



To: Madison Landmarks Ordinance Review Committee
From: Heather L. Bailey, Ph.D., Preservation Planner
Date: February 1, 2019
RE: Annotated consultant recommendations

Background:

On January 13, 2019, Legacy Architecture (the historic preservation consultant hired by the City) proposed revisions to Madison’s Historic Preservation Ordinance, focusing on Subchapter 41G. Subchapter 41G contains the review standards for each of the City’s five local historic districts.

The process for developing these recommendations included three rounds of meetings in each district. During the third round of meetings, the consultant presented initial recommendations and facilitated a discussion about them with meeting participants. Those in attendance were also encouraged to provide written comments on forms provided by the City. Staff later received additional comments by email. The notes from the Round 3 meetings and original written comments and emails can be found at <https://madison.legistar.com/View.ashx?M=F&ID=7000898&GUID=3F2FA003-6660-4ED4-AAA8-B2334D14BD62>.

The consultant then revised the initial recommendations based on input received, resulting in the January 13, 2019 final recommendations that follow. To facilitate the committee’s discussion on the consultant’s recommendations, staff organized the input received as described above and inserted it into the specified sections of the document. Comments are located within a highlighted box. Note that where necessary, some comments may have been slightly edited for brevity. To ensure accuracy and transparency, each comment is keyed back to the original source based on the following key:

Comments Key

- FS1. First Settlement Round 3 Neighborhood Meeting — Written Comments
- FS2. First Settlement Round 3 Neighborhood Meeting — Consultant Notes from Meeting
- MH1. Mansion Hill Round 3 Neighborhood Meeting — Written Comments
- MH2. Mansion Hill Round 3 Neighborhood Meeting — Consultant Notes from Meeting
- MH3. Correspondence from Frances Ingebritson
- MB1. Marquette Bungalows Round 3 Neighborhood Meeting — Written Comments
- MB2. Marquette Bungalows Round 3 Neighborhood Meeting — Written Comments
- MB3. Correspondence from Marquette Bungalows Neighborhood Group
- MB4. Correspondence from Erin Jonaitis
- TLR1. Third Lake Ridge Round 3 Neighborhood Meeting — Written Comments
- TLR2. Third Lake Ridge Round 3 Neighborhood Meeting — Consultant Notes from Meeting
- TLR3. Correspondence from Linda Lehnertz
- UH1. University Heights Round 3 Neighborhood Meeting — Written Comments
- UH2. University Heights Round 3 Neighborhood Meeting — Consultant Notes from Meeting
- UH3. Correspondence from Steve Hiniker
- UH4. Correspondence from David Wood and Jane Doughty
- UH5. Correspondence from Joan Knoebel and Michael Cullenward
- AP1. Additional Public Comments — Jeff Vercauteren



RECOMMENDATIONS FOR THE STANDARDS FOR REVIEW

January 13, 2019

Costs

- MH2. I'd like there to be funding available for HD property owners, similar to what TIF does for big developers.
- MH2. I would like the revisions to regulate maintenance fairly and equally. It's expensive, and I spend the money to keep it up. It's not fair when others let theirs deteriorate while I'm maintaining mine.
- MB2. What about aging in place? What about economic feasibility?
- MB3. Lack of Incorporation of Public Comments. We respectfully request that issues raised in these comments be incorporated into revisions to the ordinance: Consideration as to cost of repairs versus those of replacement, including recognition that a strict adherence to a repair first model is not always economically feasible, nor sustainable option; flexibility with repair and replacement materials that are similar to (but not necessarily the same as) original materials; considerations as to aging in place, including accessibility; and sustainability both for the future of our neighborhood, and for generations to come.
- MB3. Failure to strike an appropriate balance between preservation and private property interests. The Consultant's proposed ordinance seemingly requires homeowners to identify character features in need of maintenance and make repairs without any consideration as to cost or technical feasibility.
- TLR1. Paint colors should never be regulated. Only places like Mt. Vernon have enough \$ resources to research colors.
- TLR1. One older resident's concern about economic feasibility was brushed off in an incredibly rude way. Insinuating that owners who can't afford to pay historic material/design upcharges are irresponsible people. I was appalled, and the consultant should be ashamed.
- TLR2. What about excess costs of complying with standards?
- TLR3. Will the new standards require preservation tax credit projects in a district to get a CoA? Will the City standards be more restrictive than the State or Federal standards?
- UH2. What will be the fiscal implications of the proposal?
- UH1. Fiscal implications for plan?
- UH3. The proposed ordinance is an extreme overreach and would likely result in lowering property values. Improvements like the use of energy efficient materials not compatible with the ordinance would make residences less desirable and less comfortable and less marketable (and more expensive to maintain). I appreciate the character of the neighborhood and would like to preserve that character. However, the proposal as written is an extreme overreach and I am strongly opposed to it.
- UH5. We have neighbors forced to return custom whole house window orders because the windows didn't pass muster with the administrator. Never mind energy efficiencies, it's the "look" we're preserving.
- UH5. We replaced our roof staying true to the shake shingles originally spelled out, at a cost of \$50,000 as compared to less than half that for asphalt. As you may know, insurance companies are not fans of wooden shingled roofs, greater fire risk, yet comply we did. Shortly thereafter, another nearby Tudor, with a distinctive curving brow roof, that owner replaced her shake shingle roof with asphalt shingles and no one from the city apparently batted an eye. Perhaps the city realized the elderly owner couldn't afford it otherwise.

Sustainability

MH2. I'd like to be able to salvage materials from demolitions in other areas of the city.

MB2. What about sustainability, green building, energy efficiency, and carbon footprint?

TLR2. How does the ordinance address the threat of flooding?

General Comments

MH1. Landmark districts should be better recognized with signs, etc.

MH1. 123 W Gilman should probably be a National Historic Landmark.

MH 2. I want the revisions to hold the line on demolitions, new construction, relocations. We need it to be predictable.

MH2. Can we require better modeling/rendering for large proposed projects, so that we can have a better 3D idea of what the proposal will produce?

MH2. More education about, and recognition of, historic properties and HDs.

MH3. Madison has a problem with developers who provide inadequate and sometimes false information when they submit design review materials. Denver's Design Review applications forms for historic properties are excellent.

MB1. My comments are general and apply to the entire proposed ordinance revisions. Terminology needs to be look at more closely or, in other words, too much ability to interpret. One example is the use of the word "feasible" used throughout the document. I can see abuse as time passes, people come and go on commissions and elected officials. Too much room for interpretation.

MB2. Property owners were concerned that very little attention was given to their input.

MB3. Stated intent of the recommendations is not consistent with actual language used.

TLR3. Concerned about the fast pace of the current process. Would like comments from previous rounds and from the Historic Preservation Plan open house to be part of the current phase of review.

TLR3. Recommend removing all references to zoning code. Trying to regulate building height will create a conflict with zoning code.

TLR3. Recommend a "general standards" section instead of repeating some of the standards in each of the three sections (alterations, additions, new construction)

TLR3. Concern that some standards may create enforcement problems: location of A/C units; techniques to remove mortar and cleaning masonry; requirements to repaint a building; lubrication on windows; gutter cleaning

UH2. Landmarks Commission - How are the members chosen? They should be people who understand buildings and preservation. Some could be very strict in their application of the standards.

UH2. Subdivisions – where do the recommendations address this issue? Also setbacks, how are they addressed in the recommendations? I want the ordinance to prevent crowding.

UH2. Can you number the paragraphs in the Recommendations, please? Full outline numbering system?

UH1. Process: Please clarify how these regulations get applied. What is the process? You find out when we pull a building permit?

UH1. Process: What exactly, step by step, should we do when we want to make changes to the exterior of our house? We need language about what is grandfathered.

UH1. Reasonable members on the Landmark committee are desirable.

UH1. Is the purpose of the ordinance to restrict or enable changes to modernize or change things?

UH4. Proposed changes are extreme over-reach and would prevent updating a property appropriately. It would require properties in a historic district to be treated like individually landmarked properties. "We strongly urge that the proposed Historic Preservation Plan be rejected and a new process be initiated to create a plan that can be supported by all."

UH5. As long-time residents of the University Heights neighborhood, we write with great concern to oppose the proposed draconian changes to the ordinance impacting our neighborhood. Our first thought upon reading the consultant's report was: Whose home is this, ours, or Landmarks?

The follow Recommendations for the Standards for Review have been provided to the Landmarks Ordinance Review Committee (LORC) after Round 3 meetings with each historic district. They rely heavily upon the Secretary of the Interior’s Standards for Rehabilitation, the Secretary of the Interior’s Guidelines for Rehabilitating Historic Buildings, the Wisconsin Historical Society’s Guidelines for Planning Historic Preservation Tax Credit Projects in Wisconsin, Wisconsin Historical Society’s Contractor Standards for Typical Tax Credit Projects, existing portions of Subchapter 41G, current historic preservation methodology, as well as property owner input. They are only recommendations.

After the conclusion of the Round 3 historic district meetings, the LORC will have a series of public meetings (6 are currently scheduled between January 24, 2019 and February 28, 2019) in which they will delve deeper into the actual ordinance language. Their recommendations will go to the Landmarks Commission for approval and to Common Council for final approval and adoption.

Enabling Legislation

The National Historic Preservation Act of 1966 created the National Register of Historic Places, the list of National Historic Landmarks, and State Historic Preservation Offices, which provides a mechanism for local governments to designate and protect historic properties by local legislation.

Regulation of historic properties is done through local ordinances, which are enabled by Wisconsin State Statute Chapter 44, Section 62.23(7)(em). Such regulation has been upheld by the US Supreme Court as a constitutional exercise of the police power, regulations which enhance or protect the health, safety, general welfare, or moral of a community. In Penn Central Transportation Co. v. New York City, 438 UW 104 (1978), the Court held that historic preservation enhances the quality of life for all and rejected claims that classification of certain properties as “historic” deprived their owners of the equal protection of the laws and that regulation of proposed alteration to historic properties constituted a “taking for public use without just compensation.”

Ordinance Revisions

- FS2. How will Landmarks Commission be trained in the application of the new ordinance language?
- MB3. Unclear which parts of existing ordinance the consultant is suggesting should change.
- MB3. Inconsistency with state law: an ordinance framework that requires repair before replace, then replace using the same materials when feasible, diminishes application of State law, even rendering it meaningless in some cases.
- TLR2. How do these recommendations relate to the LORC process?

Based on the recommendation of the Wisconsin Historical Society, all the 180 historic preservation ordinances across the State of Wisconsin should be updated to address two recent legislative actions affecting local historic preservation ordinances: 2015 Wisconsin Act 176 and 2017 Wisconsin Act 317 (62.23(7)(em)2m) which states, “In the repair or replacement of a property that is designated as a historic landmark or included within a historic district or neighborhood conservation district under this paragraph, a city shall allow an owner to use materials that are similar in design, color, scale, architectural appearance, and other visual qualities.”

In addition to state legislative actions, the City of Madison was already in the process of updating their four-decade old ordinance with the intent to clarify and to be consistent with current state statutes and more closely aligned with national preservation methodology.

41.02 Definitions

- FS2. Would DIY repainting or repointing masonry be a level 1?
- MB3. Creation of a mandatory hierarchy that is inconsistent with Federal guidelines. The Consultant's recommendations would create a mandatory and inflexible hierarchy for reviewing alteration requests, more restrictive than even the reviews for federal tax incentives.
- MH1. What is a "full" bay?
- MB2. Take care of the word "original."
- TLR3. Need to clarify between additions and new construction. Also, would a new garage be counted as new construction?
- TLR3. Include which NPS definitions should be used.
- TLR3. Remove redundancies in the definitions.
- TLR3. Add definitions of: area of visual compatibility; demolition permit and stop work order (if Preservation Planner will be issuing those now); directional expression; openings; proportion; rhythm; solids; voids; visible from the street
- TLR3. Need actual definitions not proposal for terms that need definition.
- TLR3. Refine definition of "historic district."
- TLR3. Area of visual compatibility will not work if it only considers properties within the same zone.
- AP1. The definition of "area of visual compatibility" should allow for compatibility to be reviewed in comparison with other structures of the same type in the district.

When LORC, Landmarks Commission, or Common Council deem it necessary to add definitions to the ordinance, utilize National Park Service definitions where possible. Not that the NPS is deemed more worthy or better than state or local definitions, just that they have had decades to perfect it, and those definitions are now accepted nationwide. A historic property owner in San Diego, California would understand the terminology the same as a historic property owner in Bangor, Maine.

Consider improving 41.02 Definitions to remove many of the redundancies currently contained in Subchapter 41G and make the standards more succinct. Some of the terminology introduced in the recommendations may be cause for 41.02 to be revisited. New definitions for technical or industry jargon would be appreciated by property owners for added clarity and ease of understanding.

Add "accessory structures." Accessory structures are structures that are not the primary structure, including garages, garden sheds, accessory dwelling units, and others as defined by Madison's Zoning Ordinance. Based on conversations with staff, LORC may want to consider the effect and size of small garden sheds not placed on concrete slabs.

