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DECISION, FINDINGS OF FACT AND CONCLUSIONARY FINDINGS OF THE MCMINNVILLE HISTORIC LANDMARKS COMMITTEE FOR THE APPROVAL OF ALTERATIONS TO A HISTORIC LANDMARK LOCATED AT 835 NW BIRCH STREET

- **DOCKET:** HL 3-20 (Certificate of Approval for Alteration)
- **REQUEST:** Approval of alterations to an existing historic landmark and building that is listed on the McMinnville Historic Resources Inventory as a "Significant" historic resource (resource number B274). The proposed alterations include the relocation of one existing vinyl window, the addition of one new vinyl window, and the replacement of the existing asphalt composition roof with a standing seam metal roof.
- LOCATION: 835 NW Birch Street. The property identified as Tax Lot 9300, Section 20AA, T. 4 S., R. 4 W., W.M.
- **ZONING:** R-2 (Single Family Residential)
- APPLICANT: Zachary Geary, Branch Geary Inc., on behalf of property owner Liz & Joe Wilkins

McMinnville Historic Landmarks Committee

STAFF: Chuck Darnell, Senior Planner

DATE DEEMED COMPLETE: April 21, 2020

HEARINGS BODY & ACTION:

HEARING DATE

- & LOCATION: May 14, 2020, Zoom Online Meeting
- **PROCEDURE:** An application for a Certificate of Approval for Alteration is processed in accordance with the procedures in Section 17.65.060 of the McMinnville Municipal Code.
- **CRITERIA:** The applicable criteria for a Certificate of Approval for Alteration are specified in Section 17.65.060(B) of the McMinnville Municipal Code. In addition, the goals, policies, and proposals in Volume II of the Comprehensive Plan are to be applied to all land use decisions as criteria for approval, denial, or modification of the proposed request. Goals and policies are mandated; all land use decisions must conform to the applicable goals and policies of Volume II. "Proposals" specified in Volume II are not mandated, but are to be undertaken in relation to all applicable land use requests.
- APPEAL: As specified in Section 17.65.080 of the McMinnville Municipal Code, the Historic Landmarks Committee's decision may be appealed to the Planning Commission

within fifteen (15) days of the date written notice of decision is mailed. The City's final decision is subject to a 120 day processing timeline, including resolution of any local appeal.

COMMENTS: This matter was referred to the following public agencies for comment: McMinnville Fire Department, Police Department, Engineering Department, Building Department, Parks Department, City Manager, and City Attorney; McMinnville Water and Light; McMinnville School District No. 40; Yamhill County Public Works; Yamhill County Planning Department; Frontier Communications; Comcast; Northwest Natural Gas; and Oregon Department of Transportation. Their comments are provided in this document.

RECOMMENDATION

Based on the findings and conclusionary findings, the Historic Landmarks Committee finds the applicable criteria are satisfied with conditions and **APPROVES** the Certificate of Approval for Alteration (HL 3-20), **subject to conditions**.

mark Planning Department:

Date: May 20, 2020

Heather Richards, Planning Director

I. APPLICATION SUMMARY:

The applicant has provided information in their application narrative and findings (attached as Attachment 1) regarding the history of the subject site and the request under consideration. Staff has found the information provided to accurately reflect the current land use request and the relevant background, and excerpted portions are provided below to give context to the request, in addition to staff's comments.

Subject Property & Request

The subject property is located at 835 NW Birch Street. The property identified as Tax Lot 9300, Section 20AA, T. 4 S., R. 4 W., W.M. See Vicinity Map (Figure 1) below.

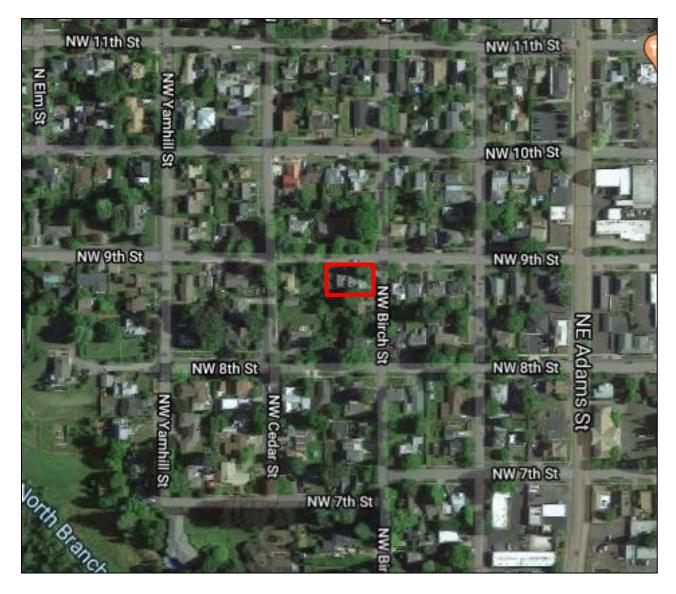


Figure 1. Vicinity Map (Property Lines Approximate)

The existing building on the subject property is listed on the Historic Resources Inventory as a Significant resource (resource number B274).

The applicant provided an overview of their proposal and project in the application narrative, which is as follows:

"This application is for the remodel of the existing single family home located at 835 NW Birch Street. Relative to the applicable review criteria, the exterior work of the project remodel includes two elements; the relocation of one window and the addition of one new window, and re-roofing the house to replace the aging asphalt shingles with standing-seam metal roofing.

The window elements of the project occur within the existing kitchen, which impacts the exterior wall along the South face of the house. See the attached provided site plan and photos to detail the location, but to summarize, the house is located on the corner lot of NW 9th and Birch, with Birch street to the East and 9th street to the North, putting the South side in-between this house and the neighbor to the South.

The re-roof of the house is needed for the health of the structure. The current roof, an asphalt composition roof, has reached it's end-life. The current home owners are seeking approval to install a standing-seam metal roof on the structure."

