reports, and Preservation Case Studies developed by the Preservation Assistance Division. For a complete list of publications including price and GPO stock number information, write to: The Preservation Assistance Division at the above address.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-044

Applicable Standard: 2. Preserving the Distinguishing Character of a Building (nonconformance)

Subject: PORCH ALTERATIONS

Issue: Porches are a very common and often dominant feature on the primary facades of many residential buildings and yet represent that portion of a building which is often subjected to insensitive changes. The size of the porch, its architectural style, the ornateness or simplicity of detailing, the sense of openness, and delineating features such as columns and balustrades, are all important attributes. "Interpreting the Standards" No. 82-033 discusses problems and concerns with enclosing historic porches, a change which is often sought by owners undertaking rehabilitation in order to gain additional year-round living space. Porches may also suffer from owners' attempts to deal with inherent maintenance problems that often stem from the nature of their construction and exposure to the effects of weathering and decay. Encasing a decorative but deteriorated balustrade, removing or simplifying brackets and fretwork, or boxing-in open eaves are all usually inappropriate alterations to an architecturally significant porch. Work that at first glance may be considered only a small physical change to a porch can often have a major impact on the historic or architectural character of the building and be clearly in violation of the Standards as in the case described below.

Application: An early twentieth-century frame house was one of many buildings in a historic district undergoing extensive renovation work by a single developer. The house is somewhat unusual in that it was apparently built as a duplex in an area of mostly single family houses. The twin porch design is thus both historically and architecturally significant in its contribution to the character of the building (see illus. 1). In the course of the rehabilitation, the developer connected the two porches with a new eight-foot section, purportedly to shelter the steps from the rain (see illus. 2). Both the State Historic Preservation Officer and the National Park Service considered this treatment as a violation of Standard 2, thus precluding certification of rehabilitation despite the rest of the work being handled in a sensitive manner. In rebuilding the porch to extend across the entire front, the following changes had occurred:

1. The historic twin porch design was lost;
2. A strong horizontal element created by the large continuous porch was created for the first time;
3. The projecting center portion of the duplex was interrupted by the porch, obscuring this original strong architectural feature; and,
4. The historical and architectural character of the building as a duplex was substantially diminished.

83-044

The sole justification for the porch alteration was the need to alleviate water accumulation at the steps. Traditionally, such porch roofs were pitched away from the steps and the building in order to properly shed water; the owner should have thus repaired the porch and added gutters and downspouts, as necessary, to correct the water problem.

After considering the tax implications of denial of certification and the cost of undertaking corrective measures, the owner offered to remove the porch linkage and was subsequently advised by the appeal hearing officer that such a measure would bring the project into conformance with the Standards and would lead to certification of rehabilitation.

Prepared By: Charles Fisher, TPS

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1. Prior to rehabilitation, the historic twin porch design and center projecting bay were strong architectural features.



2. In connecting the two historic porches, the twin porch design was lost; a strong horizontal element was created by the large continuous porch; and the sense of a duplex building was diminished. To obtain certification, the owner agreed to restore the porch.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-045

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance)
 9. Compatible Contemporary Design for New Alterations/Additions (nonconformance)

Subject: REPLACING NONSIGNIFICANT LATER ADDITIONS

Issue: One aspect of overall rehabilitation work may involve replacement of a deteriorated nonsignificant later addition with a new addition in order to meet certain functional needs. An example of such work is the replacement of previously existing enclosed vestibules both for convenience to patrons and to highlight business entrances. Whatever the reason for a new addition, all contemporary design must conform to Standards 2 and 9; that is, it must be neither visually intrusive nor physically damaging to historic building material.

Application: A nine-story, late Victorian brick and brownstone commercial building located in a historic district within a large northeastern city was being rehabilitated for use as a multi-purpose business and shopping complex (see illus. 1). When the proposal for extensive interior and exterior work was forwarded by the State Historic Preservation Officer to NPS for review, NPS concurred with the State's general assessment of nonconformance with the Secretary's Standards and denied certification, listing violations of Standards 2, 5, 6, and 9. Exterior work cited for nonconformance included window alterations and the design for new glass canopies to cover areaways flanking a main entrance. Nonconforming interior work included demolition of an existing skylight; large cuts in the main floor; introduction of a mezzanine; and construction of two curved staircases linking the interior levels.

Rather than appeal the denial, the owner chose to revise the project plans and over a ten-month period worked with NPS staff so that the entire project might be reconsidered. After all major components of the proposed interior work had been satisfactorily resolved, the one exterior item still being negotiated was the design of the two new glass and metal canopies to replace the two deteriorated wooden vestibules (see illus. 2). (The need per se for canopies to replace existing nonsignificant coverings had never been disputed from either the standpoint of patron convenience or commercial viability.)

The architect's initial design for the glass and dark colored anodized aluminum canopies incorporated a standard vault with a flat roof section which NPS felt was a visual intrusion upon the substantially unaltered facade. Although there would be no destruction of historic material, the curved roof line of the proposed canopy extended well above the level of the earlier vestibule and obscured the lower portion of the first floor windows, a distinguishing feature of the building (see illus. 3). For the overall project to meet the Standards, NPS informed the owner that any new canopy would have to be located below the sill of the first floor windows. In response, the architect prepared one alternative design for the canopies which met the height condition, but which--both NPS and the owner agreed--introduced several other design problems (see illus. 4) which might affect pedestrian safety.

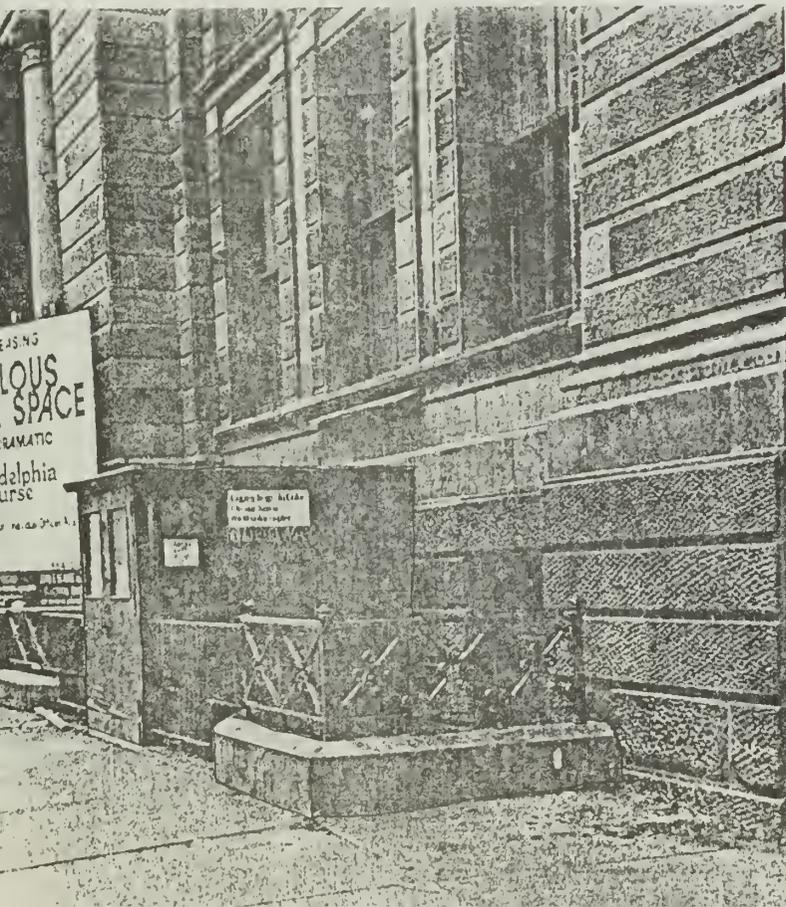
At a later date, citing these problems and increased construction costs, the owner again sought approval of the initial design. NPS continued to maintain its earlier position that the initial design did not meet the Standards but felt that alternative canopy design options still existed that would meet the Standards yet at the same time be practical and esthetically pleasing. At this point, the owner elected to appeal the denial, seeking approval of the overall project including the initial canopy design. Prior to the hearing, however, the architect submitted two new scaled-down alternatives for the glass canopies, both of which were approved by NPS (see illus. 5), thus enabling the entire project to be certified. Following project approval, the Option "A" canopy was actually constructed (see illus. 6).

Prepared By: Kay D. Weeks, TPS

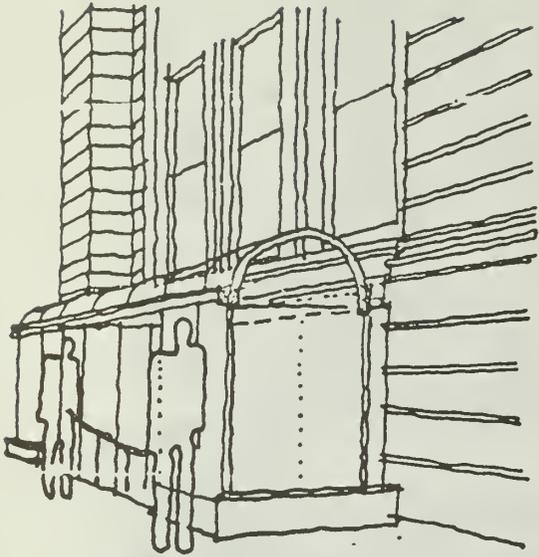
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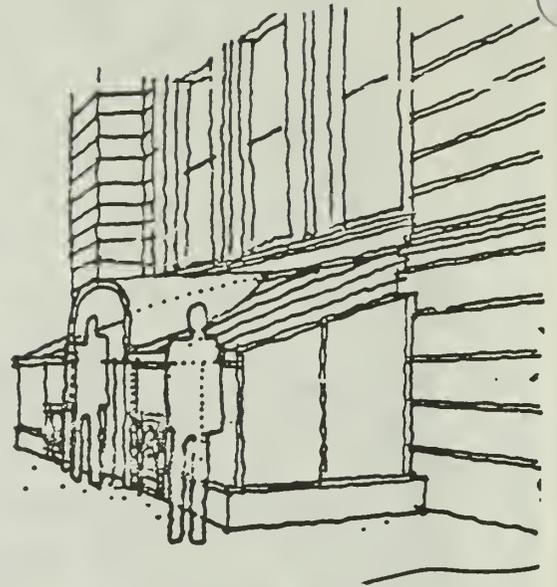
1. East elevation showing wooden vestibules flanking main entrance, added c. 1920.



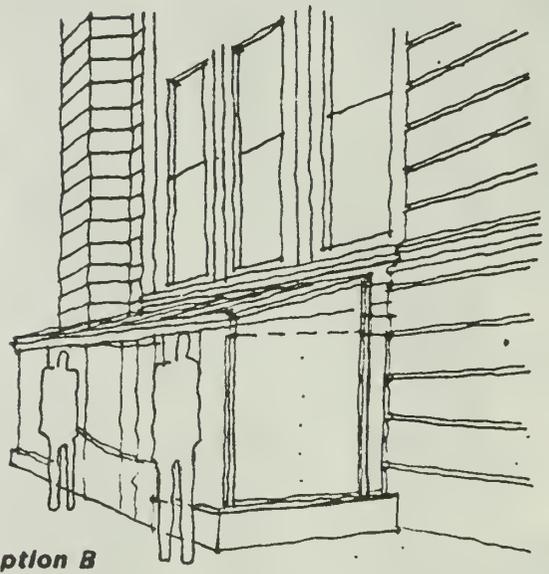
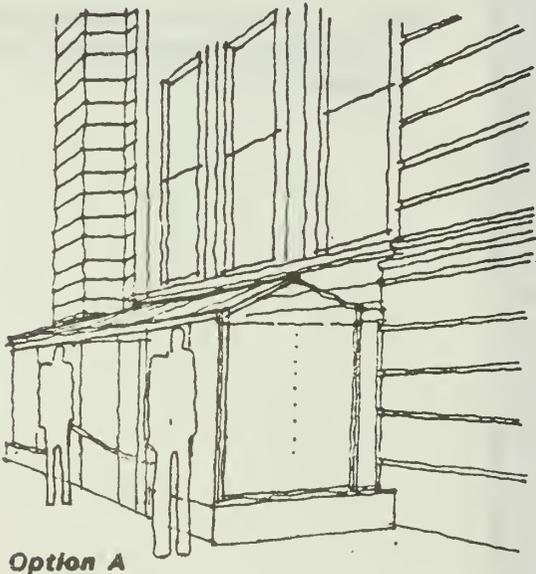
2. Deteriorated condition of vestibule.



3. Initial canopy design was not approved by NPS because its height obscured the first floor windows.



4. Revised canopy design met the NPS height condition but introduced potential pedestrian safety problems.



5. Final canopy designs (Option A and B), both of which NPS approved. The Option A design was ultimately constructed.



6. The Option A entrance canopy in place.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-046

- Applicable Standards:
3. Recognition of Historic Period (nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (nonconformance)
 9. Compatible Contemporary Design for New Alterations/Additions (nonconformance)

Subject: WINDOW ALTERATIONS: Inappropriate Contemporary Design
Inappropriate Historic Appearance

Issue: In rehabilitating historic buildings, property owners may sometimes consider replacing original windows with those of a different design, not only to reduce maintenance and energy costs but to try to "improve" or "enhance" the appearance of the building. For example, some owners believe that next to cleaning or repainting, the easiest way to give an office building a new look is to install a contemporary window and use tinted glass to serve as a sharp contrast between the old and the new. Another unfortunate approach is to remove the original windows and install a window design from a different historic period in an effort to make the building look either older or grander than it actually is. On the other hand, the recommended approach--according to the Standards--is to preserve historic features such as windows, whenever possible. If energy conservation is an integral part of the planning objective in order to make a project economically viable or to meet regulatory requirements, ways of improving the performance of the existing windows should always be explored first. Then, if windows cannot be easily repaired, an evaluation should be made to determine their contribution to the overall architectural character of the building before any replacement proposal is considered.

Throughout the planning process, however, changing the historic window design to "improve" or "enhance" the appearance of the building should not be considered. If the windows are a distinguishing feature of the historic building and must be replaced because of their physical condition, they should be duplicated as closely as possible in accordance with Standard 6. Where the windows are not significant in their own right but are located on significant facades, there is more flexibility in the type of replacement windows that can be installed. However, even within this more flexible context, the replacement window units should never give the building a "historic" appearance it never had (Standard 3), nor should a design be selected that is incompatible with the historic character of the building (Standard 9).

Application: Inappropriate Contemporary Design

Constructed in 1911 with a white glazed brick covering the upper floors, this individually listed National Register property is a visually prominent and architecturally significant building, located in a small southern town (see illus. 1). As the National Register nomination indicated, "at the ends of the building each of the upper floors had three double-hung windows. On the south side each floor had seven pairs of double-hung windows. The windows collectively provided very bright and agreeable work space inside the building." The building has a relatively austere facade

reflecting its commercial character and results in the simple double-hung windows becoming a significant design feature.

In the course of rehabilitating the building for mixed commercial and residential use, the double-hung clear-glazed wooden windows were removed (and stored) and replaced with metal windows with a single vertical division created by a meeting rail. In addition, a dark tinted glass was used in place of the original clear glazing (see illus. 2 and 3). The change in the design and the use of dark tinted glass gave the new windows a strong contemporary look not in keeping with the historic character of the building. Upon submitting a certification application, the owner was advised that the window alterations did not meet numbers 2, 5, 6 and 9 of the Secretary's Standards.

The owner was further advised by NPS that the original double-hung wooden windows were typical of the time in terms of technology and design consideration and for the building were a significant feature. As such, the windows should have been repaired and if that was not practical, the replacement units should have matched the configuration of the original double hung sash and the reflective qualities of the glass. Representatives from both the state historic preservation office and the NPS regional office inspected the completed project and observed major changes in the design and the reflective qualities of the windows. With the new dark tinted glass and dark trim finish, the windows now appear as dark voids, contrasting with the white glazed brickwork. The denial of certification by the regional office was sustained on appeal by the owner.

Application: Inappropriate Historic Appearance

Plans for the rehabilitation of a small late nineteenth century cottage, located in a historic district in the South, were submitted prior to undertaking the work. After the determination was made by NPS that the proposed work met the Standards, the owner elected to revise the plans to include the removal of the two original first floor windows and subsequent replacement with floor-to-ceiling windows (see illus. 4 and 5). Upon completing the work and requesting final certification the owner was advised by NPS that the introduction of the new sash and exterior shutters which extend to the porch floor created a design feature that never existed in this particular structure and gave the building an inappropriate historic appearance. Moreover, NPS indicated to the owner that this particular type of window generally was found in buildings of an earlier period in that area.

On appeal the owner provided sufficient evidence to show that such large windows were common in the local historic district but acknowledged that he had removed the original windows in rehabilitating his building. When the appeal hearing officer sustained the decision that the project did not meet Standard 3, the owner offered to reinstall the original sash, which had been restored for use in another building. The corrective work has since been undertaken and the project certified (see illus. 6).

Prepared by: Charles E. Fisher, TPS

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1. The original windows were of clear glazing and were of a one over one pane configuration.



2. New windows with dark tinted glass and a vertical division on the upper floors were not in keeping with the character of the building.



3. Close-up view shows the vertical division used in the new windows.



4. The 1880s cottage was in deteriorated condition prior to rehabilitation. Ghost marks of missing porch are evident. The original 2 over 2 windows had survived on the front and were to be repaired according to the plans submitted to NPS for prior review.

5. In the course of rehabilitation the owner elected to remove the original windows and install new ones in a historic design which extended to the first floor. Full-length blinds were also added.



6. After the work was determined not to meet the Standards because of the window alterations, the owner proceeded to reinstall the original ones and thus obtained certification.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-047

- Applicable Standards:
1. Compatible New Use (nonconformance)
 2. Retention of Distinguishing Architectural Character (nonconformance)
 5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance)
 10. Reversibility of New Alterations/Additions (nonconformance)

Subject: INTRODUCING NEW OPENINGS INTO MAJOR ELEVATIONS

Issue: The introduction of new window or door openings to accommodate new functions is a common component of projects submitted for rehabilitation certification. In most cases, a limited number of new openings cut in party walls or other non-significant elevations will not alter the historic character of a building. On the other hand, where such openings are introduced on a principal facade, the loss of significant historic building material, change in rhythm of the bays, or other nonconforming treatments that, together, destroy the historic building's essential form and integrity, will generally result in denial of certification.

Application: An abandoned Elks lodge located in a historic district was proposed for reuse as the home office of a life insurance company. Located on a site that slopes steeply down from front to back, the building has two stories on the front facade and three on the rear elevation (see illus. 1 and 2). Since the building occupies the full width of a city block, both the facade and rear elevations front directly on streets. The facade is highly ornamented in the Second Renaissance Revival style, while the rear elevation is less ornately decorated.

Because office use would require more parking than was available on the street or in adjacent lots, the developers proposed incorporating a parking facility at the basement level in the rear of the building. The SHPO and the NPS regional office approved the concept of parking in this portion of the basement, a space which had been used as a gym.

The location of the driveway entrance to the parking area posed a problem, and became the issue over which the project ultimately was denied certification. The best location would have been on the less ornately decorated rear elevation. The plan originally considered by the developers to locate the entrance at the rear, however, contained a ramp that the city traffic engineer would not approve. As a result, the entrance was proposed for the main elevation (see illus. 3). The regional office felt this design adversely affected not only the facade's character and historic fabric, but also would destroy significant fabric located inside the building in a library (see illus. 4).

In its letter of denial to the developers, the regional office wrote:

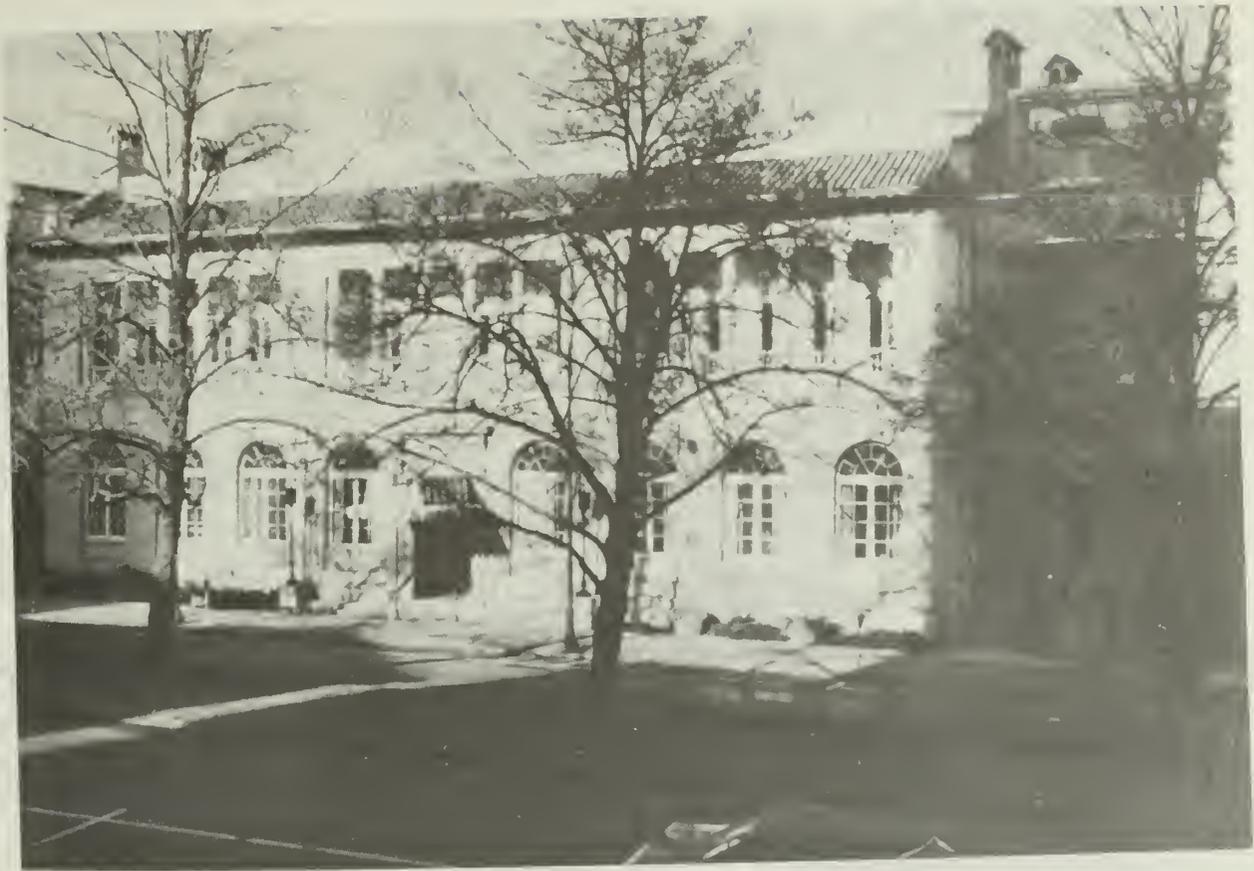
The introduction of the garage entrance on the principal facade alters the character of that well-detailed, Second Renaissance Revival-style facade. Not only does it result in the demolition and removal of historic material of significance, but it would also interrupt the rhythm and balance that is characteristic of this symmetrical facade (Standard 2). In addition, significant architectural features of the library--the bookcases, fireplace mantel, and decorative frieze--would be lost if the garage entrance is constructed as proposed (Standard 5). The Standards recommend a compatible use for a building that requires minimal alteration (Standard 1). Parking which requires a major opening on a principal facade cannot be considered a compatible use requiring minimal alterations. It is irreversible and destroys the form and integrity of that facade. The essential form and integrity of the structure should be unimpaired should alterations be removed in the future (Standard 10). While this office recognizes the arguments presented on the parking issue, the rehabilitation still must be consistent with the historic character of the structure and the Standards.

Rather than appeal the regional office's decision, the architect for the developers redesigned the parking space, placing the entrance at the rear of the building. The new design was acceptable to the city traffic engineer.

The resubmitted design was approved by the regional office, and construction on the project is going forward.

Prepared by: William G. MacRostie, TPS

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1. Front Facade



2. Rear Elevation



3. The original parking entrance proposed for the facade. The balustrade over the entrance was intended to serve as a visual "connector" to similar original features on the facade. The library slated for partial demolition is located behind the proposed entrance.



4. The parking entrance through the library would have necessitated removal of the fireplace and bookshelves.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-048

- Applicable Standard:
2. Retention of Distinguishing Architectural Character (nonconformance)
 5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance)
 9. Compatible Contemporary Design for New Alterations/Additions (nonconformance)
 10. Reversibility of New Alterations/Additions (nonconformance)

Subject: INAPPROPRIATE EXTERIOR ALTERATIONS: WAREHOUSE TO APARTMENTS

Issue: In order to market abandoned and functionally obsolete historic buildings, owners are often tempted to make major alterations as a statement of the new life and vitality of the area and in order to accommodate the new use of the building. This is particularly true when warehouse buildings are converted to apartments. Not only must these large buildings be modified to meet light and ventilation code requirements for residences, but they must often compete with modern new construction nearby that has highly marketable amenities.

Some types of buildings can more easily accommodate new uses and alterations than others. Nineteenth-century warehouses, with thick masonry walls and small window openings, present a particular challenge to owners; depending on the design of the particular warehouse, the alterations that can be made to the building without destroying its historic warehouse character may be limited. The key is identifying the distinguishing architectural features of the building and then planning a rehabilitation that allows for the retention of these features.

If the proposed alterations do not conform to the Secretary of the Interior's Standards for Rehabilitation and as a result, the historic character of the building is destroyed, the project cannot be certified for tax benefits.

Application: A circa 1890s six-story brick tobacco warehouse located in a historic waterfront district was purchased for conversion to 204 apartments and first floor commercial space. The building was in good condition, although it had been vacant for many years. The city hoped that the conversion of this warehouse to apartments would be the first step in revitalizing this portion of the waterfront area, particularly since the building was the largest in the primarily residential district and formed the corner of the historic district boundary. A market study was commissioned by the owners to determine what changes would be necessary to make the building marketable. The study recommended that at least 85% of the residential units have a waterfront view, that a portion of the interior of the building be removed to provide necessary light and ventilation to meet code requirements, that some of the windows be widened as well to meet code requirements for light and ventilation, that all units have an exterior balcony and that a seventh floor be added to the structure to increase the number of rentable

units. This information was then used by the architect to develop the rehabilitation plan.

The state historic preservation office had worked closely with the owners in the evolution of the design and strongly recommended certification of the project. The regional office, however, reviewed the project and expressed concern over a number of the proposed changes. The most drastic alteration to the building was the proposal to create an interior court with a waterfront orientation by removing 7 of the 17 bays of one facade. Two other controversial changes proposed were to widen the windows in select vertical bands, and to attach lightweight metal balconies to the exterior. While there was also concern for the cumulative effect of the other proposed changes, these three issues resulted in regional denial of certification for the project based on Standards 2, 5, 9, and 10. These changes would have altered the historic character of the warehouse building by removing historic material, by failing to respect the skilled craftsmanship of the building, and finally, by incorporating incompatible and non-reversible elements of new work. The owner, with the support of the State, appealed the decision of the regional office.

In reviewing the proposed changes, the appeals hearing officer determined that the architectural elements that contributed to the historic character of the building should be clearly outlined: e.g. the massiveness of the 200' x 400' structure; the highly articulated facades composed of alternating bands of windows openings and pilasters; and the vertical effect of these bands with a hierarchy of openings from the ground floor to the top floor complemented by the horizontal beltcourses, top floor frieze and corbelled cornice. The brickwork was well executed and even with the substantial detail on the surface of the building, the facade retained a strong sense of flatness as there were no deep surface penetrations (see illus. 1). In summary, the architecture of the warehouse was very sophisticated for this type of construction and was significant both to the building and to the 19th-century district in which it was located.

Following an onsite inspection of the warehouse and the district, the hearing officer sustained the denial of the regional office for a number of reasons. He felt that the planar quality of the exterior walls would be drastically altered by the addition of projecting balconies with their inherent shadow lines (see illus. 2). He felt that widening selected bands of windows would interrupt the regular rhythm of the window bays. Widening the upper floor windows would also alter the hierarchy of window openings from large openings on the first floor to the small openings on the top floor. His last major concern was the proposed cut in the building, which not only removed the significant original materials of the facade, but altered the massive quality of the warehouse structure (see illus. 3).

While sustaining the decision of the regional office, the hearing officer encouraged the owner to reconsider the proposed changes to the building and resubmit his application with a proposal that would meet the Standards. While the hearing officer felt that the building could not accommodate any external projecting balconies, he felt that an atrium court that did not remove any of the

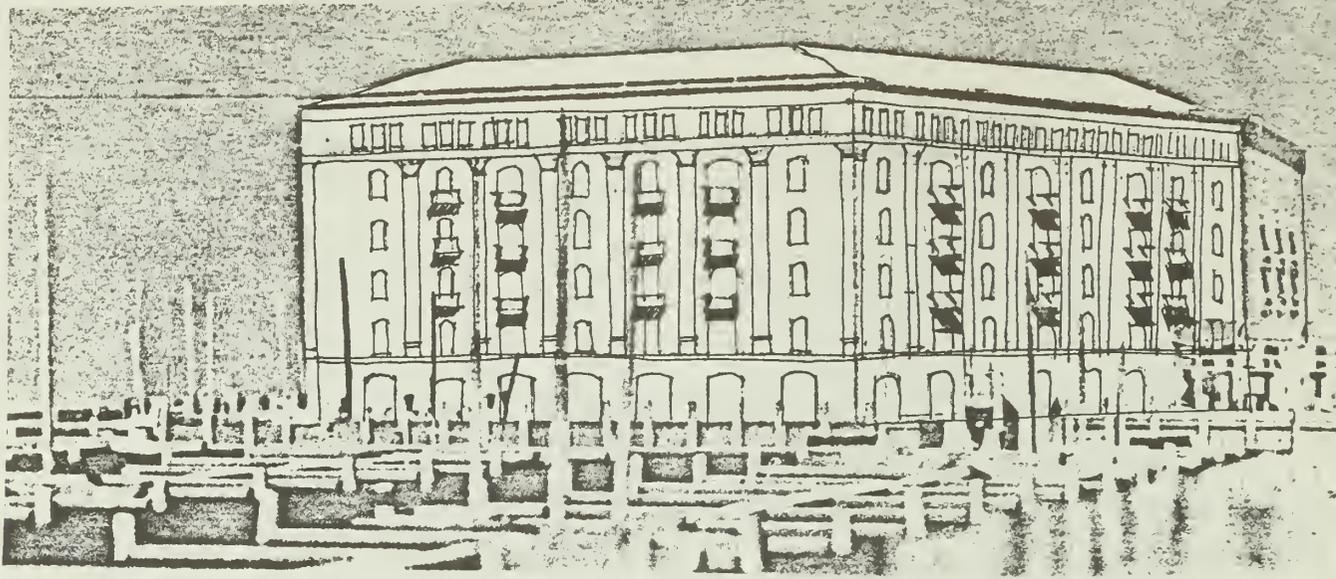
facade and a modified scheme for widening the windows that reflected the hierarchy of existing openings could be considered.