Add "additions." A portion of a structure built after the historic structure was completed. Additions are physically connected to a primary or accessory structure and increase its volume. Additions may be constructed within the period of significance or outside the period of significance.

Refine definition of “alteration” to remove the word “addition.” Additions are covered under a separate set of standards for additions. The act or process which changes one or more of the exterior architectural features of a designated structure. The International Building Code had three levels of alterations. In all three instances, alterations include work within the existing volume of a building and do not include adding volume to a building.



- Level 1 alterations include the removal and replacement of the covering of existing materials, elements, equipment, or fixtures using new materials, elements, equipment, or fixtures that serve the same purpose.
- Level 2 alterations include the reconfiguration of space, the addition or elimination of any door or window, the reconfiguration or extension of any systems, or the installation of any additional equipment.
- Level 3 alterations apply where the work area exceeds 50% of the aggregate area of the building.

Add definition of “area of visual compatibility.” Include language that parcels must be compatible with other historic resources constructed in the period of significance (not non-historic, non-contributing, or properties constructed outside of the period of significance) within 200 feet around the property per 41.03(5). Also see the definition of “compatible.”

Add definition of “compatible.” Capable of existing or performing in harmonious or agreeable combination in “design, color, scale, architectural appearance, and other visual qualities” [directly from state statute] including, but limited to, alignment, character, context, directional expression, height, location, materials, massing, proportion, relationship of solids to voids, rhythm, setting, size, volume, etc.

Add definition of “directional expression.” The vertical or horizontal orientation of the structure.

Add definition of “elevation” and the types of elevations, i.e.-street elevations. The draft version of this document used the term “façade” and “elevation” interchangeably. Façade typically came from portions of the recommendations from Madison’s Subchapter 41G, whereas elevation came from the Secretary of the Interior. For the purpose of the revision to the document, the word elevation was used.

Refine definition of “historic district.” The National Park Service defines a historic district as follows: “A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.” See more about historic districts at https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_4.htm#district

Add definitions of “massing.” A term in architecture which refers to the perception of the general shape and form as well as size of a building. A filled volume or positive space.

Add definition of “inconspicuous.” Not visible or attracting attention.

Add definition of “new structures.” New structures are not connected to existing structures and include new principle structures and new accessory structures.

Add definition of “openings.” A void in a solid such as a space or gap in the wall of a building that allows for the admission of light and air, i.e.-windows, doors, etc.

Add definition of “proportion.” Harmonious relation of parts to each other or to the whole: balance, symmetry. The relation of one part to another or to the whole with respect to magnitude, quantity, or degree: ratio. Proportion is a central principle of architectural theory and an important connection between mathematics and art.

Add definition of “rhythm.” An ordered recurrent alternation of strong and weak elements; movement, fluctuation, or variation marked by the regular recurrence or natural flow of related elements; windows, walls and other elements of a building designed in such way that it transmits a repetition of the same element.

Add definition of “scale.” The size of an object in relationship to another object.

Add definition of “solids.” Wall, face, or flat plane that usually encloses a volume.

Add definition of “visible from the street.”

TLR3. Should use visible from public right-of-way rather than just from the street. Need to be specific about what sides and parts of a contributing building are being regulated. Different districts have varying amounts of the side elevation visible from the street.

- I believe “street façade” is straight forward and easily understood, but there is a gray area for sides of buildings that are still visible from the street. Differentiation should be given to blocks where houses are widely spaced apart, and the secondary or side façade is clearly visible from the street, versus blocks where houses are closely spaced, and the secondary or side façade is not easily visible from the street. The consultant gave some consideration to recommending a standard where, if the structure was 0’-4’ from the side property line, the entire side elevation would be reviewed as not visible. If the structure was 5’-9’ from the side property line, the frontmost 10’ of the side elevation would be considered visible from the street and the remainder of the side elevation would be reviewed as not visible. If the structure was 10’-14’ from the side property line, the frontmost 15’ of the side elevation would be considered visible and reviewed as an elevation visible from the street and the remainder of the side elevation would be reviewed as not visible, and so on and so forth. Essentially, the distance from the structure to the side property line would dictate how much of the frontmost portion of the side elevation would be considered visible. After driving through the districts with staff on January 10, 2019, the consultant can attest to the fact that the entirety of the side elevation is clearly visible at narrow distances between 5’ and 10’, so this approach may not be desired.
- Qualifiers such as “primary, main, front, visible from the street, highly visible, and character-defining” were also used interchangeably. Primary, highly visible, and character-defining came from the Secretary of the Interior, whereas main, front, and visible from the street came from Madison’s Subchapter 41G. As several instances of side and secondary elevations that are highly visible were pointed out, the words main and front may not be as all-encompassing as LORC or the Landmarks Commission would want. Therefore, the phrase “visible from the street” was used as much as possible for the purpose of this version of the document.
- Terms such as “side, rear, secondary, less visible, minimally-visible, and non-character-defining” were also used interchangeably. Side and rear came from Madison’s Subchapter 41G, where secondary, less visible, minimally visible, and non-character-defining came from the Secretary

of the Interior. For the purpose of the revision to the document, the word phrase “not visible from the street” was used as much as possible.

- Consideration should also be given to the use of the word “street.” There has been some discussion that this should be revised to “public right of way.” As defined in Madison 10.05(1)(b), “Right-of-Way means the surface and space above and below an improved or unimproved public roadway, highway, street, bicycle lane and public sidewalk in which the City has an interest, including other dedicated rights-of-way for travel purposes.” The consultant is agreeable to include public roadway, highway, street, and public sidewalk or a bicycle lane in conjunction with a public roadway, highway, or street in the interpretation of “street”. However, a bicycle path not in conjunction with a public roadway, highway, or street or a navigable river or lake may be taking the intention of “street” a bit too far. This should be further reviewed by LORC in conjunction with the City Attorney.

Refine definition of “visually compatible” or cross-reference to “area of visual compatibility” or “compatible” above.

Add definition of “voids.” A gap, negative space, or empty volume or an opening in a solid.

Add definition of “volume.” The enclosure of space or the amount of space occupied by a three-dimensional object as measured in cubic units.

41.03 General Administrative Provisions, 41.07 Designating Landmarks, or 41.10 Creating and Amending Historic Districts

TLR3. It is unnecessary to put a requirement to show historic districts on a map or in the Assessor information in this ordinance. That should be covered by the Historic Preservation Plan.

Consider adding language to the ordinance to codify a requirement to identify landmarks and historic district boundaries on the city zoning map. The City of Madison already shows historic district boundaries on the zoning map, but the map is incredibly difficult to locate online.

Consider adding language to the ordinance to codify a requirement to identify landmarks and historic district boundaries on the city assessor’s data. The City of Madison already does this to cross reference to the zoning map.

41.03 General Administrative Provisions

MB2. What things are grandfathered?
MB3. Suggestion that owners use economic hardship variance is not a practical solution. It requires additional legal process and may require the extra engagement of other professionals such as architects, engineers, and attorneys.
TLR3. Consultant should state why parts of the ordinance that were updated in 2015 also have suggested revisions.
TLR3. Preservation Planner and this ordinance should not make interpretations about how a proposal meets zoning code in terms of its nonconformity.

Staff shall ensure that 41.03(6) Transition Rule is removed from the ordinance.

Consider adding language regarding grandfathering or nonconformities. The use of any building materials, building features, or building site that was lawfully existing at the time of the adoption of this ordinance, or any subsequent amendment(s), may be continued. This ordinance does not prohibit the alteration or addition to a nonconforming structure. Rather, the structure may be altered or added onto without fully meeting the requirements of this ordinance if the alteration or addition does not increase the nonconformity. For instances, a skylight on an elevation visible from the street that was installed in the 1970s, prior to the enactment of the ordinance for that district, would not be allowed under the recommended Standards for Review. However, a property owner would be allowed to repair or replace the skylight, but the replacement should follow the ordinance as closely as possible, i.e. – the replacement skylight shall be flat, parallel to the slope of the roof, and painted to match the roof material.

41.11 Historic District Ordinance Requirements

- FS2. Will the City explore expanding the Period of Significance in the First Settlement District to include mid twentieth century buildings?
- MB2. Why are we streamlining? Why should Marquette Bungalows' Standards be the same as Mansion Hill's Standards?
- MH2. Will the revisions protect against excessive relocation? Too much relocation reduces the integrity of Mansion Hill HD.
- MH3. Each historic district in subchapter G must have design guidelines based on each district's character-defining features (such as Minneapolis and Denver).
- TLR2. One set of Standards for all HDs? Skeptical, different HDs have different characteristics.
- TLR2. Need more details in recommendations – what's the process when the ordinance doesn't address the on-the-ground reality?
- TLR2. How will properties just outside the P.O.S. be regulated under these recommendations?
- TLR2. How will these recommendations improve clarity and prompt decision-making? E.g. Our insurance company refused to write a policy for us when they learned that we are in an HD because of the reputation for slow approvals.
- TLR3. Concerned about shift to not differentiating process and requirements for individual districts. If a single process is adopted, this will required modifications to MGO 41.11(2).
- TLR3. Need consistency between the review process for individual landmarks and for districts. Would individually landmarked properties within a historic district follow a different process?

Streamlining the ordinance will provide clarity for property owners, designers and architects, contractors, city staff, and Landmarks Commission members. Good preservation practice is good preservation practice, no matter what district one owns property in. The standards for masonry or a roof in Marquette Bungalows should be no different that the standards for masonry or a roof in Mansion Hill and so on and so forth for all the requirements. Therefore, it is the consultant's professional recommendation that the same set of Standards for Review be utilized across all historic districts. If this is the case, consider omitting 41.11 Historic District Ordinance Requirements as they may no longer be needed.

General Notes for Subchapter 41G

TLR3. An ordinance is not the place to specify definition terms having certain formatting or to be hyperlinked. That should be in the preservation plan.

Bold, italicize, or underline words that appear in 41.02 Definitions for better clarity and cross-referencing purposes and to omit redundancies to make it more succinct. Include hyperlinks in online or PDF versions of the ordinance.

Consider omitting all background information such as Purpose and Intent, Criteria for Creation, Historic Resources, and Reference to Plan. They're redundant and repetitive and don't highlight the uniqueness of the district, nor do they need to be codified into the ordinance. Furthermore, it's highly unusual for this type of information to be in an ordinance and is more customary for it to appear in a design guideline. The Historic Preservation Plan will make a recommendation for illustrated design guidelines that highlight the unique characteristics of each district.

Secretary of the Interior's Standards for Rehabilitation

FS2. How would the ordinance language handle the replacement of architectural details, whether I have historic photos or not? Conjecture? Based on mark/scar in the building fabric? Seems like the recommendations would make detailed restoration more difficult.

MB2. What about 36 CFR 67 and 36 CFR 68?

MB3. Conflation of two sets of Federal Standards and Guidelines. We do not understand the rationale for applying these standards to owners like us who cannot take advantage of such federal tax credits.

MH2. Where do your recommendations depart from the SOIS standards? It would be very helpful for us to know what you omitted from the SOIS in bringing them into your recommendations.

TLR3. Recommendations are not specific enough. But should be careful about incorporating the SOI verbatim as this will add new requirements for historic district properties.

UH2. Does the SOIS apply to interior of homes?

Consider incorporating the Secretary of the Interior's Standards for Rehabilitation verbatim into the ordinance as many other communities do and utilize them as a baseline for review. These Standards were last updated in 1995 and have stood the test of time for the last 23 years.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Secretary of the Interior's Guidelines for Rehabilitating Historic Buildings

- MB2. What about the Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings?
- TLR2. Asked for clarity on the difference between standards and guidelines.
- TLR3. Concerned about lack of differentiation between commercial and residential building types.
- TLR3. For preservation tax credits, SOI Guidelines are just recommendations, not requirements. Concerned about using some of the SOI Guidelines as requirements for City CoAs.

Consider incorporating applicable portions of the Secretary of the Interior's Guidelines for Rehabilitating Historic Buildings (<https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>) into the ordinance. Local, state, and federal officials utilize the Guidelines, which were updated in 2017, for reviewing a variety of project types, including state and federal historic tax credit applications. The follow Recommendations for the Standards for Review rely heavily upon applicable portions of the Guidelines as well as existing portions of Subchapter 41G.