The proposed alterations are identified in the submitted south building elevation below:





In addition, the applicant provided a description of the materials that were provided to support the application. This description is in response to a staff request for architectural drawings, including elevations of the proposed alteration, which are typically required of Certificate of Approval for Alteration applications. Their description of the materials is as follows:

"The project in total, beyond the scope requiring certificate of approval of alteration from the Historic Landmarks Committee, is a kitchen remodel. A kitchen remodel that expands the footprint of the kitchen, rearranges the primary appliances and plumbing in the kitchen, and updates finishes and fixtures. The project did not involve, nor necessitate an entire set of architectural drawings of the existing houses that rendered every square foot of the interior and every plane of the exterior. The creation of full exterior elevations to illustrate the metal roofing material approval request, we feel, is unwarranted. To assist both the Historic Landmarks Committee and staff in understanding the details of the material we have included diagrams, details, and specifics of the material proposed. Details on both the metal panels themselves (Metallion Industries "Loc-Seam" 24 gauge, 12" wide seam, concealed fastener system) and the host of trims and flashings. We hope the details included of the specific dimensions of the proposed standing seam metal roofing - width of panels, height of standing seam, etc. - and it's specific treatments at the edges of roof gables, rake edges, eaves, valleys, and ridges are able to assist the Committee and staff in the deliberation and decision process in lieu of a full architectural set of elevations of the house."

Background

The property was originally surveyed in 1980, which is the date that the "Statement of Historical Significance and Property Description" were drafted and included on the Historic Resources Inventory sheet (resource number B274) for the subject property. The survey photo of the building is dated as 1983. This survey work led to the inclusion of the property on the Historic Resources Inventory, and the Historic Resources Inventory was adopted by the McMinnville City Council on April 14, 1987 by Ordinance 4401. The "Statement of Historical Significance and Property Description" state the following:

"This is a one and a half story L-shaped Rural vernacular set squarely east-west on the lot surrounded by a variety of shrubs and an old fir. The house has four cross-gables with eave returns. The roof is of cedar shingles and the siding is beveled – except for a partial addition which is weatherboard. The foundation is cement without an apparent basement. A one-story front porch has four simple columns. The windows are double-hung sash, one-over-one."

The applicant has described that changes have occurred to the building since the time of the survey in 1980. The house now has an asphalt shingle roof instead of a cedar shingle roof, vinyl siding instead of beveled siding, and some white vinyl windows that appear to have replaced past windows of a different material.

Photos of the existing building were provided by the applicant, and are shown below:

East Elevation:



Northeast Corner of Structure:



North and Partial West Elevations:



Partial South Elevation (Area of Proposed Window Alteration):



Summary of Criteria & Issues

The application (HL 3-20) is subject to Certificate of Approval for Alteration review criteria in Section 17.65.060(B) of the McMinnville Municipal Code (MMC. The goals and policies in Volume II of the Comprehensive Plan are also independent approval criteria for all land use decisions.

The specific review criteria for Certificate of Approval for Alteration requests, in Section 17.65.060(B) of the MMC, require the Historic Landmarks Committee to base each decision on the following criteria:

- 1. The City's historic policies set forth in the comprehensive plan and the purpose of this ordinance;
- 2. The following standards and guidelines:
 - a. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
 - b. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
 - c. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
 - d. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
 - e. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
 - f. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.
 - g. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
 - h. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
 - i. The Guidelines for Historic Preservation as published by the United States Secretary of the Interior.
- 3. The economic use of the historic resource and the reasonableness of the proposed alteration and their relationship to the public interest in the historic resource's preservation or renovation;
- 4. The value and significance of the historic resource; and
- 5. The physical condition of the historical resource.

The applicant has provided findings to support the request for a Certificate of Approval for Alteration. These will be discussed in detail in Section VII (Conclusionary Findings) below.

II. CONDITIONS:

- 1. That the new window proposed on the south elevation shall be a wood window. The window shall be a double-hung, one-over-one window in the same dimension as the adjacent existing windows. That any existing vinyl window retained but moved, will also be wood.
- 2. That the proposed standing seam metal roofing material is not allowed. The existing roofing material may be replaced with a like-for-like replacement of the asphalt shingle roofing material that currently exists on the structure. The replacement of the asphalt shingle roofing material

shall maintain all of the existing forms and features of the roof, including the cross gables and eave returns.

III. ATTACHMENTS:

1. HL 3-20 Application and Attachments (on file with the Planning Department)

IV. COMMENTS:

Agency Comments

This matter was referred to the following public agencies for comment: McMinnville Fire Department, Police Department, Parks and Recreation Department, Engineering and Building Departments, City Manager, and City Attorney, McMinnville School District No. 40, McMinnville Water and Light, Yamhill County Public Works, Yamhill County Planning Department, Recology Western Oregon, Frontier Communications, Comcast, Northwest Natural Gas. The following comments were received:

• McMinnville Engineering Department

If remodel exceeds 25% of the assessed value of the structure, existing sidewalks and driveway will need to meet PROWAG standards and missing sidewalks shall be constructed to PROWAG standards.

Sewer was replaced in 2014 with 4" ABS, inspection reports attached (Note – inspection reports are on file with the Planning Department).

McMinnville Building Department

From the world of building codes, the additional window will call for a new header and possible foundation modification properly sized to support the structure above. Also, by adding the window and eliminating wall area, an analysis will be necessary to verify that enough wall area remains to resist wind and seismic loads. The proposal would exceed that allowed by the prescriptive code options and will need the input from an engineer.

<u>McMinnville Water and Light</u>

McMinnville Water & Light has no comments on this historic landmark alteration submittal.

Public Comments

Notice of this request was mailed to property owners located within 300 feet of the subject site. As of the date of the Historic Landmarks Committee public meeting on May 14, 2020, no public testimony had been received by the Planning Department.

V. FINDINGS OF FACT - PROCEDURAL FINDINGS

- 1. The applicant, Zachary Geary, Branch Geary Inc., on behalf of property owner Liz & Joe Wilkins, submitted the Certificate of Approval application (HL 3-20) on April 3, 2020.
- 2. The application was deemed incomplete on April 13, 2020. A revised application submittal, including some but not all of the items that were requested by the Planning Department to deem the application complete, was provided on April 19, 2020. The applicant also confirmed in writing

on April 21, 2020, that they would only be providing those items submitted on April 19, 2020 and that no other information will be provided, per ORS 227.178(2)(b).

- 3. The application was deemed complete on April 21, 2020. Based on that date, the 120 day land use decision time limit expires on August 19, 2020.
- 4. Notice of the application was referred to the following public agencies for comment in accordance with Section 17.72.120 of the Zoning Ordinance: McMinnville Fire Department, Police Department, Parks and Recreation Department, Engineering and Building Departments, City Manager, and City Attorney, McMinnville School District No. 40, McMinnville Water and Light, Yamhill County Public Works, Yamhill County Planning Department, Recology Western Oregon, Frontier Communications, Comcast, Northwest Natural Gas.