Prepared by: Sharon C. Park, AIA, TPS

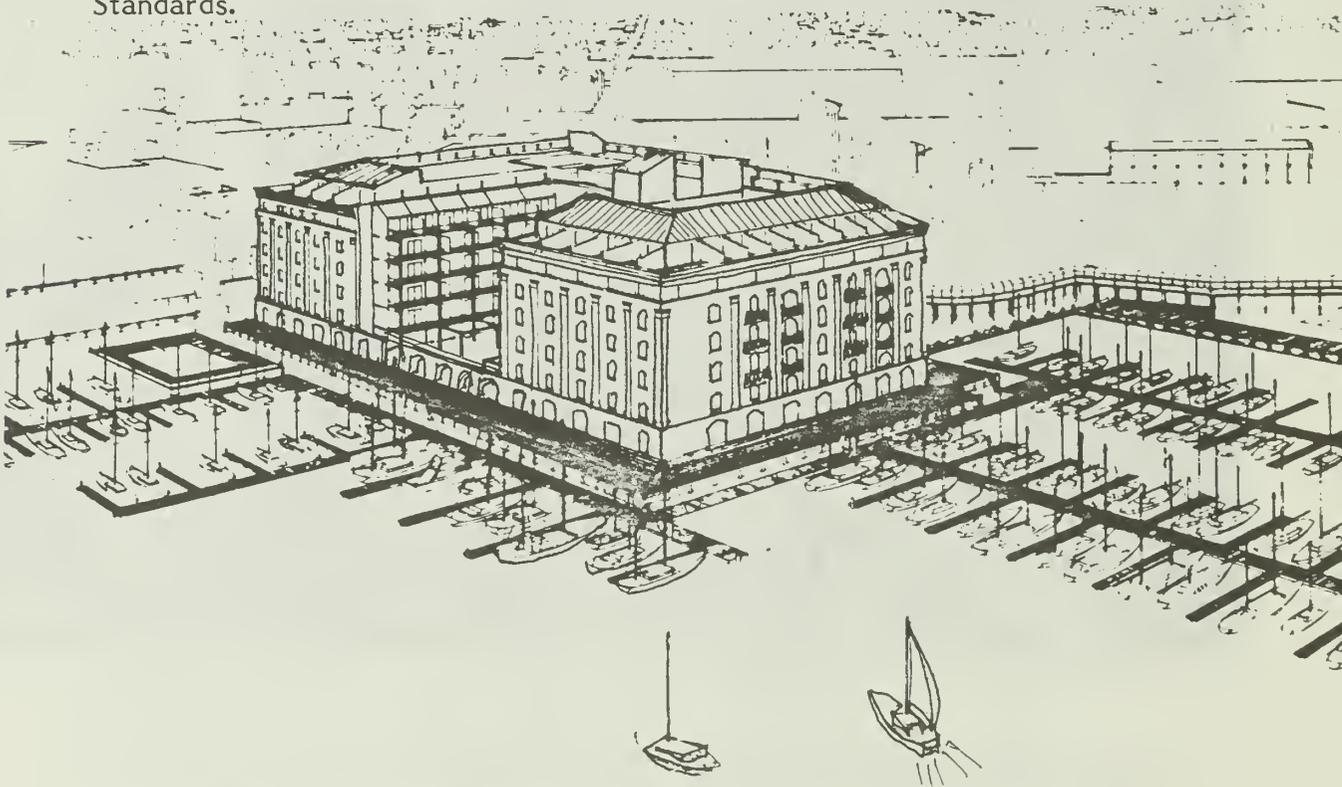
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1. The existing south elevation of the 1890s warehouse building with its alternating bands of pilasters and window openings. The size of the openings decreases as the building progresses from the base to the top floor. The brickwork was quite sophisticated for a warehouse structure.



2. The proposed south elevation with bands of projecting balconies. The window openings would be widened or lengthened in order for each of the 204 apartment units to have one balcony. Not only would the windows be altered in selective bands, but the proposed balconies would create deep shadow lines on the facade. While the owner felt that the balconies were a reversible feature that could be removed in the future, the hearing officer determined that both the visual clutter of the balconies and the change in the hierarchy of the window openings did not meet the Standards.



3. Perspective view of the proposed changes shows the large courtyard and the removal of seven bays of the waterfront facade in order to provide a water view for 85% of the apartment units. The hearing officer determined that the loss of significant original historic material and the drastic change in character created with the new "U" shaped plan did not meet the Standards. The projecting balconies and widened windows were also cited as not meeting the Standards. The setback rooftop addition, however, was not a concern as it would not have been visible from the street level of the historic district.

Number: 83-049

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (nonconformance)
 9. Compatible Design for New Alterations/Additions (nonconformance)

Subject: INAPPROPRIATE STOREFRONT ALTERATIONS

Issue: Storefronts frequently define the historic character of commercial buildings. Entrances and display windows are particularly important features of storefronts; the number of entrances and their placement in relation to windows can create a distinct rhythm on the primary facade that should be retained in the course of a rehabilitation. If new entrances are required because of code requirements or new interior use, their design and placement should not detract from the importance of the storefront to the building.

Application: A commercial building, located in a historic district and constructed circa 1880-90, was enlarged from three bays to seven bays sometime around 1900 (see illus. 1 and 2). The added storefront, consisting of double doors flanked by window bays, duplicated the original storefront. The two fronts were separated by a narrower bay containing a single door.

In the most recent rehabilitation, which converted the building to office space, the owners replaced the two sets of double doors with windows copied from those existing in other bays of the storefronts. To accommodate ground floor offices, an arched entrance was added to the side elevation (see illus. 3). The design for this doorway echoed an interior doorway and an arched entrance on a neighboring building. The original side entrance was replaced with a window.

The regional office denied certification to this project, citing Standards 2, 6, and 9. The State Historic Preservation Office supported this decision. In its evaluation, the region noted that "the new arched entrance is not compatible in character with the exterior of the building as a whole, as the design of the new entrance bears no similarity to the building's other window and door openings." Equally important in the denial were the changes to the storefronts, which were "significantly altered by conversion of two, original entrances to windows and by the consequent removal of the original transoms. Although the removed doors themselves may not have been original, the placement of entrances as they were, with double doors and a transom between the windows, constituted a distinct rhythm to the storefront."

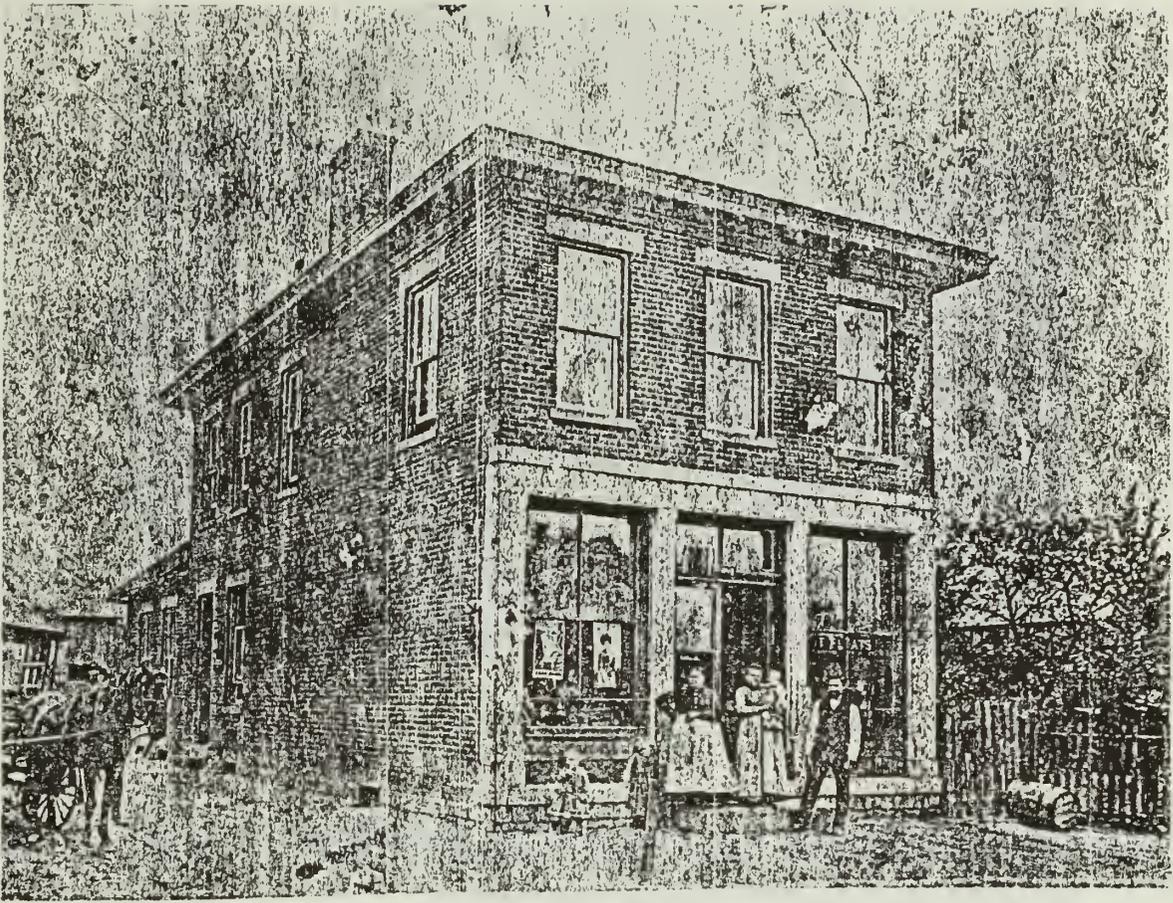
The owners appealed, stating that the doors they replaced with windows were not original, and were badly deteriorated. The new windows, on the other hand, matched

the existing windows, thus "creating an elegant front with distinct 'rhythm.'" They also contended that the arched side entrance was consistent with the character of the structure since it was patterned on an existing interior arch and reflected entrances on neighboring buildings.

Upon appeal, the decision of the regional office was sustained. The chief appeals officer noted that the "two entrances were an important part of the commercial character and architectural detailing of the storefront facade." Furthermore, the "functional relationship of the storefront facade to the partially blank wall on the ground floor of the /side/ facade also reflected the commercial use within this portion of the building." The new entrance on this facade introduced a major new design element into the "strong rectilinear character of the building." This change further diminished the importance of the storefront to the structure.

Prepared by: Michael Auer, TPS

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1a.

1a. and 1b. Historic photograph (1a) showing original three-bay storefront building (ca.1880-1890). With minor alterations, this storefront survived until most recent rehabilitation. Side door led to second floor apartments. Drawing (1b) shows the building's main features clearly.



1b.

83-049



2a.

2b.

2a. and 2b. Building as it looked after ca. 1900 enlargement. Two identical storefronts (double doors flanked by window bays) were separated by a bay containing a single door.



3a.

3b.

3a. and 3b. After rehabilitation. Double doors on the front have been replaced with windows, an arched side entrance has been cut, and the former side entrance has been replaced with a window.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-050

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (Conformance)
 9. Compatible Contemporary Design for New Alterations/Additions (Conformance)

Subject: NEW OPENINGS IN BLANK EXTERIOR WALLS

Issue: A change of use of a historic structure may necessitate cutting new openings for windows or doors in blank exterior walls. Usually, such blank walls are secondary elevations, i.e., those exterior walls without special architectural treatment or emphasis such as common or party walls, or the side or rear walls that are not readily visible from the main thoroughfare. However, for some building types, such as ice houses, grain silos, creameries, etc., blank walls are highly significant to a building's character. New openings that would alter this character would not be approved. Therefore, owners contemplating new openings should be careful not to consider a blank wall a "throwaway" feature but should design the new openings to conform with Standards 2 and 9 and to be subsidiary elements in the overall building. If the design for new openings makes such a strong architectural statement as to change the appearance of the building radically or overwhelm the historic facades, certification of the rehabilitation will be denied.

Application: An 1880's Romanesque Revival warehouse in a midwestern city was converted into luxury office space. The 5-story brick warehouse was actually two long, narrow buildings divided by a central load-bearing masonry wall. The north (street) wall was the principal facade and contained virtually all of the architectural and stylistic details (ornamental brickwork, windows, storefronts). The west wall was a blank brick wall covered with a sprayed-on stucco-like coating for weather protection and may have been a party wall originally although it has been exposed for some time. The first floor 1960's aluminum and glass storefronts were without intrinsic significance (see illus. 1). The building was individually listed in the National Register as one of the few remaining nineteenth century warehouses in an area that is now almost exclusively new high-rise hotels, offices, a convention center, and vacant lots.

In planning for the rehabilitation of this warehouse, the owner determined that the only economically viable use was as luxury office space and that increasing the attractiveness of the space would require introducing windows into the blank west wall. Although the east wall did have some existing windows, the central load-bearing wall precluded "borrowing" natural light from the east across the width of the building. Additionally, the owner discovered that severe water damage had left the northwest corner of the warehouse structurally unsound and that part of the west wall would have to be rebuilt from the ground up.

The rehabilitation, developed in close cooperation with the State, incorporates the new window openings into the rebuilt section of the west wall. The new windows are similar in size, shape, and rhythm to the windows on the primary north wall but the brickwork, sash, and glazing are clearly contemporary. The new brickwork is a slightly different color from the original and flush around the new windows rather than projecting; the sash is aluminum and a different color from the original, and the glazing is single-light. In rehabilitating the north facade, the owner carefully repaired the existing 2-over-2 wooden double-hung sash (see illus. 2).

The non-significant 1960's storefronts were removed and replacement storefronts were constructed, although the new use of the building might not include retail on the first floor. The replacement storefronts incorporate new matching brick and stone piers and new wooden windows and multi-light transoms. The newly constructed west wall also incorporates two "storefront bays" but uses a less decorative brick pier and plain transoms in order to continue the differentiation between the historic north facade and the contemporary section of the west wall. The entrance was moved from its 1960's location in the center of the north facade to the northwest corner of the building. Access is through open storefront bays from both the north and west which create a recessed entrance at the corner of the building (see illus. 2).

In denying certification of the rehabilitation, the regional office stated that:

This new facade competes with the original front facade for perception as the dominant design element of the building. There would be acceptable ways of adding windows to a blank and insignificant wall, if the alteration retained the simple and secondary character of the facade. The new wall and windows already installed in this building attract much attention, make a strong architectural statement, and are located on the side of the building most visible from the nearest major intersection. The new design violates Standards 2 and 9.

The other reasons for denial of certification related to the recessed entrance, which was determined to be uncharacteristic of the original storefront in violation of Standards 5, 6, and 9. The owner, with the strong support of the State, appealed this decision.

During the appeal the owner provided photographs that had been unavailable to the regional office at the time of the initial review. These photographs clearly show the juxtaposition of the new west wall, which reads as a compatible, contemporary design, and the original north facade (see illus. 2). They also demonstrate that from one major intersection, the original north facade is the most visible and that from the other major intersection, the west wall will be almost completely obscured upon completion of a new hotel to be constructed on the adjacent lot.

The Chief Appeals Officer overturned the regional office denial and determined that the project met the Standards, providing that a wooden column was installed at the center of the north entrance bay to maintain the rhythm of the storefronts. In certifying the project, the Chief Appeals Officer said of the new openings in the western wall:

The resulting new construction, successfully repeating window sizes and shapes from the original facade, reads as a clearly recent and subsidiary statement. This is due to the use of frankly contemporary details: flush brickwork of a slightly different color from the old construction; aluminium windows, again of a different color from the old; and single-light sash.

The owner installed the required column and the project was certified.

Prepared by: Sara K. Blumenthal, PAD

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1. North and west facades of warehouse.
The 1960's storefronts are non-significant.



2. New windows and entrance on west facade. Certification was conditional upon owner adding a wooden column in center of westernmost storefront.

Number: 83-051

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (conformance)
 9. Compatible Design for New Alterations/Additions (conformance)
 10. Reversibility of New Alterations/Additions (conformance)

Subject: CONTEMPORARY ADDITIONS

Issue: The economic viability of some rehabilitations is dependent on the construction of new space for additional rental income or for the housing of new services which cannot be accommodated in the historic structure. In order to meet the requirements of the Secretary of the Interior's "Standards for Rehabilitation," particularly numbers 2, 9, and 10, it is important that the new addition be designed and constructed so that the character-defining features of the historic building or buildings are not radically changed, obscured, damaged, or destroyed in the process of rehabilitation. Further, new additions should be compatible in terms of mass, materials, relationship of solids to voids and color; and the size and scale of the addition should be in proportion to the historic building, and attached if possible, to the rear or inconspicuous side. New designs may be contemporary or may be in the "style" of the historic building as long as there is a clear distinction between the two and the new work does not appear to be part of the historic resource.

Application: A pair of 4 story brick rowhouses was to be rehabilitated for use as an in-town hotel. The Federal style buildings were constructed in 1809 as part of a row of large residences, but shortly thereafter, they were converted for commercial use. In the 1870's, the two adjacent buildings were modified and connected for use as an inn, and continued in that use until the 1970's. The two buildings, now identified as one structure, were recently listed in the National Register.

The new owner wanted to reopen the historic building as a small in-town hotel, but the structure lacked certain features necessary for the successful operation of a modern hotel. The interior needed remodeling along with new elevators, restaurant facilities and additional rental rooms. The new owner proposed three small additions to accommodate these needs: a recessed rooftop shed dormer to house elevator equipment, and two small 4 story additions in the rear. While the rooftop addition would not be visible from the street, one of the rear additions would be highly visible as the property was located on a corner (see illus. 1).

The original design proposal submitted to the State historic preservation officer showed the rear additions constructed in brick which replicated the brick details of the historic resource. In addition, the existing hip roof was expanded to cover the new rear additions. As a result, the new construction could not be differentiated from the historic building.

In reviewing the initial application, the State office made note of several important aspects of the project that would require redesign. As a Federal era design, the pair of town houses was distinguished by narrow, one room deep "T" shaped plans. The state felt that the infilling of this plan should not give the appearance of earlier mid-Georgian plans that were heavier in mass and proportion. As such, the State recommended that the new additions read as separate structures connected to the historic resource, thereby preserving the original sense of the Federal plan. In addition, the new construction should be attached to the historic building with a minimum of damage to historic fabric so that if, in the future, the additions were to be removed, the basic form and integrity of the historic structure would remain.

The SHPO suggested that a contemporary design for the additions be considered, that the materials used provide a neutral backdrop for the historic resource, that the roofline of the additions be lowered so as not to damage the ornamental historic cornice, and that care be taken to minimize removal of historic fabric. In essence, the new rear additions should be treated as separate pavilions that would read as new construction in order to preserve the character-defining features of the historic resource. The owner was amenable to these suggestions and resubmitted his design (see illus. 2), which was then forwarded to the regional office with a recommendation for approval.

In reviewing the proposal, the regional office agreed with the State on the need to clearly differentiate the new construction from the historic resource through the use of materials and setback connection details, while achieving compatibility in terms of scale, proportion, and location. A modern flush metal panel system was selected for the exterior sheathing of the new construction to act as a neutral backdrop to the carefully restored historic brickwork. The use of glazed panels recessed between the historic masonry and the new addition would allow the distinct feature of the Federal plan to be exposed. In addition, much of the original rear walls of the historic structure would remain exposed with the windows in place as part of the new construction. This would reduce the loss of historic fabric while leaving clear evidence of the connection between the original and new construction (see illus. 3).

On the exterior, the new additions would reflect the scale, massing, and proportions of the historic building without replicating the original detailing. The placement of the window and door openings on the exterior of the new pavilions would match the scale and proportion of the historic facade, but the detailing would be executed in a modern fashion. The use of a separate hipped roof for the pavilion additions would maintain the scale of the historic rowhouses and the neighborhood (see illus. 4).

The regional office approved the proposed rehabilitation as the existing historic resource was being carefully preserved and the new additions were compatible with the historic character of the property.

Prepared by: Sharon C. Park, AIA, TPS

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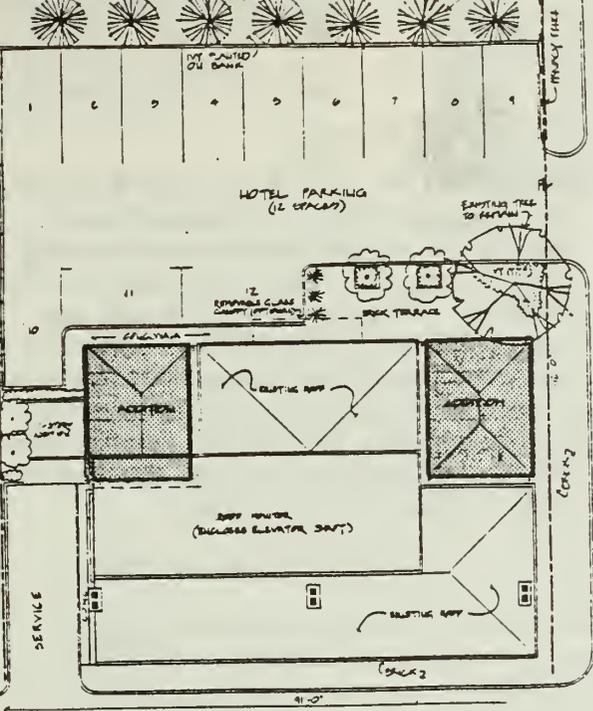


Illustration #1. Site Plan

The proposed two rear additions would change the plan from a "T" shape to a deep rectangle. In order to preserve the characteristic proportions of the Federal era, circa 1809, plan, it was determined that the new additions read as separate structures and not as a continuation of the historic structure.



Illustration #2. PERSPECTIVE VIEW. The revised design treated the rear addition as a modern pavilion to clearly differentiate it from the historic structure.

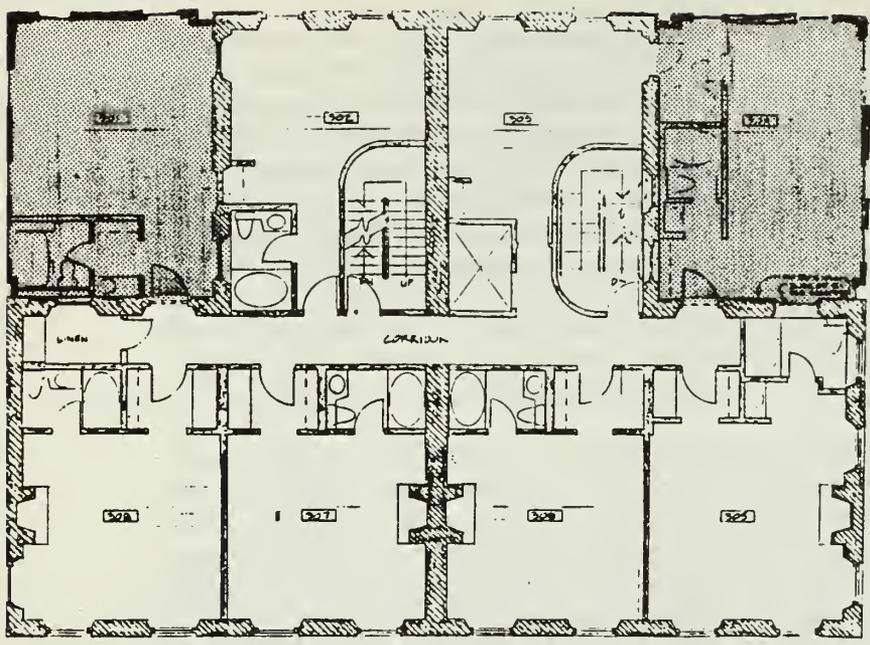


Illustration #3. TYPICAL FLOOR PLAN. The proposed infill plan (shaded) would respect the historic materials by leaving the original rear walls exposed within the new addition. The existing window and door openings would be left in place, as much as possible. In addition, recessed panels would be used as a connector infill between the original building and the additions in order to clearly differentiate the new construction from the historic structure.

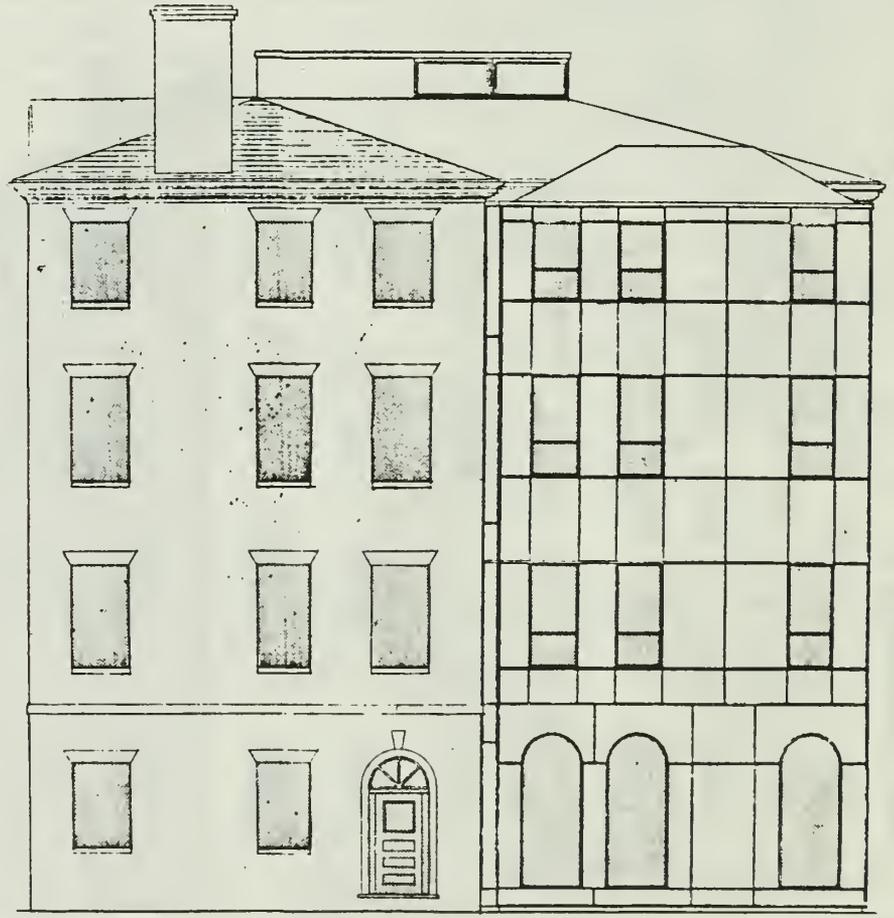


Illustration #4. ELEVATION
 The new 4 story addition visible from the street would be compatible in scale and proportion with the historic structure. The pattern of window and door openings in the new addition would reflect the rhythm in the historic facade. The use of a modern panel system, as opposed to detailed brickwork, would clearly separate the new construction from the historic resource. The use of a separate hipped roof for the addition would retain the scale of the property and would eliminate damage to the historic roof and cornice.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 83-052

- Applicable Standard: 2. Retention of Architectural Character (conformance)
6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (conformance)

Subject: COMPATIBLE, NON-MATCHING REPLACEMENT WINDOW SASH

Issue: Windows in historic buildings-- both the openings and the actual sash that fill the openings-- can play an important role in defining historic character. Where window openings or window sash are distinguishing features of the historic building (especially on primary facades), building owners should strive to retain and repair them, in accordance with Standard 6. If, after careful investigation, the window frames and sash are found to be so deteriorated that they must be replaced, then replacement windows should match the historic windows as closely as possible, also in accordance with Standard 6 and the rehabilitation guidelines. Unfortunately, owners often replace historic windows with incompatible windows as part of a rehabilitation project, resulting in denial of certification. In rare cases, non-matching replacement sash may be acceptable where the historic window sash are not considered essential in defining the overall character of the building. This usually occurs on buildings with richly ornamented facades where there are numerous architectural features and details that add a high degree of articulation to the building, and which are the major determinants of its historic character. It should be emphasized, however, that this is the exception, rather than the rule, and that violation of Standard 6 will usually result in certification denial.

Application: A 10-story, 1904 classical revival commercial building in a proposed historic district was rehabilitated as housing for the elderly. The primary facade of rusticated concrete and limestone was richly decorated with brackets, cartouches, and pediments. The project work included replacement of all the historic window sash. (Fortunately, no new window openings were made, nor was the proportion or size of the window openings changed.) The original wooden window sash were replaced with double-glazed metal units. The original sash were divided at midpoint by a horizontal meeting rail; this division was repeated with the metal replacement sash, but the meeting rail was thinner, and was placed on the lower third of the sash. On the seventh floor, a pair of tripartite arched windows were further altered by replacement with fixed single pane glazing in the side lights. Although a horizontal division of the sash was maintained, the replacements altered the historic pane configuration and meeting rail dimensions. With the concurrence of the SHPO, the NPS regional office denied certification. This decision was explained in the denial letter to the owner:

The result of all these window alterations has had a detrimental effect on the historic appearance of the building. When it is necessary to replace existing historic windows in the course of rehabilitation, the "Standards" for this program require that the replacement windows match the visual qualities of the historic windows.

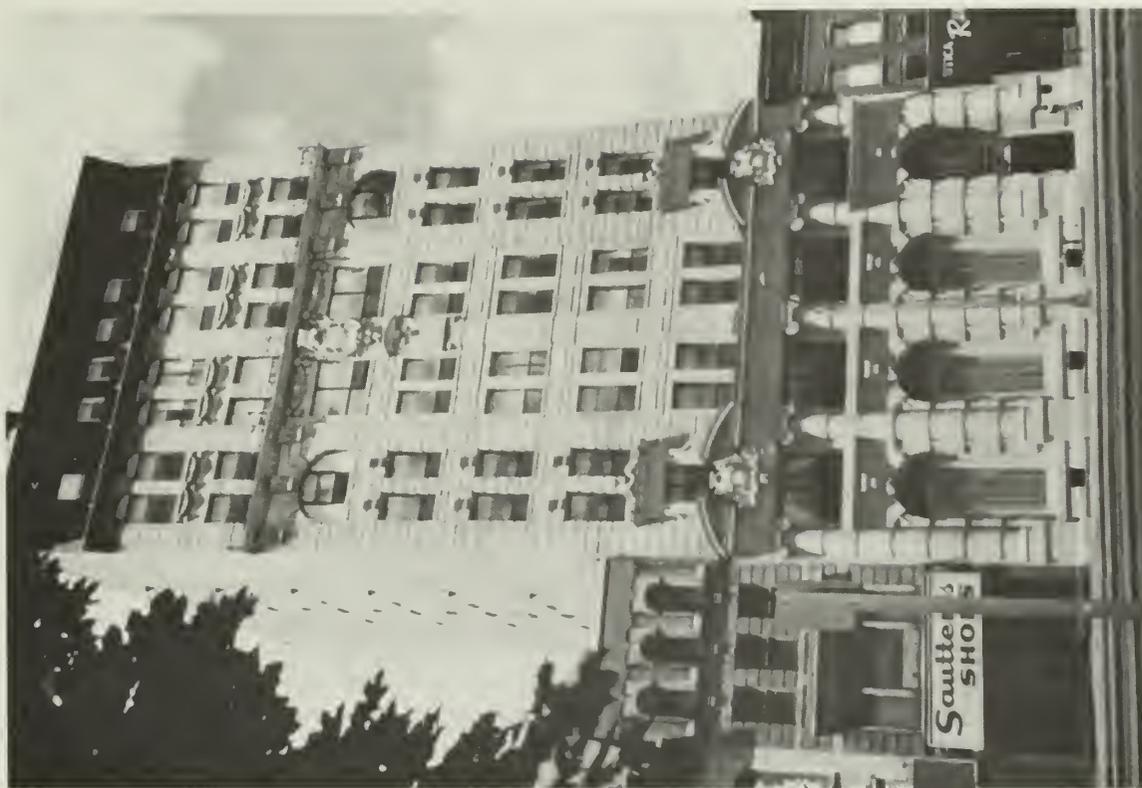
In requesting an appeal, the owners contended that the new windows "caused no noticeable change in the building's appearance from any angle or distance." The owners also submitted additional photographs of the primary facade taken before and after the window installation.