I. Recommendations for the Standards for Review for Alterations

- MB1. Need to take economic feasibility into account in more cases. It would be good to strike a balance between historic preservation and economic feasibility. Clearing up sections to use state ordinance wording in document.
- MB2. "If using the same kind of materials is not feasible" is used in several locations throughout the document. Who decides what is feasible or not?
- MH2. Non-structural features: can the owner decide to just remove them? Is that kind of alteration covered by the ordinance? If they're dangerous or need to be removed for any reason, is there assistance for that, financial or consultation with city staff?
- TLR2. Can I demolish a non-conforming (or non-POS) addition?
- TLR3. Some of the recommendations will be onerous for property owners: no AC units or compressors on the front façade; Historically-painted wood features shall be repainted with colors that are appropriate to the building and district; Thermal devices (such as infrared heaters) may be used to carefully remove paint when it is so deteriorated that total removal is necessary prior to repainting; rear decks must have wooden handrails; Wrought iron, simulated wrought iron, and wood fences are permitted, but chain link, metal mesh, vinyl, composite, bamboo, reed, and other rustic style fences, such as rough sawn wood or split-rails, are prohibited.

A. Building Materials

- TLR3. "Repointing mortar shall duplicate the strength, composition, color, texture, width, and profile of the historic mortar joints." My neighbor's house has crushed oyster shell in the mortar – how does one duplicate that texture?
- TLR3. "Installation of insulation, artificial siding, cementitious materials over masonry is prohibited." Landmarks approved EIFS on 722 Williamson in 2016.

1. Masonry: Stone, Brick, Terra Cotta, Concrete, Stucco, and Mortar
 - a) Masonry features that are important in defining the overall historic character of the building (such as walls, brackets, railings, cornices, window and door surrounds, steps, and columns) and decorative ornament and other details, such as tooling and bonding patterns, coatings, and color shall be **identified, retained, and preserved**.
 - b) Masonry shall be **protected and maintained** by ensuring that historic drainage features and systems that divert rainwater from masonry surfaces (such as roof overhangs, gutters, and downspouts) are intact and functioning properly.
 - c) Masonry shall only be cleaned when necessary to halt deterioration or remove heavy soiling. Masonry cleaning tests shall be performed. Test areas should be examined by the Preservation Planner to ensure that no damage has resulted. Soiled masonry surfaces shall be cleaned with the gentlest method possible, such as low-pressure water and detergent and natural bristle or other soft-bristle brushes. Biodegradable or environmentally-safe cleaning or paint removal products and paint removal methods that employ a poultice to which paint adheres, when possible, to neatly and safely remove old lead paint are encouraged. Abrasive methods (including sandblasting, other media blasting, or high-pressure water or acids on limestone or marble) which can damage the surface of the masonry and mortar joints are prohibited.

- d) Historically-painted masonry features may be repainted. Painting of historically unpainted masonry is prohibited. Installation of insulation, artificial siding, cementitious materials over masonry is prohibited.
- e) Masonry shall be **repaired** by patching, splicing, consolidating, or otherwise reinforcing the masonry using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing parts of masonry features when there are surviving prototypes, such as terra-cotta brackets or stone balusters.
- f) An entire masonry feature may be **replaced** in kind if it is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples can include large sections of a wall, a cornice, pier, or parapet. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities. Exterior insulation and finish systems (EIFS) are prohibited.
- g) Masonry mortar joints shall be repointed where there is evidence of deterioration, such as disintegrating mortar, cracks in mortar joints, loose bricks, or damaged plaster on the interior. For structures constructed within the period of significance, deteriorated lime mortar shall be carefully removed by hand raking the joints to avoid damaging the masonry. Power tools shall only be used on horizontal joints on brick masonry in conjunction with hand chiseling to remove hard mortar that is deteriorated or that is a non-historic material which is causing damage to the masonry units. Mechanical tools should be used only by skilled masons in limited circumstances and generally not on short, vertical joints in brick masonry. Repointing mortar shall duplicate the strength, composition, color, texture, width, and profile of the historic mortar joints. Lime based, Type O mortar shall be used because it is more flexible. Type N mortar may only be used on structures constructed within the period of significance if masonry test results prove it is similar in strength to the historic mortar. Portland cement based, Type S mortar is prohibited, except on structures constructed outside of the period of significance.
- h) Stucco shall be repaired by removing the damaged material and patching with new stucco that duplicates the old in strength, composition, color, and texture.
- i) Joints in concrete shall be sealed with appropriate flexible sealants and backer rods, when necessary.
- j) Openings in a masonry foundation may be filled with materials that are similar in design, color, scale, architectural appearance, and other visual qualities of the surrounding masonry and shall be inset at least one inch from the face of the wall.

2. Wood: Clapboard, Weatherboard, Shingles, and Other Functional and Decorative Elements

MH1. Dictating colors seems to be going too far
MB1. We need to strike a balance between historic preservation and economic realities.
MB2. It would be helpful to include a list of materials that can be used in the final recommendations for the Standards for Review for Alterations in addition to the list of materials prohibited.
TLR3. Do residents need to pay for an analysis of original paint color?
TLR3. Siding exposure (dimensions) should depend upon what is original to the house, not an artificial standard for all buildings.

- a) Wood features that are important in defining the overall historic character of the building (such as siding, cornices, brackets, window and door surrounds, and steps) and their paints and finishes shall be **identified, retained, and preserved**.
- b) Wood features shall be **protected and maintained** by ensuring that historic drainage features that divert rainwater from wood surfaces (such as roof overhangs, gutters, and downspouts) are intact and functioning properly.
- c) Paint shall be retained and applied to protect wood features that are subject to weathering, moisture, and ultraviolet light, such as exposed beam ends, outriggers, or rafter tails. Damaged or deteriorated paint shall be removed to the next sound layer using the gentlest method possible (i.e., hand scraping and hand sanding) prior to repainting. Thermal devices (such as infrared heaters) may be used to carefully remove paint prior to repainting. Chemical strippers may be used to supplement other methods such as hand scraping, hand sanding, and thermal devices. Biodegradable or environmentally-safe cleaning or paint removal products and paint removal methods that employ a poultice to which paint adheres, when possible, to neatly and safely remove old lead paint are encouraged. Coatings that encapsulate lead paint shall be used where the paint is not required to be removed to meet environmental regulations. Historically-painted wood features shall be repainted. In the event of partial repainting, historically-painted wood features shall be repainted with colors that are appropriate to the building and match features not being repainted.
- d) The overall condition of the wood shall be evaluated to determine whether more than protection and maintenance, such as repairs to wood features, will be necessary. Wood shall be **repaired** by patching, splicing, consolidating, or otherwise reinforcing the wood using recognized conservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of wood features when there are surviving prototypes, such as brackets, molding, or sections of siding.
- e) An entire wood feature may be **replaced** in kind if it is too deteriorated to repair (if the overall form and detailing are still evident) using physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples of such wood features include a cornice, entablature, or a balustrade. If using wood is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities.
- f) Re-siding with asbestos, wide clapboards over four (4) inches in exposure, composite clapboards and vertical panels with faux wood grain texture, diagonal

boards, vertical boards, rough sawn wood, rough split shingles, shakes, metal, and vinyl siding are prohibited. On elevations not visible from the street on structures constructed within the period of significance and all elevations on structures construction outside of the period of significance, smooth composite clapboards and trim may be used.

g) In the event of partial replacement, transitions from historic wood siding to replacement siding shall occur at corners or jogs in the building's mass where feasible. Transitions may occur along a flat wall plane provided each course of siding is "toothed in" or offset at least 16" from the course above or below; aligning vertical butt joints more than two courses high or adding trim between the historic wood siding and the replacement siding is prohibited. The color of the replacement siding shall match the siding not being replaced.

h) Where more than one layer of siding exists on the structure, all layers except the first must be removed prior to re-siding.

i) *All trim must project beyond the face of the siding. If insulation is applied under the new siding, all trim must be built up, so it projects beyond the face of the siding to the same extent it did with the historic siding.*

3. Metals: Wrought and Cast Iron, Steel, Pressed Metal, Terneplate, Copper, Aluminum, and Zinc

MH1. Dictating colors seems to be going too far

a) Metal features that are important in defining the overall historic character of the building (such as columns, capitals, pilasters, spandrel panels, or stairways) and their paints and finishes shall be **identified, retained, and preserved**.

b) Metals shall be **protected and maintained** from corrosion by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved decorative features.

c) Metals shall be cleaned to remove corrosion prior to repainting or applying appropriate protective coatings. The metal shall be identified prior to any cleaning procedure and then tested to ensure that the gentlest cleaning method possible is selected; or, alternatively, determining that cleaning is inappropriate for the particular type of metal. Non-corrosive chemical methods shall be used to clean soft metals (such as lead, tinplate, terneplate, copper, and zinc) whose finishes can be easily damaged by abrasive methods. The least abrasive cleaning method shall be used for hard metals (such as cast iron, wrought iron, and steel) to remove paint buildup and corrosion. If hand scraping and wire brushing have proven ineffective, low-pressure abrasive methods may be used if they do not abrade or damage the surface.

d) Appropriate paint or other coatings shall be applied to historically-coated metals after cleaning to protect them from corrosion. Historically-painted metal features shall be repainted with colors that are appropriate to the building and district. An appropriate protective coating (such as lacquer or wax) shall be applied to a metal feature that was historically unpainted, such as a bronze door, which is subject to heavy use.

e) The overall condition of metals shall be evaluated to determine whether more than protection and maintenance, such as repairs to metal features, will be necessary. Metal shall be **repaired** by reinforcing the metal using recognized preservation methods. Repair may include the limited replacement in kind or with a

compatible substitute material of those extensively deteriorated or missing components of features when there are surviving prototypes, such as column capitals or bases, storefronts, railings and steps, or window hoods.

f) An entire metal feature may be **replaced** in kind if it is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples of such a feature could include steel-sash windows. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities.

B. Building Features & Systems

MH1. All should reference facing a public right of way, not a front façade and be clear that it applies to being visible from these right of ways (including lake).

MB1. I feel very concerned about the stated order of operations: 1. Identify, retain, and preserve; 2. Protect and maintain; 3. Repair; 4. Replace. As a homeowner, there are many reasons that replace should be places on par with repair. It is absolutely possible to maintain the historic character and integrity of a home using replacement products and modern building materials. These proposed changes will make it too expensive for people to maintain their properties and age in place. Plus, many residents are actively trying to reduce our carbon footprint. Even well repaired windows bleed heat/cold depending on the season. The ability to replace original material with substantially similar new material should be allowed based on economic/financial feasibility of replace vs. the prohibitive cost of repair.

MB1. Need to strike a balance between historic preservation and economic realities. Grandfathering: repairs and replacement elements that were replaced/added before historic district -- e.g. replacing a skylight or bump out window that is grandfathered in follow state statute -- needs to be able to replace windows with similar appearance alternatives.

1. Roofs

- FS1. I wonder how the materials used will be able to change as updated to allow for flexibility, especially for roofs, etc.
- MH1. Why should real materials “be similar to the roof materials on existing structures within 200 feet of subject property”? E.g., an 1850s building has/had metal roof. 1910s & 1920s buildings around it has/had shingles. Weird requirement. Can we mandate where solar panels go? I thought state statute disallowed that.
- MH1. The dormer standard makes no sense to me.
- TLR1. What about existing non historic materials?
- TLR3. Will the City require owners to repair or duplicate weathervanes; keep parapets on more than just the primary façade?
- TLR3. Some of the prohibited roofing materials may be historically appropriate. Some level of discretion should be provided.
- TLR3. Would double layer of shingles over a ridge vent count as the “same material”?
- TLR3. If gable end of a house faces the street, any venting would be visible what are the owners to do?
- TLR3. Are skylights prohibited if they are visible from the right-of-way or allowed if they are ten feet back from the front edge of the roof? Those could contradict.
- TLR3. Need to take into account State law regarding placement of solar panels.
- UH2. What’s the rationale for requiring roof materials to be similar to those within 200’?
- UH2. Gutters – how will they be regulated? The recommendations don’t include them.

a) Roofs and their functional and decorative features that are important in defining the overall historic character of the building shall be identified, retained, and preserved. The form of the roof (gable, hipped, gambrel, flat, or mansard) is significant, as are its decorative and functional features (such as cupolas, cresting, parapets, monitors, chimneys, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles), and size, and patterning. The form of the roof visible from the street shall not be altered except to restore it to the historic documentable appearance. The removal of decorative and functional features visible from the street is prohibited.

b) A roof shall be protected and maintained by cleaning gutters and downspouts and replacing deteriorated flashing. Roof sheathing should also be checked for indications of moisture due to leaks or condensation. Adequate anchorage shall be provided for roofing material to guard against wind damage and moisture penetration. A leaking roof shall be protected with a temporary waterproof membrane with a synthetic underlayment, roll roofing, plywood, or a tarpaulin until it can be repaired. Roofing material that requires a protective coating and was painted historically (such as a terneplate metal roof or gutters) shall be re-painted as part of regularly-scheduled maintenance with a compatible paint coating system following proper surface preparation. Protecting a roof covering when working on other roof features.

c) The overall condition of the roof and roof features shall be evaluated to determine whether more than protection and maintenance, such as repairs to roof features, will be necessary. A roof shall be repaired by ensuring that the existing historic or compatible non-historic roof covering is sound and waterproof. Repair may include the limited replacement in kind, or with a compatible substitute

material, of missing materials (such as wood shingles, slates, or tiles) on a roof visible from the street, as well as those extensively deteriorated or missing components of features when there are surviving prototypes, such as ridge tiles, dormer roofing, or roof monitors. Using corrosion-resistant roof fasteners (e.g., nails and clips) to repair a roof to help extend its longevity.