Comments received from agencies are addressed in the Decision Document.

- 5. Notice of the application and the May 14, 2020 Historic Landmarks Committee public meeting was mailed to property owners within 300 feet of the subject property in accordance with Section 17.65.070(C) of the Zoning Ordinance on April 28, 2020.
- 6. No public testimony was submitted to the Planning Department prior to the Historic Landmarks Committee public meeting.
- 7. On May 14, 2020, the Historic Landmarks Committee held a duly noticed public hearing to consider the request.

VI. FINDINGS OF FACT – GENERAL FINDINGS

- 1. **Location:** 835 NW Birch Street. The property identified as Tax Lot 9300, Section 20AA, T. 4 S., R. 4 W., W.M.
- 2. **Size:** Approximately 8,400 square feet.
- 3. Comprehensive Plan Map Designation: Residential
- 4. **Zoning:** R-2 (Single Family Residential)
- 5. **Overlay Zones/Special Districts:** None.
- 6. **Current Use:** Single Family Residential
- 7. Inventoried Significant Resources:
 a. Historic Resources: Historic Resources Inventory Resource Number B274.
 b. Other: None
- 8. **Other Features:** The site is developed with a single family residential structure. There site is relatively flat without any significant slope. The only significant or distinguishing natural features associated with this property are a few large and mature trees located on the property, including one large fir tree in the front yard that is also mentioned in the Historic Resources Inventory's description of the property.
- 9. Utilities:
 - a. Water: Water service is available to the subject site.
 - b. Electric: Power service is available to the subject site.

- c. **Sewer:** Sanitary sewer service is available to the subject site.
- d. Stormwater: Storm sewer service is available to the subject site.
- e. **Other Services:** Other utility services are available to the subject site. Northwest Natural Gas and Comcast is available to serve the site.
- 10. **Transportation:** The site is adjacent to NW Birch Street and NW 9th Street, which are both identified as a local streets in the McMinnville Transportation System Plan. Section 17.53.101 of the McMinnville Municipal Code identifies the right-of-way width for local streets as 50 feet.

VII. CONCLUSIONARY FINDINGS:

The Conclusionary Findings are the findings regarding consistency with the applicable criteria for the application. The applicable criteria for a Certificate of Approval for Alteration are specified in Section 17.65.060(B) of the Zoning Ordinance.

In addition, the goals, policies, and proposals in Volume II of the Comprehensive Plan are to be applied to all land use decisions as criteria for approval, denial, or modification of the proposed request. Goals and policies are mandated; all land use decisions must conform to the applicable goals and policies of Volume II. "Proposals" specified in Volume II are not mandated, but are to be undertaken in relation to all applicable land use requests.

Comprehensive Plan Volume II:

The following Goals, Policies, and Proposals from Volume II of the Comprehensive Plan provide criteria applicable to this request:

The implementation of most goals, policies, and proposals as they apply to this application are accomplished through the provisions, procedures, and standards in the city codes and master plans, which are sufficient to adequately address applicable goals, polices, and proposals as they apply to this application.

The following additional findings are made relating to specific Goals and Policies:

GOAL III 2: TO PRESERVE AND PROTECT SITES, STRUCTURES, AREAS, AND OBJECTS OF HISTORICAL, CULTURAL, ARCHITECTURAL, OR ARCHAEOLOGICAL SIGNIFICANCE TO THE CITY OF McMINNVILLE.

APPLICANT'S RESPONSE: The proposed project will meet the policies of the Comprehensive plan by preserving and protecting this site of historical significance. The alterations to the home, both under committee review and beyond, will represent a significant investment by a dedicated homeowner in the longevity and core value of this historic resource, thus preserving it for years to come.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City partially concurs with the applicant's findings. The City agrees that the investment in the structure is a commitment to the continued use and preservation of the historic resource. However, the City finds that the materials proposed to be used in the alterations to the structure would not preserve the historical significance of the structure. Conditions of approval are included to address the roofing and window materials, and are described in more detail in findings for other applicable review criteria below. These conditions of approval would still allow the alterations and investment in the historic resource to occur.

GOAL X 1: TO PROVIDE OPPORTUNITIES FOR CITIZEN INVOLVEMENT IN THE LAND USE DECISION MAKING PROCESS ESTABLISHED BY THE CITY OF McMINNVILLE.

- **GOAL X 2:** TO MAKE EVERY EFFORT TO ENGAGE AND INCLUDE A BROAD CROSS SECTION OF THE COMMUNITY BY MAINTAINING AN ACTIVE AND OPEN CITIZEN INVOLVEMENT PROGRAM THAT IS ACCESSIBLE TO ALL MEMBERS OF THE COMMUNITY AND ENGAGES THE COMMUNITY DURING DEVELOPMENT AND IMPLEMENTATION OF LAND USE POLICIES AND CODES.
- Policy 188.00 The City of McMinnville shall continue to provide opportunities for citizen involvement in all phases of the planning process. The opportunities will allow for review and comment by community residents and will be supplemented by the availability of information on planning requests and the provision of feedback mechanisms to evaluate decisions and keep citizens informed.

APPLICANT'S RESPONSE: The process for a Certificate of Approval for Alteration provides an opportunity for citizen involvement throughout the process through the public notice and the public meeting process. Throughout the process, there are opportunities for the public to review and obtain copies of the application materials and the completed staff report prior to the advertised public meeting(s). All members of the public have access to provide testimony and ask questions during the public review and hearing process.

FINDING: SATISFIED. The City concurs with the applicant's findings.

McMinnville Zoning Ordinance

The following Sections of the McMinnville Zoning Ordinance (Ord. No. 3380) provide criteria applicable to the request:

Chapter 17.03. General Provisions

17.03.020 Purpose. The purpose of this ordinance is to encourage appropriate and orderly physical development in the City through standards designed to protect residential, commercial, industrial, and civic areas from the intrusions of incompatible uses; to provide opportunities for establishments to concentrate for efficient operation in mutually beneficial relationship to each other and to shared services; to provide adequate open space, desired levels of population densities, workable relationships between land uses and the transportation system, and adequate community facilities; to provide assurance of opportunities for effective utilization of the land resource; and to promote in other ways public health, safety, convenience, and general welfare.

APPLICANT'S RESPONSE: None.