After inspecting the property and reviewing the additional information submitted by the owner, the appeals officer overruled the original decision. Central to the reversal was the appeals officer's determination that the historic windows were not critical in defining the historic character of this particular building, and the replacement windows were compatible. The appeals officer stated in the notification letter:

The historic character of this building is primarily determined by its form and by the richness and scale of the architectural features, including the split pediments, rusticated columns and voussoirs; carved garlands, brackets, sculptured keystones, tabernacle frames and cartouches. I do not consider the windows to be an essential character-giving element in this particular building. Even though the proportions of the pane openings and rail dimensions have been altered, the relationship of solid wall to windows openings was preserved in the rehabilitation process; in this particular case, I feel that the replacement windows minimally meet the Secretary's "Standards for Rehabilitation" and the overall rehabilitation is consistent with the historic character of the building. I would not expect to make this decision where similar window treatments were proposed on a building less ornate than this one.

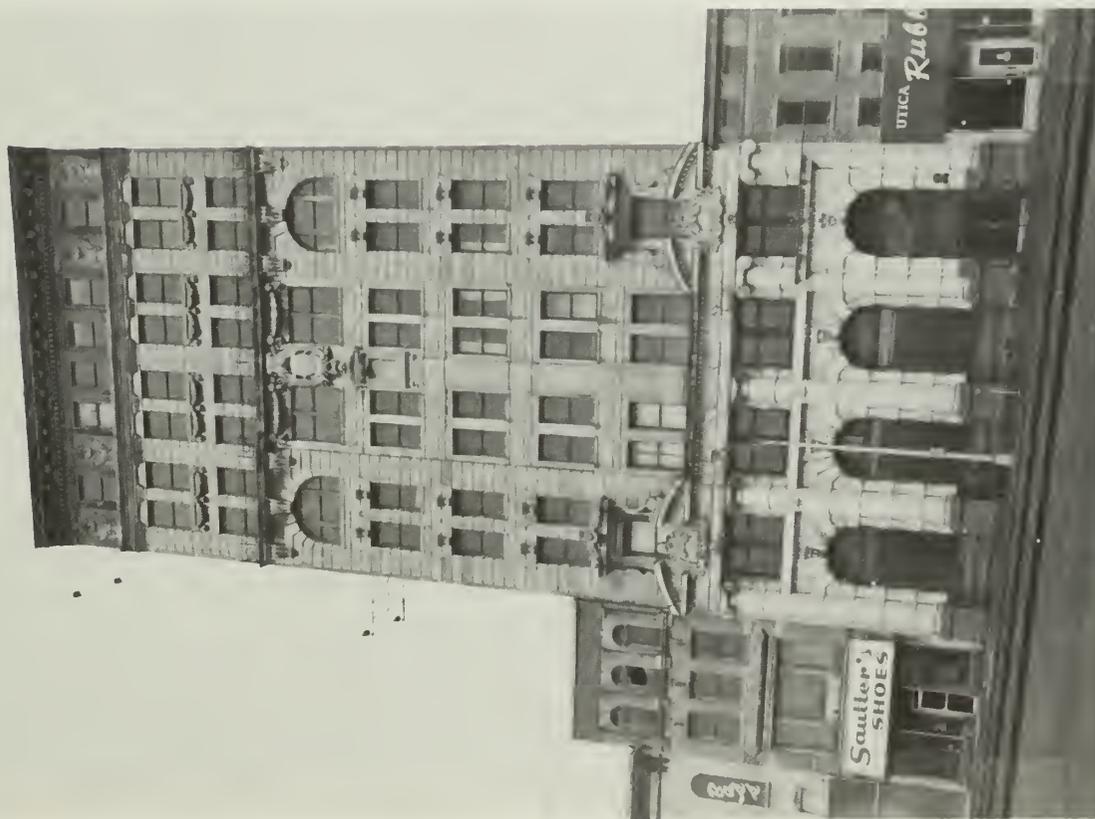
Prepared by: Jean Travers, TPS

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AFTER

Replacement sash now feature a lower meeting rail. The side lights in the arched windows were also replaced with fixed single pane glazing. The top floor is in a shadow; it was not altered by the project work.



BEFORE

Original double hung window sash featured a mid-level, horizontal meeting rail.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-053

Applicable Standards:

1. Compatible New Use (nonconformance)
2. Retention of Distinguishing Architectural Character (conformance; nonconformance)
4. Retention of Significant Later Alterations/Additions (nonconformance)
5. Sensitive Treatment of Distinctive Features and Craftsmanship (conformance; nonconformance)

Subject: REHABILITATING HISTORIC STOREFRONTS FOR NON-COMMERCIAL USE

Issue: The historic character of a commercial structure is often jeopardized when a building is rehabilitated for residential or office use. The owner, therefore, must first consider Standard 1 of the Secretary of the Interior's "Standards for Rehabilitation", which addresses the issue of compatible new use when determining the nature of a rehabilitation project. If a commercial building is to be used for residential purposes, several factors must be considered in order to preserve its historic character. Because the open quality of most storefronts is not always compatible with the greater privacy and security required for new uses, owners often propose designs that involve the alteration or removal of historic materials and features. In storefronts, such features may include large expanses of glass, transom lights, cast iron surrounds, kick plates, elaborate cornices, and special entrance conditions. Collectively, these elements can be important in defining the unique character of a commercial building and should thus be retained in the process of rehabilitation.

According to Standard 2 of the Secretary of the Interior's "Standards for Rehabilitation," "the distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible." In order to comply with the Secretary's Standards, it is necessary to assess the feasibility of residential or office use on the main floor and the need to preserve the historic storefront character of the building. To properly address preservation issues and weigh them against the demands of contemporary re-use, rehabilitation projects require innovative design solutions which are sensitive to historic materials and features. Radical alterations to the storefront of a historic commercial structure will result in diminution of the building's historic character and ultimately in denial of certification for tax benefits.

Application: A mid-nineteenth century corner grocery store and residence was converted to a two-unit residential building. Located in a historic district of mixed commercial and residential use, the building exhibited the scale, detail and simple architectural design characteristic of the time period and area in which it was constructed (see illus. 1 and 2). In preserving the existing storefront and diagonal entrance, the owner installed new plate glass in the existing openings and transoms, and replaced the recently constructed brick infill below the plate glass windows with wooden panels (see illus. 3 and 4). The cornice, often a significant architectural element in storefront design, was also repaired and repainted. Important interior features such as a pressed tin ceiling and pine

fireplace mantel were restored. The completed design maintains the commercial character of the building, yet, with the inserted wood panels at the base and the possible addition of appropriate curtains or shutters behind the plate glass, it does not sacrifice the privacy of the residents. The project is, therefore, in conformance with the Secretary's Standards and was approved as a certified rehabilitation by the National Park Service.

A second project involved the conversion of an early nineteenth-century brick Federal style townhouse into law offices. Originally a residential structure, the building had been used for commercial purposes as early as 1902 and had acquired a new entrance and wood and glass storefront on the ground floor (see illus. 5). Because other structures along the street had also been adapted for commercial use at an early date, this was seen as a significant development in the evolution of the district. The area is currently comprised of buildings which are primarily commercial at street level and residential above.

Rehabilitating the building, which had been substantially damaged by fire, involved completely removing the existing storefront and entrance and replacing the historic opening with brick infill and residential-scale fenestration which replicated that on the upper floors (see illus. 6). This treatment violates numbers 2, 4 and 5 of the Secretary's Standards. By continuing the facade treatment of the upper floors on the street level, the commercial character of the building was lost and the continuity of the streetscape interrupted. The impact of inserting a building with residential character was dramatic because the structure is one of a continuous row of buildings, which, although not built together, had acquired significance as commercial structures and read as a consistent portion of the district. The project was denied certification on the basis that the changes to the front facade, especially the loss of the building's storefront character, were not in keeping with the Secretary's Standards. In an appeal of this denial new information was presented which indicated that the date of construction of the existing storefront was recent (approximately 1950) and that the storefront had suffered extensive fire damage. While the denial was reversed because of new information and because, in lieu of the damaged storefront, the owners had attempted to return the building to its original residential appearance, the Chief Appeals Officer took this opportunity to express his conviction that the commercial character of this part of the district reflected changes to the area over time and, where possible, should be preserved.

A third rehabilitation of a two-story mid-nineteenth century commercial structure in an urban residential neighborhood involved the retention of a corner entrance and projecting display cases. To adapt the building to residential use, wood lattice in a contemporary motif was applied to the inside of the projecting bays (see illus. 7). Although not a Tax Act project, this unique, yet reversible, design solution increases privacy and security from the street while preserving the historic fabric and commercial character of the building. By respecting the building's original appearance, its compatibility with neighboring structures is maintained.

Prepared by: Martha L. Werenfels, TPS

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Example One

1. and 2. Before rehabilitation. The corner grocery store had its original diagonal entrance and flanking plate glass windows. Although the storefront remained intact, the base had been filled with brick and the plate glass boarded over.





Example One.

3. and 4. After rehabilitation. In rehabilitating the original storefront, the owner installed plate glass in the large openings and transoms and replaced the brick infill with wooden panels. By retaining significant architectural features, the commercial character of the building was retained.





Example Two.

5. Before rehabilitation. The early 1800's rowhouse, although damaged by fire, retained its storefront. It is seen here as an integral part of a row of commercial structures.



Example Two.

6. After rehabilitation. The building exhibits residential scale windows and door openings on the ground floor. This alteration results in a loss of the building's commercial character and an interruption in the commercial row.



Example Three.

7. Wood lattice installed inside the display windows increases privacy from the street without sacrificing the commercial character of the building.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-054

Applicable Standards:

2. Preserving the Distinguishing Character of a Building (nonconformance)
3. Recognition of Historic Period (nonconformance)
4. Retention of Significant Later Alterations/Additions (nonconformance)
5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance)
6. Repair/replacement of Deteriorated or Missing Features Based on Historical Evidence (nonconformance)

Subject: REPLACING REPAIRABLE HISTORIC INTERIOR/EXTERIOR FEATURES AND MATERIAL

Issue: "Rehabilitation," as defined in 36 CFR 67.2 assumes that some alteration is necessary to accommodate a new use; at the same time, the definition makes clear the requirement that those portions or features of the property which are "significant to its historic, architectural, and cultural values must be preserved." In order to meet this preservation requirement and be certified for tax benefits, features and materials of both the interior and the exterior of a building that are important--or character-defining--should (1) be identified in the planning stage; and (2) be retained and repaired in the work stage so that alterations necessary for the new use do not result in their loss.

It is particularly important to note that preserving exterior features does not mean that, as a trade-off, interior material and features can be removed; similarly, repairing and preserving interior features does not mean that exterior materials and features can be removed. When either interior or exterior materials and features that are important in defining the building's historic character are removed, the rehabilitation may violate Standard 2, 3, 4, 5, or 6 and, in consequence, be denied certification for tax benefits.

Application: An 1894 townhouse located in a historic district in the midwest exhibits on the exterior the simple architectural details characteristic of late-nineteenth century townhouses built in the area. The three-story, three-bay residence has modestly detailed brickwork, a recessed entrance with an ionic column supporting a first floor entablature and decorative lintels over second floor windows (see illus. 1). This simple detailing is also present on the interior, where a considerable amount of historic material, including millwork, mantels, doors, and moldings contributes to the character of the building (see illus. 2). The floor plan, with side entrance and stair hall, also has an unusual diagonal arrangement of the mantel and partitions in the parlor (see illus. 3).

In order to convert the residence into four modern apartment units, both exterior and interior work was necessary. The owner's rehabilitation proposal for the townhouse exterior included cleaning the masonry with low-pressure water; limited tuckpointing; replacing a severely deteriorated cornice with one which would match the existing in material and detailing; replacing a later front door with one milled to the dimensions of the original; and replacing unrepairable window sash with new sash, reusing the historic wood frames. All of this exterior work was considered to be in conformance with the Secretary's Standards.

Interior demolition had already begun when the project was reviewed by the National Park Service. This work included removal of historic material and features which the owner assessed as "unusable." The owner's proposed floor plan for the apartments (see illus. 4) required removal of existing partitions; subdivision of the front parlor in order to maximize rentable bedroom space; and relocation of the living area to the former historic entrance and stair hall space. Substantial rearrangement of rooms throughout the building resulted in removal of additional partitions and corner fireplaces. Door and window trim, as well as baseboards and doors, were also removed. The regional office of the National Park Service felt that the interior materials, features, and spaces were important in defining the historic character, and should have been retained and repaired to the greatest extent possible. In consequence, the project was found to be in violation of Standards 2, 5, and 6 and was denied certification for tax benefits.

In appealing the denial, the owner stated that some of the historic materials and features had been severely deteriorated and needed to be replaced; and that still others were missing entirely. Based on his assessment, all existing historic materials and features were removed and a contemporary looking interior--considered by the owner to be a more marketable--was constructed.

Photographic documentation presented at the appeal, however, indicated that the historic materials and features could have been repaired and only needed to be replaced in part with new material. It was the opinion of the Chief Appeals Officer that, together with the distinguishing spatial arrangement, interior materials and features should have been preserved in the process of rehabilitation.

The owner then expressed a willingness to re-install portions of the historic interior material which had not been severely damaged in the removal process and had subsequently been stored; and to reconstruct the interior partitions and missing historic features using all new materials. However, due to the extensive removal of historic materials and features that should have been retained and repaired initially, this proposal was determined to be in violation of Standard 6. Once material is removed under such conditions, the loss is considered irretrievable; it cannot be remedied through reconstruction. The limited re-installation proposed in this case was determined not to constitute adequate preservation of the resource. It should also be noted that acceptable preservation work on the exterior, in conformance with the Standards, was not considered a mitigating factor because all work must be in conformance with the Standards for certification purposes.

Application: A second rehabilitation in the southeast involved a three-story wood frame house which was built ca. 1830 and displays Federal style features, including fireplaces, trim and doors. Changes had taken place on the exterior of the house ca. 1910, the most major of which was the addition of a large Victorian front porch extending across the front facade and wrapping around two sides (see illus. 5). The porch was characterized by columns resting on brick piers, turned ballusters and a decorative central pediment. At the time of the porch construction a lean-to addition was also built on the rear of the building and a bathroom was installed on the third floor.

The intent of the rehabilitation work on the residence was to restore the building to its original 1830s appearance--the rationale for such work being largely predicated on the owner's assessment of the 1910 features. Because the porch was determined by the owner to be severely deteriorated and thus unrepairable, he felt preservation would require a prohibitively expensive dismantling and reconstruction of the piers, as well as total replacement of the roof (see illus. 6). As a result of this assessment, the porch was demolished. New front stairs and a covered stoop were then constructed on the primary facade to its 1830's appearance (see illus. 7). Interior work--including opening up of original fireplaces, removal of later inappropriate panelling, and repairs and repainting of doors and door trim--was also undertaken and completed as part of the project.

When the project was reviewed by the State Historic Preservation Office, initial concern was expressed over potential violation of Standard 4 in the exterior demolition work, and, in a final review by the region, the work was subsequently denied for violation of Standards 2, 4, 5, and 6. According to a letter from the regional office of the National Park Service, "The Victorian porch was distinctive in terms of its large size and style...and had gained significance in its own right; thus, its removal resulted in the loss of an important feature attesting to both the stylistic and physical evolution of the structure."

Finally, the Region agreed with the State in the final review that the porch as it existed at the time of the rehabilitation was deteriorated, but that its condition did not warrant removal. Because it was a character-defining feature that should have been retained and repaired, its removal violated Standards 2, 4, 5, and 6. A secondary issue in the denial was that the design for the new entry was not based on either photographic or physical evidence and was, therefore, conjectural. This treatment violated Standard #3.

Because the owner felt that "restoration" to its 1830's appearance was an appropriate treatment for the structure, he appealed the regional decision. In a final letter to the owner that sustained the region's decision, the Acting Appeals Officer wrote:

The c. 1910 wrap-around porch, which was removed during the course of rehabilitation, was significant in determining the character of the building...Removal of the porch, with its decorative frieze, classical columns

84-054

and turned ballusters, constitutes a loss of an important character-defining feature...While it is my understanding that work on the interior was well-executed, it cannot compensate for loss of a major character-defining element.

Prepared by : Kay D. Weeks and Martha L. Werenfels

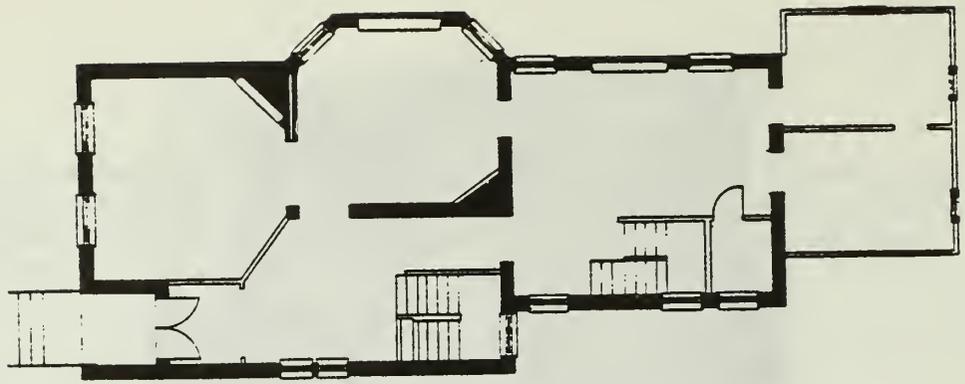
These bulletins are issued to explain preservation project decisions made by the U. S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. The townhouse, with its simple detailing, pictured before rehabilitation. The owner's proposal for exterior work was considered to be in conformance with the Secretary's Standards.

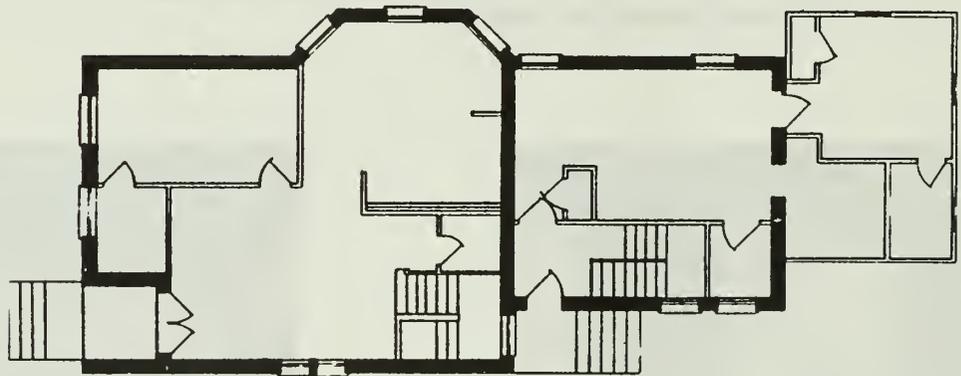


2. Modest interior detailing, such as window and baseboard trim, and diagonally placed mantels contribute to the historic character of the 1894 townhouse and thus should have been preserved to the greatest extent possible.



EXISTING FLOOR PLAN

3. A floor plan with side entrance and stair hall, and front parlor containing diagonally arranged partitions, chimney and mantel were identified as important in defining the historic character.



PROPOSED FLOOR PLAN

4. Interior work involved demolition of existing partitions as well as relocation of the living area to the historic entrance and stair hall space (see illus. 3). The rearrangement of rooms led to removal of corner mantels, baseboards, and door and window trim (see illus. 2). Because the character-defining interior spaces, features, and materials were not sufficiently preserved, the entire project failed to meet the Standards, despite qualifying exterior work.



5. An 1830 structure with its large 1910 wrap-around porch characterized by columns resting on brick piers, highly decorative central pediment and turned balustrade. The porch was in a deteriorated, but still repairable, condition prior to rehabilitation work.



6. A detail of the 1910 porch shows structural problems that need to be corrected. The owner assessed the 1910 front porch as unreparable, which led to its removal.



7. The replacement front porch--conjectural in design--was constructed after demolition of the historic porch. NPS concluded that because the 1910 porch was an important character-defining feature and was repairable, it should have been retained. The project was denied certification of rehabilitation for tax benefits.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-055

Applicable Standards:

2. Preserving the Distinguishing Character of a Building (nonconformance)
3. Recognition of Historic Period (nonconformance)
6. Repair/Replacement of Deteriorated or Missing Features Based on Historical Evidence (nonconformance)

Subject: REPLACING HISTORIC MATERIALS/FEATURES WITH NEW MATERIAL TO CREATE AN "IMPROVED" APPEARANCE

Issue: As stated in 36 CFR 67.2 the treatment "rehabilitation" assumes that at least some repair or alteration of the historic building will need to take place in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy the materials and features--including their finishes--that are important in defining the building's historic character. In terms of specific project work, preservation of the building and its historic character is based on the assumption that (1) the historic materials and features and their unique craftsmanship are of primary importance and that (2), in consequence, they will be retained, protected, and repaired in the process of rehabilitation to the greatest extent possible, not removed and replaced with materials and features which appear to be historic, but which are--in fact--new.

Sometimes an owner or developer will fail to identify character-defining materials or features in the planning stage and, in consequence, will remove or alter them so that the historic character of the building is compromised. More often, however, character-defining materials and features on the exterior or the interior are adequately identified but, in a mistaken effort to make the historic building look like new or to have an improved or uniform appearance, they are removed and replaced with new material. In other words, rather than retaining or repairing the historic material and features, an owner or developer will remove them--perhaps believing they are unrepairable or that repair costs are too high--then use new materials to create "historic appearing" features, or, alternatively, to create a contemporary look. In either case, the justification is often that the new product looks even better than the historic material and will be more visually appealing for re-use purposes.

Such removal and replacement of historic materials will violate Standards 2, 3, and 6. A determination to remove and replace character-defining materials and features must be based on severe damage or deterioration, as determined by a structural engineer or other qualified professional. Then, even if well-defined circumstances exist justifying replacement of individual features for visual reasons--or a loadbearing wall for structural reasons--it is critical that so much new material is not introduced that a historic building becomes essentially new construction.

Application: A ca. 1870 stone Gothic Revival structure (see illus. 1) was being rehabilitated for re-use as an office building. A 1967 "modernization" of the building's facade for retail use had involved installation of a stucco false front on the upper level of the building. When the false front was subsequently removed as part of the new work, the owner found that the castellated stone at the top of the building had been removed; the historic decorative bands had been chipped away to permit installation of the stucco work; the window sills and jambs were damaged; and several holes had been bored into the stone to anchor the false front. Stone on the ground level of the building had been removed as the result of a 1950s installation of an aluminum and glass entry and merchandise and display area (see illus. 2 and 3).

Based on his evaluation of the overall damages to the stone as a result of the combined alterations, the owner concluded that the entire facade was essentially beyond repair and that partial replacement of the historic material would not be possible without leaving a splotchy, uneven facade--an appearance he felt was unacceptable. The report specifically cited the unavailability of matching limestone, potential structural consequences of replacing only the damaged stone, and the high cost of repair over replacement. As a result of this assessment, the owners elected to demolish both damaged and intact historic limestone from the primary facade by cutting it back to a depth of 5 inches, then re-build the facade with an all new stone veneer in order to achieve an even, uniform appearance (see illus. 4).

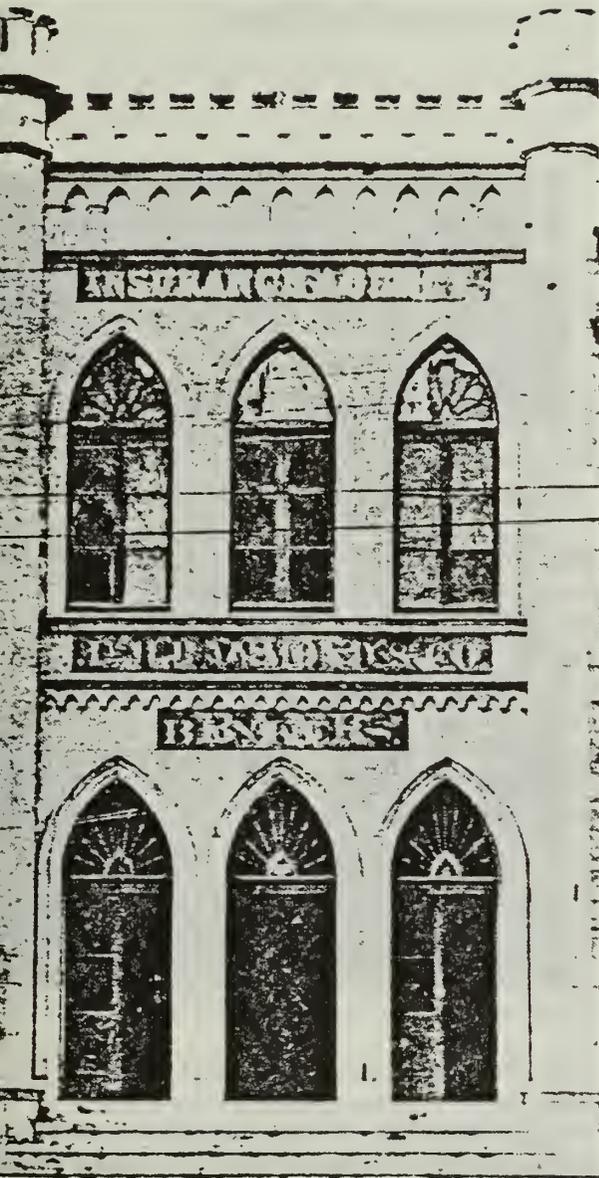
When the Part II application was reviewed by the State, concerns were expressed about the removal of what they assessed--as a result of a site inspection--to be a largely intact upper level that could have been repaired; and the subsequent demolition of the entire character-defining facade and reconstruction with all new material. Considered a precedent-setting project by the region, application materials were forwarded to the Associate Director, National Register Programs, for an opinion before a final decision was reached.

In a memo to the regional office, the Associate Director stated:

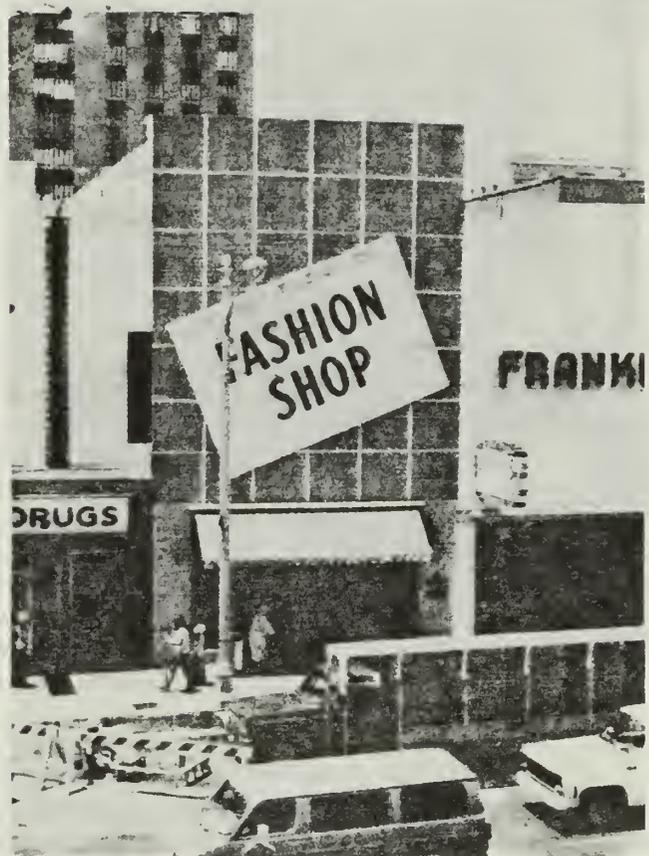
It is our understanding that there are no significant features or spaces on the interior and that the facade was the sole "character-defining" feature of the structure. Because so little significant historic material remained, it became all the more important to retain what had survived to the present. While the party and rear walls and floor systems remain intact, retention of these components does not constitute adequate preservation of the resource for Federal tax benefits. The integrity of the individual architectural features and spaces has been irretrievably lost, as a result of other changes over the years and, finally, as a result of this most recent rehabilitation.

Prepared by: Kay D. Weeks

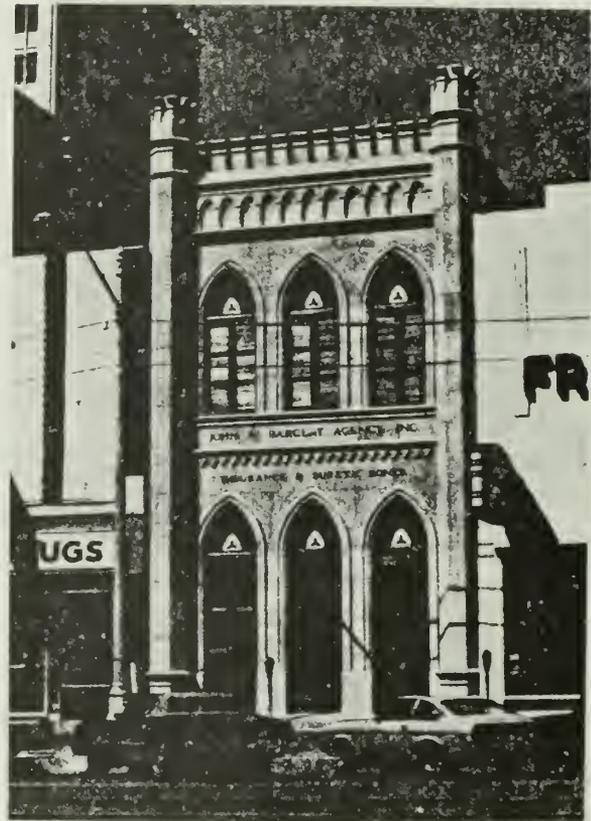
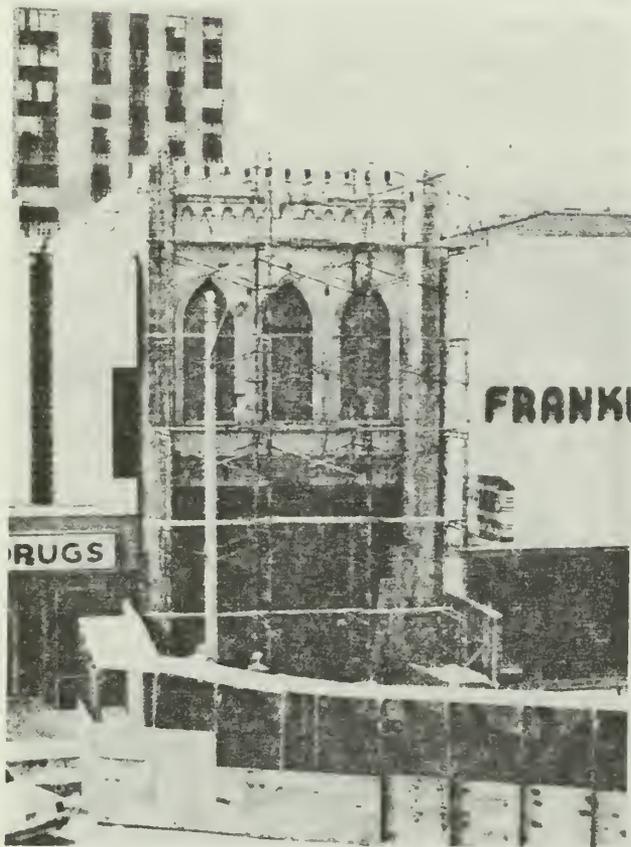
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1. This historic photograph shows the 1870s building constructed of limestone and featuring Gothic detailing.