d) An entire roof covering or feature may be replaced in kind if it is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Only missing or damaged roofing tiles or slates shall be replaced rather than replacing the entire roof covering. Examples of such a feature could include a large section of roofing, a dormer, or a chimney. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities and may include three-tab asphalt shingles, architectural (also known as dimensional or laminate) shingles with a straight bottom edge and light faux shadowing that simulate wood shingles or slate, wood roof shingles, clay or concrete tile, slate, flat standing seam metal, and flat interlocking metal panels on flat roofs. Dutch lap, French method, and interlocking asphalt shingles are allowed on structures constructed after 1920 and within the period of significance. Thick wood shakes, architectural (also known as dimensional or laminate) asphalt shingles with scalloped or staggered bottom edges that simulate wood shake, slate, or tile and have heavy faux shadowing, corrugated or ribbed metal roofing panels, and metal shingles are prohibited.

e) Low-profile continuous ridge vents shall be permitted provided that the vents extend to the front edge of the fascia and are covered with the same material as the roof visible from the street. Rectangular or continuous soffit vents shall be permitted if they are finished or painted the same color as the adjacent soffit. Round soffit vents are prohibited. Static vents, electric vents, wind turbines, and attic fans visible from the street are prohibited.

f) Skylights not visible from the street shall be permitted. Skylights visible from the street are prohibited except for side roof slopes where the front edge of the skylight is at least ten (10) feet back from the front edge of the main roof. Skylights shall be flat, parallel to the slope of the roof, and painted to match the roof material. Tubular, arched, domed, or pyramidal shaped skylights are prohibited.

g) Mechanical and service equipment on the roof (such as heating and air-conditioning units or solar panels) when required for a new use shall be installed so that they are as unobtrusive as possible and do not damage or obscure character-defining historic features. Roof-mounted solar arrays on sloped roofs shall be flat, parallel to the slope of the roof, and arranged in a pattern or grid parallel to the roof's ridge and eaves. Locating solar panels on the site (ground-mounted), on structures constructed outside of the period of significance, additions, or new structures is encouraged.

2. Windows

FS2. Is the intention of the recommendations to regulate windows on secondary elevations at such a precise distance from the front façade?

MB2. The language seems to mandate wood windows and preclude the use of clad wood windows, which was not the intention. The wording of this Standard should be reconsidered and clarified.

MB2. Who decides when a window is beyond repair?

MB4. Concern about lead exposure. Would like windows with lead paint to be replaced rather than repaired and repainted.

TLR1. Page 10, second bullet: it requires new window to have similar operation, but later gives examples of double hung existing but new casement etc. being allowed. This appears to be self contradictory.

TLR1. The recommendation to paint over flaking lead paint on windows is incorrect and not acceptable.

TLR2. Windows – I see they can be replaced, but is it the owner's call or would it be reviewed by LC? If an owner would prefer to replace old windows, can we do that?

TLR2. Glass - tinted, low-E, visible light transmittance. Not a lot of resistance.

TLR3. Visible from the right-of-way and 10 feet back from the front façade may be contradictory.

TLR3. Historic windows typically did not have gaskets or insulating units.

TLR3. Remove vague references such as "recognized preservation methods."

TLR3. Visibility of window openings 10-feet back from the front will depend on the context of the particular district.

TLR3. There is no mention of allowed window replacement materials. Are vinyl allowed?

a) Windows and their functional and decorative features that are important to the overall character of the building shall be identified, retained, and preserved. The window material and how the window operates (e.g., double hung, casement, awning, or hopper) are significant, as are its components (including sash, muntins, sash horns, glazing, pane configuration, sills, mullions, casings, brick molds, or trim) and related features, such as shutters. Historic windows visible from the street shall be retained and preserved.

b) The wood or metal which comprises the window jamb, sash, and trim shall be protected and maintained through appropriate treatments, such as cleaning, paint removal, and reapplication of protective coating systems. Windows shall be made weathertight by re-caulking gaps in fixed joints and replacing or installing weather-stripping. The historic operability of windows shall be sustained by lubricating friction points, replacing broken components of the operating system (such as hinges, latches, sash chains or cords), and replacing deteriorated gaskets or insulating units.

c) Sash locks, window guards, removable storm windows, and other reversible treatments may be installed to meet safety, security, or energy conservation requirements. Storm windows may be added with a matching or a one-over-one pane configuration that will not obscure the characteristics of the historic windows. Storm windows improve energy efficiency and are especially beneficial when installed over wood windows because they also protect them from accelerated deterioration. Storm windows shall be painted or otherwise coated to match the

color of the window; mill finish or anodized aluminum is prohibited. Interior storm windows may be added as an alternative to exterior storm windows.

d) The overall condition of the windows shall be evaluated to determine whether more than protection and maintenance, such as repairs to windows and window features, will be necessary. Window frames and sashes shall be repaired by patching, splicing, consolidating, or otherwise reinforcing them. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated, broken, or missing components of features when there are surviving prototypes, such as sash, sills, hardware, or shutters. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities. Glazing putty that has failed shall be removed, and new putty shall be applied; or, if glass is broken, carefully remove all putty, replace the glass, and re-putty. A historic single-glazed sash may be modified to accommodate insulated glass when it will not jeopardize the soundness of the sash or significantly alter its appearance. Except in structures constructed outside of the period of significance, clear (no low-e) glass shall be used to repair windows; low-e glass with a visible light transmittance (VLT) of greater than seventy-two percent (72%) and a visible light reflectance of less than twelve percent (12%) may be used in the repair of windows if the glazing manufacturer's specification or cut sheet is provided to the Preservation Planner. Colored glass shall be used to repair stained glass windows. Patterned glass may be used for privacy in bathrooms.

e) An entire window may be replaced in kind if it is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature, when the replacement can be based on historic documentation, or on elevations not visible from the street. Compatible substitute material similar in design, color, scale, architectural appearance, and other visual qualities may be considered, such as wood, aluminum clad wood, and steel. Aluminum may be allowed on non-residential buildings. True divided lights and simulated divided lights with window grids on the exterior and interior the same color as the window sash with spacer bars between the panes of glass shall be permitted. Incompatible, non-historic windows may be replaced with new windows that are compatible with the historic character of the building, or windows may be reinstated in openings that have been filled in with new windows that are compatible with the historic character of the building. Except in structures constructed outside of the period of significance, vinyl, fiberglass, vinyl or fiberglass clad wood, aluminum, glass block, picture, bay, and bow windows are prohibited. Except in structures constructed outside of the period of significance, clear (no low-e) glass shall be used to replace windows; low-e glass with a visible light transmittance (VLT) of greater than seventy-two percent (72%) and a visible light reflectance of less than twelve percent (12%) may be used in the replacement of windows if the glazing manufacturer's specification or cut sheet is provided to the Preservation Planner. Colored glass shall be used in the replacement of stained-glass windows. Patterned glass may be used for privacy in bathrooms.

f) The sills of historic window openings on elevations not visible from the street may be raised to serve bathrooms and kitchens. The reconfigured openings and the windows in them should be compatible with the overall design of the building but, in most cases, not duplicate the historic fenestration. The new openings shall have similar operation (e.g., double hung, casement, awning, or

hopper) where possible, components (including sash, muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim), and finish as historic windows of the structure. For instance, a 6 over 6 double hung window's operation may be reconfigured to a 6-light fixed, awning, or hopper window or a 9-light casement window. Historic components such as sills, mullions, casings, brick molds, or trim shall be identified, retained, and preserved, and a new panel shall be inserted below a new, higher sill.

g) New window openings where none previously existed on elevations not visible from the street may be added if required by a new use. The new openings and the windows in them should be compatible with the overall design of the building but, in most cases, not duplicate the historic fenestration. The new openings shall have a similar height to width ratio, operation (e.g., double hung, casement, awning, or hopper), components (including sash, muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim), and finish as historic windows of the structure. If the historic design of the building is predominantly single or pairs of window openings with wall between, the new window opening shall be single or pairs of window openings with wall between. New window openings containing multiple windows where none previously existed are prohibited.

h) Window openings in a masonry foundation may be filled with materials that are similar in design, color, scale, architectural appearance, and other visual qualities of the surrounding masonry and shall be inset at least one inch from the face of the wall.

3. Entrances & Porches

TLR3. What if a porch is on the rear of a building?

TLR3. Are Larson screen/storm combo doors allowed? What of full-light storms or security storms that have the intricate pattern over the glass?

TLR3. Will shellac or polyurethane be allowed as a finish for a door?

TLR3. "Porch pilasters, columns, or posts shall be trimmed with decorative molding at the top and bottom of the posts." What if decorative molding did not originally exist?

TLR3. There are variations in the stair wing walls in the districts, which the proposed language does not address. What about stone wing walls?

TLR3. Wood-framed screens are not always needed, and wrought-iron may be historic to the building.

TLR3. Shouldn't enclosing a porch be included in the "additions" section?

UH2. Rear porch on a historic masonry (sandstone) house that is a later addition (1960s) that does not match. If I remove it and build a new porch, does the replacement need to be masonry to match the house?

a) Entrances and porches and their functional and decorative features that are important in defining the overall historic character of the building shall be identified, retained, and preserved. The materials themselves (including masonry, wood, and metal) are significant, as are their features, such as doors, transoms, pilasters, columns, balustrades, stairs, roofs, and projecting canopies. A historic entrance or porch shall be retained even though it will no longer be used because of a change in the building's function. A porch that is historic to the structure or dates to the period of significance of the district shall be retained and preserved.

b) The masonry, wood, and metals which comprise entrances and porches shall be protected and maintained through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coating systems.

c) The overall condition of entrances and porches shall be evaluated to determine whether more than protection and maintenance, such as repairs to entrance and porch features, will be necessary. Entrances and porches shall be repaired by patching, splicing, consolidating, and otherwise reinforcing them using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated features or missing components of features when there are surviving prototypes, such as balustrades, columns, and stairs.

d) An entire entrance or porch that is too deteriorated to repair (if the overall form and detailing are still evident) shall be replaced using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities.

e) If the entrance door is historic or dating from the period of significance and blends with the historic character of the structure, it shall be retained unless the owner can demonstrate to the Landmarks Commission that it is beyond repair. Aluminum clad wood, aluminum, and insulated hollow metal entrance doors shall be approved if they are similar in design, color, scale, architectural appearance, and other visual qualities. Storm doors shall be compatible with the entrance door and the overall design of the building. Storm doors shall be full-light or full-view, wood or aluminum, and in the same color as the entrance door or trim. Mid-view and high-view storm doors are prohibited. Storm doors with metal grilles may be approved if they blend with the style of the structure. Unpaneled, modern-style doors and doors with a fake wood grain, mill finish or clear anodized aluminum, and other metallic finishes are prohibited, except on structures constructed outside of the period of significance. All doors shall be painted or finished with a material that resembles a painted finish, unless staining can be based on historic documentation.

f) New in-swinging or out-swinging French door openings may be added where none previously existed on elevations not visible from the street. The new openings and the doors in them should be compatible with the overall design of the building but, in most cases, not duplicate historic doors. The new openings shall have a similar height to width ratio, components (including muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim), and finish as historic doors of the structure.

g) Where physical evidence of the overall form and detailing are not evident, porch ceilings shall have the appearance of narrow beaded boards, unless another historic material is approved by the Landmarks Commission. Porch pilasters, columns, or posts shall be trimmed with decorative molding at the top and bottom of the posts. Solid wall porch balustrades and stair wing walls shall be covered in masonry or siding to match the structure. Open porch balustrades and stair railings shall have top and bottom rails with the bottom rails raised no higher than four (4) inches above the floor. Balusters shall be located between (not in front of or behind) the top and bottom rails and shall be vertical, square, and spaced such that a four (4) inch sphere may not pass through the railing at any point. Handrails on

stairs shall be wood to match the porch balustrade. Decorative wrought iron, aluminum or other metal, composite, and vinyl balustrades and railings are prohibited, except on structures constructed outside of the period of significance. Stairs may be constructed of wood, concrete, or brick. If wood is used, stairs shall have solid wood risers and be enclosed on the sides by lattice or a wing wall. First floor porch flooring shall be tongue-in-groove boards; carpeting, dimensional lumber or board decking, and composites with faux wood grain texture are prohibited. Porch floor joists shall be hidden from view by rim joists or frieze boards. Spaces beneath porches and stairs shall be enclosed with a framed lattice of crisscross design, narrow vertical boards, or other openwork design. The lattice shall be designed such that a three-(3) inch sphere could not pass through any portion of the lattice. All wood on exterior porches, except flooring and stair treads, shall be painted or opaque stained. Other porch designs may be permitted if they are compatible with the character of the structure and the district and if the owner can demonstrate to the Landmarks Commission that a different design is original to the structure.

h) Porches on elevations not visible from the street may be enclosed with wood-framed screens or storm windows similar in proportion to windows on the structure, on the condition that the balustrade be retained and preserved, repaired, or replaced in a design compatible with the historic character of the structure. The wood-framed screens or storm windows shall match the color of the porch and be placed behind pilasters, columns, or posts and balustrades so they do not obscure those features. Screening porches visible from the street is allowed, but enclosing porches visible from the street is prohibited.

i) Garage doors shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district. Horizontally paneled doors and flat paneled doors are prohibited.