FINDING: SATISFIED. The purpose of the Zoning Ordinance is met by the proposal as described in the Conclusionary Findings contained in this Decision Document.

17.65.060 Exterior Alteration or Remodeling. The property owner shall submit an application for a Certificate of Approval for any exterior alteration to a historic landmark, or any resource that is listed on the National Register for Historic Places. Applications shall be submitted to the Planning Department for initial review for completeness as stated in Section 17.72.040 of the McMinnville Zoning Ordinance. The Planning Director shall determine whether the proposed activities constitute an alteration as defined in Section 17.65.020 (A) of this chapter. The Historic Landmarks Committee shall meet within thirty (30) days of the date the application was deemed complete by the Planning Department to review the request. A failure to review within thirty (30) days shall be considered as an approval of the application. Within five (5) working days after a decision has been rendered, the Planning Department shall provide written notice of the decision to all parties who participated.

APPLICANT'S RESPONSE: None.

FINDING: SATISFIED. The applicant, who is representing the property owner, filed an application and request for approval of proposed alterations to the building that is designated as a Significant resource on the Historic Resources Inventory. The application was reviewed by the Historic Landmarks Committee within 30 days of the application being deemed complete.

17.65.060 Exterior Alteration or Remodeling. [...]

B. The Historic Landmarks Committee shall base its decision on the following criteria:

17.65.060(B)(1). The City's historic policies set forth in the comprehensive plan and the purpose of this ordinance;

APPLICANT'S RESPONSE: None.

FINDING: SATISFIED. The findings for the applicable Comprehensive Plan policies are provided above.

17.65.060(B)(2)(a). A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.

APPLICANT'S RESPONSE: The single family dwelling at 835 NW Birch street will continue to be used as such after the completion of the proposed work outlined in this application.

FINDING: SATISFIED. The City concurs with the applicant's findings.

17.65.060(B)(2)(b). The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

APPLICANT'S RESPONSE: The current owners of the property purchased the home in 2014. By then the house had already had some work done to it to change or alter the historic character of the property.

The Historic Resource Survey on file for this property, resource B274, reads:

"This is a one and a half story L-shaped Rural vernacular set squarely east-west on the lot surrounded by a variety of shrubs and an old fir. The house has four cross-gables with eave returns. The roof is of cedar shingles and the siding is beveled – except for a partial addition which is weatherboard. The foundation is cement without an apparent basement. A one-story front porch has four simple columns. The windows are doublehung sash, one-over-one."

Currently, the home has an asphalt shingle roof on it, vinyl siding applied over the entire exterior, and has had numerous windows replaced with white vinyl windows of similar style (double-hung, one-over-one).

The requested work is trying to both respect the historic character of the property as well as exist within the makeup of the current materials of the house. For the window work, the new window being installed would be immediately adjacent to the existing white vinyl double-hung windows and, as such, the additional new window installed would be a matching white vinyl double-hung window. The re-roof work is needed due to age and poor condition of the existing

asphalt shingles that were previously installed. The owner is seeking metal as an acceptable material due to the environmental and sustainability factors associated with a metal versus asphalt roofing material. Metal roofs can last two to three times longer than asphalt shingles, can be recycled upon the end of their life on the house, can be made up of prior-recycled metals, will allow a better application for solar panels (than asphalt), and will hold up more durably under the weathering of the trees on site. The owner also notes that the asphalt shingle roofing is not original to the property and the historic roofing materials no longer exist on the home.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City partially concurs with the applicant's findings, in that the existing asphalt shingle roof is not an original distinctive material or feature. The City adds that the proposal generally protects the character-defining structural components of the historic landmark, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the cross-gabled roof with eave returns, foundation, and front porch with columns. However, the proposed roofing material is not found to be compatible with the historic resource, and also is not found to be consistent with other applicable review criteria, as described in more detail below. The findings provided by the applicant in regards to the environmental and sustainability factors associated with metal roofs are not found to be relevant to the applicable review criteria and the preservation of the historic character of the historic resource. Because the standing seam metal roofing material is not found to be compatible with the historic resource, as described in more detail below, the use of the material would detract from the historic character of the historic resource.

The alteration involving the relocation of an existing window and addition of a new window immediately adjacent is being proposed in an area of the historic resource that has already had its historic character significantly altered. The two existing windows in this location are vinyl windows which as stated by the applicant appear to be replacements of the original window material. The windows are double-hung and one-over-one, which is the same style of window referenced in the Historic Resources Inventory sheet for the structure. The siding in this location is a vinyl siding, which is a replacement of an original beveled siding material. The area of the window alteration is also located on the south elevation that is not prominent or highly visible, and in an area of the structure that is not specifically referenced in the statement of historical significance in the Historic Resources Inventory sheet for the structure. Due to the location of the proposed window alteration, and the fact that the alteration would not substantially impact any primary building façade, the proposed relocation of the existing window and addition of a new window immediately adjacent to the two existing vinyl windows is not found to detract from the historic character of the historic resource. However, the material of the new window and the relocated window should be consistent with the historic character of the historic resource. Photographs provided by the applicant show that there are still some wood windows in existence on the house, so a wood window would not be inconsistent with this pattern. The new wood windows could be designed to be of the same size, form, and function as the adjacent vinyl window to not be inconsistent in design or appearance. Therefore, a condition of approval is included to require that the new window and the relocated window be wood to be consistent with the historic materials that existed on the historic resource and to protect the historic character of the historic resource.

17.65.060(B)(2)(c). Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.

APPLICANT'S RESPONSE: The inventoried home at 835 NW Birch, photographed on page 3 of the Historic Resource page for B274 in 1983, remains in large part the same physical record of its time. Aside from the roofing material change, siding material change, and the exchange

of some windows (all done prior to this owner's purchase of the home) the massing, style, and charm of the home are all there. What was inventoried as a "Residence - Lock Shop" is still a residence. Cross-gabled, with its original porch and still holding it's "Rural Vernacular" building style. Vernacular architecture is described as a built environment that is based upon local needs; defined by the availability of particular materials indigenous to its particular region; and reflects local traditions and cultural practices. Traditionally, the study of vernacular architecture did not examine formally schooled architects, but instead that of the design skills and tradition of local builders, who were rarely given any attribution for the work. More recently, vernacular architecture has been examined by designers and the building industry in an effort to be more energy conscious with contemporary design and construction—part of a broader interest in sustainable design.