2. A 1967 storefront alteration involved installation of a stucco false front on the upper levels; stone at the ground level had been removed as the result of the installation of an aluminum and glass entry in the 1950s.



3. When the 1967 storefront was removed, the owner assessed overall damages to the upper and lower levels and felt total replacement of the limestone facade was necessary to restore the historic appearance.

4. This photograph shows a totally reconstructed facade using all new material. NPS recommended denial of the project for tax benefits because it determined that the damaged upper level could not be repaired. An unacceptable loss of historic material on a significant facade was specifically mentioned in the denial letter.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-056

- Applicable Standards:
2. Preserving the distinguishing character of a building (conformance)
 3. Recognition of Historic Period (conformance)
 6. Repair/replacement of Deteriorated or Missing Features based on Historical Evidence (conformance)

Subject: REPLACING SEVERELY DETERIORATED HISTORIC MATERIALS

Issue: Although maximum retention of historic material is always the primary goal in rehabilitation projects, building features may be so severely deteriorated that replacement with new material is required, either for visual or for structural reasons--or both. Such replacement may be limited to several bricks, wood window sash, or brackets of a cornice; or may involve an entire loadbearing wall or walls.

In the latter situation, when extensive replacement of historic material has been recommended by a structural engineer or other qualified professional--even if it is to be replaced with matching new material--it is important that so much new material is not introduced that a formerly historic building becomes essentially new construction. In this regard, replacing a structurally unsound wall on a side or rear elevation is usually less critical than replacing deteriorated features on a primary elevation; similarly, replacing extensively damaged interior material and features on upper floors may be less critical than removing and replacing significant material and features in highly visible first-floor spaces. It should be remembered, however, that even when features and material which are secondary in defining the character of the building are extensively replaced, the cumulative effect may involve such a high degree of loss that, in consequence, the project will violate Standards 2 and 3. When extensive loss of historic material occurs--even if severe deterioration or damage is present and seems to warrant extensive replacement--a project can be denied certification because the "historic resource" is no longer historic.

Application: An 1860s rusticated ashlar brownstone commercial building, altered in 1880 with the addition of a flush ashlar brownstone facade on the west, was purchased for rehabilitation for office use (see illus. 1). The building had been derelict and vandalized for several years--in addition to the total lack of maintenance--and, as a result, was severely damaged and deteriorated. Within the three exterior walls (south, west, and north), which consist of 14-inch thick loadbearing masonry of two wythes of brick faced with brownstone, the mortar was failing between the brick and the stone. The brownstone was spalling on both the north and south walls, with the condition much worse on the north (see illus. 2 and 3). The building had been painted in the past, possibly in an effort to stop water penetration. On the interior, the majority of the distinguishing architectural detailing had been removed as a result of deterioration,

vandalism, and inappropriate earlier work. A cast iron and marble stairway between the first and second floors and two cast-iron columns with ornate capitals on the first floor were still in place. The floor structure and flooring were intact, but damaged, and historic window trim and some sash remained.

An initial structural assessment led to a proposal to rebuild the north and south walls. The structural engineer felt that the original construction technique--tying the interior brick to the facing brownstone with iron strap anchors--was inadequate. Further, the deficiency of the walls had been aggravated by water penetration into the cavity between the brick and the stone, which had caused the iron anchors to rust. The recommendation to rebuild both walls was based primarily on a few test holes bored in the walls for investigation of the condition of the materials, particularly the metal anchors; and on the fact that both walls were out-of-plumb by about two inches. However, because this proposal--along with planned interior alterations for modern office use--involved such a substantial loss of historic material, the National Park Service determined that if the project proceeded as proposed, the resulting building would be substantially new construction. Therefore, despite the seriously deteriorated condition of the materials, NPS found that the work, as proposed, would violate Standards 2, 3, and 6.

Subsequently, two structural engineers sought ways to preserve more of the historic material. It was confirmed that the north and south walls were out-of-plumb. To ascertain the reason for the apparent structural problems, more holes were bored so that the condition of the walls could be thoroughly investigated. The findings were that the north wall had lost its loadbearing capacity because of the advanced deterioration of the stone, brick, and iron anchors; however, the engineers' solution was to rebuild the wall only from the second floor up rather than the entire wall as initially proposed. Since the materials were not salvageable, the replacement wall would be all new materials. Cast-stone over concrete block was selected as a compatible substitute material with the facing cast-stone to simulate the historic brownstone. The re-evaluation of the structural and preservation problems of the building led to the conclusion by the architect and engineer that the south wall could be retained in place with the use of stainless-steel pins tying cementitious patches to the sound brownstone beneath. The bulk of the patching would be at the beveled edges of the ashlar blocks where the worst erosion had occurred, leaving the majority of the historic material intact and visible.

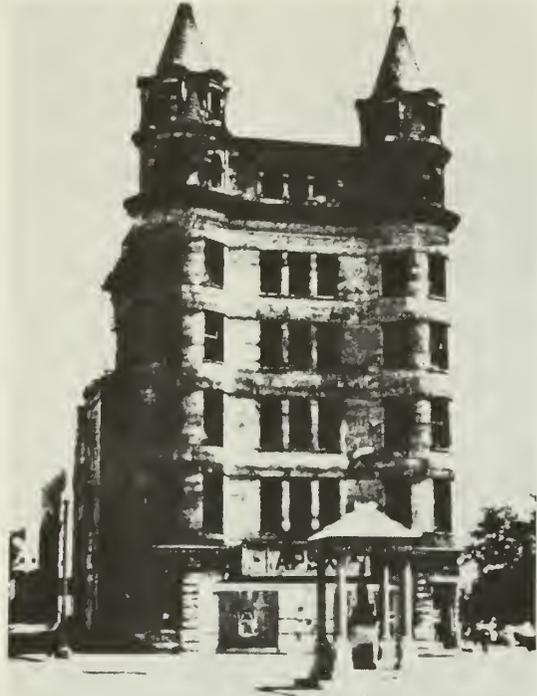
As opposed to the initial approach, this proposal was found to preserve considerably more historic material and was thus given preliminary approval; however, in approving the rehabilitation proposal for Federal tax incentives, the National Park Service expressed "serious concerns about the severe deterioration of the building." The certification letter further stated that the positive determination was based on the assessment "that the wooden floor and ceiling framing, the window trim on the exterior walls, and some window sash on the west wall...as well as the first floor columns and stair can be saved. It is possible that unforeseen problems, including additional loss of historic fabric, may jeopardize certification."

During the rehabilitation, the building was sold. The new owner wanted to rebuild both the south wall (facing the main street) as well as the north wall (facing a side street) in order to avert the possibility of future structural problems and to achieve a

uniform appearance. When asked about amending the certification application to include this new work, the National Park Service referred to its earlier approval letter, stating that any further loss of historic material would result in denial of certification for the entire project. The owner consequently proceeded with the project as initially approved.

Prepared by: Susan Dynes and Kay D. Weeks

These bulletins are issued to explain preservation project decisions made by the U. S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. This photograph of the west elevation shows the 1880 addition of flush ashlar brownstone above the rough-cut brownstone of the first floor. Because the historic brownstone on this wall was basically sound, only repainting was required.



2. The brownstone of the south wall was not as deteriorated and could be retained in place and structurally strengthened by stainless steel pins tying cementitious patches to the sound stone beneath. Limiting the patching to the beveled edges of the stone blocks where the greatest amount of deterioration had occurred was considered a sensitive preservation solution because it left the historic material both intact and visible.



3. Badly spalling brownstone on the north, and less visible, wall was for the most part unsalvageable. Replacement walls were constructed from the second story up, a solution that assured maximum retention of historic material while making the building structurally sound for the new use.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number:84-057

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (nonconformance)

Subject: INAPPROPRIATE REPLACEMENT WINDOWS

Issue: A highly decorative window with an unusual shape, or glazing pattern, or color is most likely to be immediately identified as a character-defining feature of the historic building. It is far more difficult, however, to assess the importance of repeated windows on a facade, particularly if they are individually simple in design and material, such as the single light, double-hung sash commonly found in many vernacular late 19th and early 20th century buildings. Because rehabilitation projects frequently include proposals to upgrade or replace window sash or even replace entire windows, it is essential that both their contribution to the historic character and their physical condition be evaluated before specific repair or replacement work is undertaken.

In the latter half of the 19th century, the use of standard size sheets of clear glass; the equal division of lights on both the top and bottom of double-hung windows; and the lack of muntins represented a window evolution that stemmed from an interaction of style changes and technological developments. In consequence, such simple double-hung (1/1) windows are often a distinguishing architectural feature of the building that should be identified, retained, and preserved in the process of upgrading or repairs within an overall rehabilitation project. A successful preservation solution, however, is contingent upon recognizing the design role of the windows in determining the historic character; then prescribing sensitive repair and upgrading techniques.

If the historic windows are determined to be unrepairable, replacement windows need to be chosen with great care. Again, it is crucial that the role of the windows in determining the historic character be identified first--in other words, the relative importance of the size, shape, color, and detailing of the windows to the overall appearance of the building. After this initial assessment is made, various replacement units available from manufacturers can be evaluated to assure an acceptable replacement solution. Unfortunately, all too often an inappropriate approach is taken, that is, simple double-hung (1/1) windows are replaced with aluminum units without matching the trim detail, the width of the frames and sash, the location of the meeting rail, the reveal or setback of the window from the wall plane, the separate planes of the two sash, or the color or reflective qualities of the glass. In particular, the installation of inappropriately designed replacement windows in a relatively unornamented building can dramatically change the historic appearance of such a building and, as a result, violate Standards 2 and 6.

Application: A six-story residential/office building located in a historic district in a large northeastern city was recently rehabilitated. The work consisted of substantial alterations to the interior in its conversion to modern apartments; restoration of the front entrance; and the installation of replacement windows. Because there apparently were few remaining historic features on the interior, the historic character was primarily determined by its exterior--the materials, features, and finishes. For this reason, it was particularly important to preserve the historic appearance of the exterior to the maximum extent possible.

Due to its prominent location at the end of a row of 19th century structures, this simple, but distinctively-detailed early 20th century building, had three highly visible facades. On each of these facades, the traditional equally-sized double-hung sash were important features, comprising almost half of the total wall area. Their windows' color, proportions, spacing, and frame details also helped to relate the building to the adjacent older properties (see illus. 1).

Because the windows were determined by the owner to be unrepairable, they were removed and replacement units were selected and installed. The replacement windows had flat frames devoid of molding detail, a bronze-anodized finish, and a fixed upper and operable lower sash. Further, the location of the meeting rail was lowered--for ease of operation of the large sash--so that the lower sash was only 1/3 rather than 1/2 the size of the historic window (see illus. 2). The owner also chose tinted glass which she felt was justified in order to lessen the visual impact of an adjacent elevated highway.

When the regional office reviewed the work, they determined it violated Standards 2 and 6. The denial letter stated:

...The historic windows, with clear planes in a 1/1 configuration contributed to the restrained character of the building. "Before" photographs show all of the 1/1 windows in place, and no documentation was provided with the Part 2 application to show that the existing units could not have been repaired and retained. Had replacement proven necessary, the appropriate treatment would have been to use new units which matched the configuration, color, and other visual qualities of the historic windows. Instead, the replacement windows selected employ a lowered meeting rail (in a 2/3 to 1/3 configuration) and tinted glass. As a result, the replacement windows are incompatible with and detract from the historic character (see illus. 3).

The owner appealed the region's decision on the basis that the replacement windows were necessary and the design did not detract from the historic character of the building. After careful consideration, the region's decision was sustained by the Chief Appeals Officer. In sustaining that decision, he added:

Your major rehabilitation work on the facades of the building consisted of restoring the front entrance, and the window changes which are at issue. The lower floor with its different masonry treatment and decorative entrance certainly is more detailed than those above. Yet on the three intermediate floors--which constitute the majority of the facade--the windows predominate, and they have now been changed through the

introduction of new metal frames and sash. Even on the top floor, the windows are an important feature even though the masonry has more decorative detail. You sought to justify the change in the appearance of the windows based on the desirability of tinted glass from an interior perspective and the wish for an easy-to-operate sash. While I would agree with you that the smaller sash may require less effort to operate, you could have found commercially available windows that would have matched the appearance of the historic sash, as required by Standard 6, and that would have been easy to operate.

Prepared by : Charles E. Fisher and Kay D. Weeks, TPS

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1. This 20th century building served as an anchor at the end of the small historic district and had three highly visible facades. Note how the location, design, and even the color of the wooden sash and frames matched that of the adjacent older properties.



2. This is a close-up view of the contemporary window units which were installed. They had flat framing detail, bronze-anodized finish, tinted glass, and a lowered meeting rail.

3. Below is a comparison view of "before" and "after" rehabilitation which shows the impact of the window changes. While relocation of the meeting rail was the most pronounced alteration, the tinted glass, lack of trim around the frames, increased width of the anodized aluminum frames, and loss of other detail were cited in denial of the project for preservation tax benefits.



Interpreting

the Secretary of the Interior's

Standards for Rehabilitation

Number: 84-058

Applicable Standards:

2. Retention of Distinguishing Architectural Character (nonconformance)
5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance)
9. Compatible Contemporary Design for New Alterations/Additions (nonconformance)

Subject: INAPPROPRIATE SIZE AND SCALE OF NEW EXTERIOR ADDITIONS:
LOSS OF HISTORIC CHARACTER

Issue: In the Secretary of the Interior's "Standards for Rehabilitation," the Department of the Interior acknowledges that a new exterior addition to a historic building (such as a fire stair, service wing, or additional story) may be essential to return the property to a state of utility for an efficient contemporary use; however, at the same time, the cumulative effect of the design and installation process of a new addition must not radically change, damage, destroy, or obscure those "portions and features of the property which are significant to its historic, architectural, or cultural values." (36 CFR 67.2).

Therefore, in evaluating the appropriateness of a new addition, it is critical that the important character-defining materials, form, features, and detailing of the historic building be properly identified so that they may be protected and preserved. This identification process will also make clear those "portions and features" of the historic property that are not important in defining the historic character and may thus be reasonably altered or added to in the course of rehabilitating for the new use.

Because of the difficulty in designing sensitive new additions and to clarify what constitutes a compatible new addition, the NPS has expanded its guidance in this area (see pp. 56-57, "New Exterior Additions to Historic Buildings" in the Revised Guidelines to the Standards for Rehabilitation (1983). The advice listed first in the guidelines is to avoid constructing a new exterior addition altogether because of the potential for altering and expanding the historic form and thereby diminishing the historic character. Rather, it is recommended that services and functions required by the new use be located in non-character-defining interior spaces. Only after it is determined that interior spaces cannot be utilized, should a new exterior addition be considered at all. Then, the new addition should be designed so that its size and scale are limited in proportion in relationship to the historic building--and located on an inconspicuous side of a historic building to further assure that there will be no radical changes to the historic form and appearance.

The failure to recognize those qualities that comprise a building's historic character (its materials, form, features, and detailing as well as relationship to the site and the district) prior to designing and attaching a new exterior addition can result in overall changes that are inconsistent with the historic character. In consequence, Standard 2, 5, or 9 may be violated, thus jeopardizing project certification.

Application: A small late 1920s Mission Revival building of brick construction with stucco finish is primarily distinguished on the main facade by a waved parapet cap and symmetrically placed openings (see illus. 1). In rehabilitating the building for use as law offices, interior and exterior work was undertaken, including replacement of damaged plastered walls, re-stuccoing of the brick, cleaning and painting of windows, and the construction of two new exterior additions.

The first new addition consisted of enclosing existing stairs at one end of the facade for the clients' main entrance, as well as serving as handicapped access to a ground floor elevator. The second new addition was a non-functional matching wing wall at the other end of the facade which the developer felt would preserve the sense of symmetry which was so strong in the historic building (see illus. 2 and 3).

After reviewing the Part II application, the State office recommended denial of the project, citing violation of Standards 5 and 9; the regional office, completing its review, concurred with the State's assessment. In a denial letter to the owner, the regional office stated:

The new additions, consisting of the exterior stairs enclosure at one end of the facade and the wing wall at the other end, increase the length of the facade by at least one-third, thereby altering significantly its overall mass, scale, and proportional relationships. Further, these additions extend and expand on the symmetrical historic design of the facade in a way that lends to it a degree of expansiveness...not present in the simple design character of the structure's original design features. It is apparent that the attempt to match the color, texture, and detail of the original design and to continue its symmetry by extending the facade wall was motivated by a desire to preserve the historic character of the building. In effect, however, this matching new design is incompatible: it compounds the additions' negative visual impacts on the original design by making contemporary and historic portions of the building indistinguishable from one another.

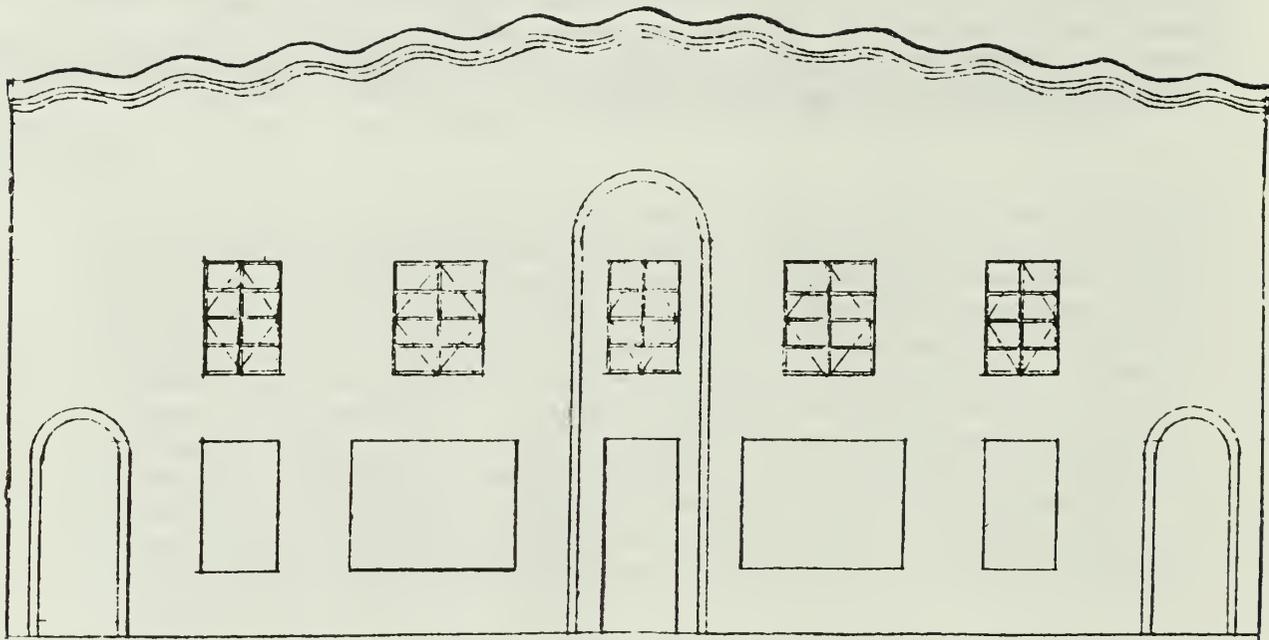
When the project was subsequently appealed, the Chief Appeals Officer sustained the regional office's decision that the new additions violated Standards 5 and 9, adding that "they also give the building a monumentality that, historically, it never possessed, thus changing its historic character." In consequence, the project also failed to conform to Standard 2. As part of the appeals process, the architect forwarded three drawings (schemes A, B, and C; see illus. 4, 5, and 6) for possible changes to the new additions to bring the project into conformance with the Standards and thus qualify for Federal historic preservation tax incentives. After reviewing all of the drawings, the Chief Appeals Officer concluded in his final letter to the owner:

The only remedial action that can now be taken...would be to follow scheme "C": insert a wide expansion joint between the historic building facade and the new stair enclosure, demolish the new wing wall, lower the parapet on the stair tower by at least one foot, and paint the new addition a different color than the original facade. These actions would make the distinction between the old

and new construction clear; and would restore to the building its aspect of a modest, simplified Spanish Colonial Revival commercial structure. Demolition of the wing wall would allow one to view the continuous wavy cornice as it carries around the corner. If the final revised project fails to meet any of the above conditions, it will not meet the Standards and cannot be certified.

Prepared by: Kay D. Weeks, TPS

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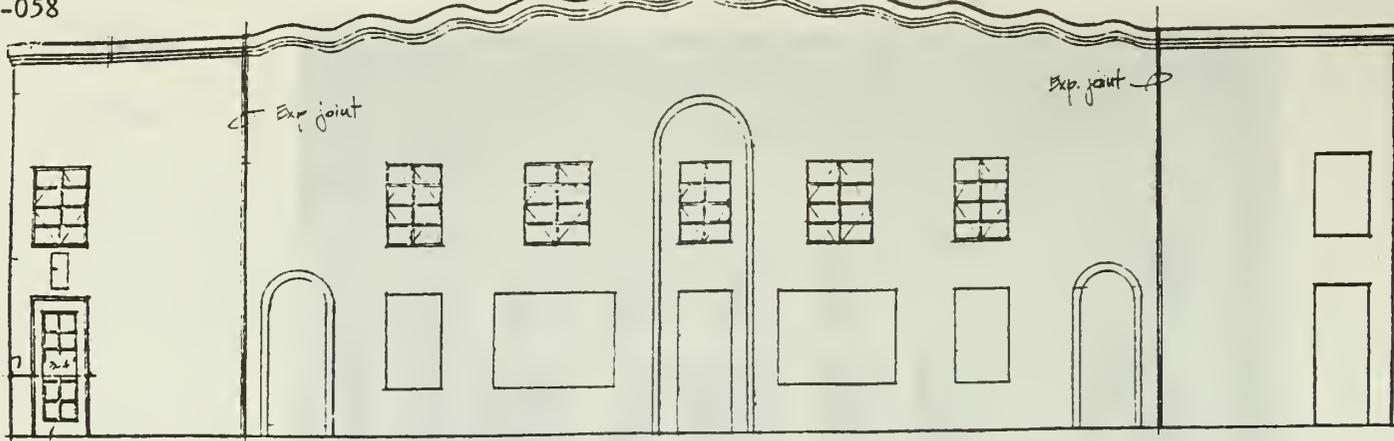
1. This drawing points out the historic form of a small-scale Spanish Colonial Revival building with a waved parapet cap and symmetrical window and door openings.



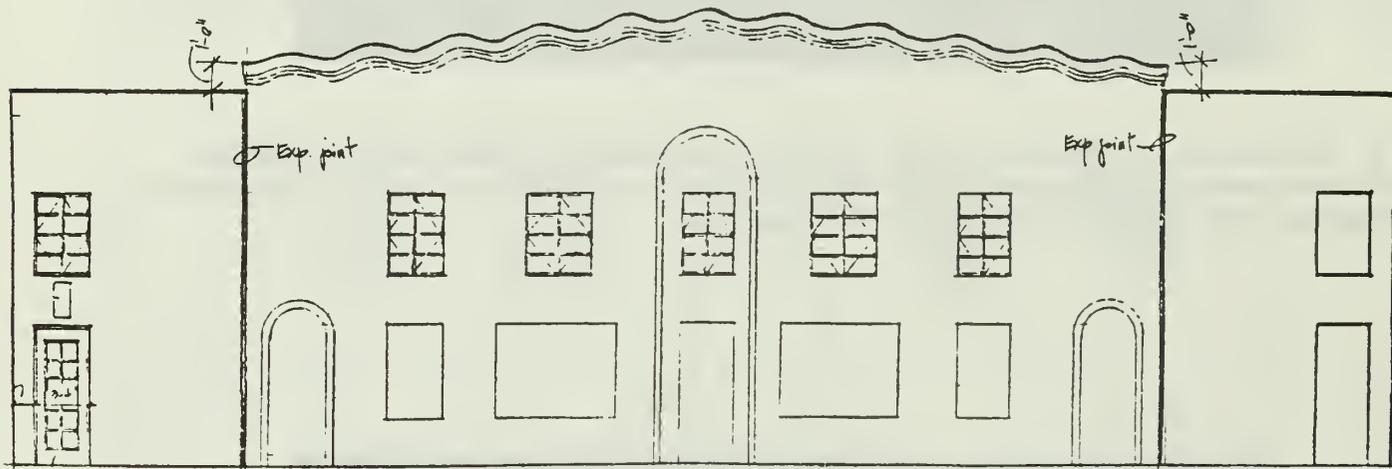
2. This view of the southeast corner of the primary elevation shows the new addition that enclosed an existing stair. The addition extends from the termination of the historic building, which is defined by the waved parapet cap.



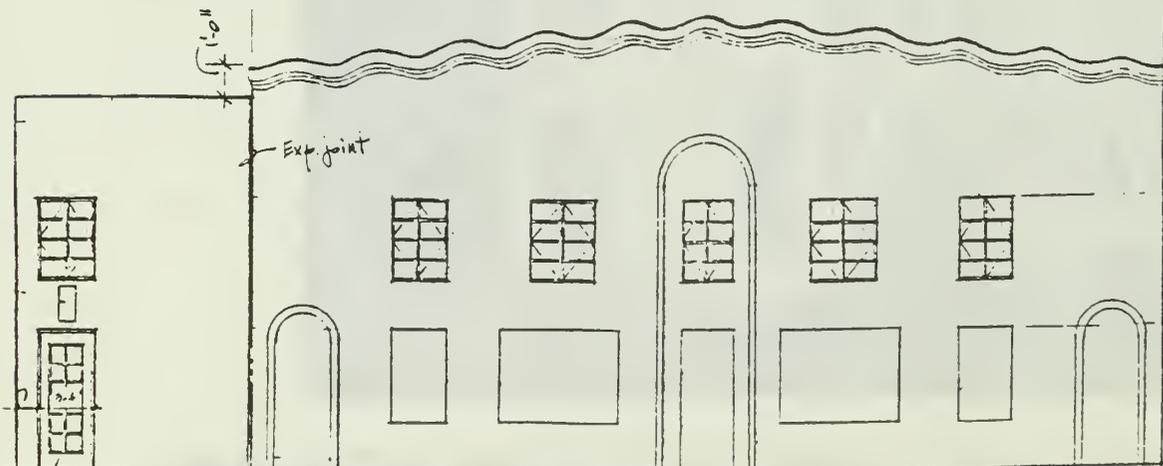
3. This view of the northeast corner of the primary elevation shows the added wing wall that was built to visually balance the new addition on the southeast corner. Again, the addition extends from the end of the historic building, as defined by the waved parapet cap. Both additions increased the total length of the historic building by one-third and made indistinguishable what was historic and what was new construction.



4. Scheme "A" was proposed by the developer to make the project meet the Standards. This change in the design would simply have provided expansion joints to show the difference between the historic building and the new additions. The proposal was rejected.



5. Scheme "B" was also offered by the developer as a means of making the project meet the Standards. Part of this design change was acceptable--the lowered parapet on the stair enclosure. The total scheme was rejected, however, because the nonfunctional northeast wing wall, even though differentiated in height, still unnecessarily expanded the historic form of the building. It also created a symmetry at a scale that never existed historically.



6. Scheme "C" represents those changes to the design that would have to be made to bring the project into conformance with the Standards. The Chief Appeals Officer specifically listed as requirements for certification a widened expansion joint; demolition of the northeast corner wing wall; lowering the parapet on the stair tower; and further distinguishing the new addition from the historic facade by use of a different paint color.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-059

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance)
 5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Features Based on Historical Evidence (nonconformance)

Subject: REPLACING A SIGNIFICANT INTERIOR FEATURE TO MEET HEALTH AND SAFETY CODE REQUIREMENTS

Issue: To comply with health and safety codes in rehabilitation projects, the Revised Guidelines to the Secretary of the Interior's "Standards for Rehabilitation" first recommendation to owners and developers is to work with local code officials to investigate variances available under some codes or to devise creative and safe alternatives so that alterations and additions to historic buildings can be avoided completely, if possible. Because such variances or alternatives may not always be feasible, owners and developers are next advised to identify significant spaces, features, and finishes, so that they can be preserved in the process of successfully meeting code requirements (such as providing barrier-free access, upgrading historic stairways or elevators, or installing fire suppression systems).

While it is understood that owners must often undertake work necessary to meet health and safety code, the Department of the Interior--by law--cannot approve rehabilitation projects if significant interior spaces, features, or finishes are lost as a result of such code-required work and, in consequence, the rehabilitation is not consistent with the historic character of the building. In reviewing an overall project, it is thus critical that administrators evaluate work proposals to assure that significant interior features are properly identified so that they may be protected and preserved in the process of meeting health and safety code requirements. Where a conflict exists between code requirements and the Secretary of the Interior's "Standards for Rehabilitation", it should be noted that "...The Secretary of the Interior's Standards take precedence over other regulations and codes in determining whether the historic character of the building is preserved in the process of rehabilitation and should be certified." 36 CFR 67.7(d).

Application: An early 20th century commercial building was being rehabilitated for use as medical offices (see illus. 1) As the result of an inspection by a structural engineer to assure compliance with State health and safety codes, proposed rehabilitation work involved removal of a historic ornamental iron cage-type elevator that was manually operated (see illus. 2) and replacement with a modern elevator (see illus. 3) featuring automatic pushbutton operation. (The ANSI building code specifically requires an enclosed cab and hollow metal shaft doors.) Additional proposed work included removal of the ground floor elevator doors; removal of one set of the existing west-side elevator doors on floors #3 through #7; and the subsequent blocking of access to the elevator on that side due to limited passenger use after rehabilitation (see illus. 4 and 5).

When the project was initially reviewed by the S.H.P.O, recommendation for certification was made because it was felt that loss of the elevator--although unfortunate--did not constitute a radical change to the building's interior. However, when the National Park Service evaluated the proposed work that principally involved removal of the historic elevator and replacement with a modern elevator to meet code, a final determination was made that such removal of a significant interior feature violated Standards 2, 5, and 6. The denial letter to the owner stated:

The elevator with its highly elaborate iron grillwork and the decoratively molded elevator doors in the lobby is a significant historic feature which contributes to the historic character of this early twentieth century commercial building. The features of the elevator, particularly the decorative cab and the lobby doors are historically significant elements which should be preserved. Your rehabilitation...will lead to the loss of a significant feature of the building, in violation of the Standards for Rehabilitation, and the rehabilitation will not be consistent with the historic character of the building. For purposes of the historic preservation tax incentives, the Standards for Rehabilitation take precedence over other regulations and codes in determining whether the historic character of the building is preserved in the process of rehabilitation and should be certified (36 CFR 67.7(d).

The denial was subsequently appealed and, in spite of the owner's referral to ANSI codes requiring enclosure of the elevator, the NPS decision was sustained by the Chief Appeals Officer, who reiterated in the letter to the owner, "...since a rehabilitation must preserve the historic character of a property to be certified, I have determined that this project is not consistent with the historic character of the building and does not meet the "Standards for Rehabilitation." In the same letter--in order to achieve a certifiable project--the owner was encouraged to pursue alternative means of preserving the elevator by enclosing the cab itself with fire-rated glass or by constructing a fire-rated enclosure for the elevator shaft.