4. Storefronts

TLR3. Storefronts should not have an entire separate set of standards. Rather, the unique aspects of storefronts should be addressed.

TLR3. What of lighting (e.g., exterior florescent bulbs)?

TLR3. Is this suggesting that signage requires Landmarks approval? If so, that would be a good recommendation.

a) Storefronts and their functional and decorative features that are important in defining the overall historic character of the building shall be identified, retained, and preserved. The storefront materials (including wood, masonry, metals, ceramic tile, clear glass, and pigmented structural glass) and the configuration of the storefront are significant, as are features, such as display windows, base panels, bulkheads, signs, doors, transoms, kick plates, corner posts, piers, and entablatures. The removal of inappropriate, non-historic cladding, false mansard roofs, and other later, non-significant alterations can help reveal the historic character of the storefront. However, later, non-original features that have acquired significance over time and are within the period of significance shall be retained. The glazing and the transparency (i.e., which allows the openness of the interior to be experienced from the exterior) that is so important in defining the character of a historic storefront shall be retained.

b) Masonry, wood, glass, ceramic tile, and metals which comprise storefronts shall be protected and maintained through appropriate treatments, such as cleaning, paint removal, and reapplication of protective coating systems.

c) The overall condition of the storefront shall be evaluated to determine whether more than protection and maintenance, such as repairs to storefront features, will be necessary. Storefronts shall be repaired by patching, splicing, consolidating, or otherwise reinforcing them using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of storefronts when there are surviving prototypes, such as transoms, base panels, kick plates, piers, or signs. Except in structures constructed outside of the period of significance, clear (no low-e) glass shall be used to repair storefront glazing. Low-e glass with a visible light transmittance (VLT) of greater than seventy-two percent (72%) and a visible light reflectance of less than twelve percent (12%) may be used in the repair of storefront glazing if the glazing manufacturer's specification or cut sheet is provided to the Preservation Planner. Prismatic glass may be used at storefront transoms.

d) An entire storefront that is too deteriorated to repair (if the overall form and detailing are still evident) may be replaced in kind using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities. Missing awnings or canopies that can be historically documented to the building may be replaced, or new signage, awnings, canopies, or lighting that are compatible with the historic character of the building may be added.

5. Mechanical Systems

FS2. Will the ordinance allow solar installations?

MB1. This is not clear and could be defined arbitrarily: "Window units on primary and other highly visible elevations"

MB1. It is important to allow non-permanently installed window air conditioning units on the street facing side. The upstairs of our house gets dangerously hot in the summer and the design of the rooms would make it very difficult to cool the front upstairs bedroom if we could not have a window unit.

TLR1. Window units? My house is not habitable without A/C. Never considered \$100 removable units to be an "alteration."

TLR3. Window A/Cs are temporary. Need consistency of visible from the street vs. 10-feet from the front.

TLR3. If mechanical equipment will be highly visible, will it be prohibited?

UH1. Some heating systems cannot be modified for air condition so not having no window air conditioners [sic]

AP1. The limitation on window air conditioning units is overly restrictive. The cost of other types of HVAC systems is often prohibitive. Window units are often the only feasible solution.

a) A split system mechanical unit may be installed in a manner that will have minimal impact on the historic character and result in minimal loss of historic building material and shall be placed in a location on a elevations not visible from

the street. Split system mechanical units on elevations visible from the street are prohibited.

b) Mechanical equipment on the roof may be installed, when necessary, so that it is minimally visible from the street to preserve the building's historic character and setting. Installing mechanical equipment on the roof that is overly large or highly visible from the street is prohibited

c) Air conditioning compressors shall be placed in a location on an elevation or roof not visible from the street. Air conditioning compressors on elevations visible from the street are prohibited.

d) Grilles (mechanical air intake, exhaust, etc.), vents (plumbing stack, mechanical air intake or exhaust, etc.), electrical and communications equipment (transformers, cabinets, mobile service boosters, security cameras, etc.), and utility meters (water, gas, electric, etc.) shall be placed in a location on an elevation not visible from the street or on the roof. Grilles, vents, equipment, and meters on elevations visible from the street are prohibited, unless technically infeasible. Grilles, vents, equipment, and meters shall be finished or painted to match adjacent materials.

C. Building Site

MH1. Several parking lots in MH are not legal/approved.

TLR3. Do owners need to recreate historic landscape? What if one wants to add a driveway?

TLR3. Does this mean that permanent dewatering is not allowed?

TLR3. Burial grounds have their own set of needs/concerns that should be separately addressed. No current historic district has burial grounds, to my knowledge.

TLR3. A number of retaining walls are on the City right-of-way. Will the City be required to go through Landmarks approval?

TLR3. There is no differentiation between front and backyards in this section. Instead of these vague standards, perhaps the City should survey and identify historic features that need to be retained.

TLR3. Fences are temporary features and do not damage the historic resource.

UH2. Happy to see recommendations for landscaping. I'm concerned about the flexibility of the interpretation of these. I want the ordinance to protect old trees, other landscape features.

UH2. Is this a new section? How will it affect what we do with landscape of our properties?

UH2. I like the spirit of the new section, but the language is kind of draconian.

UH2. I have a historic retaining wall, but it's deteriorating. If I rebuild it, do I need to find historic photo and restore it accurately?

UH2. Iron work – Can that stay? We have a step up from sidewalk to walkway. Do I need a CoA to alter that?

UH2. Everyone around us has chain-link fencing in the backyard. Prohibiting chain link would not be popular.

UH1. Landscape language is overbroad. Amy's explanation about the importance of hardscape elements makes sense, but the first bullet doesn't suggest the priority or priorities Amy mentioned.

Features of the building site that are important in defining its overall historic character shall be **identified, retained, and preserved**. Site features may include walls, fences, or steps; circulation systems, such as walks, paths or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, windbreaks, or gardens; landforms, such as hills, terracing, or berms; furnishings and fixtures, such as light posts or benches; decorative elements, such as sculpture, statuary, or monuments; water

features, including fountains, streams, pools, lakes, or irrigation ditches; and subsurface archeological resources, other cultural or religious features, or burial grounds which are also important to the site. The historic relationship between buildings and the landscape shall be retained. Graveling, mulching, or gardening the entire front yard is visually obtrusive and is prohibited.

1. Buildings and site features shall be **protected and maintained** by providing proper drainage to ensure that water does not erode foundation walls, drain toward the building, or damage or erode the landscape. Any existing irrigation that may be wetting the building excessively shall be corrected. Disturbance of the terrain around buildings or elsewhere on the site shall be minimized, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds. Areas where the terrain will be altered shall be surveyed and documented to determine the potential impact to important landscape features, archeological resources, other cultural or religious features, or burial grounds. Important landscape features shall be preserved through regularly-scheduled maintenance of historic plant material. Protective fencing, bollards, and stanchions may be installed on a building site, when necessary for security, that are as unobtrusive as possible. Continued protection and maintenance of buildings and landscape features on the site shall be provided through appropriate grounds and landscape management.

2. The overall condition of materials and features shall be evaluated to determine whether more than protection and maintenance, such as repairs to site features, will be necessary. Historic site features which have been damaged, are deteriorated, or have missing components shall be **repaired** to reestablish the whole feature and to ensure retention of the integrity of the historic materials. Repairs may include limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing site features when there are surviving prototypes, such as paving, railings, or individual plants within a group (e.g., a hedge). Repairs should be physically and visually compatible. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities.

3. An entire feature of the site that is too deteriorated to repair (if the overall form and detailing are still evident) may be replaced using the physical evidence as a model to reproduce the feature. Examples could include a walkway or a fountain, a land form, or plant material. If using the same kind of material is not feasible, then a compatible substitute material may be considered. Compatible substitute materials shall be similar in design, color, scale, architectural appearance, and other visual qualities.

D. Code Required Work

1. Accessibility

- FS2. Since a ramp is temporary, don't include prohibition of this. Using a ramp could be less damaging to historic fabric than what is suggested.
- MB3. Failure to address sustainability and aging in place: The *Accessibility* section of the Consultant's recommendations at page 15, like those sections discussed above, creates a compulsory, inflexible framework of preservation without regard to cost or technical feasibility when addressing accessibility needs.
- TLR3. It is highly unlikely that properties will be able to do a gradual slope rather than install a ramp due to how close homes are to the sidewalk. It should be a consideration, not a requirement.
- AP1. The requirement to place elevators and stairways within an existing structure rather than constructing a new addition should be qualified with the phrase "to the extent feasible." It is often cost-prohibitive to construct new functions and services within the existing structure. To assure the long-term feasibility of existing structures, there should be flexibility in installing new systems, provided any addition is compatible with the existing structure.

- a) The historic building's character-defining exterior features and features of the site and setting which may be affected by accessibility code-required work shall be identified.
- b) Barrier-free access requirements shall be complied with in such a manner that the historic building's character-defining exterior features and features of the site and setting are preserved or impacted as little as possible.
- c) Specialists in accessibility and historic preservation shall be utilized to determine the most sensitive solutions to comply with access requirements in a historic building, its site, or setting.
- d) Barrier-free access that promotes independence for the user while preserving significant historic features shall be provided.
- e) Solutions to meet accessibility requirements that minimize the impact of any necessary alteration on the historic building, its site, and setting, such as compatible ramps, paths, and lifts, shall be utilized.
- f) Relevant sections of existing codes regarding accessibility for historic buildings shall be used that provide alternative means of code compliance when code-required work would otherwise negatively impact the historic character of the property.
- g) Except in structures constructed outside the period of significance, the impact of accessibility ramps shall be minimized by installing them on elevations not visible from the street when it does not compromise accessibility or by screening them with plantings.
- h) A gradual slope or grade to the sidewalk may be added to access the entrance rather than installing a ramp that would be more intrusive to the historic character of the building and the district.
- i) An exterior stair or elevator tower that is compatible with the historic character of the building may be added on an elevation not visible from the street only when it is not possible to accommodate it on the interior without resulting in the loss of significant historic spaces, features, or finishes.
- j) A lift shall be installed as inconspicuously as possible when it is necessary to locate it on an elevation visible from the street of the historic building.

2. Life Safety

FS2. Will the ordinance address the imperative to remediate lead and asbestos?

MB1. Economic feasibility needs to be a viable reason to replace instead of repair.

TLR3. Lead Paint: What environmental regulations apply?

TLR3. Rather than having an unexplained life safety section, specific lifesafety measures should be addressed as applicable.

a) The historic building's character-defining exterior features and features of the site and setting which may be affected by life-safety code-required work shall be identified.

b) Life-safety codes (including requirements for impact-resistant glazing) shall be complied with in such a manner that the historic building's character-defining exterior features and features of the site and setting are preserved or impacted as little as possible.

c) Building materials shall be removed only after testing has been conducted to identify hazardous materials and using only the least damaging abatement methods.

d) Code officials and historic preservation specialists shall be utilized to investigate systems, methods, or devices to make the building compliant with life-safety codes to ensure that necessary alterations will be compatible with the historic character of the building.

e) Relevant sections of existing codes regarding life safety for historic buildings shall be used to provide alternative means of code compliance when code-required work would otherwise negatively impact the historic character of the building. *A new stairway to meet life-safety code requirements shall be added in a manner that preserves adjacent character-defining features and spaces.* Existing openings on elevations not visible from the street or, if necessary, creating new openings on elevations not visible from the street shall be used to accommodate second egress requirements.