We feel the end result of our work will not impair the property's ability to act as a physical record of its time and overall will serve to protect the integrity of the home through stewardship and investment by the current owners.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City partially concurs with the applicant's findings, in that the existing asphalt shingle roof and vinyl windows to be altered are not original distinctive materials or features. The City adds that finds that the proposal generally protects the character-defining structural components of the historic landmark, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the cross-gabled roof with eave returns, foundation, and front porch with columns. However, the proposed roofing and window material is not found to be physically or visually compatible with the historic resource, and also is not found to be consistent with other applicable review criteria, as described in more detail below. Conditions of approval are included to address the roofing and window materials.

17.65.060(B)(2)(d). Changes to a property that have acquired historic significance in their own right will be retained and preserved.

APPLICANT'S RESPONSE: The home was originally constructed in 1900, according to the Historic Resources Inventory sheet. When inventoried in 1983, the home seemed wholly intact - noting that there was an "addition which is weatherboard" and had an addition/alteration described as "Convert Garage to Living Space" which was tied to permit number "01B0805". The inventory sheet lists the siding as "beveled".

Currently installed is beveled vinyl siding, which was introduced as an exterior product in 1950 and by 1970 was more commonly used in the market and exists on numerous historic homes in McMinnville.

FINDING: SATISFIED. The City concurs with the applicant's findings, and adds that there is no evidence that changes to the property have acquired historic significance that require retention or preservation.

17.65.060(B)(2)(e). Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

APPLICANT'S RESPONSE: The window addition and relocation will stay within the existing condition of already replaced vinyl windows and in an un-obtrusive location on the house (south side, away from public streets) which is not visible from the sidewalk or other public right of ways. The re-roof of the house will transition away from the currently installed asphalt shingles to standing-seam metal. Neither the existing roofing material or the area of the kitchen windows are contain elements that characterize or define this property. The materials, features, finishes,

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City partially concurs with the applicant's findings, in that the existing asphalt shingle roof and vinyl windows to be altered are not original distinctive materials or features. However, the City finds that the proposed material for the window and re-roofing did not satisfy other applicable review criteria, as described in more detail below. Conditions of approval are included to address the roofing and window materials.

17.65.060(B)(2)(f). The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.

APPLICANT'S RESPONSE: The only work being done as "intervention" due to "deterioration" is the re-roof of the existing asphalt shingle roof which is not an original distinctive feature of the house.

FINDING: SATISFIED WITH CONDITION #2. The City partially concurs with the applicant's findings, in that the existing asphalt shingle roof is not an original distinctive feature. However, the City finds that the existing roofing material is more compatible with the historic distinctive material which was a cedar shingle roofing material. The proposed standing seam metal roofing material is not found to match the old in composition, design, or texture. The standing seam metal roofing represents a change in materials that is different in physical composition, as metal is not an organic material such as wood (cedar shingles) or even an organic-based asphalt shingle. The standing seam metal roofing material is also different in texture, design, and appearance. The historic roofing material was in the form of shingle roofing material that had a repetitive design more in scale with the beveled siding of the remainder of the structure. The historic roofing material was also in the obvious shingle pattern and appearance, with a more robust texture to the building material than a standing seam metal roof would provide. A National Park Service Preservation Brief tilted "Roofing for Historic Buildings" also provides specific guidance that "Asphalt shingles or ceramic tiles are common substitute materials intended to duplicate the appearance of wood shingles...", thereby providing a more specific example of a material that is compatible with the historic cedar (wood) shingles that previously existed on the historic landmark. Therefore, the City does not find the standing seam metal roofing material to be a compatible substitute material for the missing historic roof feature.

A condition of approval is included to not allow the standing seam metal roofing material, but that the roofing material could be replaced with a like-for-like replacement of the asphalt shingle roofing material that currently exists on the structure. This material is found to be more compatible with the historic resource in question and more accurately duplicates the historic wood shingle roof that is missing, as is supported by the National Park Service Preservation Brief referenced above.

Additional findings related to the Preservation Brief language referenced above are provided in the findings for the Secretary of the Interior Standards below.

17.65.060(B)(2)(g). Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

APPLICANT'S RESPONSE: Not Applicable: No chemical treatments are a part of this project.

FINDING: SATISFIED. The City concurs with the applicant's findings.

17.65.060(B)(2)(h). Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

APPLICANT'S RESPONSE: Not Applicable: No archeological resources are a part of this project.

FINDING: SATISFIED. The City concurs with the applicant's findings.

17.65.060(B)(2)(i). The Guidelines for Historic Preservation as published by the United States Secretary of the Interior.

APPLICANT'S RESPONSE: The owner and applicant feels the project is consistent with the Guidelines for Historic Preservation as published by the United States Secretary of the Interior. Specifically, under the Treatment for Rehabilitation - the treatment for which this scope of work falls - we took note of the following section relating to the handling of the re-roof of the current asphalt shingles for standing-seam metal:

"Design for the Replacement of Missing Historic Features - When an entire interior or exterior feature is missing, such as a porch, it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the process of carefully documenting the historic appearance. If the feature is not critical to the survival of the building, allowing the building to remain without the feature is one option. But if the missing feature is important to the historic character of the building, its replacement is always recommended in the Rehabilitation guidelines as the first, or preferred, course of action. If adequate documentary and physical evidence exists, the feature may be accurately reproduced. A second option in a rehabilitation treatment for replacing a missing feature, particularly when the available information about the feature is inadequate to permit an accurate reconstruction, is to design a new feature that is compatible with the overall historic character of the building. The new design should always take into account the size, scale, and material of the building itself and should be clearly differentiated from the authentic historic features."

If the committee feels that, given the circumstance, a standing-seam metal roof of neutral and complimentary color is acceptable, the action of replacing the non-original asphalt shingles with the metal is consistent with the Secretary of Interior standards. See attached provided illustrations of proposed metal color(s) and examples of historic homes with original metal roofing. Metal, in numerous different forms, profiles, and colors is undeniably recognized as a historic roofing material by the Secretary of the Interior with multitudes of published resources on the material type and application for residential properties ("The Guidelines for Historic Preservation as published by the United States Secretary of the Interior" pgs 98-101 refer to use and replacement of metal as acceptable, pg 12 acknowledges metal as historic material, and many Recommended lists in roofing treatments include and acknowledge metal roof as appropriate material).

Further exploring the Rehabilitation treatment, under "roofs" on page 98, there are "recommended" and "not recommended" measures.