Prepared by: Kay D. Weeks, TPS

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1. Rehabilitation project work on an early 20th century building focused upon meeting health and safety code requirements for the new use.



2. This shows a detail of the open dome, manually-operated elevator with its highly decorative iron grill work. Because an enclosed cab was required by State law, the historic elevator was found to be in violation of ANSI building code standards. The consulting engineer thus recommended its removal and replacement with a modern elevator.



3. The replacement cab featured an enclosed cab and hollow metal shaft doors, in accordance with health and safety codes. Removal of the 1916 elevator eventually led to project denial because the historic elevator was deemed a significant interior feature and, thus, its retention and preservation were necessary to meet minimum preservation requirements.



4 and 5. The decoratively detailed elevator doors in the lobby (left) were to be removed as part of the code-required elevator replacement as well as the simpler, panelled doors on floors 3-7 on the west side (right).

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-060

Applicable Standards:

2. Retention of Distinguishing Architectural Character (nonconformance)

9. Compatible Design for New Additions (nonconformance)

Subject: ROOFTOP ADDITIONS TO SMALL SCALE BUILDINGS

Issue: Rooftop additions are sometimes seen as a way of increasing the usable floor area of historic buildings located in urban areas. When this type of new addition is being considered, it must be designed in such a way that it is as inconspicuous as possible when viewed from the street. Keeping a new rooftop addition inconspicuous may be difficult on a small building of only two or three stories. Even if the new addition is set back from the plane of the facade and screened with an existing roof parapet, it is difficult to minimize the visual impact of an entire new floor on a relatively low building. On buildings with a relatively small existing floor plan, the recommended setback may not permit the creation of sufficient new space. This need to gain valuable floor space has often led to the practice of bringing the rooftop addition out flush with the historic facade.

The National Park Service recognizes that some alterations and additions may be necessary to adapt the historic building to an efficient contemporary use. If a new rooftop addition to a small scale building, however, radically changes the historic appearance of the building so that the historic character is lost, the project will violate Standards 2 and 9.

Application: A deteriorated three-story commercial building in a National Register Historic District noted for late 19th century commercial buildings was rehabilitated into mixed retail/residential use. Prominently located on a corner site flanked by two-story structures, the building was built in 1884 as a two-story brick commercial structure. In the 1890s a one-story addition was placed on the roof of the building flush with the exterior walls, the exterior was stuccoed and a bracketed cornice was added. Numerous other buildings within the historic district received similar additional floors as the commercial district prospered during the first three decades of the 20th century. These additions were flush with the facades and ornamented with brackets and other victorian motifs popular in the district.

The building was severely deteriorated, had lost its ornamental projecting cornice in the mid-twentieth century, and had suffered serious fire damage on the third floor prior to the rehabilitation (see illus. 1). The overall rehabilitation project included a one and a half story addition to add eight loft bedroom apartment units over the retail and office space (see illus. 2).

As the building was relatively small (45'x65') and as a previous addition had been flush with the exterior, the new addition was designed to continue the vertical expansion of the building flush with the existing facades in order to maximize new floor space (see illus. 2). To further blend the addition into the historic district, the owner determined that a cornice using brackets similar to the lost cornice should be installed on the new parapet. The spacing of the brackets, however, was modified to accommodate small modern windows. Dates were added to the facade to differentiate the two major periods of construction, 1890 and 1980 (see illus. 3).

The owner submitted his request for certification after the rehabilitation was complete. The state recommended certification of the rehabilitation because it was consistent with the historic character of the district. The regional office denied certification because the addition was not consistent with the historic character of the building itself. Prior to the addition, the building had a simple horizontal character. After the height of the building had been increased by almost one-third, the new vertical emphasis gave the building an appearance that it never had historically. Furthermore, the historicizing of the details of the addition, including the jack-arch windows, corbelled beltcourse, pilasters, brackets and wrought iron cresting, eliminated any visual distinction between the new addition and the historic building. The use of datestones as a device was not sufficient distinction to clarify the periods of construction nor to preserve the historic character of the building.

The owner appealed the decision, stating that the addition was contemporary in design and that it "did not destroy significant historical, architectural or cultural materials and is compatible with the size, scale, color, material, and character of the property, neighborhood, and environment." The Chief Appeals Officer sustained the denial of certification, supporting the regional office's determination that the size and location of the addition were responsible for "altering significantly its (the building's) overall mass, scale, and proportional relationships." While the imitative nature of the design of the addition had confused the historic character of the building by giving the building an appearance it never had, even if the design had been purely modern in execution, the project could not have been certified as meeting the "Standards." He concluded that while the building still contributed in a general way to the overall historic character of the District, that the rehabilitation of the building was not consistent with the historic character of the individual resource as a result of the rooftop addition and therefore, could not be certified.

Prepared by: Sharon C. Park, AIA, TPS

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1. The building prior to rehabilitation was a three-story structure prominently located on a corner site in a National Register district noted for late 19th century commercial structures. Originally built in 1884 as a two-story brick building, a third floor was added in 1890, the building was stuccoed and an elaborate projecting cornice was applied. The cornice was lost in the mid-twentieth century and the building suffered a serious fire on the third floor prior to the rehabilitation.

2. The historic building received a one and a half story addition to accommodate eight loft bedroom apartments over the retail and office space. Note the change in scale and the dramatic vertical emphasis as a result of the new rooftop addition. As the overall mass, scale and proportional relationships of the building were significantly altered, the project was denied certification.



3. The new rooftop addition is not differentiated from the historic resource except by the use of applied dates. The addition is flush with the exterior walls and has adopted historicized features including wrought iron cresting, bracketed cornice, jack-arch windows, pilasters and beltcourses. In this case, however, the addition so altered the scale and massing of the building, that even if the addition had been contemporary in design, it could not have been certified.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-061

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance)
 3. Recognition of Historic Period (nonconformance)
 4. Retention of Significant Later Alterations/Additions (nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (nonconformance)

Subject: ALTERATIONS TO NON-ORIGINAL 20TH CENTURY STOREFRONTS

Issue: Storefronts on many 19th and early 20th century buildings were changed in the 1920s and 1930s, incorporating new materials and designs popular at that time and introducing trademarks of the increasing number of commercial chains. Some of these later storefronts today have no intrinsic value while others merit preservation as part of the historic structure.

As guidance in evaluating non-original storefronts, those that meet one or more of the following categories usually are worthy of retention:

1. Exhibit high quality workmanship;
2. Show evidence of being architect-designed;
3. Incorporate materials not commonly used today but are characteristic of a particular period (e.g., curved glass, Carrara glass, bronze frames);
4. Are representative of a particular architectural style;
5. Are compatible with the rest of the building in terms of design and scale and date to a historically significant period of the building and/or district.

Application: A two-story commercial building located in a historic district in the Southwest was operated until recently as part of the S. H. Kress Company store chain (see illus. 1). While the building dates to the early teens, the storefront had been altered in the late 1930s, incorporating a distinctive design which was a trademark of many Kress Company buildings. The band of transom windows recessed entries, metal framing and large glass display windows sections created the visual image characteristic of, and historically associated with, the Kress Company chain and its buildings constructed or renovated in the 1920s and 1930s (see illus. 2 and 3). Thus, while the 50-year age criteria of the National Register was minimally met, greater significance was attached to the storefront because it was part of the nationwide Kress Company effort in storefront design. While the new owners of the building originally had intended to maintain the existing storefront, breakage of one of the

large curved glass sections posed an unforeseen rehabilitation problem since such glass was not readily available locally in the required safety glass. With the overall rehabilitation progressing quickly, the decision was made to replace the entire storefront with a composite design referencing features from other buildings in the historic district (see illus. 4). Regretfully, little physical or pictorial evidence of the original appearance of the building had survived. The completed rehabilitation was denied certification and the decision sustained on appeal primarily because of the loss of the intact 1930s storefront (Standard 4), but also because the new storefront was a conjectural historic design and contained inappropriate detailing (Standards 2,3, and 6). Regarding the problem of availability of materials--curved glass sections--cost was not the major factor but rather time. Given time, companies could have been located which make such custom shapes in safety glass. Unfortunately, expediency and perhaps only mild appreciation of the historic importance of the 1930s storefront did not facilitate the careful investigation of such alternatives.

Prepared by: Charles E. Fisher, TPS

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1. Prior to rehabilitation, the 1930s Kress Company storefront had survived in place with nice curved entrances although the transoms had been covered over.



2. Very little change to the 1930s storefront had occurred prior to rehabilitation as evidenced by this historic photograph.



3. The entire storefront was replaced following breakage, during rehabilitation of one of the curved sheets of glass. Expediency and difficulty in locating a manufacturers of curved glass were cited by the owner as reasons for the change.



4. View of storefront after rehabilitation showing conjectural appearance of the original storefront — note inappropriate detailing of the transoms and small size of the doors.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-062

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (conformance)
 4. Retention of Significant Later Alterations/Additions (conformance)
 5. Sensitive Treatment of Distinctive Features and Craftsmanship (conformance)

Subject: REPLACING ALTERED FEATURES OF A HISTORIC STOREFRONT:
COMPATIBLE CONTEMPORARY DESIGN

Issue: Standards 2, 4, and 5 call for the retention of distinctive architectural features--whether original or changes that reflect the history and development of the building or the craftsmanship of its builders--and Standard 6 states that such distinctive features should be repaired rather than replaced, wherever possible. However, there may be cases where, over time, there has been a cumulative loss of historic material comprising these features and introduction of new material that neither exhibits a distinctive style nor special craftsmanship. (Examples of material loss may include decorative portions of a building such as a storefront cornice; more functional portions, such as its display windows, entrance doors, metal kick plates, or transoms; larger portions that combine structural and design roles within the overall storefront such as masonry, wood, or cast-iron pilasters between bays; or even the individual storefront bays themselves.)

If individual features of a storefront have been altered and the alterations are not "changes that have acquired significance in their own right," then the preservation and repair requirements of Standard 6 do not apply. In these cases, the nonsignificant later features may be removed and compatible replacement features designed and installed as long as the new work preserves any remaining historic material, the storefront character is preserved, and the overall rehabilitation is consistent with the historic character of the building. The option of replacing features, such as storefront doors or windows would, however, never extend to later, distinctive features that help define the storefront character.

In summary, it is cautioned that a thorough professional evaluation be made prior to removal to ascertain both the significance of individual storefront features as well as their potential for repair. Demolition of distinctive architectural features and craftsmanship can be the basis for denying an entire rehabilitation project.

Application A 6-story brownstone and terra-cotta structure built in the 1890s and located in a historic district in a southeastern city was being rehabilitated for retail and office use. Proposed exterior work included removal of nonoriginal 20th century storefront infill features--transoms, double doors, glass display windows, and concrete block kick panels (see illus. 1, 2). A contemporary replacement storefront would then be installed within the original cast-iron columns, pilasters, and framing, thus retaining the three-bay division of the historic storefront. The owner's primary reason

for removing much of the later storefront--those nonoriginal portions--was to integrate an additional code-required fire exit into an overall design scheme that he felt would successfully reflect the building's new use as an art gallery.

In its initial review, the SHPO recommended approval of the project work, but expressed concern over whether or not the 20th storefront infill features had acquired significance over time. In the regional review, the project was denied certification. In a letter to the owner, the reasons for denial were explained:

We have reviewed your proposal to replace the existing storefront with a new entrance of contemporary design that would meet the code requirement of providing a second fire exit. Though not original to the building, the storefront appears to be of sufficient age and design quality to have gained significance in its own right; we feel that its removal would violate Standards 4 and 5. Although we recognize the need to install a fire exit through one of the side display windows, alternative methods were suggested to the architect by this office that would avoid damaging the significant portions of the storefront (i.e., the gridded transom windows and double doors) and which would not require replacement of the entire storefront...In the absence of documentation demonstrating that the existing storefront is not significant in terms of its age, period, style, materials, or condition, we cannot approve its removal for the purpose of installing a modern entrance to the building.

Because the owner felt that the existing storefront needed to be altered to accommodate code; that the altered portions were not important historically; and that the contemporary storefront met Standard 9, the region's decision was appealed. Prior to appeal, the SHPO offered a final recommendation on the storefront replacement issue in a letter to the Chief Appeals Officer, supporting the owner's contention that new evidence seemed to indicate that most of the later alterations to the storefront had post-dated the 1930s:

In our initial review of the project, much discussion occurred concerning the significance of the existing storefront. While the existing storefront, which is obviously not original, is of nice design, it is not of sufficient quality to say that the storefront has acquired special significance in its own right or that it is important to retain the storefront to show the evolution of the building through history. In addition, I have personally inspected the building and believe that the storefront is not representative of any particular stylistic period and is not an example of skilled craftsmanship or a good example of design and use of material.

On appeal, the regional decision was overturned and the project subsequently certified for preservation tax benefits. In a final letter to the owner, the Chief Appeals Officer stated:

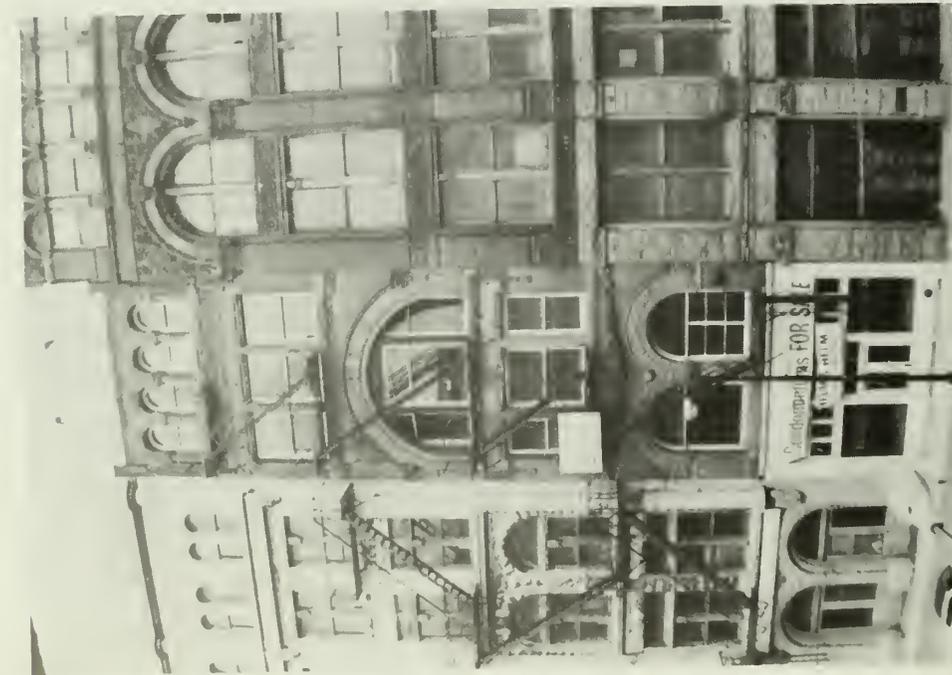
After carefully considering information submitted by your architect concerning the construction detail and dating of the existing storefront and comments provided by the State Historic Preservation Officer, I have determined that the proposed project meets the

Secretary's Standards. I share, however, some of the concerns of the regional office regarding proposed storefront design. While I have concluded that the existing storefront has not acquired special significance over time nor exhibits significant stylistic features or craftsmanship, I would encourage you to consider a contemporary design that provides greater visual distinction between the transom and the display windows. I would also encourage you to revise your design to provide for solid base panels beneath the windows and doors. These alterations would, I feel, be more in keeping with the historic character of the building and district yet would clearly "read" as new construction.

After removal of the altered, nonhistoric portions of the storefront, the compatible new infill was installed, thus retaining and preserving those original portions identified as historically significant (see illus. 3,4).

Prepared by: Kay D. Weeks and Charles E. Fisher, TPS

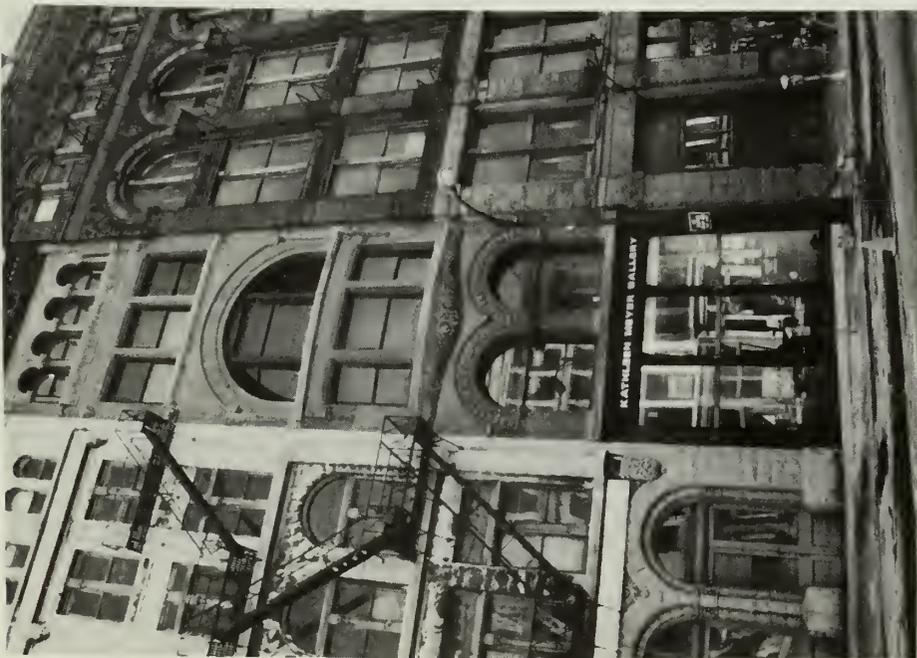
These bulletins are issued to explain preservation project decisions made by the U.S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. Overall view of the 1890s building and ca. 1930-1940 alterations to the original storefront. While the twentieth century storefront alterations were considered to be of "nice design," they were not significant stylistically or in material and craftsmanship.



2. The owner removed the nonoriginal elements of the storefront, including plain concrete block kick panels beneath the display windows, standard non-decorative woodwork and glazing in the transoms and display window sash, and the unadorned double doors. Although the proposal was denied by the region, it was ultimately overturned on appeal. The Chief Appeals Officer concluded that the later storefront elements did not display any special significance, and could thus be removed. The original portions of the storefront--the distinctive cast-iron columns, pilasters, and cornice--were retained, preserved, and integrated into a compatible, contemporary storefront design.



3 and 4. Overall and detail views, after installation of the compatible new storefront features. Note the 1930s-1940s features have been replaced, while the new design successfully retains the 3-bay division defined by the decorative cast-iron columns and cornice. The original cast-iron storefront elements have been painted dark brown as well as upper level window trim and cornice.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-063

Applicable Standard: 7. Cleaning with Gentlest Method Possible
(nonconformance)

Subject: INAPPROPRIATE CHEMICAL CLEANING OF HISTORIC MASONRY
BUILDINGS

Standard 7 of the Secretary of the Interior's Standards for Rehabilitation states that "the surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken." While "the gentlest means possible" is usually interpreted to mean chemical cleaning, water, or water with the addition of detergents, it is important to realize that these methods too, can be damaging to historic building fabric. Cleaning techniques involving water or chemicals are not infallible, and must always be tested. If carried out improperly -- for instance, if the chemical mixture is too strong, if chemicals are not adequately rinsed out of the masonry, if wet cleaning methods are undertaken during cold weather or if there is still a possibility of freezing temperatures -- such cleaning methods can physically abrade or otherwise visually damage historic masonry. In short, chemical cleaning may not be "the gentlest means possible." Historic masonry buildings (and brick buildings in particular) which have been chemically cleaned in a way that has resulted in damage to the visual or aesthetic qualities of the masonry, may be denied certification for tax benefits.

Application No. 1: A 1912 bank and office building constructed of brick with stone and terra cotta trim was rehabilitated for contemporary office use after being vacant for several years (see illus. 1). Located at a major downtown intersection, this nine story building is a prominent and highly visible landmark throughout the city, towering as it does above the more modestly scaled two to three story neighboring buildings. The proposed project which was given preliminary approval by the National Park Service, and was carried out in 1982, included refurbishing of office suites on the interior, chemical cleaning of the exterior masonry, and replacement of the later 1940's storefront infill with more appropriately scaled window glass.

When the completed project was submitted to the National Park Service for final review, however, it was denied certification on the basis of the cleaning techniques which had resulted in "severe discoloration and splotching of the brick surfaces" (see illus. 2). The region's denial letter went on to say: "The brick was apparently cleaned with an inappropriate chemical cleaner which was not adequately tested before its use, contrary to the recommendations contained in the Secretary's Guidelines for Rehabilitating Historic Buildings. Although the physical damage to the brick was not documented, the region felt that the visual change to the brick surface was sufficient to deny the project, citing violation of Standards 7 and 2.

When the owner appealed the denial he explained that the exterior of the building had actually been cleaned and treated with a water repellent two times. Unsatisfied with the result after the first chemical cleaning, the owner required the cleaning contractor to reclean the building in what turned out to be a futile attempt to improve the appearance of the brick. During the appeal, the owner was unable to identify the type of chemicals or the methods used in the cleaning, nor did he provide any close-up photographs of the discolored brick. Consequently, it remained unknown whether the chemical cleaning had also caused physical damage to the brick.

After careful review of the project, the Chief Appeals Officer sustained the region's decision, stating that: "I concur with the regional office's finding that this treatment (cleaning of the exterior brickwork) 'has so altered the appearance of the building as to detract from its historic character.' Standard 7 permits only the gentlest means of surface cleaning... Close-up photographs showing the conditions of the brick before and after this process (the second cleaning) were not submitted, nor were technical details of the cleaning methods and substances made available. Nevertheless, it is convincingly evident from the extent and degree of the persistent discoloration that the brickwork was subjected to unacceptably harsh cleaning. Accordingly, I find a violation of Standard 7."

Application No. 2: In a second case, a mid-nineteenth century brick rowhouse was rehabilitated for rental residential use (see illus. 3). A major aspect of the rehabilitation of the exterior was the removal of paint covering the brick facade. The project application stated that the building was to be chemically cleaned, generally an acceptable paint removal technique in accordance with the Secretary of the Interior's "Standards for Rehabilitation," and the proposal was given preliminary approval by the National Park Service. However, when the request for final certification was submitted, photographs showed that the "cleaned" brick appeared to have been damaged by the cleaning method (see illus. 4). When questioned, the owner revealed that the paint had been removed with sodium hydroxide, more commonly called caustic soda or lye. With the knowledge that some types of chemical cleaning may be just as damaging to historic brick as sandblasting, it was decided that an on-site inspection of the property by the National Park Service was necessary in order to determine if, indeed, the brick really had been damaged by this method of paint removal. At the project site, comparison of the cleaned brick with the painted brick of an identical row house on the same block provided evidence (see illus. 4 and 5) that the surface of the rather soft brick had been "etched" by lye.

On that basis, the project was denied certification by the National Park Service Regional office. The denial letter sent to the owner stated: "The National Park Service has been cautioning property owners for some time about the dangers of paint removal and cleaning of soft masonry. The (State Historic Preservation Office) has been advising property owners concerning the early practice of painting many...rowhouses for aesthetic reasons and as a protective treatment for inherently poor quality brick. We strongly urge you to be more cautious in future projects when you consider removing paint from historic masonry; we would encourage you not to remove paint where historically such surface treatment has acquired significance over time. Where paint removal is an appropriate treatment, only the gentlest means possible, determined by careful testing, should be used. If no method can be found which does not damage the brick or change its original visual appearance, the paint should not be removed."

When the owner appealed this decision, the Chief Appeals Officer upheld the denial of the regional office, explaining that "as a result of the cleaning, the surface of the brick has been eroded, exposing additional folds and irregularities in the clay and creating a rougher texture to the brick. These visual and physical changes to the brick have altered the character of the masonry facade."

Prepared by: Anne E. Grimmer, TPS

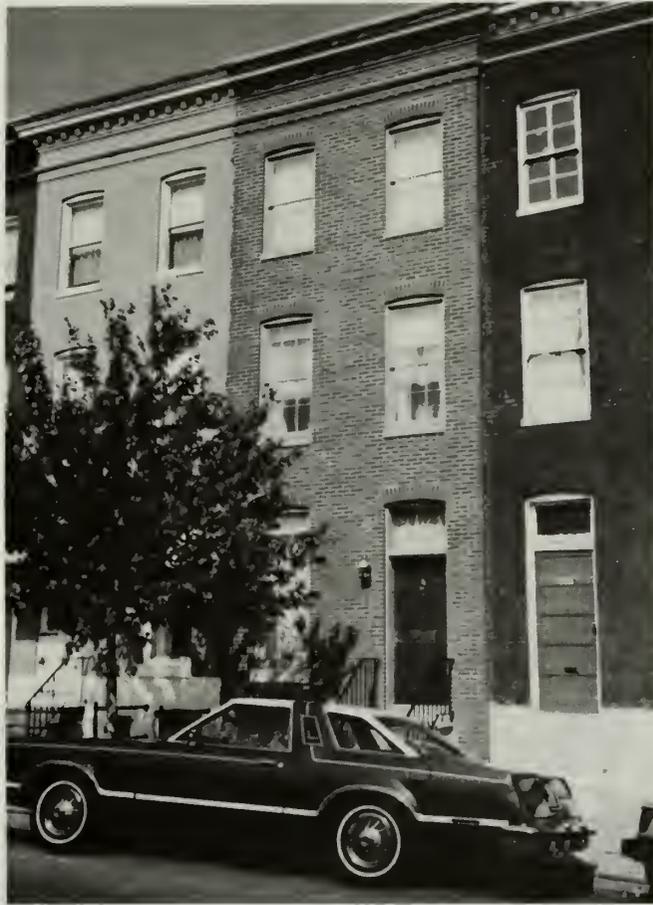
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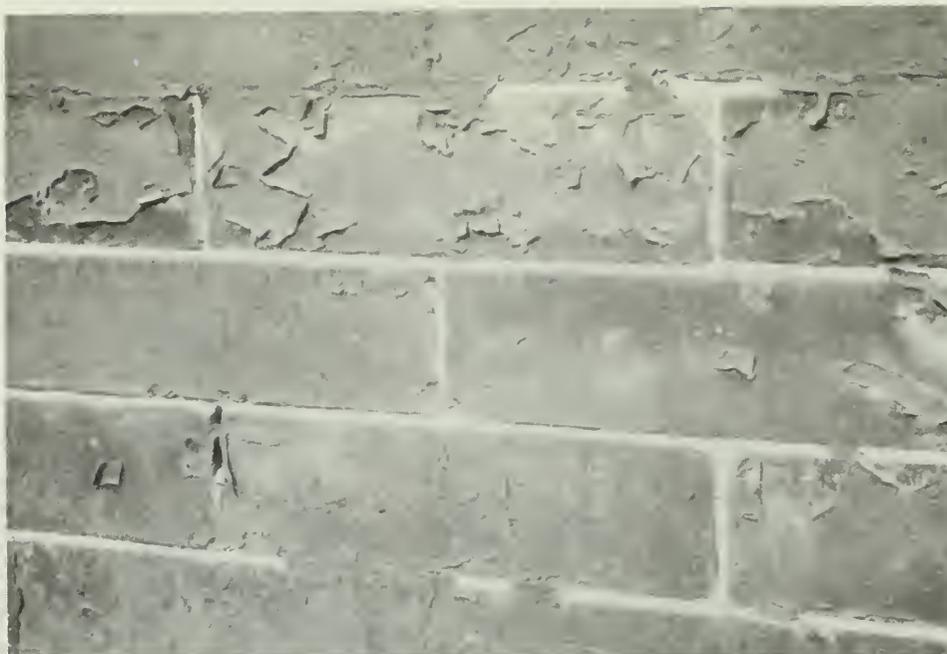
1. Nine story bank and office building before rehabilitation. Note uniformity of brick color.



2. Office building after chemical cleaning showing splotchy and discolored brick.



3. Brick rowhouse in center after paint removal using sodium hydroxide stands out conspicuously from its still painted neighbors.



4. Close-up view of uncleaned partially painted wall with original paint. Note relatively smooth surface of this brick on identical house on same block



5. Close-up view of chemically cleaned brick showing deep ridges and newly abraded texture.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 84-064

Standards for Evaluating Significance Within
Registered Historic Districts (36 CFR 67.5
(a)(2))

Subject: EXTENSIVE REPLACEMENT OF HISTORIC MATERIALS/FEATURES:
LOSS OF INTEGRITY

Issue: In planning any rehabilitation project, it is assumed that some historic materials (masonry, wood, and metal) will be deteriorated or damaged and need repair or replacement in preparation for the new use. While a reasonable level of replacement of such deteriorated or damaged exterior and interior material is acceptable, at the same time the preservation requirements outlined in 36 CFR 67 must always be met. To receive Part 1 certification, the building, prior to rehabilitation, must convey historic significance through its intact features, i.e., display integrity of design, materials, and workmanship, location, feeling, and association according to the Secretary of the Interior's "Standards for Evaluating Historic Significance Within Registered Historic Districts;" and to receive Part 2 certification, the building, after rehabilitation, must retain those portions and features of the building that have been identified as significant prior to work, in accordance with the Secretary of the Interior's "Standards for Rehabilitation."

If, after close inspection, it becomes clear that the significant portions and features of the building cannot be retained and preserved because of the extent of physical deterioration or damage, then the building will generally not possess sufficient integrity of design, materials, and workmanship to be designated as a "certified historic structure" and, in consequence, Part 1 certification should be denied. In unusual cases where Part 1 certification has already been issued and, during the course of rehabilitation, it is discovered that the structure does not possess sufficient integrity, the Part 1 certification should be rescinded and the Part 2 application returned to the owner, unprocessed, with a letter explaining the action.

Application: A deteriorated, three-story, three-bay wide brick structure built in 1843 was certified in the Part 1 application as contributing to the significance of the registered historic district--a 13 block area of 19th century Federal and Greek Revival structures (see illus. 1,2,3,4).

A Part 2 application was submitted at the same time as the Part 1 application, but a determination on Part 2 could not be given due to a lack of information concerning the below-grade storefront which the owner proposed removing as part of the work to return the building to a residential appearance. The letter from NPS, WASO requesting additional information, stated:

Although the application material indicates that the structure was originally residential, the photographs suggest that the storefront, including the projecting bay with side entrance door and cornice, may have acquired historic significance over time. For this office to make a Part 2 assessment, however,

you will have to provide information concerning the building's conversion on the lower floor to commercial use and the approximate date of the existing storefront. Photographs of the storefront showing in more detail what had survived should be submitted. When additional information and photographic documentation is received, a determination can be made as to whether the project meets the Standards for Rehabilitation.

In response, the owner submitted the requested information on the storefront in order to process the Part 2 application; this particular work component was reviewed and found to be in conformance with the Standards.

The amended application also included new photographic documentation that revealed the severely deteriorated condition of previously blocked-up portions of the rear of the building and the extent of damage and loss of both exterior and interior features. This portion of the building had not been assessed in the initial application, but was assumed to be substantially intact when Part 1 certification was issued. The newly submitted photographic documentation called into question the integrity of design, materials, and workmanship of the building, and it was decided to re-evaluate the Part 1 certification (see illus. 5,6,7). Following re-assessment, a second letter was sent to the owner, explaining the region's findings:

Based on the information submitted in the original application, the National Park Service determined that the property contributed to the significance of the registered historic district in which it was located, and thus qualified (for tax benefits) as a "certified historic structure." This certification was based on the assumption that a majority of the structure was still standing and that character-giving features such as interior trim, moldings, and fireplace details would be retained...