II. Recommendations for the Standards for Review for New Additions

- FS2. Need clarification on the recommendation on differentiation on new additions.
- MH1. The highest or at least a very high priority is to get heights in zoning and heights in Downtown Plan to be compatible and consistent with MH historic district. Causes big problems. Include DR1 & 2 that are in MH historic district
- MB1. I don't have any idea what this means: "setback at least one full bay"
- MB1. Include economic and sustainability as factors in original improvement process for alterations instead of requiring variances.
- MB2. Information on garage doors in Standards for Review for New Structures should be copied to the Standards for Review of Alterations.
- MH2. Why not recommend that additions closely match, architecturally, the original building?
- TLR2. What if I want to build an addition that is an exact match to my existing historic house?
- TLR3. What if an owner wants to add on a porch that has been removed?
- TLR3. Is there a reason to treat additions and new structures differently? Even reaching the height of the historic structure may detract from historic significance.
- TLR3. The recommendation says additions and enlargements on nonconforming properties need to "conform to the provisions of this ordinance for new structures." A new structure has a separate set of recommendations that an addition. So enlargement/addition standards are based on whether the existing structure is nonconforming (new structure standard) or conforming (addition standard)?
- TLR3. The addition cannot be painted the same as the house colors?
- TLR3. All existing historic districts are in densely built locations. Additions need to be distinguished from new structures.
- TLR3. What counts as a rooftop addition: patio, mechanical ventilation, elevator shaft, additional story?
- TLR3. "... when required for a new use ..." Just because an owner wants to create a new use does not mean that new use is compatible with a historic structure. This language implies entitlement.
- TLR3. What does "one full bay" mean? "One full bay" and "inconspicuous when viewed from surrounding streets" could be two different standards. Does "inconspicuous" mean "unobtrusive" or does it mean "not seen?"
- TLR3. A different standard for rooftop additions is under the "roofs" section.
- TLR3. The section on additions arguably does not address new separate structures, such as a garage or shed.
- UH2. If a building was originally designed to have two segments, but one segment was never built, could I build the unbuilt segment according to original plans, i.e. exactly match the built original?
- UH2. Sandstone foundation. If I want to move a wall out, do I need to harvest original stone, or can I use a similar product?
- AP1. This restriction on specific forms, materials and color ranges should be removed. There should be flexibility in distinguishing the addition from the existing structure, provided the addition is compatible with the existing structure.

A. General

1. Functions and services required for a new use (including elevators and stairways) shall be placed in secondary or non-character-defining interior spaces of the historic building rather than constructing a new addition.
2. A new addition shall be constructed on an elevation not visible from the street. New additions on the front of the principal structure are prohibited, except for restoring or reconstructing missing historic features like entrances and porches.
3. A new addition shall be constructed that results in the least possible loss of historic materials so that character-defining features are not obscured, damaged, or destroyed.

New additions that destroy significant historic materials or character-defining features are prohibited.

4. A new addition shall be designed that is subordinate, secondary, and compatible to the historic building. No addition shall be higher than the existing principal structure. If the existing principal structure is already nonconforming, any additions or enlargements shall conform to the provisions of this ordinance for new structures and Section 28.192.

5. The same forms, materials, and color range of the historic building shall be used in a manner that does not duplicate it but distinguishes the addition from the historic building.

6. The alignment, rhythm, and size of the window and door openings of the new addition shall be based on those of the historic building.

7. A simple, recessed, small-scale hyphen, or connection, may be incorporated to physically and visually separate the addition from the historic building.

8. The addition shall be distinguished from the historic building by setting it back from the wall plane of the historic building.

9. The addition shall be stylistically appropriate for the historic building type (e.g., whether it is residential or non-residential).

10. The design for a new addition shall be considered in terms of its relationship to the historic building as well as the historic district, neighborhood, and setting.

11. New additions in densely-built locations (such as a downtown commercial district) may appear as a separate building or infill, rather than as an addition. In such a setting, the addition or the infill structure must be compatible with the size and scale of the historic building and surrounding buildings—usually the front elevation of the new building should be in the same plane (i.e., not set back from the historic building). This approach may also provide the opportunity for a larger addition or infill when the façade can be broken up into smaller elements (i.e., may appear as several separate buildings) that are consistent with the scale of the historic building and surrounding buildings.

12. A compatible rooftop addition for a multi-story building, when required for a new use, shall be designed that is set back from elevations visible from the street and that is inconspicuous when viewed from a standing position from across the street. A rooftop addition shall be limited to one story in height to minimize its visibility and its impact on the historic character of the building.

B. Building Materials

1. Masonry: Stone, Brick, Terra Cotta, Concrete, Stucco, and Mortar

a) New additions shall be designed and constructed so that the character-defining masonry features of the historic building are not negatively impacted. New additions shall result in the least possible loss of historic masonry materials so that character-defining features are not obscured, damaged, or destroyed. New additions that destroy significant historic masonry materials or character-defining features are prohibited.

b) Materials for exterior walls shall be similar in design, color, scale, architectural appearance, and other visual qualities of the historic building, but differentiated enough so that it is not confused as historic or original to the building. Combinations of materials that occur on the historic building or in the historic district, i.e., brick on first floor with clapboard on second floor are acceptable. Stone, brick, terra cotta, concrete, stucco, and mortar are encouraged. Decorative concrete block, composite panels with faux stucco texture, and exterior insulation and finish systems (EIFS) may be used as secondary or accent cladding materials with Landmark Commission approval. Pebble dash is prohibited.

2. Wood: Clapboard, Weatherboard, Shingles, and Other Functional and Decorative Elements

- a) New additions shall be designed and constructed so that the character-defining wood features of the historic building are not negatively impacted. New additions shall result in the least possible loss of historic wood materials so that character-defining features are not obscured, damaged, or destroyed. New additions that destroy significant historic wood materials or character-defining features are prohibited.
- b) Materials for exterior walls shall be similar in design, color, scale, architectural appearance, and other visual qualities of the historic building, but differentiated enough so that it is not confused as historic or original to the building. Horizontal wood or smooth composite clapboards four (4) inches or less in exposure, smooth wood shingles, or combinations of materials that occur on the historic building or in the historic district, i.e., brick on first floor with clapboard on second floor are acceptable. Smooth composite vertical panels and metal may be used as secondary or accent cladding materials with Landmark Commission approval. Asbestos, wide clapboards over four (4) inches in exposure, composite clapboards and vertical panels with faux wood grain texture, diagonal boards, vertical boards, rough sawn wood, rough split shingles, shakes, metal, and vinyl siding are prohibited.

C. Building Features & Systems

TLR3. "New dormers shall be no less than twelve (12) feet from the front edge of the roof." This precludes new dormers on properties where the roof (not the gable end) faces the street.

1. Roofs

- a) Mechanical and service equipment on the roof (such as heating and air-conditioning units or solar panels) when required for a new use shall be installed so that they are inconspicuous on the site and from the public right-of-way and do not damage or obscure character-defining historic features.
- b) Rooftop additions, decks, or terraces when required by a new or continuing use shall be designed to be set back from elevations visible from the street and inconspicuous when viewed from a standing position from across the street and not damage or obscure character-defining historic features. A rooftop addition shall be limited to one story in height to minimize its visibility and its impact on the historic character of the building.
- c) A green roof or other roof landscaping, railings, or furnishings shall be installed that are not visible on the site or from the street and do not damage the roof structure.
- d) The form and pitch of the roof shall be similar to the roof form and pitch on the historic structure.
- e) New chimneys shall be constructed of compatible masonry materials that are similar in design, color, scale, architectural appearance, and other visual qualities as the rest of the structure. If there is no masonry on the structure, chimneys shall be constructed of compatible masonry materials that are similar in design, color, scale, architectural appearance, and other visual qualities as other structures within the period of significance of the district.
- f) New dormers not visible from the street shall be permitted. New dormers visible from the street are prohibited except for side roof slopes where the front

edge of the dormer is no less than twelve (12) feet from the front edge of the roof. The ridge line of a dormer shall not extend above the ridge line of the main roof. The front face of a dormer wall shall not extend beyond the face of the main structure wall below. Shed dormers behind existing dormers or gables may be approved on elevations not visible from the street. Dormer roof form, overhang, cladding, trim, and window shall be similar in design, color, scale, architectural appearance, and other visual qualities as the historic building. If the historic roof form is not practical, another form may be approved if it does not detract from the historic character of the building or the neighborhood.

g) Roof materials shall be similar to the roof materials on the historic structure. Any roofing materials shall be permitted on flat or slightly sloped roofs not visible from the street. Three-tab asphalt shingles, architectural (also known as dimensional or laminate) shingles with a straight bottom edge and light faux shadowing that simulate wood shingles or slate, wood roof shingles, clay or concrete tile, slate, flat standing seam metal, and flat interlocking metal panels on flat roofs shall be permitted on roofs visible from the street. Thick wood shakes, Dutch lap, French method, interlocking shingles, architectural (also known as dimensional or laminate) asphalt shingles with a scalloped or staggered bottom edges that simulate wood shake, slate, or tile and have heavy faux shadowing, corrugated or ribbed metal roofing panels, and metal roof shingles are prohibited on roofs visible from the street.

h) Low-profile continuous ridge vents shall be permitted provided that the vents extend to the front edge of the fascia and are covered with the same material as the roof visible from the street. Rectangular or continuous soffit vents shall be permitted if they are finished or painted the same color as the adjacent soffit. Round soffit vents are prohibited. Static vents, electric vents, wind turbines, and attic fans visible from the street are prohibited and ones not visible from the street are permitted provided they match the color of the roof.

i) Skylights not visible from the street shall be permitted. Skylights visible from the street are prohibited except for side roof slopes where the front edge of the skylight is at least ten (10) feet back from the front edge of the main roof. Skylights shall be flat, parallel to the slope of the roof, and painted to match the roof material. Tubular, arched, domed, or pyramidal shaped skylights are prohibited.

j) Mechanical and service equipment on the roof (such as heating and air-conditioning units or solar panels) shall be installed so that they are as unobtrusive as possible. Roof-mounted solar arrays on sloped roofs shall be flat, parallel to the slope of the roof, and arranged in a pattern or grid parallel to the roof's ridge and eaves. Locating solar panels on the site (ground-mounted), on structures constructed outside of the period of significance, additions, or new structures is encouraged.

2. Windows

MH1. What is a "mill finish"?

a) Openings and the windows in them should be compatible with the overall design of the historic building but not duplicate the historic fenestration. The new openings shall have a similar operation (e.g., double hung, casement, awning, or hopper), components (including sash, muntins, glazing, pane configuration, sills,

mullions, casings, brick molds, or trim), and finish as historic windows of the structure.

b) Wood, aluminum clad wood, and steel windows are permitted. Aluminum windows are permitted on non-residential buildings. True divided lights and simulated divided lights with window grids on the exterior and interior the same color as the window sash and spacer bars between the panes of glass shall be permitted. Bay windows may be approved if they have sides perpendicular to the wall and if they do not extend beyond the eaves of the roof. Except in structures constructed outside of the period of significance, vinyl, fiberglass, vinyl or fiberglass clad wood, aluminum, glass block, picture, bay, and bow windows are prohibited. Clear or low-e glass may be used, and patterned glass may be used for privacy in bathrooms.

3. Entrances & Porches

a) Doors shall be compatible with the overall design of the building but, in most cases, not duplicate historic doors. New door openings shall have a similar height to width ratio, components (including muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim), and finish as historic doors of the structure. Aluminum clad wood, aluminum, and insulated hollow metal entrance doors shall be approved if they are similar in design, color, scale, architectural appearance, and other visual qualities. Storm doors shall be compatible with the door and the overall design of the building. Storm doors shall be full-light or full-view, wood or aluminum, and in the same color as the entrance door or trim. Mid-view or high-view storm doors are prohibited. Storm doors with metal grilles may be approved if they blend with the style of the structure. Unpaneled, modern-style doors and doors with a fake wood grain, mill finish or clear anodized aluminum, and other metallic finishes are prohibited, except on structures constructed outside of the period of significance. All doors shall be painted or finished with a material that resembles a painted finish, unless staining can be based on historic documentation.

b) Except on structures constructed outside of the period of significance, porch ceilings shall have the appearance of narrow beaded boards. Porch pilasters, columns, or posts shall be trimmed with decorative molding at the top and bottom of the posts. Solid wall porch balustrades and stair wing walls shall be covered in masonry or siding to match the structure. Open porch balustrades and stair railings shall have top and bottom rails with the bottom rails raised no higher than four (4) inches above the floor. Balusters shall be located between (not in front of or behind) the top and bottom rails and shall be vertical, square, and spaced such that a four (4) inch sphere may not pass through the railing at any point. Balusters may also be compatible with the overall design of the historic porch but, in most cases, not duplicate the historic balusters. Handrails on stairs shall be wood to match the porch balustrade. Decorative wrought iron, aluminum or other metal, composite, and vinyl balustrades and railings are prohibited, unless not visible from the street. Stairs may be constructed of wood, concrete, or brick. If wood is used, stairs shall have solid wood risers and be enclosed on the sides by lattice or a wing wall. First floor porch flooring shall be tongue-in-groove boards; carpeting, dimensional lumber or board decking, and composites with faux wood grain texture are prohibited. Porch floor joists shall be hidden from view by rim joists or frieze boards. Spaces beneath porches and stairs shall be enclosed with a framed lattice of crisscross design, narrow vertical boards, or other openwork design. The lattice

shall be designed such that a three-(3) inch sphere could not pass through any portion of the lattice. All wood on exterior porches, except flooring and stair treads, shall be painted or opaque stained. Other porch designs may be permitted if they are compatible with the character of the structure and the district and if the owner can demonstrate to the Landmarks Commission that a different design is original to the structure.

c) Porches on elevations not visible from the street may be enclosed with wood-framed screens or storm windows similar in proportion to windows on the structure. The wood-framed screens or storm windows shall match the color of the porch and be placed behind pilasters, columns, or posts and balustrades so they do not obscure those features. Screening porches visible from the street is allowed, but enclosing porches visible from the street is prohibited.

d) Except on structures constructed outside of the period of significance, rear yard decks may have solid wall balustrades and stair wing walls with masonry or siding to match the structure or open balustrades and stair railings with top and bottom rails with the bottom rails raised no higher than four (4) inches above the floor. Balusters shall be located between (not in front of or behind) the top and bottom rails and shall be vertical, square, and spaced such that a four (4) inch sphere may not pass through the railing at any point. Balusters may also be compatible with the overall design of the historic porch but, in most cases, not duplicate the historic balusters. Handrails on stairs shall be wood to match the deck balustrade. Decorative wrought iron, aluminum or other metal, composite, and vinyl balustrades and railings are prohibited, unless not visible from the street. Spaces beneath decks and stairs shall be screened by framed lattice or evergreen shrubs, and all parts of the deck, except the flooring and steps, shall be painted or opaque-stained in a color to blend with the colors on the structure.

e) Second exit stairways shall be provided on the interior of the structure where possible. When this is not possible, exterior second exit platforms and stairs shall be as unobtrusive as possible and located on elevations not visible from the street. Second exit platforms or stairs visible from the street are prohibited, unless the owner can demonstrate to the Landmarks Commission that no other location is possible.

f) Projecting, partially projecting/inset, and inset balconies are prohibited on elevations visible from the street.

g) Garage doors shall be located on elevations not visible from the street whenever feasible and shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district. Horizontally paneled doors and flat paneled doors are prohibited.