"**Recommended** - Identifying, retaining, and preserving roofs and their functional and decorative features that are important in defining the overall historic character of the building. 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, weather vanes, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles), and size, color, and patterning. "

We feel that the move from the already unoriginal (which, as established, was made unoriginal by prior owners, not by current owners) asphalt shingle roofing material to standing seam metal we will follow the Secretary of Interior's **Recommended** path and preserve the "functional and decorative features that are important to the character of the building." Not altering the framing or structure of the lines or sections, and using the low-profile trims and flashings will achieve this. The roof isn't adorned with "decorative and functional features" as listed. Lastly, the material in question to get replaced is already the unoriginal material so the question is for the appropriateness for the introduction of metal as an acceptable material. Interesting to note that the above recommended path from the Secretary of the Interior allows for metal-to-metal selection, establishing that metal itself is acceptable as a material on historic residences.

"**Not Recommended** - Removing or substantially changing roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Removing a major portion of the historic roof or roofing material that is repairable, then rebuilding it with new material to achieve a more uniform or "improved" appearance. Changing the configuration or shape of a roof by adding highly visible new features (such as dormer windows, vents, skylights, or a penthouse). Stripping the roof of sound historic material, such as slate, clay tile, wood, or metal."

We feel that the replacement of the asphalt shingles, that have hit their lifetime limit, with an alternate material will not commit any of the Secretary of the Interior's **Not Recommended** items listed above or through the remaining **Not Recommended** table.

Further exploring the Rehabilitation treatment, under "windows" on page 102, there are "recommended" and "not recommended" measures.

"**Recommended** - Identifying, retaining, and preserving windows and their functional and decorative features that are important to the overall character of the building. 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, ogee lugs, glazing, pane configuration, sills, mullions, casings, or brick molds) and related features, such as shutters."

We feel that the scope of work related to the windows already outlined will follow the Secretary of Interior's **Recommended** guidelines as listed above. The windows in specific of the project are two windows that were installed prior to the current owner's possession of the house and are incongruous to the period of the home in material - vinyl as opposed to wood. The scope of work would not violate the **Recommended** guideline listed above.

Further exploring the Rehabilitation treatment, under "Sustainability" on page 155, there is a statement:

"**Sustainability** is usually a very important and integral part of the treatment Rehabilitation. Existing energy-efficient features should be taken into consideration early in the planning stages of a rehabilitation project before proposing any energy improvements. There are numerous treatments that may be used to upgrade a historic building to help it operate more efficiently while retaining its character. "

Further reading there are many official references to Metal as Historic Roofing Material:

A. National Park Service - Roofing for Historic Buildings <u>https://www.nps.gov/tps/how-to-preserve/briefs/4-roofing.htm#materials</u>

Pertinent Excerpt #1:(Historic Roofing Materials in America) Metal: Metal roofing in America is principally a 19th-century phenomenon. Before then the only metals commonly used were lead and copper. For example, a lead roof covered "Rosewell," one of the grandest mansions in 18th century Virginia. But more often, lead was used for protective flashing. Lead, as well as copper, covered roof surfaces where wood, tile, or slate shingles were inappropriate because of the roof's pitch or shape.

Copper with standing seams covered some of the more notable early American roofs including that of Christ Church (1727–1744) in Philadelphia. Flat-seamed copper was used on many domes and cupolas. The copper sheets were imported from England until the end of the 18th century when facilities for rolling sheet metal were developed in America.

Sheet iron was first known to have been manufactured here by the Revolutionary War financier, Robert Morris, who had a rolling mill near Trenton, New Jersey. At his mill Morris produced the roof of his own Philadelphia mansion, which he started in 1794. The architect Benjamin H. Latrobe used sheet iron to replace the roof on Princeton's "Nassau Hall," which had been gutted by fire in 1802.

The method for corrugating iron was originally patented in England in 1829. Corrugating stiffened the sheets, and allowed greater span over a lighter framework, as well as reduced installation time and labor. In 1834 the American architect William Strickland proposed corrugated iron to cover his design for the market place in Philadelphia.

Pertinent excerpt #2: (Alternative Roofing Materials)

The search for alternative roofing materials is not new. As early as the 18th century, fear of fire caused many wood shingle or board roofs to be replaced by sheet metal or clay tile. Some historic roofs were failures from the start, based on overambitious and naive use of materials as they were first developed. Research on a structure may reveal that an inadequately designed or a highly combustible roof was replaced early in its history, and therefore restoration of a later roof material would have a valid precedent. In some cities, the substitution of sheet metal on early row houses occurred as soon as the rolled material became available.

B. National Park Service National Center for Preservation Technology and Training - Roofs & Chimneys

Image examples from their online resources and guidelines: <u>https://www.ncptt.nps.gov/technical-resources/resilient-heritage/roofs-chimneys/</u>

C. National Park Service - Roofing for Historic Buildings https://www.nps.gov/tps/education/roofingexhibit/metals2.htm

Stamping sheets of metal was an innovation that added rigidity to a thin material and facilitated interlocking edges, reducing needed lap and preventing wind lift. Patterns were frequently patented and were produced in iron, tinplate, galvanized steel or copper.

Sheets of iron were first pre-formed by corrugation in England in 1828. American manufacturers were producing corrugated roofing from both plain and galvanized iron by mid-19th century. Corrugation added stiffness, making the material self-supporting over longer spans and eliminating the need for sheathing or closely spaced framing. Thus,

corrugated iron was well suited for inexpensive, quickly assembled buildings, making it a common material for the construction that accompanied the California Gold Rush. Later in the century, manufacturers offered flat sheets with edges pre-formed for standing seams or in a V shape as economical alternatives to onsite fabrication.