The new photographic documentation that you submitted shows that barely one-third of the building was standing at the time rehabilitation work commenced. As a result of the building's extremely deteriorated condition, significant architectural features are too deteriorated to be preserved on the remaining portion of the building. In addition, nearly all interior finishes are to be replaced and rebuilt using new materials. As a result of the new information, we have determined that No. 2 of the "Standards for Evaluating Significance Within Registered Historic Districts" has been met (e.g., the structure does not contribute to the significance of the district) and, therefore, the building cannot qualify as a "certified historic structure." This decision supersedes the earlier decision...Since the building does not qualify as a "certified historic structure," in accordance with Department of Interior regulations, the project is not eligible for certification of rehabilitation.

Because the owner felt preservation tax incentives should be made available and the Part 2 processed, the project was appealed. On appeal, the region's denial of Part 1 was affirmed by the Chief Appeals Officer, who reiterated: "Similarly, I have

determined that it is not a certified historic structure because the integrity of the original design, individual architectural features and spaces have been irretrievably lost through physical deterioration and structural damage..."

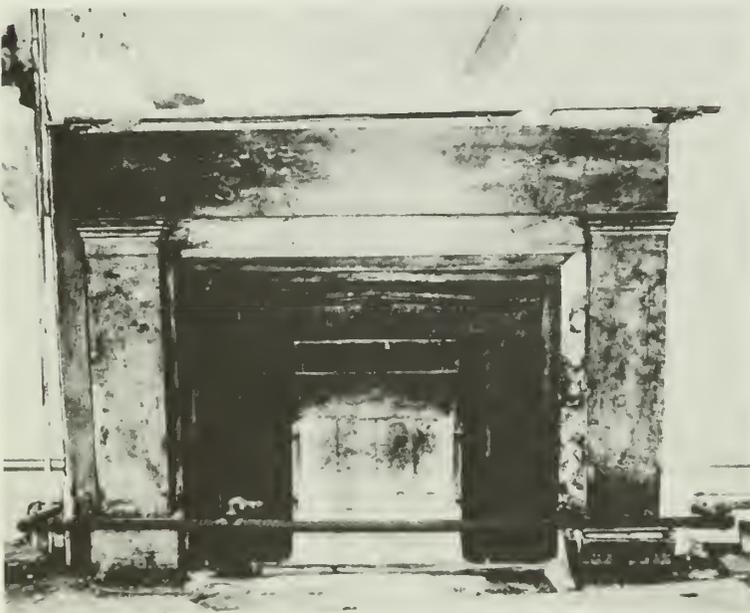
Prepared by: Kay D. Weeks, TPS

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1. Although photographic documentation submitted with the Part 1 application showed some deterioration and loss on the primary elevation, NPS determined that the building exhibited sufficient "integrity" to qualify as a certified historic structure.

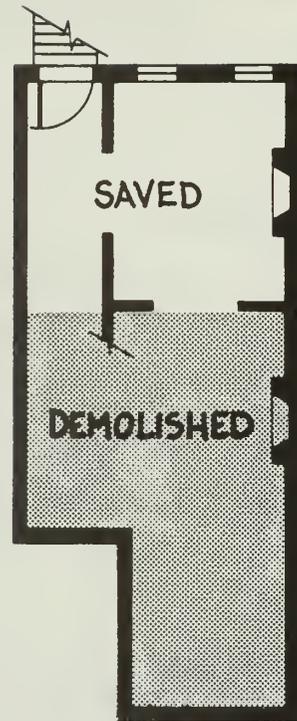
2. Limited demolition at the rear of the building had already occurred and protective boards had been applied.



3, 4. The interior, with intact trim and mantels helped define the character of this simple, mid-19th century structure.



5. Crucial to the decertification of the structure were additional photographs documenting the condition of the rear of the building prior to rehabilitation. After removal of the boards, this new information showed that barely 1/3 of the building remained.



6. The plan indicates the extent of material loss that had occurred prior to rehabilitation, including exterior and interior features.

7. The rear of the building and major portions of the interior required extensive replacement of historic material with new material.



Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-065

Applicable Standards:

1. Compatible New Use (conformance)
2. Retention of Distinguishing Architectural Character (nonconformance, conformance)
5. Sensitive Treatment of Distinctive Features and Craftsmanship (nonconformance, conformance)
6. Repair/Replacement of Deteriorated or Missing Features (conformance)
9. Compatible Design for New Alterations/Additions (nonconformance, conformance)

Subject: Alterations to Historic Auditorium Spaces

Issue: Changing the use of historic auditorium spaces, such as those in theatres, churches and schools, poses difficult design problems. Some new uses cannot be accommodated in such auditoriums without destroying character-defining spaces or features. Dividing the space, or altering or destroying its features will result in a denial of certification for noncompliance with Standards 2 and 5. However, there are cases where earlier insensitive alteration to, or extensive deterioration of, the materials comprising significant features and spaces has already resulted in loss of the historic character. In such cases, further alterations to accommodate a new use will generally not result in denial of rehabilitation certification. It is particularly important, however, that a careful professional evaluation be made of altered spaces and deteriorated features to assure that repair is, indeed, infeasible.

Applications: A small church built in 1875 in the Gothic style and located in a historic district had been purchased by a neighboring church in 1923 for use as an educational facility. During the 1960's it had been used as a theater and recreational center (see illus. 1 and 2). A proposal was made to rehabilitate the structure into residential condominiums (see illus. 3). In order to accomplish this conversion, the owner proposed to subdivide the interior space and to insert three new floor levels into the sanctuary.

The regional office denied the project preliminary certification on the basis that the "austere interior is of major importance" in defining the "ecclesiastical character of the structure." It found that inserting seven residential units into the interior would seriously impair that character. While the concept of inserting residences into the church was not ruled out, the plans as submitted were deemed unsatisfactory because they involved the "total loss of the original volume and space of the sanctuary."

Upon appeal the owner stressed the alterations made to the interior during the previous 20 years. The "austere" appearance resulted, he stated, from the gutting of the interior to provide a basketball court. The interior did not, therefore, contribute to the overall character of the building. He further stated that "the sense of volume and the ecclesiastical character of the former church will be retained in the individual apartment units. After the rehabilitation, this building will look like a church, as it does now."

In his decision upholding the denial of certification, the Chief Appeals Officer determined that changes made to the interior over the years had not seriously diminished the historic character of that space. The alterations, he said, "appear to amount to little more than removal of church furnishings." He noted that the church retains such features as the regularly spaced windows, the conspicuous roof structure and exposed scissor trusses, and that the extent and form of the space remain. Overall, he concluded, the interior still conveys a sense of the purpose for which it was designed--assembly. The interior space, therefore, was determined to be integral to the historic character of the building. Because that space would be destroyed by the insertion of apartments as planned, certification was denied.

A second case involved an 1890's brownstone, Romanesque Revival church with an octagon plan sanctuary, individually listed in the National Register, and located in a residential section of a major northeastern city. A rehabilitation was proposed to convert the building, which had been empty for fourteen years, to medical offices. The new use necessitated insertion of three floors and office partitions into the sanctuary (see illus. 4). The interior had ornate, clustered, engaged colonettes; acanthus leaf entablatures; a wooden chair rail; four arched tripartite windows; an egg-and-dart ceiling cornice; and a shallow dished ceiling. Plans called for enclosing most of the deteriorated plaster detailing on the walls with furred-out walls, and removal of the lath and plaster of the dished ceiling (see illus. 5).

The church had been converted to a synagogue in 1948, at which time the organ; organ chamber; choir, choir gate, and railing; pulpit; stained glass windows; and pendant lighting fixtures had been removed. Shortly afterward (early 1950's), an acoustical tile ceiling and recessed lighting were installed. During fourteen years of disuse, the building's attic and tower had become infested with pigeons, little maintenance had been done, the building was without heat, and had been vandalized.

The NPS regional office denied the proposal preliminary certification, citing Standards 1, 2, 5, 6, and 9. The decision was predicated on an evaluation of the sanctuary space and its elaborate ornamentation as essential to the historic character of the building. The region determined that, "although parts of the historic fabric were water-damaged and although alterations had occurred, the sanctuary had not lost its ability to convey historical associations and the damaged features were repairable." The denial letter stated that the installation of new floors and partitions that "leave no area for perception of even part of the original, grand, open plan" violates Standards 1, 2, and 9. The removal of the ceiling, enclosure of decorative detailing, and replacement of (1948) windows violates Standards 2, 5, and 6.

In appealing the regional denial, the owners stated that the dished ceiling plaster and lath (as well as the applied acoustical tile) would have to be removed, as they were soaked with water from the numerous roof leaks, and had a thick layer (as much as one foot) of pigeon excrement above. Further, due to water penetration and freeze-thaw cycles, the decorative plaster on the sanctuary walls was severely damaged and so unstable as to be unable to withstand even the slightest impact.

At the appeal meeting, close-up photographs of deteriorated plaster details were shown (see illus. 6), and the condition of the plasterwork was fully discussed. The Appeals Officer overturned the regional office denial and determined that the project was consistent with the existing historic character of the church. In certifying the project, he said:

The information and photographs (as well as the physical evidence) you provided clarified for me the condition of the building...I am convinced that the plasterwork has deteriorated to such an extent that it cannot now be repaired, and that the interior wall and ceiling finishes have lost their physical integrity and their historic character.

Church sanctuaries are often character-defining features of historic churches. The importance of these spaces, however, is not dependent on the ornateness of detailing. The first space discussed here was plain; the second was elaborate. In neither case did evaluation of the proposed project depend on the level of ornamentation. Minor changes had been made to the first church interior, but the materials and the sanctuary space had remained intact. In the second case, the sanctuary had lost its character due to extreme deterioration. Regardless of the original level of detail, if a character-defining historic interior remains largely intact, it must be retained in a rehabilitation. Subdivision or other alteration that destroys the form or features of a significant space will result in denial of certification.

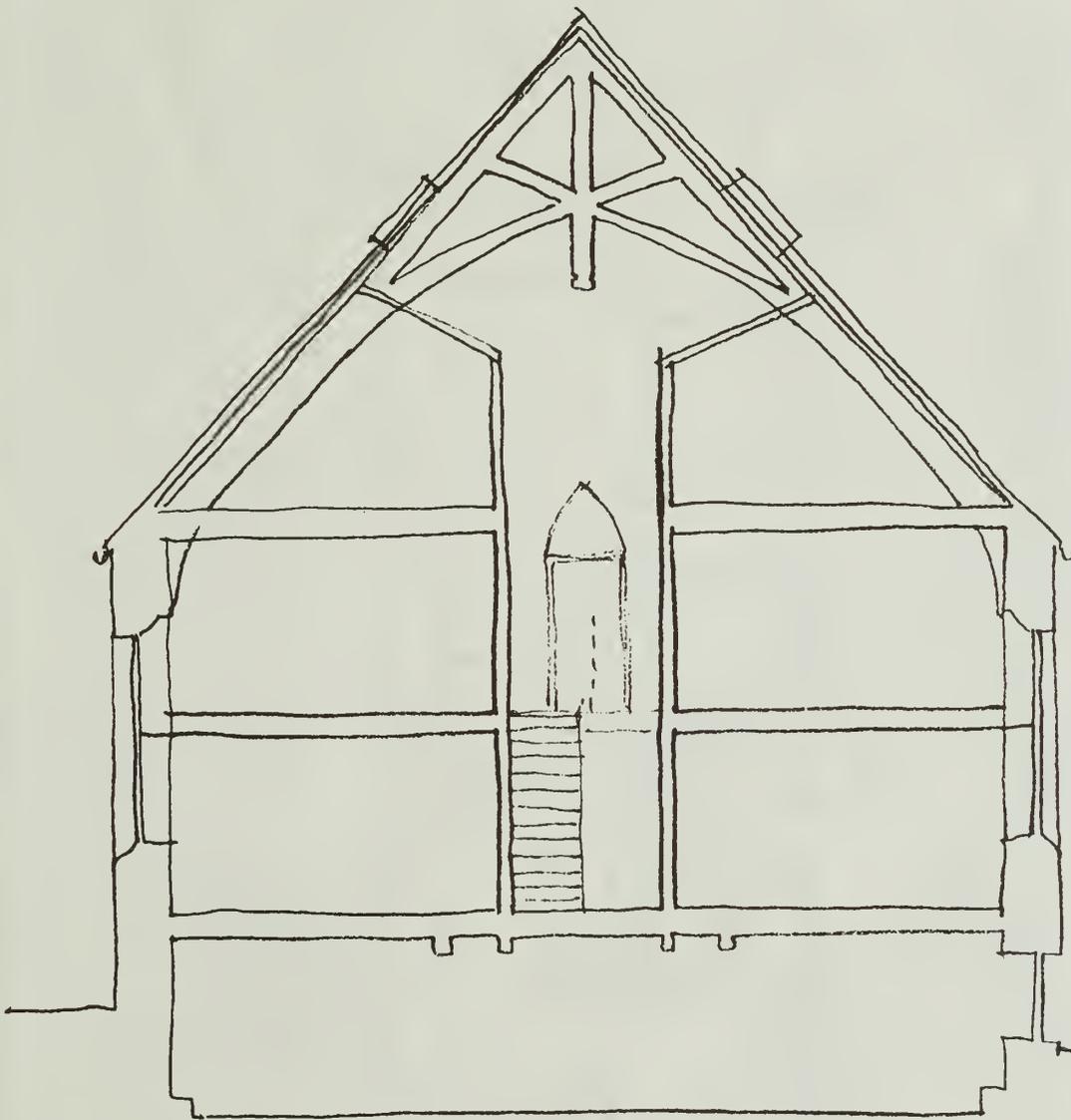
Prepared by: Michael Auer and Susan Dynes, TPS

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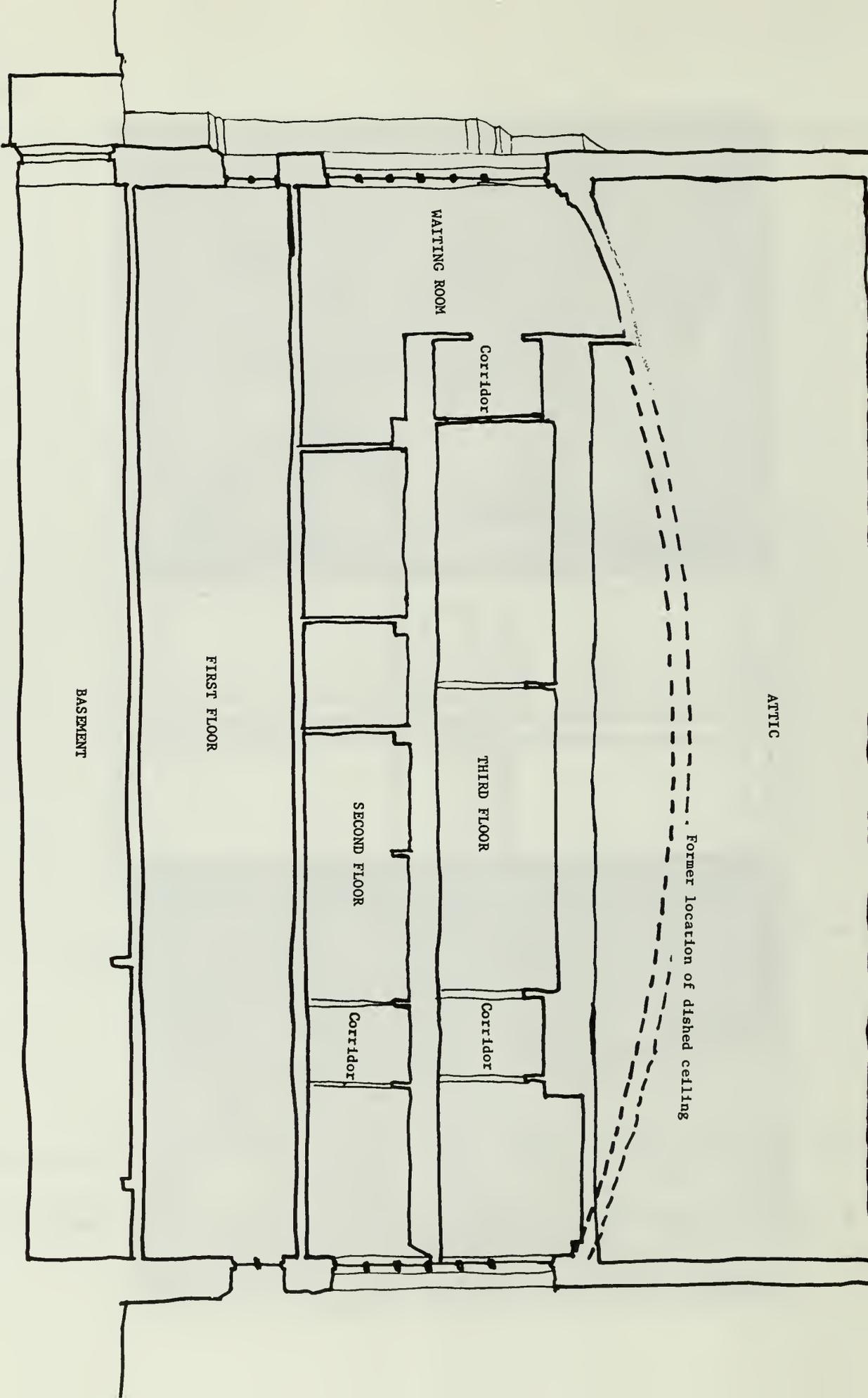
1 and 2. Interior of the church at the time rehabilitation planning commenced. Remaining features include regularly spaced windows, roof structure and exposed scissor trusses, original floor to ceiling height. Only the church furnishings had been removed.





SECTION THROUGH STAIR HALL

3. Section showing proposed insertion of two floors and a hallway within the sanctuary.



4. Section of Octagon sanctuary space with proposal to add floors and partitions for the new use as offices. Two-story waiting room with reconstructed plaster details on left of sketch.



5. Damaged ceiling, due to moisture from roof leaks, buildup of pigeon droppings above, and lack of heat.

85-065



6. Detail of sanctuary perimeter wall with engaged colonettes and obvious plaster deterioration

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-066

- Applicable Standards:
1. Compatible New Use (Conformance)
 2. Retention of Distinguishing Architectural Character (conformance)
 9. Compatible Design for New Alterations/Additions (conformance)
 10. Reversibility of New Alterations/Additions (conformance)

Subject: INTERIOR ALTERATIONS TO CHURCH STRUCTURES TO ACCOMMODATE NEW FUNCTIONS

Issue: Rehabilitation of any historic building should always take into consideration the preservation of significant interior spaces, materials and features. This is particularly important when evaluating churches because the large, open spaces frequently are significant character-defining features. Preservation of the exterior form and shape of a church structure is of obvious importance, but because the exterior is essentially a reflection of this interior space, successful rehabilitation of a church structure ultimately depends on finding a new use that respects this character-defining feature. Generously scaled open space is characteristic of even a simple country church and like other types of auditorium spaces, such an interior does not readily lend itself to very many other uses. Selection of a new use that respects the character of this space and any distinctive architectural details is a critical first step in meeting the Secretary of the Interior's "Standards for Rehabilitation." Once a new use is found, its functional requirements must be adapted to fit into the existing space without damaging or adversely affecting its historic character.

Application: A small turn-of-the-century board and batten Gothic Revival church located on a rural wooded site had stood vacant and unused for nearly thirty years (see illus. 1-2). Built on the brick foundation of an earlier church constructed in the 1870's, the church has a nave 5 bays in length covered by a steeply pitched gable roof. The gabled entrance porch on the south side of the nave is distinguished by stickwork detailing outlining the gable. Lancet windows light the nave, and the 2-bay long apse features a tripartite stained glass window opposite a pair of stained glass windows with a stained glass roundel above on the west end of the church. The vestry room, a small gabled section (matching the entrance porch) projects off the north side of the apse. A square bell tower with a shingled spire dominates the north side of the nave opposite the entrance porch. The simple interior is highlighted by exposed oak roof beams, arched trusses, and matchboard ceiling and wainscotting (see ill. 3-4). Individually listed on the National Register, this building had essentially retained most of its original fabric, as well as its form and pristine country setting, all of which contributed to its historic character. The church did not have plumbing, electricity or a modern heating system when the owner purchased it with the intention of converting it into an artist's studio and residence.

The rehabilitation (already underway when the Part 2 Historic Preservation Certification Application was submitted to the National Park Service), included the installation of mechanical systems, insertion in the nave of 2 small pent-roofed sheds to house a bathroom and storage, construction of a spiral staircase and a mezzanine above the chancel to function as a sleeping loft, conversion of the vestry room into a kitchen, and the cutting of three skylights into the north side of the roof of the nave.

When the project was reviewed by the National Park Service, the determination was made that the cumulative effect of the rehabilitation work violated Standards 2, 9, and 10, of the Secretary of the Interior's "Standards." Cited in the denial letter was the installation of the large skylights into a "major roof slope," dramatically altering the exterior appearance of the building and on the interior flooding the dark ceiling with light, not only changing a distinctive and character-defining feature (in violation of Standard 2), but also resulting in loss of historic roof fabric (in violation of Standard 10). The addition of a mezzanine in the chancel and a circular stair in the center of the arch at the chancel entrance were cited as being incompatible with the character of the building (in violation of Standards 2 and 9), as was the insertion of the bathroom and storage sheds in the nave because their construction changed the nave space and its visual relationship with the chancel.

The owner appealed the denial, arguing that the skylights were not highly visible on the exterior to passers-by, as that elevation of the church faces onto an abandoned cemetery, not a public-right-of-way. Furthermore, their installation did not result in extensive loss of historic fabric because materials removed were used to patch damaged areas of the roof. The owner also stated that the mezzanine and stairway inserted in the chancel and the bathroom and storage sheds in the nave were sensitively designed and compatible with the historic character of the church (see illus. 5-6).

After careful review of the project and newly submitted photographic documentation of the now completed work, the Chief Appeals Officer reversed the denial, and certified the rehabilitation. The Chief Appeals Officer, explaining his decision in a letter to the owner, agreed with the owner that the alterations to the interior were not inconsistent with the historic character of the historic resource.

The skylights were introduced directly behind the bell tower in the north slope of the roof which faces away from the principal approach to the building; they are not obtrusive from the exterior, nor are they so numerous as to adversely affect the character of the interior. The mezzanine, circular stair and sheds were introduced to the interior with minimal damage to the historic fabric. While the chancel arch was partially enclosed in inserting the mezzanine, the windows in the east wall remain visible through the glass panels and open circular stair. The pendant sheds constructed in the nave similarly respect the axial lines and tunnel-like view of the church interior from the west end towards the east. In fact the slope of the shed roofs focuses the lines of sight toward the chancel and the windows beyond (see illus. 6). The changes made to the interior of this building are consistent with the historic character of this historic structure, and I find them in conformance with the Secretary of the Interior's "Standards for Rehabilitation."

Finally, the Chief Appeals Officer concluded that his decision to overturn the denial was also,

...based in large part on the sensitivity to the setting of this structure...evident in the decisions you made regarding the use and treatment of this building. The property surrounding it retains its rural character and this setting contributes greatly to its historic character as a country church. Your rehabilitation preserves the setting and appearance of the church exterior. (see illus. 7)

Prepared by: Anne Grimmer, TPS

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1. South elevation of church before rehabilitation.



2. North elevation of church before rehabilitation.



3. View of nave looking west toward baptistry before rehabilitation.



4. View of nave looking east into apse and sanctuary before rehabilitation.



5. North elevation showing new skylights inserted in nave roof after rehabilitation.



6. View of nave looking east. Note the 2 new sheds in front of and on either side of spiral stairs in center of sanctuary arch leading to mezzanine.



7. South elevation of church after rehabilitation.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-067

- Applicable Standards:
6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (conformance)
 9. Compatible Contemporary Design for New Alterations/Additions (conformance)

Subject: OPTIONS FOR REPLACING MISSING HISTORIC FEATURES

Issue: When a certified historic structure which otherwise possesses integrity is missing a significant feature of the primary elevation, a particularly important decision has to be made as to how to treat this portion of the building's history that has been lost.

If physical evidence and/or pictorial documentation is available and restoration of a missing feature of the facade is desirable, the most traditional and often preferred approach is to accurately recover it in both form and detailing so that the entire facade appears to be "historic." Although the missing feature is actually new material, the historic form is re-established.

If the restoration option is chosen, the replacement feature needs to be evaluated on its accuracy of form and detailing, whether the replacement feature is made of matching historic material (wood, masonry, or architectural metal) or a compatible substitute material. In this regard, it should be noted that it is not acceptable to replace a missing historic feature with a feature that conveys a false or confusing sense of history--that glamorizes the missing historic feature; or otherwise gives the building a "historic" appearance that never existed.

A second acceptable, but potentially difficult, approach is to replace a missing feature with a compatible new feature. This option can be quite successful within a rehabilitation project because, as opposed to recovering the historic configuration with new materials, it honestly acknowledges loss of the historic feature, then gives the replacement feature--such as a compatible, contemporary storefront--a legitimacy of its own within the rehabilitation.

If a compatible contemporary approach to replacement is chosen, a very different process needs to be used to evaluate the project for conformance with the Standards. This process should begin with an assessment of the remaining historic features of the facade. Any new work then has the dual goal of preserving and retaining those significant aspects that have survived; and of suggesting that an important element of the facade was missing but has now been replaced. Such a replacement feature should approximate the form of the missing historic feature, clearly reading as new through avoidance of historicized detailing. Modern materials may assist in conveying a contemporary appearance, but their use is not required.

It should be recognized that once a significant feature is lost through deterioration, alteration, or vandalism, even a thoroughly documented and carefully crafted replacement feature is no more than an interpretive facsimile. Therefore, whether or not physical evidence and pictorial documentation exist that could be used to restore the missing feature such as a porch or cornice or storefront, a third option--although not widely accepted in a historic preservation context--is to simply acknowledge the loss as part of the evolution of the historic building.

In summary, the three options for replacing a missing feature are as follows:

1. Use pictorial documentation and/or physical evidence to re-create the historic feature.
2. Acknowledge loss of the missing feature, then re-evaluate the features of the existing facade to design a compatible new replacement feature that does not alter or damage the remaining character-defining portions that convey historic significance.
3. Accept the loss; do not replace the missing historic feature.

Applications: In the first case, a significant storefront of a "contributing" nineteenth-century limestone building had been extensively altered; in addition, a highly decorative and equally significant cornice was missing (see illus. 1). In the rehabilitation project, the owners elected Option 1, above, to restore both altered and missing portions of the building using physical evidence and pictorial documentation (see illus. 2). Overall work included cleaning and repair of the limestone; repair of window sash and frames; replacement of the missing cornice using fiberglass elements and, following removal of the later, altered storefront features, an accurate duplication of the historic design was constructed (see illus. 3). The project has received preliminary certification for the investment tax credit.

In the second case, a former theatre building located in a midwest historic district was determined to be a contributing element, in spite of the fact that it had been extensively altered in the 1960s for use as offices. The original glazed wooden double doors, (see illus. 4), had been removed and the openings filled in with glass block as part of the 1960s renovation (see illus. 5). Also, in order to level the sloped theatre entrance floor, concrete had been poured in the front 15 feet of the building to a thickness of 22 inches at the facade.

The recent rehabilitation project for which certification was requested included substantial interior office renovation; removal of small areas of the later paint to determine the original brick colors and painting over the gray paint to approximate them; replacement of the deteriorated second-floor casement windows with matching sash; and replacement of the 1960's glass block in the first floor openings with large steel-framed windows and transoms (see illus. 6). The owner felt that the new windows were compatible with the remaining character-defining features of the historic facade, as outlined in Option 2.

After review, the regional office denied the project certification based on an assessment that the new first floor windows violated Standards 6 and 9. The denial letter stated:

Although there is no question that the block infill...was not significant, the rehabilitation of the building should have either left the existing conditions

in place, been based on a significant documented period of the building, or reflected a predictable treatment to the age, style, use and detail of the building. The windows installed in place of later inappropriate glass block infill followed none of these approaches.

Because the owner felt that the new design was compatible, in accordance with Standard 9, and that the installation of doors was not possible because of the poured concrete and the use of the building, the denial was appealed.

After carefully evaluating the facts, the Chief Appeals Officer reversed the regional decision, finding that the overall rehabilitation was consistent with the historic character of the former theatre building. An assessment of the building's facade, without the distinctive wooden double doors, revealed that the historic character of the facade now consisted of the prominent projecting central pavilion, together with the pattern of narrow vertical openings on the second floor, the freestanding piers, and the patterned brick. One option was to accurately restore the form and detailing of the missing doors. But an equally acceptable option was to acknowledge their loss and select a compatible contemporary solution. Since the doors were now gone, retention of the significant openings in the rehabilitation was a key preservation objective. Whether these openings were used as doors or as fixed windows was not an issue in the appeal. However, if the existing openings had been altered, changing the historic proportions, or the piers or patterned brickwork changed, the historic character would clearly have been diminished. This project, however, retained and preserved the remaining character-defining features of the facade.

In approving the project, the Chief Appeals Officer held that the owner had met the requirements of Option 2, to design a replacement feature that did not alter or damage the existing masonry openings, or did not have a negative visual impact on the facade. In fact, the new work successfully borrowed elements from the documented historic doors in the compatible contemporary approach, as stated in a final letter reversing the region's denial:

The restrained design of the new windows repeats proportions from the original doors, which are known from a historic photograph. The stone panels recall the major horizontal division established by the large kick-plates on the doors, the vertical mullions indicate the original division of each bay into two doors; and the new transom approximates the proportion of the original transom. Replication of the original doors, based on the historic photograph you have, would have been an acceptable preservation treatment as well...