4. Storefronts

a) Storefronts, signage, awnings, canopies, or lighting shall be compatible with the historic character of the building. Clear or low-e glass may be used.

5. Mechanical Systems

FS2. What about placement of metering? The recommendations don't address that, they should.

a) A split system mechanical unit may be installed in a manner that will have minimal impact on the historic character and result in minimal loss of historic building material and shall be placed on an elevation not visible from the street. Split system mechanical units on elevations visible from the street are prohibited.

- b) Mechanical equipment on the roof may be installed, when necessary, so that it is minimally visible from the street to preserve the building’s historic character and setting. Installing mechanical equipment on the roof that is overly large or highly visible from the street is prohibited.
- c) Air conditioning compressors shall be placed in a location on an elevation not visible from the street. Air conditioning compressors on elevations visible from the street are prohibited.
- d) Grilles (mechanical air intake, exhaust, etc.), vents (plumbing stack, mechanical air intake or exhaust, etc.), electrical and communications equipment (transformers, cabinets, mobile service boosters, security cameras, etc.), and utility meters (water, gas, electric, etc.) shall be placed in a location on an elevation not visible from the street or on the roof. Grilles, vents, equipment, and meters on elevations visible from the street are prohibited, unless technically infeasible. Grilles, vents, equipment, and meters shall be finished or painted to match adjacent materials.

D. Building Site

FS2. Would the recommendations allow installing parking space (i.e, paving) on your property, e.g. in backyard?
 TLR1. Fences? No historic fences have been – [sic]
 UH1. Interpretation of preservation I think is necessary but will be difficult to interpret and/or enforce.

1. New onsite features (such as parking areas, access ramps, or lighting) shall be designed so that they are as unobtrusive as possible, retain the historic relationship between the building or building and the landscape, and are compatible with the historic character of the property.
2. New exterior additions to historic buildings or adjacent new construction shall be designed to be compatible with the historic character of the site and preserve the historic relationship between the building or building and the landscape.
3. An irrigation system needed for a new or continuing use of the site shall be located where it will not cause damage to historic buildings.
4. Poured concrete retaining walls with a smooth rubbed finish and under twenty-four (24) inches in height, flagstone, and stone ashlar retaining walls are permitted. Proposals to construct front yard retaining walls of other materials must be submitted to Landmarks Commission for approval prior to installation. Railroad tie, landscape timbers, boulders, and concrete block retaining walls are prohibited.
5. Wrought iron, simulated wrought iron, and wood fences are permitted. Chain link, metal mesh, vinyl, composite, bamboo, reed, and other rustic style fences, such as rough sawn wood or split-rails, are prohibited. Fences in the front yard shall not exceed three (3) feet in height.
6. No new parking lots will be approved unless they are accessory to and on the same zoning lot as a commercial structure or multiple family dwelling.

E. Code Required Work

FS1. These really should be stressed as one wants to update the work. It should have life be most important.

1. Accessibility

- a) The impact of accessibility ramps shall be minimized by installing them on elevations not visible from the street when it does not compromise accessibility or by screening them with plantings.
 - b) An exterior stair that is compatible with the historic character of the building may be added on an elevation not visible from the street only when it is not possible to accommodate it on the interior without resulting in the loss of significant historic spaces, features, or finishes.
 - c) A lift shall be installed as inconspicuously as possible when it is necessary to locate it on an elevation visible from the street of the historic building.
2. Life Safety
- a) A new stairway to meet life-safety code requirements shall be added in a manner that preserves adjacent character-defining features and spaces.
 - b) Existing openings on elevations not visible from the street or, if necessary, creating new openings on elevations not visible from the street shall be used to accommodate second egress requirements.
 - c) A code-required stairway that cannot be accommodated within the historic building shall be placed in a new exterior addition located on an elevation not visible from the street.
 - d) A new exterior stairway addition shall be designed to be compatible with the historic character of the building.

III. Recommendations for the Standards for Review for New Structures

- MB1. I am extremely concerned about the building costs associated with these requirements, especially in the case of a catastrophic loss by fire. It is possible that the standard insured value of a home may fall far short of the cost to rebuild in the fashion described in the proposal.
- MH2. Will the revisions strengthen the ordinance’s regulation of redevelopment, or accumulating/ redevelopment of adjacent parcels?
- MH2. 200-foot rule: is it common/consistent among other cities?
- TLR1. If historic district A is full of contributing structures built on 1 acre lots, and historic district B is full of contributing structures on 0.2 acre lots, is the 200 foot standard (applied to both) still reasonable/realistic?
- TLR2. 200-foot radius rule – does it make sense in areas with larger lots?
- TLR2. Standards for new const. should be more demanding.
- TLR2. The scale of new construction in the Williamson St. corridor needs to be reined in. The HD ordinance does not demand enough regulation of new const. here.
- TLR3. “A new building may be added to a historic site or property only if the requirements for a new or continuing use cannot be accommodated within the existing structure or structures.” This language can be read to mean that an applicant is entitled to an addition if any desired use cannot be accommodated within the existing structure. Want an additional bedroom? Want to build a 100-unit apartment building? A property owner’s wants is not relevant under the current ordinance. The ordinance currently promotes “architectural compatibility of new construction and exterior alterations in a historic district.”
- TLR3. If there is not enough lot space to locate new construction far enough away from a historic building, then the negative impact is allowed?

- TLR3. This would be an extreme downgrade for standards for new construction. Currently, all districts (except the 2-block Marquette Bungalow district) require compatibility. There may be different opinions of what is compatible, differences that can cause vigorous debate, but the standards exist. "Shall be considered" merely means that the Landmarks Commission needs to think about compatibility, but they can opt to ignore compatibility (or the Council can ignore).
- TLR3. Rather than downgrading existing standards, those standards should be better defined. At some point compatibility no longer exists. That maximum should be specified.
- TLR3. Infill: This recommendation requires size/scale compatibility. What about compatibility of the proportion and rhythm of solids to voids in the street facade(s) and the rhythm of buildings masses and spaces? Should a standard be created as to what counts as "broken up into smaller elements?"
- TLR3. Height is only provided in feet, not stories. Is this intended to preclude Plan Commission conditional use approval of greater heights?
- TLR3. How can a rhythm be repeated in one large building if the historic resources have space between the buildings?
- TLR3. Where would a corner property locate an accessory structure?
- UH1. I believe modern new well designed architecture has a place in the contemporary history of our neighborhood. I see no need to "arbitrarily" define roofline guidelines. Let architects who are privileged to design new buildings design whatever roofline they believe is pertinent to the integrity of the structure.
- AP1. The requirement that a new building can be constructed only if the proposed use "cannot be accommodated" within the existing structure should be removed. The use of property can change over time and new uses can be compatible with existing uses (*e.g.*, conversion of single-family dwellings to multi-family dwellings, offices or retail). A new proposal should be evaluated based on compatibility rather than whether the proposed use fits within the existing structure.
- AP1. The requirement for new construction to be "minimally visible" fails to contemplate how new construction can enhance an existing historic structure. New construction should be evaluated based on compatibility with the existing built environment rather than requiring new construction to be minimally visible.
- AP1. The question of compatibility with existing historic buildings should be less rigid than a strict 200-foot comparison and allow for a comparison with buildings of the same type in the district.
- AP1. The requirement for infill structures to be compatible with the size and scale of surrounding buildings should be clarified so it does not limit structures that are larger than existing buildings. New structures can be built to be visually compatible with existing buildings while allowing a larger square footage (*e.g.*, Lake Park Apartments next to the Dowling Building on West Wilson Street).
- AP1. A maximum height should not be established that is different than the maximum height allowed in the applicable zoning district. A requirement that a building be "similar" in height to existing buildings is vague. In some instances, a new structure with a larger height may be compatible with an existing structure even though the heights are not similar (*e.g.*, Baldwin Corners is viewed as compatible in height with adjacent historic structures, though notably taller).
- AP1. The requirement for the front façade of a new structure to be no greater than 125% of the average gross area of front façades within 200 feet is overly restrictive. This requirement would prohibit the continuation of a mix of building types with different characteristics. Buildings that are wider and taller than existing buildings can be compatible with existing structures.

A. General

1. New construction shall be located far enough away from the historic building, when possible, where it will be minimally visible from the street and will not negatively affect the building's character, the site, or setting.

2. New construction on a historic site or in a historic setting shall be designed that it is compatible but differentiated from the historic building or buildings within two hundred (200) feet of the subject property.
3. The design for related new construction shall be considered in terms of its relationship to the historic building as well as the historic district and setting.
4. New construction shall be secondary to the historic building and shall not detract from its significance.
5. Site features or land formations, such as trees or sloping terrain, shall be used to help minimize the new construction and its impact on the historic building and property.
6. Infill structures in a densely-built location (such as a downtown commercial district) must be compatible with the surrounding historic buildings—usually the front elevation of the new building should be in the same plane (i.e., not set back from the historic building) and the façade can be broken up into smaller elements (i.e., may appear as several separate buildings) that are consistent with the historic building and surrounding buildings within two hundred (200) feet of the subject property.
7. New principal structures shall be no more than one story higher than historic buildings within two hundred (200) feet of the subject property. To minimize the additional story’s visibility and its impact on the historic character of the surrounding buildings, it shall be set back from elevations visible from the street and inconspicuous when viewed from a standing position from across the street.
8. The gross area of the front elevation, i.e., all walls facing the street, shall be no greater than one hundred twenty-five percent (125%) of the average gross area of the front elevations of structures within two hundred (200) feet of the subject property, or the front façade shall be modulated with variations in setbacks that reflect or repeat the rhythm of adjacent historic buildings constructed during the period of significance and the spaces between them within two hundred (200) feet of the subject property.
9. Accessory structure shall only be erected in the rear yard. Building materials and building features shall be similar in design, color, scale, architectural appearance, and other visual qualities as the historic building and surrounding buildings within two hundred (200) feet of the subject property. Windows shall be either casements or double-hung units of a similar proportion to the windows on the principal structure. Garage doors shall be located on elevations not visible from the street whenever feasible and shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district. Horizontally paneled doors and flat paneled doors are prohibited.

B. Building Materials

TLR3. “Building materials” does not mention metal panels, which seem to be a necessary finish on commercial buildings. It is also worth noting that alterations to existing buildings can use EIFS – or at least it is not prohibited, and if one calls contractors for stucco repair, EIFS is often proposed.

1. Masonry: Stone, Brick, Terra Cotta, Concrete, Stucco, and Mortar
 - a) Materials for exterior walls shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district, but differentiated enough so that it is not confused as a historic building. Stone, brick, terra cotta, concrete, stucco, and mortar are encouraged. Decorative concrete block, composite panels with faux stucco texture, and exterior insulation and finish systems (EIFS) may be used as secondary or accent cladding materials with Landmark Commission approval. Pebble dash is prohibited.

2. Wood: Clapboard, Weatherboard, Shingles, and Other Functional and Decorative Elements

a) Materials for exterior walls shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district, but differentiated enough so that it is not confused as a historic building. Wood building materials such as horizontal wood or smooth composite clapboards four (4) inches or less in exposure and smooth wood shingles, or combinations of materials that occur within the historic district, i.e., brick on first floor with clapboard on second floor are encouraged. Smooth composite vertical panels and metal may be used as secondary or accent cladding materials with Landmark Commission approval. Asbestos, wide clapboards over four (4) inches in exposure, composite clapboards and vertical panels with faux wood grain texture, diagonal boards, vertical boards, rough sawn wood, rough split shingles, shakes, metal, and vinyl siding are prohibited.