Unlike the simple lapped installation used for corrugated or V-edge sheets, most siteformed metal roofing utilizes various folded, interlocking joints to create a weatherproof covering. Metals that can be fused (lead) or soldered (tin, terne, zinc, copper) can have sealed joints, thus removing slope as a factor in the water-shedding performance of the assembly. Solder was usually applied to seal interlocked seams that had been folded flat. Flat seams joined small sheets of metal to cover curved shapes or very low-sloped roofs. They were also used to create long strips of a metal such as tinplate, which was only available as small sheets. When the long strips were laid parallel to the slope of a roof (minimum 2 in 12 slope), the long edges could be joined without solder if the joints were raised above the rest of the roof surface as a rib. Usually the adjacent edges were folded over each other creating a standing seam. Many metals were used for this common roof. Variations on the system formed the seam over battens or used separate cap pieces to join the bent edge flanges. Although requiring slightly more material, a standing seam better accommodates the expansion and contraction of metal than does a flat seam roof.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City concurs with the applicant's finding that the proposed alterations would be considered a "Rehabilitation" of the existing historic resource, which is a type of treatment of historic properties described in the Secretary of the Interior's Standards for the Treatment of Historic Properties. This document describes the rehabilitation of a historic building as follows:

"In Rehabilitation, historic building materials and character-defining features are protected and maintained as they are in the treatment Preservation. However, greater latitude is given in the Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. Of the four treatments, only Rehabilitation allows alterations and the construction of a new addition, if necessary for a continuing or new use for the historic building."

The City finds that the proposal does include an alteration, which is only allowed in the Rehabilitation treatment. The City also finds that the proposal generally protects the characterdefining structural components of the historic landmark, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the crossgabled roof with eave returns, foundation, and front porch with columns. However, as noted by the applicant, some of the original materials listed in the Historic Resources Inventory have been replaced, including the beveled siding, some windows, and the roofing material. Therefore, these historic building materials can no longer be protected and maintained, but the Rehabilitation standard allows for missing features to be replaced using "either the same material or compatible substitute materials".

The proposal involves alterations to two features of the historic landmark that have already been lost and are therefore missing, including the roofing material on the entire structure and one existing window. The one window in question is an existing window that has already been replaced at some point in the past with a vinyl window. The existing roofing is an asphalt shingle material that was also replaced at some point in the past, replacing what was a cedar shingle roof as documented in the Historic Resources Inventory.

Findings for Roof Alteration: The proposed roof alteration is fairly substantial as it would replace the roofing material of the entire structure. The new material proposed is a standing seam metal roof. The City does not find that the use of the standing seam metal roofing material is consistent with the basic parameters of the Rehabilitation treatment. Specifically, the standing seam metal roofing is not "the same material" as the missing historic roofing material, which was cedar shingles as documented in the Historic Resources Inventory. The City also finds that the standing seam metal roofing is not a "compatible substitute material" for the historic landmark. More specific findings for the lack of compatibility of the material is provided below.

The applicant does reference that the Rehabilitation treatment provides guidance for designing for the replacement of missing historic features, which is as follows:

"Design for the Replacement of Missing Historic Features - When an entire interior or exterior feature is missing, such as a porch, it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the process of carefully documenting the historic appearance. If the feature is not critical to the survival of the building, allowing the building to remain without the feature is one option. But if the missing feature is important to the historic character of the building, its replacement is always recommended in the Rehabilitation guidelines as the first, or preferred, course of action. If adequate documentary and physical evidence exists, the feature may be accurately reproduced. A second option in a rehabilitation treatment for replacing a missing feature, particularly when the available information about the feature is inadequate to permit an accurate reconstruction, is to design a new feature that is compatible with the overall historic character of the building. The new design should always take into account the size, scale, and material of the building itself and should be clearly differentiated from the authentic historic features. For properties that have changed over time, and where those changes have acquired significance, reestablishing missing historic features generally should not be undertaken if the missing features did not coexist with the features currently on the building. Juxtaposing historic features that did not exist concurrently will result in a false sense of the building's history."

The applicant also references language in a National Park Service Preservation Brief tilted "Roofing for Historic Buildings" that provided examples of metal roofing use in American history, and also referenced language from the "Alternative Materials" section of that Preservation Brief. The applicant has argued that the standing seam metal roof could be accepted as a replacement material based on the fact that metal roofing is listed as a type of roofing in the Secretary of the Interior Standards, and based on some example photographs that were provided of other structures that appear to be historic that include metal roofing.

However, the City does not find that the applicant provided adequate context for the example photographs or evidence of metal roofing being a typical roofing material on residential structures in McMinnville or a typical roofing material during the period of development of the historic landmark in question. The example photographs provided by the applicant identify structures in other regions of the country, and do not specify the period of development or whether they are structures that would require adherence to the Secretary of the Interior Standards. While metal is listed as a type of roofing material on page 12 of the Secretary of the Interior Standards, as referenced by the applicant, there is no evidence provided of it being used as a roofing material on residential structures in McMinnville during the period of development of the historic landmark. The Historic Resources Inventory provides evidence that a cedar shingle existed on the landmark as late as 1980, and may have been an original material or a replacement of an original material with the same cedar shingle material.

Further analysis of the "Alternative Materials" section of the Preservation Brief titled "Roofing for Historic Buildings" referenced by the applicant reveals the following full text:

"In a rehabilitation project, there may be valid reasons for replacing the roof with a material other than the original. The historic roofing may no longer be available, or the cost of obtaining specially fabricated materials may be prohibitive. But the decision to use an alternative material should be weighed carefully against the primary concern to keep the historic character of the building. If the roof is flat and is not visible from any elevation of the building, and if there are advantages to substituting a modern built-up composition roof for what might have been a flat metal roof, then it may make better economic and construction sense to use a modern roofing method. But if the roof is readily visible, the alternative material should match as closely as possible the scale, texture, and coloration of the historic roofing material.

Asphalt shingles or ceramic tiles are common substitute materials intended to duplicate the appearance of wood shingles, slates, or tiles. Fire-retardant, treated wood shingles are currently available. The treated wood tends, however, to be brittle, and may require extra care (and expense) to install. In some instances, shingles laid with an interlay of fire-retardant building paper may be an acceptable alternative.

Lead-coated copper, terne-coated steel, and aluminum/ zinc-coated steel can successfully replace tin, terne plate, zinc, or lead. Copper-coated steel is a less expensive (and less durable) substitute for sheet copper.

The search for alternative roofing materials is not new. As early as the 18th century, fear of fire caused many wood shingle or board roofs to be replaced by sheet metal or clay tile. Some historic roofs were failures from the start, based on overambitious and naive use of materials as they were first developed. Research on a structure may reveal that an inadequately designed or a highly combustible roof was replaced early in its history, and therefore restoration of a later roof material would have a valid precedent. In some cities, the substitution of sheet metal on early row houses occurred as soon as the rolled material became available.