Prepared by: Kay D. Weeks and Susan Dynes, TPS

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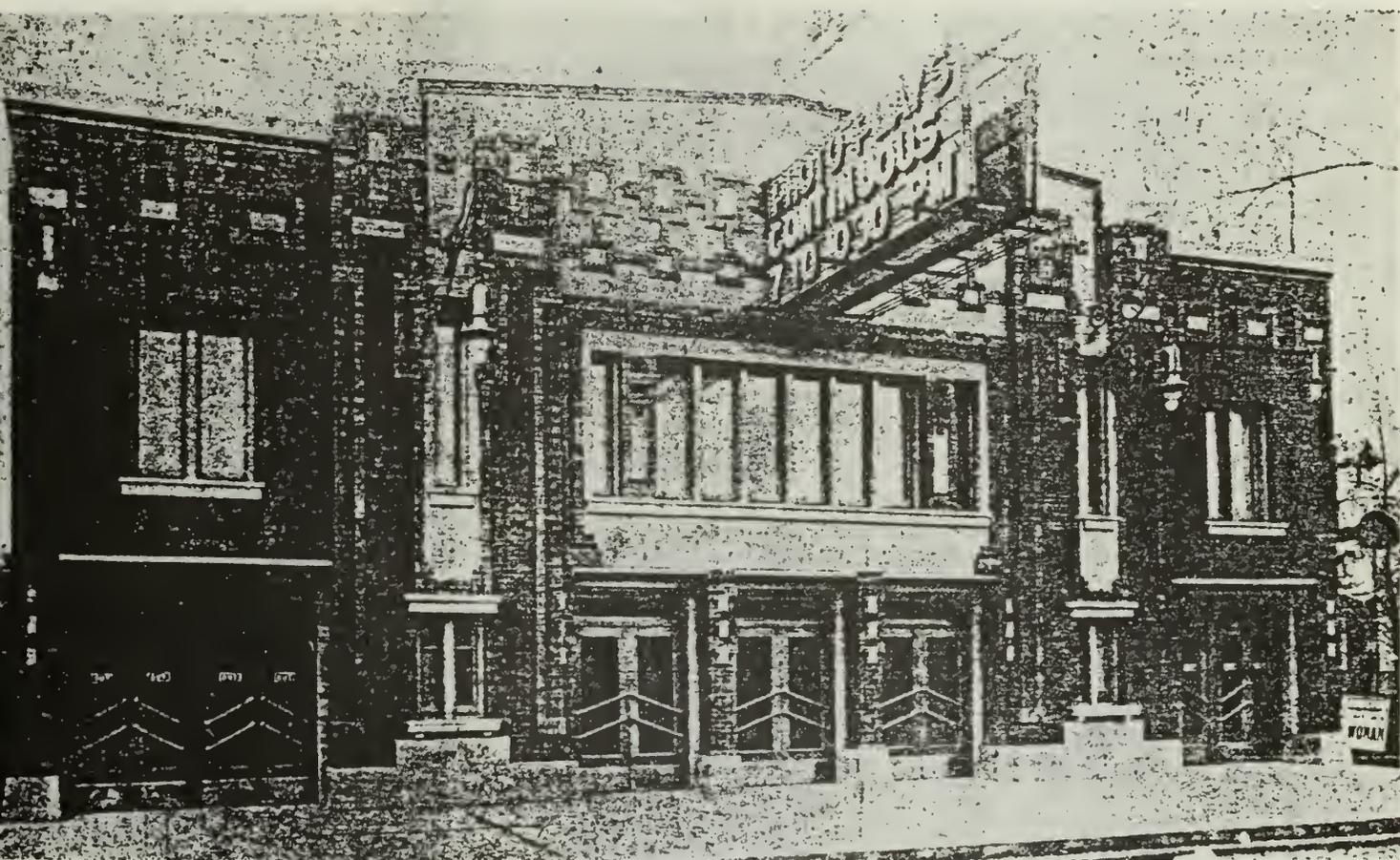
1. At the outset of rehabilitation, an 1866 limestone building was missing its ornamental cornice; and the ground level storefront had been extensively altered.



3. In addition to restoration of the storefront using matching materials, this photograph of finished work shows an acceptable use of substitute material (in this case, fiberglass) to fabricate the missing pressed metal cornice.



2. Based on the availability of this and other photographic documentation, the owners were able to accurately restore both the cornice and the storefront to their historic configuration.

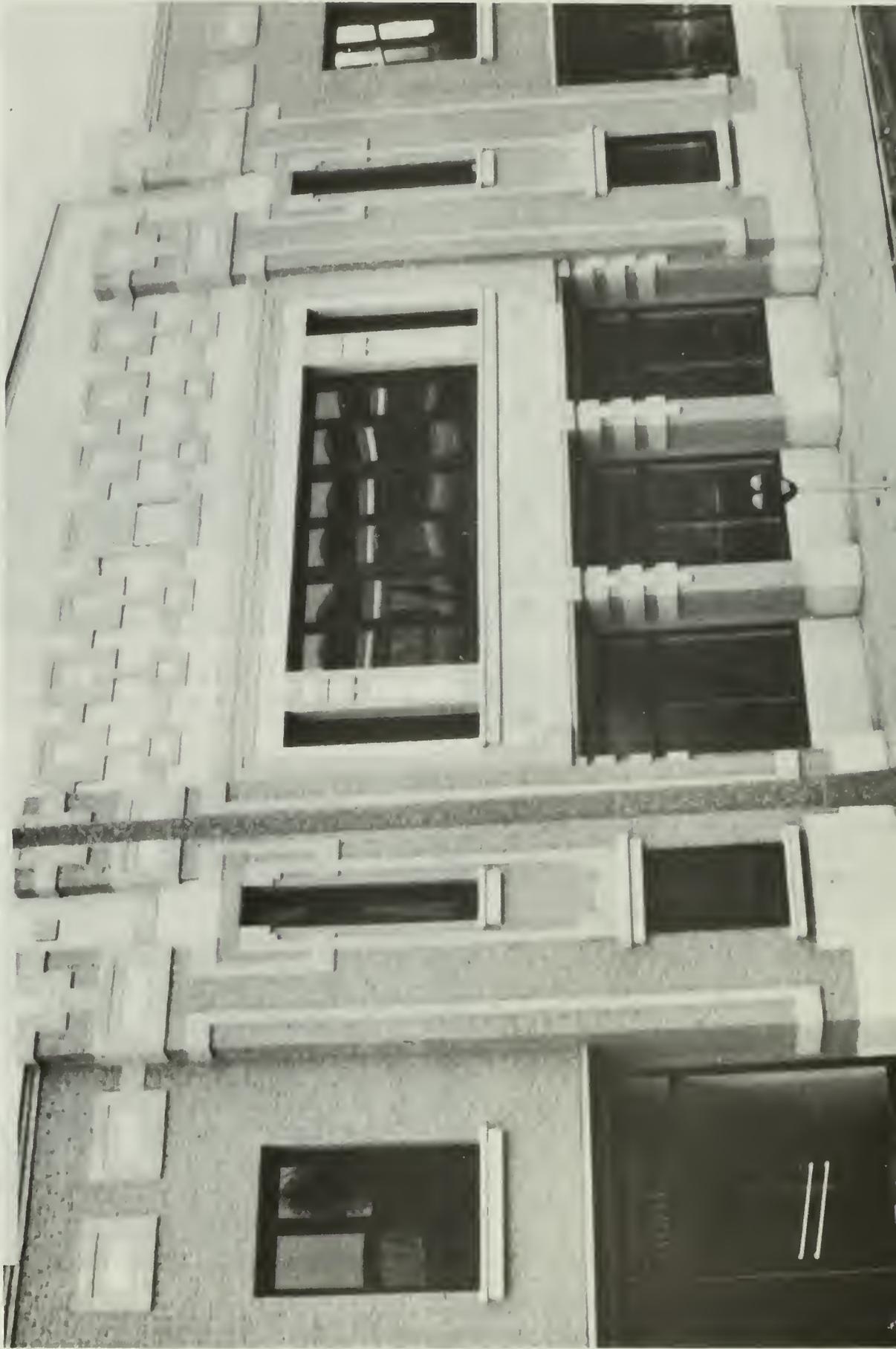


4. Historic photograph of the theatre's facade as it appeared in 1913. Note the glazed wooden double doors, repetitive features that, together with the distinctive rectangular openings themselves and the patterned brickwork, define the architectural character of the building.



Theatre building as it appeared at the commencement of rehabilitation. The wooden doors had been removed in an earlier "renovation" and the openings filled-in with glass block. In addition, the masonry was painted a uniform gray. The stone sills cover a 22-inch-thick concrete floor inside.

6. Rehabilitated facade. After removing the nonsignificant glass block infill, the owners elected not to restore the wooden double doors, but instead, to install new, simply detailed steel windows that respect the regularized openings. The brick has been painted to approximate the original colors so that the patterning is again evident.



Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-068

Applicable Standard: 2. Retention of Distinguishing Character of Building and Environment (nonconformance)

Subject: REMOVAL OR ALTERATION OF HISTORIC SITE FEATURES

Issue: Standard 2 requires that the original qualities or character of a building and its environment shall not be destroyed. The landscape and landscape features around a building are often important aspects of its character or that of the historic district in which it is located. It is incumbent upon an owner to ascertain the historic significance of all elements of an historic building and its site before making decisions about destroying or altering historic material.

Even when development pressures within a neighborhood are intense, site features that help define a building's historic character must be retained as part of a certified rehabilitation. Those elements might include gardens, walls, fountains, pools, paths, site lighting, benches, or grading.

Application: An early twentieth-century Mediterranean villa style house, individually listed in the National Register, had a formal garden, apparently conceived as an integral part of the total design (see illus. 1). The house had been vacant for over ten years and although the garden's architectural features were deteriorated and the planted areas were severely overgrown, much of the historic fabric remained. There were terraces at the front and rear of the building. The rear terrace had a simply-detailed pergola and steps down to a small walled garden with a fountain and an ornamental wall topped by an iron fence (see illus. 2). Symmetrical steps led from there to a long, narrow lawn (overgrown at the commencement of rehabilitation), at the base of which was a fountain against a masonry wall.

In a recent rehabilitation that involved reuse of the house for rental apartments and development of the site with new low-rise apartment structures, the landscape features, both plant materials and architectural elements, were destroyed. In its denial of the project, the regional office, while commending the owner on his proposal for the rehabilitation of the house, stated:

The walled garden, albeit in a neglected condition, was one of only a handful of formally designed gardens in the city that survive to the present day. The neighborhood was, in the last decade of the 19th century and the first decades of the 20th, a coherent and contiguous collection of medium to large scale urban mansions on small lots. Typical to these was a small, formally designed, often walled, garden either to the rear or to the side of the house. Today, few have survived. The imperative to save this significant feature was all the more important given this context.

The owner appealed, citing the following four points:

- 1) The deteriorated condition of the garden structures and the overgrown site.
- 2) The fact that the nomination to the National Register for the house did not mention the garden; therefore, it cannot be considered significant.
- 3) The garden to the rear of the house was never visible from the public way, nor would it be after project completion.
- 4) Certain elements of the garden -- the basic configuration of a portion of the small walled garden, the urns, the balusters and some iron work will be reused.

The owner also brought a photograph of the rear of the house after the garden area had been cleared as part of the rehabilitation effort, but before the new construction had begun. It was evident that nothing remained of the rear garden below the terrace; and that, in fact, most of the terrace had been demolished in preparation for construction of the new apartment structures (see illus. 3).

The Chief Appeals Officer upheld the region's denial of the project, stating:

Although the garden is not described in the documentation that was submitted to justify inclusion of the house in the National Register, as you pointed out during the appeal meeting, it was nonetheless a constituent element of the whole property that was nominated and accepted. The house and garden together constituted the complete resource.

Furthermore, it is evident that the garden was conceived as an integral part of the total design for the house and was constructed at the same time as an appropriate setting to complement and enhance the imposing, romantically eclectic building. Although some of the features were deteriorated and the site was overgrown, the integrity of the original garden design had survived intact.

The rehabilitation project, already well underway, will destroy all sense of the original garden design. No longer will the long vista exist from the terrace outside the house to the lower end of the site. Nor will one be able to step down through a small, enclosed garden, past a simply-detailed pergola, to a long, open lawn. The scale and design of retaining walls and balustrades, some topped with iron fences, will be lost.

Prepared by: Susan Dynes, TPS

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1. Side view of the house, showing the retaining wall around the site and the front terrace.



2. View of the rear of the house before rehabilitation began. There is a rear terrace with a pergola and a small walled garden with ornamental walls and an iron fence.



3. Rear of the house after garden was cleared but before construction began.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-069

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (conformance; nonconformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (conformance; nonconformance)

Subject: FACTORS TO WEIGH IN EVALUATING DAMAGED/DETERIORATED BUILDINGS

Issue: If a historic building is certified as "contributing to the significance of the historic district," this means that its physical characteristics are still able to convey historic, architectural, or cultural significance prior to rehabilitation and in spite of deterioration, damage, or loss as demonstrated by existing condition photographs. Part 1 certification of significance does not imply that historic building materials will be fully intact at the outset of rehabilitation; in fact, Part 2 work may involve repair or even total replacement of some particularly vulnerable historic material such as roofing, exterior wood cladding, wood window frames and sash, or interior plaster. On the other hand, if historic material that could have been repaired is unnecessarily replaced, Standards 2 and 6 will not be met.

An important factor to consider in evaluating the Part 2 work is the significance and integrity of the interior. The preservation of a significant interior that may include historic materials, features, finishes, spaces, or structural framing system may, in limited instances, serve to offset the documented need for extensive replacement of exterior material. In these select cases, the building can still make a positive contribution to the historic significance of the district and be certified for preservation tax incentives.

Application: The first case is a two-story frame house with lap siding built ca. 1865-1870. Photographs of the exterior prior to rehabilitation revealed a combination of damage, deterioration, and previous alterations (see illus. 1). Specifically, lap siding had been inappropriately covered with stucco. A later front porch, nonsignificant front and rear additions, and an exterior metal staircase leading to the second floor had all been removed. Finally, the building's interior had lost the majority of its historic features due to earlier insensitive renovations. In spite of exterior and interior losses and change, the building had been certified as meeting Part 1 integrity requirements because the essential form and detailing was sufficiently intact to convey historic significance within the district.

When the Part 2 application was submitted, rehabilitation work had already been completed. Before and after photographs of the exterior were limited to front, side, and rear elevations, with no detailed documentation evidence of deteriorated materials. The application stated that after removal of the nonhistoric stucco, the historic clapboarding was found to be deteriorated beyond repair due to moisture and termites. In consequence, all clapboarding was removed as well as the sheathing underneath.

At the same time, other historic wood features were removed and replaced, including roofing, window sash, sills, lintels, shutters, and wood trim (see illus. 2,3). Again, justification for replacement was based on extreme deterioration. When the State office reviewed the project, it recommended denial primarily based on undocumented replacement of exterior wood. Also, some of the replacement features were felt to be inappropriate, such as the heavy roof shakes. The region concurred with the State evaluation and the project was subsequently denied for nonconformance with Standards 2 and 6. The denial letter from the Regional Director strongly emphasized the unnecessary introduction of new material:

...replacing all weatherboards, all trim, shutters, all windows, all roofing materials, and adding new framing pieces for doors and windows, new brick stoops, new sills and thresholds, and new hardware have the cumulative effect of making this building appear to be a new house with some Colonial-style details...

Because the owner felt that replacement of extensively deteriorated exterior wood cladding was justified, affidavits were submitted as the basis for a Part 2 appeal. These consisted of individual, signed statements from the project architect and a licensed structural engineer attesting to the severely deteriorated condition of the property prior to rehabilitation. No new photographs documenting deterioration were included. After careful review of the new information, the Chief Appeals Officer affirmed the Region's denial:

...the affidavits...contain insufficient evidence to support your contention that the extent of the deterioration caused by moisture trapped behind the stucco and its subsequent removal was so widespread as to require complete replacement of the siding, window sash and frames, and the exterior wood trim...

...I also find that the written record and the documentation clearly demonstrate that (the building) was a certified historic structure prior to rehabilitation. However, in consequence of your rehabilitation, everything now seen on the exterior of the building is new. Because of the inordinate amount of replacement material now visible...the structure has fallen below the acceptable level of integrity of materials and workmanship that were required for it to be designated a certified historic structure for purposes of the Federal tax incentives. Therefore...it is my determination that (the building) is no longer a certified historic structure...and that this decertification is not considered retroactive.

In a second case, another "contributing" wood frame building, built ca. 1769, was rehabilitated by the present owner as a single family rental home. The building had been used historically for a variety of purposes, including a warehouse, residence, store, and post office. In the Part 2 application, the owner provided both general elevation photographs as well as detailed photographs of existing conditions, and ongoing and completed work (see illus. 4 , 5). Both exterior and interior work was photographically documented and submitted with a narrative explaining what was original, what was added later, what could reasonably be preserved, and what needed to be replaced. Because the owner's architect believed that exterior wood features were not repairable, extensive replacement of exterior work was already underway as

part of the rehabilitation. After review of the application, the State recommended approval; the Region, however, disagreed.

Reviewing the same photographs of the exterior and interior, the Region felt that the building--although having had a long history of material replacement and alteration--still possessed a number of early features. The significant wood features cited were "rafters, joists, and other structural members, some sash, window and door frames, doors, and much early wall sheathing and clapboarding." In denying the project for nonconformance with Standards 2, 5, and 6, the Region stated:

While in some instances replacement of materials may have been warranted due to the degree of deterioration, such wholesale replacement appears unjustifiable on the basis of submitted documentation and constitutes an irretrievable loss of original historic fabric...Photographs submitted indicated that many original features could have been spliced, patched, treated with consolidants, or in other ways retained, thus preserving original and distinguishing features. As the building presently stands, there is almost no historic material in place.

The owner felt that his rehabilitation met the Standards and the denial was subsequently appealed. On appeal, the Chief Appeals Officer agreed that there had indeed been extensive loss of exterior wood features in the rehabilitation, but disagreed as to their relative historical significance, particularly when weighed against unusual existing structural components and interior materials and features dating from the early 19th century. This included original ceiling rafters, cupboards, paneling, and fireplaces. Of importance in the appeal were photographs documenting the fact that the highly significant interior was preserved in the rehabilitation (see illus. 6, 7). Most important, although replacement of historic exterior wood was extensive, the clapboarding was found to be machine-sawn from the early 20th century and therefore not as significant as the Region had believed.

I agree with the Regional Director's assessment of the historic and architectural significance prior to rehabilitation. Despite its deteriorated and altered condition, its character as an 18th century structure was evident in its location and setting on the Meeting House Green, in its form, and in such particulars as its post-and-beam construction...

Careful examination of the photographs of the completed work submitted for this appeal reveals that considerably more of the historic building remains than was thought by the regional office. Virtually all of the 18th century framing that survived the earlier fire has been preserved intact; this framing gives the building its form and is an important component of its architectural significance. Inside the building are exposed posts, joists

85-069

and summer beams, and early 19th century mantels, panelling and cupboards on the chimney walls of four rooms, door and window frames, and several doors that are all original elements or later additions that have acquired significance. The further documentation of the completed work demonstrates high retention of interior features.

Prepared by: Kay D. Weeks, TPS

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1. Front and side elevations of a ca. 1865-1870 wood frame building prior to rehabilitation. Stucco had been applied over the exterior wood at a later date and had caused rotting and termite infestation of historic wood. The building was certified as meeting Part 1 integrity requirements in its deteriorated and damaged condition.



2, 3. The same building shown after rehabilitation is essentially new construction. Rather than targeted replacement of deteriorated materials, the owner replaced all of the siding, roofing, windows, sills, shutters, and trim. Some of the replacement features, such as the use of thick, cedar shakes on the roof and side porch were considered inappropriate. The owner was denied Part 2 certification on appeal. As a result of material loss during rehabilitation and the earlier loss of interior features and spaces, the Part 1 certification was also withdrawn because the building could no longer meet integrity requirements.



4. A ca. 1769 building was certified in the Part 1 application in its existing condition, which involved extensively deteriorated exterior wood clapboarding, sheathing and window sash. On the interior, some original framing members were intact, while others were repaired or replaced.



5. Completed exterior work shows the extent of replacement of deteriorated exterior wood materials and features. All siding and sheathing was replaced with new wood. Window sash and frames are also new. The applicant documented areas that needed to be replaced because of extensive deterioration as well as those portions, such as the cornice molding, that could be retained and preserved.



6. An early pegged-braced structural system, fireplace with bee-hive oven, and cupboards are shown. If the extant, significant interior had not been factored into the evaluation to offset extensive loss of exterior materials, overall preservation requirements for Part 2 would not have been satisfied.



7. The same room shown above after completion of the work. On appeal, it was concluded that the building's highly significant interior, including materials, features, spaces, and an early structural system had been identified prior to rehabilitation, then carefully retained and preserved.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-070

Applicable Standards: Standards for Evaluating Significance With
Registered Historic Districts (36 CFR 67.5 (2)(e))

Subject: REMOVING FALSE FRONTS OR NONHISTORIC SURFACE COVERINGS
PRIOR TO REHABILITATION

Issue: As part of the 1950's drive to clean-up, or "modernize" shopping and residential areas, metal false fronts were often attached, or nonhistoric surface coverings directly applied to historic building facades. When a Part 1 evaluation of significance is requested prior to rehabilitation and a false front or nonhistoric surface covering is in place, the need for removal will differ depending upon the type and extent of the obscuring covering. Two basic types of covering exist:

(1) A false front or screen covers up a historic building's facade, concealing the form, materials, design, workmanship, and historic relationship to other buildings in the district. In past administrative practice, removing a false front was considered to be part of the rehabilitation work itself and thus assessed in the Part 2 evaluation for conformance with the Secretary of the Interior's "Standards for Rehabilitation," particularly Standards 2 and 6. Now, in accordance with the revised regulations (36 CFR 67 - March 12, 1984) at least a portion of the false front or screen must be removed prior to rehabilitation in order to evaluate the integrity of the historic building. After the historic integrity is established through evaluation, the false front or screen will generally need to be removed totally in order to receive final Part 1 certification.

(2) On the other hand, when a nonhistoric surface covering (such as aluminum or vinyl siding, permastone, or asbestos siding) has been directly applied over historic wall surfaces, removal of that material may not always be necessary for Part 1 evaluation. A nonhistoric surface material, unlike a false front, usually does not totally obscure a building's significant form, features, and detailing. When a building's historical significance is conveyed through other surviving characteristics of the exterior of the building (such as its roof, cornice, unusual windows, chimneys, ornamentation, etc.), then a Part 1 certification of significance may be given with the nonhistoric surface covering left in place. The covering may simply be retained in rehabilitation; alternatively, it may be removed by the owner.

In summary, for both types of covering, Part 1 certification will be issued only when enough of the historic building is visible to classify the building as contributing to the historic district even if the proposed rehabilitation were not completed for some reason.

Application: Part 1 certification was requested for a two-story masonry building in a historic district. A photograph of the 1908 department store (see illus. 1) was submitted together with photographs of the existing appearance. In its current condition, however, it did not convey historic, architectural, or cultural

significance because an aluminum false front had been attached in the 1950s, hiding the facade as well as wrapping around both sides of the building. Enamelized metal squares had also been affixed to the side elevations. The rear of the building was both visible and apparently intact, but had no particularly distinguishing features (see illus. 2,3,4)

Even though the storefront had been altered in an earlier renovation prior to attachment of the false front, there was some evidence that the second story of the department store remained relatively intact underneath. Because a 16" gap had been left between the metal screen and the store's facade it was possible to look out the original window and see some of the masonry detailing behind the screen. This suggested that the building might retain enough integrity to meet overall requirements for Part 1 certification.

Consequently, the owner was notified by the Region that at least a portion of the false front would need to be removed in order to evaluate the historic facade to see if it possessed sufficient integrity for Part 1 certification. In response, the owner informed the Region that the scope of rehabilitation would be limited to interior work, and the building's exterior would remain "as is," in its covered condition. As a result, the building was not issued "certified historic structure" status; however, if ownership were to change, a new owner could reapply for Part 1 certification of significance.

In a second case, an owner submitted a Part 1 and Part 2 application with photographs of a 2 1/2 story, hip-roofed, frame and masonry building in a tree-lined district of similarly scaled residences. Photographs and a narrative explained that the building had been covered with a concrete veneered covering, and that the wood window sash and shutters had also been replaced with new aluminum "features" (see illus. 5). It was acknowledged in the application that these changes to the building did not contribute to its overall architectural appearance and historic integrity. Documentation also included several photographs of the interior showing raised paneling, parquet floors, tiled fireplaces, and intricate plaster cornice moldings and, in fact, the application emphasized the interior's significance.

In the Part 1 evaluation, the reviewer initially expressed some concern over the concrete veneer covering historic materials, but concluded that other surviving exterior features such as building's form, its roof--roofing materials, dormers, chimneys and cornice--and an elaborately detailed portico satisfactorily conveyed the building's architectural significance in relationship to the district (see illus. 6). Removal of the nonhistoric surface covering was thus not required for Part 1 certification to be issued. This decision would have been made even if interior materials, features, and spaces had not been significant and intact.

Prepared by: Kay D. Weeks, TPS

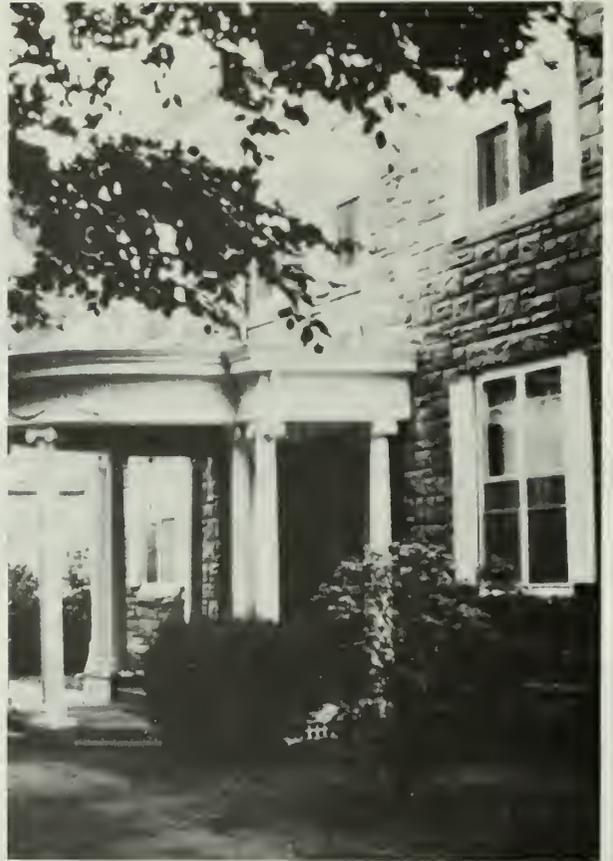
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1. Early 1900s photograph of the Ochs Building shows the storefront in its historic design prior to a series of renovations, the last of which totally obscured the facade.



2, 3, 4. The department store shown as submitted for Part I evaluation, with a false front obscuring the primary elevation and enamelled metal squares covering the secondary elevation. A photograph of the rear elevation showed a portion of the building's historic material that had not been obscured. This elevation, however, was not of any particular architectural or historic significance.



5. A photograph of a portion of the primary facade reveals a highly decorative porch, but also shows the nonhistoric concrete veneer, and aluminum sash and shutters.



6. The building is shown here on the right in relationship to another building in the district. Although the historic wood sheathing has been obscured with formstone that is heavy and gray in appearance, the surviving physical characteristics of the rest of the building were sufficient to convey historic and architectural significance. This includes the roof shape and materials, and a decorative cornice and portico. Part 1 was issued. In the rehabilitation, the concrete veneer was simply patched and retained as part of overall work.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-071

- Applicable Standards
2. Retention of Distinguishing Architectural Character (nonconformance)
 9. Compatible Design for New Additions (nonconformance)

Subject: PROPOSED ROOFTOP ADDITION ON BUILDING WITH A DISTINCTIVE CORNICE

Issue: Rooftop additions can meet the Secretary of the Interior's "Standards for Rehabilitation" if they are inconspicuous within the district or neighborhood and do not alter the historic character of the building. If a building has a distinctive profile against the skyline, a profile created by turrets, ornamental cornices or other character-defining roof features, it may be very difficult to design a rooftop addition without either destroying significant material or radically altering the appearance of the building.

Application: A nine-story commercial office structure, built in 1910-11, determined to be eligible for individual listing in the National Register, was to be renovated for continued use as offices and commercial space (see illus. 1 and 2). Situated on a highly visible corner property, the building is distinguished by its U-shaped plan, distinctive storefronts, elegant brick and terra-cotta detailing and most particularly by an elaborate projecting terra-cotta cornice and parapet.

The owner's proposal to construct two additional stories atop the building (see illus. 3) was denied certification by the regional office, which cited the "negative impact on the historic character of the building" of such an addition. The design of the rooftop addition, the denial letter further stated, "will compromise the historic character of the building by appearing as a historic component; the building's original scale will be altered, and the prominent cornice will be compromised, all violating Standards 2 and 9."

Upon appeal by the owner, the denial was affirmed by the Chief Appeals Officer, who noted that "the two-story addition... would extend to the plane of the wall, thereby drastically reducing and weakening the prominence of the cornice." The "marked appearance of the cornice against the sky," he continued, is "virtually unique" in the city, and is the "overriding character-defining feature of the building."

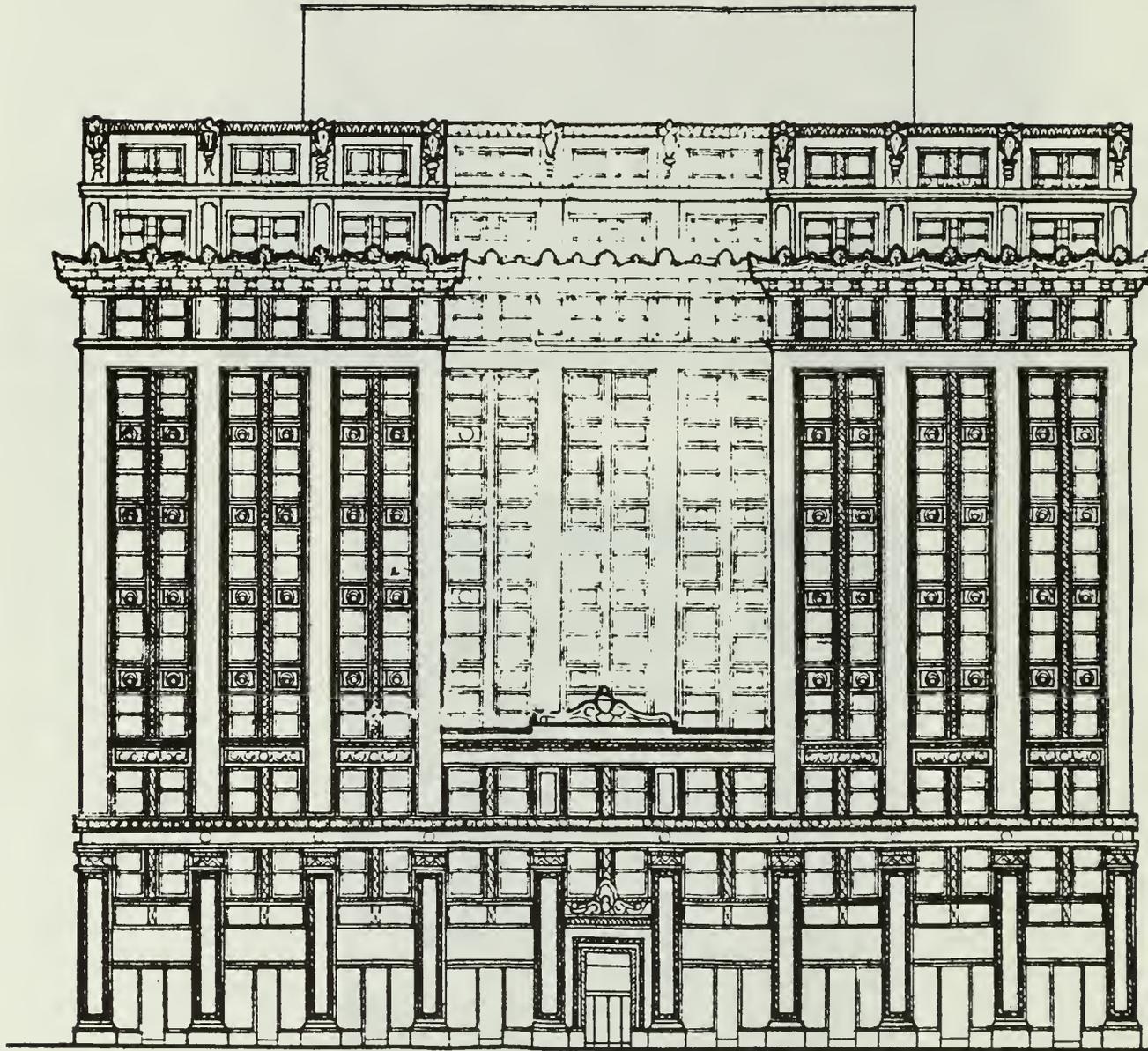
In reaching his decision, the Chief Appeals Officer noted the extensive research into the history of the building undertaken by the owner and presented at the appeal meeting. This information included the original structural steel drawings, which depicted an eleven-story building rather than a nine-story structure. These drawings indicated that the top two floors of the structure would have been constructed out to the facade line, much in the manner of the proposed addition. No elevation drawings were found, but surviving physical evidence, original promotional material, and testimony taken in a lawsuit involving the original owners also supported the claim that the building was originally designed for eleven rather than nine stories.