C. Building Features & Systems

TLR1. Side views of residences on Jenifer St. are important to retain – NOT A HOLLYWOOD SET
TLR3. Solar panels, under state law, can be installed even if conspicuous.
TLR3. Mechanical and service equipment must be inconspicuous. There seem to be several examples of conspicuous mechanical systems in historic districts.
TLR3. What about massive vents that are required just due to one particular use (e.g., meat smoking) – should that be allowed, or should the property not be able to accommodate that one use?

1. Roofs

a) Mechanical and service equipment on the roof (such as heating and air-conditioning units or solar panels) when required for a new use shall be installed so that they are inconspicuous on the site and from the street and do not damage or obscure character-defining historic features.

b) Rooftop decks or terraces shall be designed so that they are inconspicuous and minimally visible on the site and from the street.

c) A green roof or other roof landscaping, railings, or furnishings shall be installed that are not visible on the site or from the street.

d) The form of a roof shall be similar to the roof form on existing structures within two hundred (200) feet of the subject property. The pitch of a roof shall be similar to the roof pitch on existing structures within two hundred (200) feet of the subject property but shall be no less than 4-in-12.

e) New chimneys shall be constructed of compatible masonry materials that are similar in design, color, scale, architectural appearance, and other visual qualities as existing structures within two hundred (200) feet of the subject property.

f) Roof materials shall be similar to the roof materials on existing structures within two hundred (200) feet of the subject property. Any roofing materials shall be permitted on flat or slightly sloped roofs not visible from the street. Three-tab asphalt shingles, architectural (also known as dimensional or laminate) shingles with a straight bottom edge and light faux shadowing that simulate wood shingles or slate, wood roof shingles, clay or concrete tile, slate, and flat standing seam and flat interlocking metal panels on flat roofs shall be permitted on roofs visible from the street. Thick wood shakes, Dutch lap, French method, interlocking shingles,

architectural (also known as dimensional or laminate) asphalt shingles with a scalloped or staggered bottom edges that simulate wood shake, slate, or tile and have heavy faux shadowing, corrugated or ribbed metal roofing panels, and metal roof shingles are prohibited on roofs visible from the street.

g) Low-profile continuous ridge vents shall be permitted provided that the vents extend to the front edge of the fascia and are covered with the same material as the roof visible from the street. Rectangular or continuous soffit vents shall be permitted if they are finished or painted the same color as the adjacent soffit. Round soffit vents are prohibited. Static vents, electric vents, wind turbines, and attic fans visible from the street are prohibited and ones not visible from the street are permitted provided they match the color of the roof.

h) Skylights not visible from the street shall be permitted. Skylights visible from the street are prohibited except for roof slopes where the front edge of the skylight is at least ten (10) feet back from the front edge of the main roof. Skylights shall be flat, parallel to the slope of the roof, and painted to match the roof material. Tubular, arched, domed, or pyramidal shaped skylights are prohibited.

i) Mechanical and service equipment on the roof (such as heating and air-conditioning units or solar panels) shall be installed so that they are as unobtrusive as possible. Roof-mounted solar arrays on sloped roofs shall be flat, parallel to the slope of the roof, and arranged in a pattern or grid parallel to the roof's ridge and eaves

2. Windows

TLR3. Unlike alterations and additions, the visible light transmission and reflectance details are not specified. Is this intentional?

a) Openings and the windows in them should be compatible with, but not duplicate, other openings in structures within the period of significance of the district and within two hundred (200) feet of the subject property. Openings shall have a similar operation (e.g., double hung, casement, awning, or hopper), components (including sash, muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim), and finish.

b) Wood, aluminum clad wood, and steel windows are encouraged. Vinyl, fiberglass, and vinyl or fiberglass clad wood are permitted. Aluminum windows are permitted on non-residential buildings. True divided lights and simulated divided lights with window grids on the exterior and interior the same color as the window sash and spacer bars between the panes of glass shall be permitted. Bay windows may be approved if they have sides perpendicular to the wall and if they do not extend beyond the eaves of the roof. Aluminum, glass block, picture windows, bay windows with angled sides, and bow windows are prohibited. Clear or low-e glass shall be used, and patterned glass may be used for privacy in bathrooms.

3. Entrances & Porches

TLR3. Garage doors are only proposed to be regulated for new structures – existing structures do not have any limitation. “Side or rear façades” would often require a driveway along the side of a house that the owner would need to make a sharp turn to access the garage. This is generally not feasible on these smaller lots.

TLR3. Commercial often had corner entrances, not just on the front. Commercial did not have projecting entrances or porches.

a) The primary entrance to the structure shall be on the front elevation, or, in the case of a corner lot, it may be at the corner. The entrance shall either be inset or projecting from the plane of the front elevation. Entrance and storm doors shall be compatible with, but not duplicate, other openings in structures within the period of significance of the district and within two hundred (200) feet of the subject property. Openings shall have similar components (including muntins, glazing, pane configuration, sills, mullions, casings, brick molds, or trim) and finish. Wood, aluminum clad wood, aluminum, and insulated hollow metal entrance doors are encouraged. Unpaneled, modern-style doors and doors with a fake wood grain, mill finish or clear anodized aluminum, and other metallic finishes are permitted. Storm doors shall be full-light or full-view, wood or aluminum, and in the same color as the entrance door or trim. Mid-view or high-view storm doors are prohibited. Storm doors with metal grilles may be approved if they blend with the style of the structure.

b) Porches at the primary entrances of residential structures are encouraged. Porch pilasters, columns, or posts shall be trimmed with decorative molding at the top and bottom of the posts. Solid wall porch balustrades and stair wing walls shall be covered in masonry or siding to match the structure. Open porch balustrades and stair railings shall have top and bottom rails with the bottom rails raised no higher than four (4) inches above the floor. Balusters shall be located between (not in front of or behind) the top and bottom rails and shall be vertical, square, and spaced such that a four (4) inch sphere may not pass through the railing at any point. Balusters may also be compatible with the overall design of porches on structures constructed within the period of significance within two hundred (200) feet of the subject property but, in most cases, not duplicate the historic balusters. Handrails on stairs shall be wood to match the porch balustrade. Decorative wrought iron, aluminum or other metal, composite, and vinyl balustrades and railings are prohibited, unless not visible from the street. Stairs may be constructed of wood, concrete, or brick. If wood is used, stairs shall have solid wood risers and be enclosed on the sides by lattice or a wing wall. First floor porch flooring shall be tongue-in-groove boards; carpeting, dimensional lumber or board decking, and composites with faux wood grain are prohibited, unless not visible from the street. Porch floor joists shall be hidden from view by rim joists or frieze boards. Spaces beneath porches and stairs shall be enclosed with a framed lattice of crisscross design, narrow vertical boards, or other openwork design. The lattice shall be designed such that a three-(3) inch sphere could not pass through any portion of the lattice. All wood on exterior porches, except flooring and stair treads, shall be painted or opaque stained. Other porch designs may be permitted if they are compatible with the character of the district.

c) Porches on elevations not visible from the street may be enclosed with wood-framed screens or storm windows similar in proportion to windows on the structure. The wood-framed screens or storm windows shall match the color of the porch and be placed behind pilasters, columns, or posts and balustrades so they do not obscure those features. Screening porches visible from the street is allowed, but enclosing porches visible from the street is prohibited.

d) Rear yard decks may have solid wall balustrades and stair wing walls with siding to match the structure or open balustrades and stair railings with top and bottom rails with the bottom rails raised no higher than four (4) inches above the

floor. Balusters shall be located between (not in front of or behind) the top and bottom rails and shall be vertical, square, and spaced such that a four (4) inch sphere may not pass through the railing at any point. Handrails on stairs shall be wood to match the deck balustrade. Decorative wrought iron, aluminum or other metal, composite, and vinyl balustrades and railings are prohibited, unless not visible from the street. Spaces beneath decks and stairs shall be screened by framed lattice or evergreen shrubs, and all parts of the deck, except the flooring and steps, shall be painted or opaque-stained in a color to blend with the colors on the structure.

e) Second exit stairways shall be provided on the interior of the structure.

f) Projecting, partially projecting/inset, and inset balconies are prohibited on elevations visible from the street.

g) Garage doors shall be located on elevations not visible from the street whenever feasible and shall be similar in design, color, scale, architectural appearance, and other visual qualities prevalent within the historic district.

4. Storefronts

a) Storefronts, signage, awnings, canopies, or lighting shall be compatible with the historic buildings within two hundred (200) feet of the subject property. Clear or low-e glass may be used.

5. Mechanical Systems

TLR3. Nothing is recommended regarding commercial mechanicals, other than a general comment on roof mechanicals. Should vents be screened? What about security cameras?

a) A split system mechanical unit may be installed on elevations not visible from the street. Split system mechanical units on elevations visible from the street are prohibited.

b) Mechanical equipment on the roof may be installed, when necessary, so that it is minimally visible from the street. Installing mechanical equipment on the roof that is overly large or highly visible from the street is prohibited.

c) Air conditioning compressors shall be placed in a location on an elevation not visible from the street or on the roof. Air conditioning compressors on elevations visible from the street are prohibited.

d) Grilles (mechanical air intake, exhaust, etc.), vents (plumbing stack, mechanical air intake or exhaust, etc.), electrical and communications equipment (transformers, cabinets, mobile service boosters, security cameras, etc.), and utility meters (water, gas, electric, etc.) shall be placed on elevations not visible from the street or on the roof. Grilles, vents, equipment, and meters on elevations visible from the street are prohibited, unless technically infeasible. Grilles, vents, equipment, and meters shall be finished or painted to match adjacent materials.

D. Building Site

TLR3. This does not give Landmarks any authority to require site features.

1. New onsite features (such as parking areas, access ramps, or lighting) shall be designed so that they are as unobtrusive as possible, retain the historic relationship between the building or building and the landscape, and are compatible with the historic character of the property.

2. New exterior additions to historic buildings or adjacent new construction shall be designed to be compatible with the historic character of the site and preserve the historic relationship between the building or building and the landscape.
3. An irrigation system needed for a new or continuing use of the site shall be located where it will not cause damage to historic buildings.
4. Poured concrete retaining walls with a smooth rubbed finish and under twenty-four (24) inches in height, flagstone, and stone ashlar retaining walls are permitted. Proposals to construct front yard retaining walls of other materials must be submitted to Landmarks Commission for approval prior to installation. Railroad tie, landscape timbers, boulders, and concrete block retaining walls are prohibited.
5. Wrought iron, simulated wrought iron, and wood fences are permitted. Chain link, metal mesh, vinyl, and composite fences are permitted on elevations not visible from the street. Bamboo, reed, and other rustic style fences, such as rough sawn wood or split-rails, are prohibited. Fences in the front yard shall not exceed three (3) feet in height.
6. No new parking lots will be approved unless they are accessory to and on the same zoning lot as a commercial structure or multiple family dwelling.

Recommendations for a Spectrum of Standards for Review

- MH1. Not just primary, front or street facing façade- include any side that faces a public right of way.
- MB1. This section is very vague and needs to be written way more specific.
- MB1. There needs to be much more clarity regarding sections or additions to homes – that replacing windows, doors, etc. in these “additions” would have different guidelines. What about views not seen from the front of homes?
- TLR2. How does the 200-foot radius rule relate to the “spectrum of standards” vis a vis primary/secondary/rear elevations?
- TLR3. Need to be more specific about standards for buildings outside the period of significance. Concerned that buildings that are one year outside of the POS would have more lax standards.
- TLR3. Recommendations for projects only needing staff review gives the Preservation Planner too much power. The Landmarks Commission needs to keep the ability to decide what types of projects staff can review administratively, not have it dictated in the ordinance. This could also impact the appeal process.
- UH2. Define “replacement” as it applies to whether staff can approve an alteration, e.g. roof replacement?
- UH1. Define or describe more what replacements can be handled by staff.

Consider incorporating a spectrum of Standards for Review.

Applications that are for identifying, retaining, and preserving; protecting and maintaining; or repairing may be reviewed and approved by staff as delegated by the Landmarks Commission per 41.05, which should approve the overall timeliness of the process. However, staff shall have the discretion to forward applications on to Landmarks Commission if they see fit, and property owners can appeal a staff decision to the Landmarks Commission. Applications for replacement, new additions, and new construction must be reviewed and approved by Landmarks Commission.

The above recommendations for the Standards for Review shall be studied further, within the framework of a hierarchy of standards in which properties constructed during the period of significance shall be more stringent than properties constructed outside of the period of significance,

new additions, or new structures. Similarly, Standards for Review for elevations visible from the street shall be more stringent than elevations not visible from the street.