The Chief Appeals Officer acknowledged the evidence presented by the owner as satisfactorily establishing "that the original builders contemplated an eleven-story edifice rather than the nine-story building that was constructed and exists essentially unaltered today." He noted further that "the additional two stories, had they been built, would have been constructed above the cornice." He concluded, however, that the information, while very interesting, had "little relevance to the matter under consideration; what concerns us here is that which was built and embodies historic identity.... The fact is that the building was built as it was and its historic character for seventy-five years has been largely determined by the appearance of its cornice unencumbered against the sky." Because the proposed addition would have diminished that appearance, it would not have preserved the historic character of the building, and was consequently denied certification.

Prepared by: Sharon C. Park, AIA, and Michael J. Auer, Ph.D.

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3. The proposed rooftop addition, like other designs submitted, would have obscured the appearance of the character-defining cornice against the sky.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-072

- Applicable Standards:
6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (nonconformance)
 9. Compatible Contemporary Design for New Alterations/Additions (nonconformance)

Subject: PRESERVING DISTINCTIVE SIDE AND REAR ELEVATIONS

Issue: Attaching a new exterior addition usually involves some degree of loss to an external wall or walls. For this reason, it is generally recommended that an addition be constructed on a secondary side or rear elevation--as opposed to a primary elevation--where significant materials and features are less apt to be present.

There are cases, however, where side or rear elevations are architecturally detailed; where they display either a distinctive individual plan or a plan characteristic of buildings in the neighborhood; where they were traditionally highly visible within the block; or where they are of special historical significance. In these instances, the distinctive features on a side or rear elevation also need to be retained and preserved in rehabilitation, i.e., not damaged, destroyed, or hidden. If materials or features judged to possess significance are damaged or destroyed in the process of rehabilitation the intent of Standards 6 and 9 will not have been met.

Application: A late 19th c. 3-story, 3-bay brick rowhouse was determined to contribute to the historical significance of a small-town historic district. The building was typical of other Victorian-era brick townhouses in the district with its Italianate doorway, brackets, dentil work, and stone steps. Also characteristic of many buildings in the district, there was a brick two-story kitchen wing with a small second-story porch that featured a decorative balustrade on the rear of the building (see illus. 1, 2). The interior was both significant and intact; photographs documented features such as a mahogany balustrade, marble fireplace, plaster ceiling trim, and original doors and trim.

Rehabilitation of the building essentially involved work to convert the residence into a dress shop. The owner felt that the existing interior space was inadequate for the retail operation, and, as a result demolished the historic rear ell and two-story porch preparatory to building a much larger addition in its place (see illus. 3).

When the Part 2 application was reviewed by the State, denial was recommended. Several work areas were questioned, but loss of the rear addition and porch in order to construct a new, large scale commercial wing was the primary reason for denial. Standards 2, 9, and 10 were cited. The regional office agreed with the State's assessment, and also cited Standard 6. The denial letter, emphasizing the loss of fabric on a distinctive rear elevation, stated in part:

...demolition of the rear wing and second-story porch has resulted in loss of historic fabric. In the case of the porch, there was a loss of skilled craftsmanship as well. In the case of both the porch and wing, the historic rowhouse configuration (designed to supply more light, air, and space than was available from the main block alone) has been destroyed. The replacement design has a non-residential scale and appearance. No evidence of deteriorated conditions has been given to justify the demolition...

In the appeal, the owner explained that in order for the residence to function as a shop, certain changes had been necessary. The interior needed to be expanded and, to do so, an extensively deteriorated, and essentially nonsignificant porch had been removed. To substantiate their claim, a letter was submitted by the architect certifying that the rear brick kitchen wing and two-story porch could not be preserved; however, no photographs of deterioration and structural failure were provided.

After carefully evaluating the facts of the case, the regional office's denial was sustained by the Chief Appeals Officer. Citing loss of historic material as well as a permanent change to the rear of the building, the decision was further explained in a final letter to the owner:

The historic rear wing and second-story porch were demolished due to alleged severe structural deterioration; the extent of deterioration, however, was not substantiated in the course of the meeting. Furthermore, the design of the new rear wing is not compatible with the building or the district. In mass, proportion, and scale it differs drastically from what was there before and stands as an intrusion in the texture of the neighborhood, the character of which can be appreciated from the rear parking lots as well as from the street. The addition of this wing also resulted in significant change in the spatial arrangement of the first floor interiors. Accordingly, despite some exemplary preservation of interior details, I have found that the work does not satisfy the "Standards for Rehabilitation."

Prepared by: Kay D. Weeks

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1, 2. The 3-story brick rowhouse, front and rear elevations, prior to conversion into a dress shop. Although many rear elevations are not particularly distinctive, this one featured a second story gallery and brick kitchen wing that were characteristic of the rear elevations of other residences in the district. Demolition of the wing and gallery preceded construction of a massive new addition that interrupted the former visual unity of the neighborhood.



3. Completed work, rear elevation. The project was denied, largely based on demolition of the rear wing and porch and construction of a large addition that changed both the exterior form and interior plan.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-073

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (conformance)
 4. Removal of Later Non-Significant Alterations/Additions (conformance)
 5. Sensitive Treatment of Distinctive Features and Craftsmanship (conformance)
 6. Repair/Replacement of Deteriorated or Missing Architectural Features Based on Historical Evidence (conformance)

Subject: ALTERNATIVE REHABILITATION TREATMENTS FOR LATER NON-SIGNIFICANT ADDITIONS

Issue: The Standards generally encourage the retention of later additions to historic buildings. Such additions often have acquired significance in their own right because they provide evidence of the historical evolution of the building or because they are important examples of an architectural style.

Circumstances under which a later addition may not contribute to the significance of a historic structure include: 1) a later addition that is less than fifty years old; 2) a later addition that is not a fine example of an architectural style, or does not exhibit significant character or fine workmanship; 3) a later addition that does not contribute measurably to the National Register-determined period of significance of the building or district; 4) a later addition that is so badly deteriorated that its replacement would constitute a level of "reconstruction" not required in a rehabilitation; and 5) a later addition that obscures earlier significant features.

Additions to historic structures that meet any of these conditions may be treated in a variety of ways. Rehabilitation options include retention of the later addition, removal of the addition to reveal restorable features underneath, replacement with new features of a compatible new design, or, if adequate historical documentation exists, replacement with an accurate duplication of original features.

Assessing the significance of later additions requires careful professional review, and must always be done on a case-by-case basis. Removal of significant later features can result in denial of certification of a project.

Application No. 1: A six-story structure, individually listed on the National Register as well as in a National Register historic district, and erected in 1906 as a private residence and hotel, was rehabilitated for use as an office building (see illus. 1). The facade, exhibiting stylistic elements derived from the French Renaissance, was faced with a high quality brick veneer trimmed with brownstone, and the building was topped with a graceful "mansard" roof. Over the years, however, the building had undergone some stylistic changes and additions, the most notable being the construction of an Art Moderne carrara glass storefront on the first floor to accommodate a bar, as well as the

addition of a copper marquee (c. 1928 according to the application) over the hotel entrance, and extensive remodeling of the interior. The rehabilitation proposal called for the removal of the Art Moderne storefront, the bar interior, and the marquee, and reconstruction in their place of the original 1906 first-floor facade (see illus. 2). The regional office of the National Park Service denied certification because the cumulative effect of the proposed work would result in a rehabilitation that did not conform to Standards 2, 4, 5 and 6 of the Secretary of the Interior's "Standards for Rehabilitation." This decision was based largely on the proposed removal of the bar storefront and its interior which the region judged to date from the 1930's, and removal of the copper marquee (although other issues including interior fabric removal and its reconfiguration were cited in the denial letter). The regional office had assessed all of these additions to be character-defining features of the structure, and as such should be retained in the rehabilitation.

Upon appeal, the denial of the regional office was overturned, in part because of the availability of new information at the appeal meeting, including photographs that clearly showed earlier unsympathetic remodelings had destroyed all of the bar interior, documentary evidence that the Art Moderne storefront had been constructed in the 1940's, and assurance that the rehabilitation would retain all historic fabric still extant on the interior. The project, now already in progress, was given preliminary certification, and in a letter explaining his decision, the Chief Appeals Officer emphasized that he strongly concurred with the policy espoused by Standard 4 that encourages retention of those later additions that have acquired significance over time. But in this case, the owner had 2 valid options--either to retain the existing storefront or because of the existence of detailed drawings of the original facade, to restore that facade:

...each instance has to be judged on its own merits, and I find that this Art Moderne storefront is not of exceptional architectural or historical significance; it is less than 50 years old, is not mentioned in the National Register documentation as possessing exceptional importance...and is not architect-designed. Furthermore, because of the existence of the original drawings, restoration of the 1906 facade was also an acceptable approach in accordance with Standard 6. The unusually accurate substantiation of the original design was a major consideration on this point.

The fact that nothing remained of the bar interior provided further argument favoring restoration of the original facade. I feel that the copper marquee, like the storefront, is also not of exceptional significance and may be retained or removed at your discretion.

Application No. 2: Another project involved rehabilitation of two residential properties for apartment use. Originally constructed in the early part of the nineteenth century as multi-family housing for mill workers, these buildings had been certified as contributing to the significance of the historic district in which they were located. The houses were situated side-by-side, and nearly identical in design

and floor plan. They were of frame construction, two and a half stories, and six bays wide with a gabled roof (see illus. 3-4). Each house had a later addition of a wooden porch that stretched across the length of its facade. Rehabilitation work on the properties was extensive as the houses had fallen into disrepair through lack of maintenance.

Although the State Historic Preservation Office had recommended approval of the rehabilitation project, the regional office of the National Park Service denied certification on the basis that the completed project violated Standards 2, 4, 5 and 6. As in the example discussed above, the region felt this rehabilitation did not conform to the Standards due in part to removal of the later additions -- in this case, the porches (see illus. 5-6). The region's denial letter stated "these front porches were significant to each house as a later addition (estimated to be from 1900 or earlier) and were significant collectively as a phenomenon within the district."

The owners appealed the regional decision, because they felt the rehabilitation met the Standards. At the appeal meeting the owners defended removal of the porches on the basis that the porches were poorly constructed of inappropriate materials which at the time of the rehabilitation were found to be too deteriorated to repair, and not of sufficient quality or workmanship to retain. Most importantly, however, research had revealed the fact that the porches in question were first depicted on the Sanborn insurance map of 1926, but did not yet appear on the map of 1914. Thus, the maps clearly showed that the porches had been built in the twentieth century, outside the period of significance of the district.

After reviewing all the facts of the case, the Chief Appeals Officer agreed with the owners that the rehabilitation met the Secretary of the Interior's "Standards," and overturned the denial issued by the regional office. In doing so, he stated that the primary significance of these properties lay in their exterior form and details, and that these character-defining features had been preserved and restored in the rehabilitation. Had the porches been in a better state of repair, their retention would also have been an option. He further explained his decision to the owner, saying:

In its denial letter the regional office stated that removal of the front porches was in violation of the Secretary of the Interior's Standards, because these porches had not only acquired significance as later additions but also were significant collectively as a phenomenon within the historic district. However, from information you presented at the appeal meeting, we can now date the porches between 1914 and 1926, a period outside the significance of the historic district as a nineteenth-century mill community.

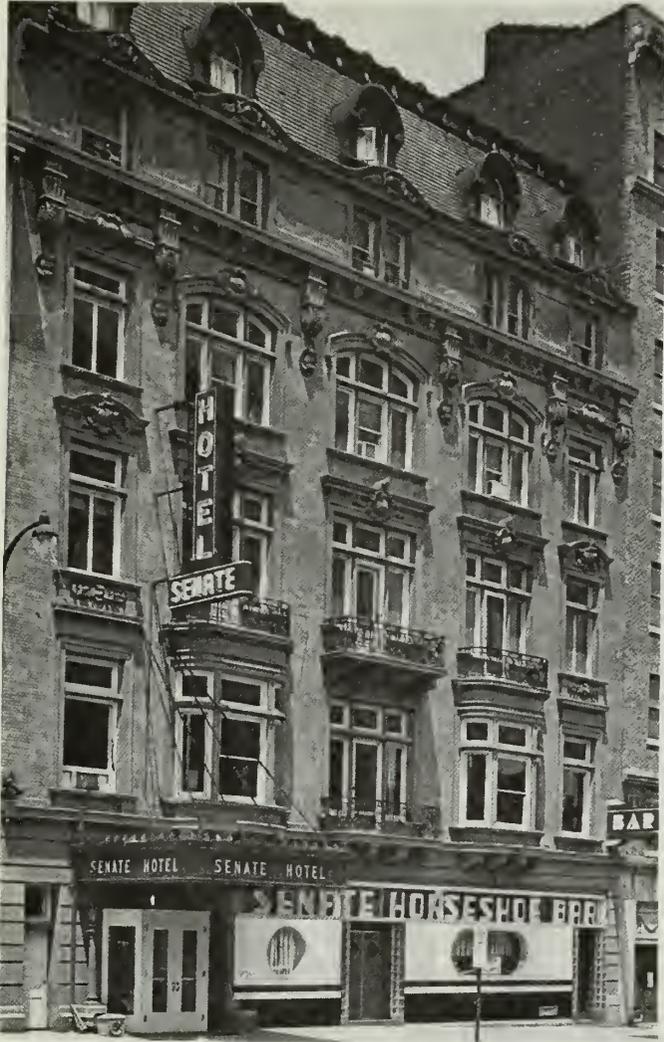
Thus, for both of these projects featuring later additions that did not contribute to the significance of the historic structure or the district, there were the four alternative rehabilitation treatments outlined in the introduction from which to choose. One option, in both cases, might have been to retain the later addition. But

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another option in accordance with the Standards, and the one selected for both projects, was restoration. In the first example, restoration of the 1906 facade was made possible because of the discovery of the existence of the original architect's drawings. In the second project, restoration was made possible because discovery of two Sanborn maps proved that the porches had not been constructed until the twentieth century, and therefore did not contribute to the nineteenth century period of significance of the historic district in which the houses were located, and as such, could be removed.

Prepared by: Anne Grimmer, TPS

These bulletins are issued to explain preservation project decisions made by the U.S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. The 1906 hotel before rehabilitation. Note the Art Moderne facade and copper marquee on the first floor.



2. During rehabilitation into an office building the first floor is being reconstructed according to the original architectural drawings.



3-4. The two houses before rehabilitation. Because the porches were added after the historic district's period of significance, their removal was one option.





5-6. The two houses after rehabilitation, their porches removed to reveal the original early nineteenth-century character. (Twelve over twelve window replacement was based on remaining original sash still extant in several of the third floor windows.)



Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-074

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (non-conformance).
 9. Compatible Design for New Additions (non-conformance).

Subject: ROOFTOP ADDITIONS

Issue: Rooftop additions proposed for larger urban buildings raise certain preservation issues. First, there is the concern over material loss -- to what extent significant historic features such as cornices will be altered and how much of the roof system and the building's structural framework will be altered, damaged, or destroyed. A second preservation issue is the visual impact of the addition on the historic character of the building. The size, scale, material, color and detailing of the proposed addition may individually or collectively impact other distinctive historic qualities of the building. Finally, an addition is often designed so as to appear to be an important and integral part of the historic design -- a treatment which can compromise the historic character of the structure and as a result preclude the project from obtaining certification of rehabilitation.

Application: A former City Hall was recently rehabilitated for use as private offices (see illus. 1). The building is located in a downtown historic district that includes many financial and institutional buildings of the early 20th century, typically 4 to 10 stories in height. Early in the history of the building, a rooftop addition had been constructed, set off to one side. Though set back from the facade, it was clearly visible diagonally from across the intersection as well as from down the street. The poorer quality workmanship and material and the fact that the electrical, mechanical and plumbing systems were independently designed led to the National Park Service determination to approve its planned removal.

The owners proposed construction of a new one-story addition running the full depth of the building yet set back along the side elevations from the historic roof balustrade (see illus. 2). On the front, however, the proposed addition would create a highly visible 3 bay penthouse, set along the same plane as the front of the building and detailed to match. When the plans were reviewed by the National Park Service a determination was made that the addition precluded the project from meeting Standards 2 and 9.

Problems with the proposed addition included its prominent location on a major facade and the detailing, which made the addition read as an integral part of the historic structure. The detailing emulated the original and along with its form and location resulted in the addition becoming a strong new design element on a significant facade -- an element which also took on an instant "historic" look. While it was restrained in size and scale in proportion to the historic building, it altered the building's historic character. The building had a distinct form which would be changed by the addition of

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such a prominent penthouse. Furthermore, the historic cornice no longer would be the termination of the historic building in design, now having to share that role with the proposed addition.

In the end, the financial infeasibility of any rooftop addition precluded its construction.

Prepared by: Charles E. Fisher, TPS

These bulletins are issued to explain preservation project decisions made by the U.S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. This former City Hall, shown here in a 1925 photograph, has changed little over the years on the exterior with the exception of an old rooftop addition off to the left. The building has a prominent corner location and is highly visible not only at the intersection of two busy thoroughfares but also from down the streets as well.



2. The proposed penthouse addition with the three bay portion across the front was determined not to meet the Standards for Rehabilitation. The change in the form of the building; the conscious attempt to tie the addition to the historic building through use of replicative detailing; and the alterations to the historic roof balustrade, were all factors cited by the National Park Service.

Interpreting the Secretary of the Interior's Standards for Rehabilitation

Number: 85-075

- Applicable Standards:
2. Retention of Distinguishing Architectural Character (nonconformance).
 9. Compatible Design for New Alterations/ Additions (nonconformance).

Subject: ELEVATED PEDESTRIAN BRIDGE AS PART OF A REHABILITATION

Issue: Elevated pedestrian bridges have become popular urban features in downtown developments. Networks of pedestrian bridges, often referred to as "skywalks" or "pedways," may be found in numerous cities to protect pedestrians from inclement weather and ease safe movement between buildings.

Pedestrian bridges, however, pose particular problems for historic buildings; they are difficult to integrate into a rehabilitation without altering the character of the historic resource. Standards 2 and 9 address the issues of retaining character-defining features and materials as part of an overall rehabilitation. When a primary elevation is partially obscured by a large, horizontal new element that penetrates the historic resource or complex, it is generally the case that the historic character of that resource is severely impacted.

In the following two examples denial of certification resulted from the proposal to incorporate a "pedway" into the overall rehabilitation. These elevated bridges had a negative impact on the individual buildings as well as the district in which they were located.

Applications : A rehabilitation proposal called for the conversion of a group of eight historic row warehouses into an interconnected mixed-use complex of shops and offices. The buildings are located in a downtown urban area that has experienced substantial demolition and subsequent new office construction. The warehouses comprise the entire historic district located on two blocks and divided by a road (see illus. 1 and 2). Across from the historic district is a modern office complex and public plaza. The road between the two is a major traffic artery and the city has proposed a pedestrian bridge over this road as part of a network of downtown bridges. The developer wished to incorporate this bridge into the new complex to provide a convenient, safe entry for office workers and shoppers. The developer determined that the bridge would help ensure the financial success of this project.

This two-block historic district is characterized by large, solid, five-story brick warehouses that follow a major transportation artery. In fact, one of the historic buildings is angled at its midpoint to follow this road, thus creating a vista that is an important aspect of this grouping of buildings. The formation of two distinct block of buildings separated by a road is also a character-defining feature of this unique grouping of row warehouses. The bold scale, the articulated warehouse detailing, and the continuous panoramic vista of the two separate groupings of buildings are all important aspects in establishing the character of this historic district.

The developer, sensitive to the exterior character of the warehouse buildings, proposed to leave the existing exteriors unaltered except for the replacement of lost features such as storefronts. As such, his proposal for the elevated "pedway" would not penetrate the original warehouses, but would enter the complex through a proposed new infill structure located over the site of the road which divided the district (see illus. 3). The design for the new "pedway" would be a thin steel box-frame truss and open on the sides.

The State and the regional office, however, determined that both the pedestrian bridge and the new infill construction would so alter the character of the historic resource that the overall project should be denied. On the issue of the proposed "pedway," the region's denial letter stated the following:

The proposed changes would impact the character of the row as a series of structures which are significant for their cohesive appearance.... The angle at which the buildings and the street bend midway through the row already serves to distinguish the row into a series of two sequential experiences. Interposing the pedway addition would destroy the way this row of buildings is experienced. The pedway is therefore incompatible with the existing row which violates Standard 9 and it would destroy the distinguishing qualities of the site and the environment in which these buildings are located thus violating Standard 2.

The owner appealed the regional decision stating that the bridge was of lightweight construction, that it would not intrude visually, and that the industrial character of the bridge was in keeping with the industrial character of the buildings. The Chief Appeals Officer, however, agreed with the State and the region that the presence of this bridge, or any bridge, along this primary elevation would severely impair the historic character of the buildings and the district. In his letter which sustained the region, the Chief Appeals Officer concluded that:

The bridge would bisect the district, and even though the structural members would not be glazed on the sides, this bridge, or any bridge, would be a major intrusion; for it would interfere with the distinguishing character of the cohesive groupings of row warehouses, the significance of which qualified the district for entry in the National Register of Historic Places.

In a second case, a 20-story office building, both individually listed in the National Register as well as being within a registered historic district, was scheduled for conversion into shops and 155 apartments. The design of this early 20th century building followed the classic approach of a formal limestone base three stories high, a block or body of brick constructions with regularized window openings for 12 floors and finally a capping of several floors in a lighter brick under an elegant copper dormered "mansard" roof (see illus. 4). Located on a corner across from a large open park, the two street elevations were primary facades of equal detail and articulation.

As part of the rehabilitation, the owner wished to provide parking for his tenants. The building had no surface parking on its own site, but the developer owned a new building a block away where secured parking and a health club would be available for use by the tenants. As the neighborhood was still in transition after a period of decline, the

owner felt that the only way to market his apartment building successfully was to guarantee his tenants 24 hour security, not only in the building, but from the parking garage via a pedestrian bridge. As the lower two floors of the building were to house offices and shops, the entrance of the proposed pedestrian bridge at the third floor provided a convenient lobby and entry point for tenants as well as serving as one of several required fire exits from the complex. The owner had made arrangements with the city to lease the airspace on an annual basis.

The owner's architect detailed the proposed pedestrian bridge to fit inside the arched fanlight at the third floor in order to reduce the loss of historic materials (see illus. 5). Any sash, framing or transom panels removed would be stored in the building for reinstallation at a later date if the pedestrian bridge were ever removed.

The State and regional offices, however, were extremely concerned that the pedestrian bridge, located on a formal elevation of the building and only one bay away from the front entrance would drastically alter the appearance of the historic resource (see illus. 6). The project was denied certification and the owner appealed the decision. The Chief Appeals Officer agreed with the denial, further stating:

The proposed pedestrian bridge is an inappropriate and incompatible attachment to the primary facade of this architecturally significant building....To interfere with the view of the building and adjacent structures by floating a bridge above other historic buildings and the street and insert it into a monumentally organized and carefully detailed facade would damage the architectural concept and diminish the historic character of the resource and adjacent buildings. The new feature would be dramatic and conspicuous, not subordinate to the historic structure; and the traditional views of the streetscape and the building would be distorted.

Although I appreciate the desire for functional and service amenities for your tenants, I am still unable, in view of the whole, to see this proposed bridge as consistent with the historic character of this important building. Therefore, it is my judgement that the bridge will have to be deleted if the desired certification is to be gained.

In each of these cases, the pedestrian bridge was considered by the owners as a critical marketing device. In both cases, however, the pedestrian bridge as a major new design element on a primary facade. Regardless of other issues raised as part of the denial, the "pedway" alone would have resulted in denial of certification.

Prepared by: Sharon C. Park, AIA, TPS

These bulletins are issued to explain preservation project decisions made by the U.S. Department of the Interior. The resulting determinations, based on the Secretary of the Interior's Standards for Rehabilitation, are not necessarily applicable beyond the unique facts and circumstances of each particular case.



1. Case No.1: This view is looking south along the major street. Note the bend in the warehouse row as the buildings follow this road. This two block row of eight buildings is the last remaining row of industrial warehouses in the city.



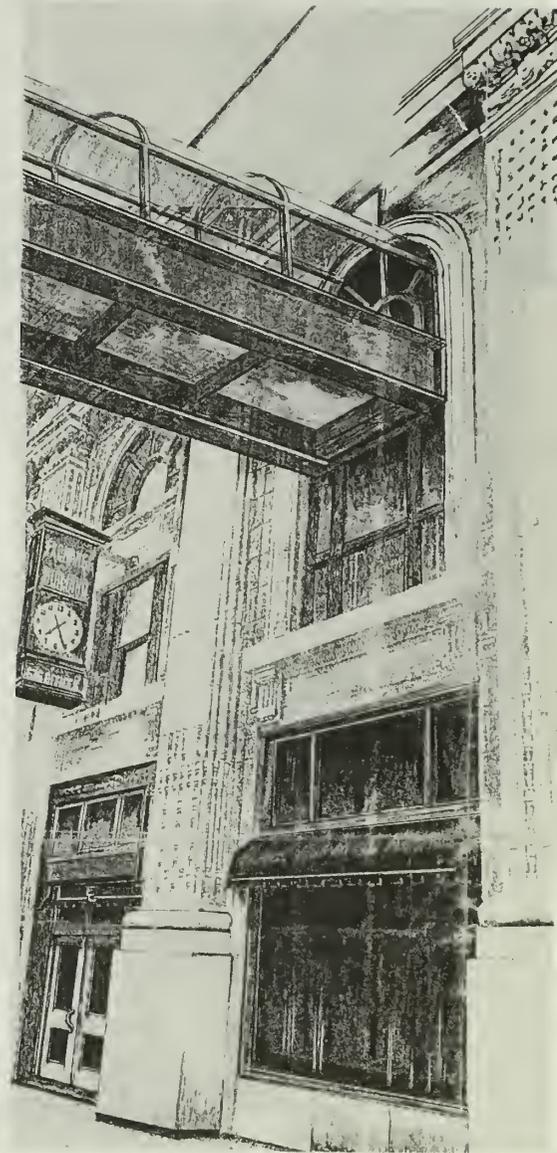
2. This view of a portion of the historic district is looking north. Note the road which divides the district into two blocks. This is the site of the proposed new addition and "pedway."



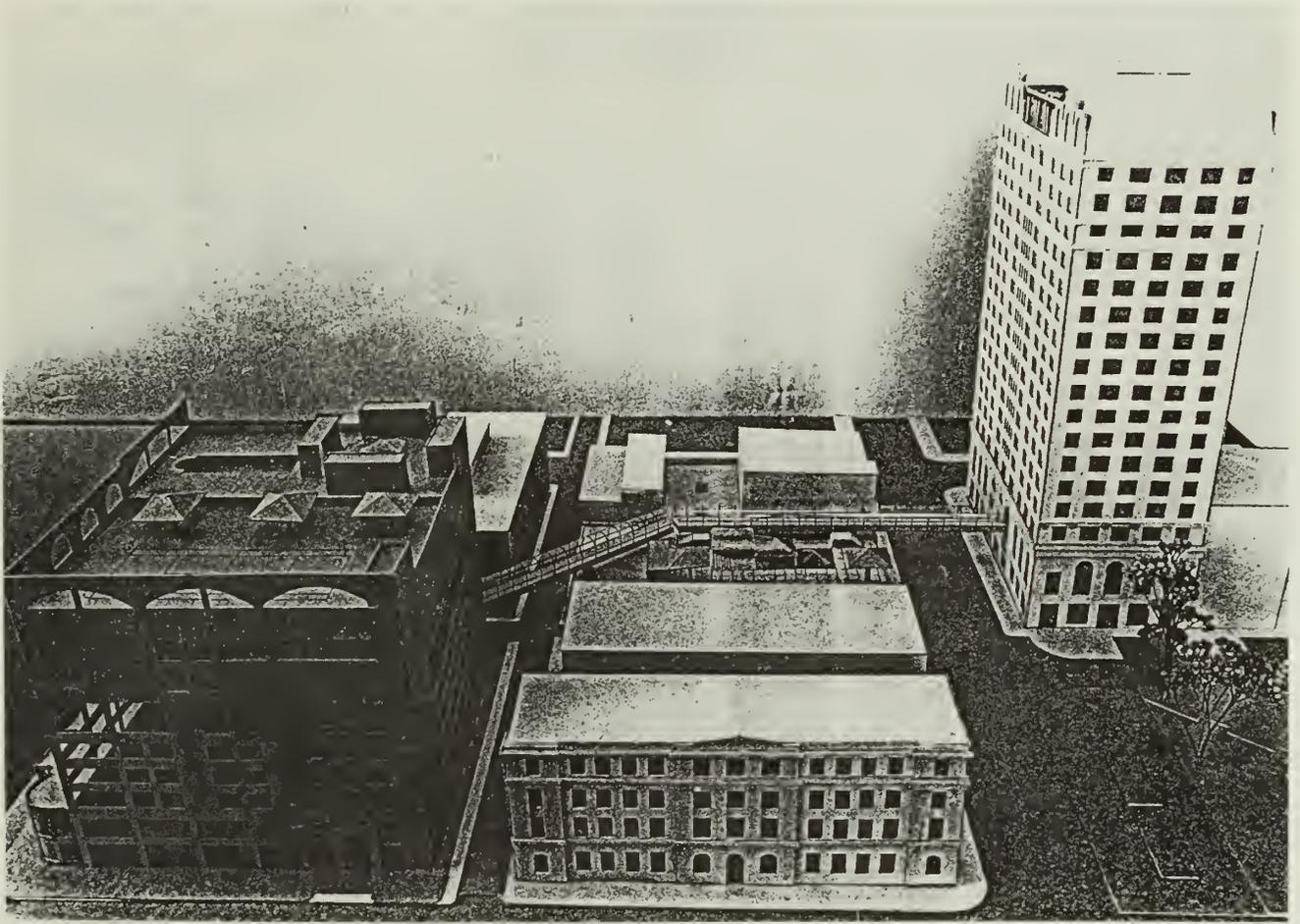
3. This artist's rendering, looking south, shows the proposed "pedway" connecting a public plaza across the street to the renovated warehouses. This new horizontal element, visually intrudes on the historic panoramic vista of the warehouses and was a cause for denial of certification. The glass enclosure over a historic street was a separate cause for denial.



4. Case No.2: This 20-story building is individually listed as well as being located within a registered historic district. The proposed "pedway" would enter the arched window in the limestone base four bays from the corner closest to the park.



5. This rendering of the proposed "pedway" shows that the architect took great care to reduce the loss of historic materials. The project, however, was denied certification as a result of the drastic change this elevated bridge would have on the formal facade of this significant architectural resource.



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