Cost and ease of maintenance may dictate the substitution of a material wholly different in appearance from the original. The practical problems (wind, weather, and roof pitch) should be weighed against the historical consideration of scale, texture, and color. Sometimes the effect of the alternative material will be minimal. But on roofs with a high degree of visibility and patterning or texture, the substitution may seriously alter the architectural character of the building."

The Rehabilitation treatment guidance for the design of missing features states that a new material being used to replace a missing feature should be "compatible with the overall historic character of the building". This is further supported in the "Roofing for Historic Buildings" Preservation Brief language on "Alternative Materials" that states that "...the decision to use an alternative material should be weighed carefully against the primary concern to keep the historic character of the building" and that "...if the roof is readily visible, the alternative material should match as closely as possible the scale, texture, and coloration of the historic roofing material."

The roof of the historic landmark in question is pitched and highly visible, which requires an analysis of the compatibility of the proposed material with the historic landmark. The City finds that the applicant did not provide any evidence or analysis of whether the standing seam metal roof is "compatible with the overall historic character of the building" as is required by the Rehabilitation treatment and the additional Preservation Brief language referenced above.

The City finds that the standing seam metal roofing is not compatible with the historic landmark in question. The standing seam metal roofing represents a change in materials that is different in physical composition, as metal is not an organic material such as wood (cedar shingles) or even an organic-based asphalt shingle. The standing seam metal roofing material is also different in scale, texture, and appearance. The historic roofing material was in the form of shingle roofing material that had a repetitive design more in scale with the beveled siding of the remainder of the structure. The historic roofing material was also in the obvious shingle pattern and appearance, with a more robust texture to the building material than a standing seam metal roof would provide. The Preservation Brief language referenced above also provides specific guidance that "Asphalt shingles or ceramic tiles are common substitute materials intended to duplicate the appearance of wood shingles...", thereby providing a more specific example of a material that is compatible with the historic cedar (wood) shingles that previously existed on the historic landmark. Therefore, the City does not find the standing seam metal roofing material to be a compatible substitute material for the missing historic roof feature.

A condition of approval is included to not allow the standing seam metal roofing material, but that the roofing material could be replaced with a like-for-like replacement of the asphalt shingle roofing material that currently exists on the structure. This material is found to be more compatible with the historic resource in question and more accurately duplicates the historic wood shingle roof that is missing, as is supported by the National Park Service Preservation Brief referenced above.

The City's findings are further supported by some of the applicable Rehabilitation guidelines for roofing on historic buildings, which are provided below:

Recommended Guideline: Identifying, retaining, and preserving roofs and their functional and decorative features that are important in defining the overall historic character of the building. 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, weather vanes, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles), and size, color, and patterning.

Finding: As described in more detail above, the proposed standing seam metal roofing material is not found to be compatible with the size, appearance, and patterning of the historic material.

Recommended Guideline: Replacing in kind an entire roof covering or feature that 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 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.

Recommended Guideline: Replacing an incompatible roof covering or any deteriorated non-historic roof covering with historically-accurate roofing material, if known, or another material that is compatible with the historic character of the building.

Recommended Guideline: Designing and installing a new roof covering for a missing roof or a new feature, such as a dormer or a monitor, when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.

Finding: As described in more detail above, the proposed standing seam metal roofing material is not found to be a compatible substitute material.

Not Recommended Guideline: Removing a feature of the roof that is unrepairable and not replacing it, or replacing it with a new roof feature that does not match.

Not Recommended Guideline: Using a substitute material for the replacement that does not convey the same appearance of the roof covering or the surviving components of the roof feature or that is physically or chemically incompatible.

Not Recommended Guideline: Creating an inaccurate appearance because the replacement for the missing roof feature is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature to be replaced did not coexist with the features currently on the building.

Not Recommended Guideline: Introducing a new roof feature that is incompatible in size, scale, material, or color.

Finding: As described in more detail above, the proposed standing seam metal roofing material is not found to be similar in appearance to the historic material, and is not found to be a compatible substitute material.

Findings for Window Alteration: The specific window alteration involves moving an existing vinyl window slightly, and installing another vinyl window immediately adjacent to it. The existing window will remain, but will be relocated. The addition of a new window in this location is not a replacement of a missing feature, but rather a new feature being installed adjacent to window features that have already been altered and replaced with vinyl window materials.

The two existing windows in this location are vinyl windows which, as stated by the applicant, appear to be replacements of the original window material. The windows are double-hung and one-over-one, which is the same style of window referenced in the Historic Resources Inventory sheet for the structure. The siding in this location is a vinyl siding, which is a replacement of an original beveled siding material. The area of the window alteration is also located on the south elevation that is not prominent or highly visible, and in an area of the structure that is not specifically referenced in the statement of historical significance in the Historic Resources Inventory sheet for the structure. Due to the location of the proposed window alteration, and the fact that the alteration would not substantially impact any primary building facade, the proposed relocation of the existing window and addition of a new window immediately adjacent to the two existing vinyl windows is not found to detract from the historic character of the historic resource. However, the material of the new window and the relocated window should be consistent with the historic character of the historic resource. Photographs provided by the applicant show that there are still some wood windows in existence on the house, so a wood window would not be inconsistent with this pattern. The new wood windows could be designed to be of the same size, form, and function as the adjacent vinyl windows to not be inconsistent in design or appearance. Therefore, a condition of approval is included to require that the new window and the relocated window be wood to be consistent with the historic materials that existed on the historic resource and to protect the historic character of the historic resource.

The City's findings are further supported by some of the applicable Rehabilitation guidelines for windows on historic buildings, which are provided below:

Recommended Guideline: Identifying, retaining, and preserving windows and their functional and decorative features that are important to the overall character of the building. 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, ogee lugs, glazing, pane configuration, sills, mullions, casings, or brick molds) and related features, such as shutters.

Recommended Guideline: Designing and installing a new window or its components, such as frames, sash, and glazing, when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.

Finding: As described in more detail above, existing incompatible vinyl windows are proposed to remain. Therefore, the windows are not existing historic materials to be preserved and are not a missing feature being replaced. The alteration does involve a minor relocation of one of the vinyl windows and the addition of one new window in a location immediately adjacent to the two existing incompatible vinyl windows.

Recommended Guideline: Adding new window openings on rear or other secondary, less visible elevations, 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.

Not Recommended Guideline: Changing the number, location, size, or glazing pattern of windows on primary or highly-visible elevations which will alter the historic character of the building.

Not Recommended Guideline: Cutting new openings on character-defining elevations or cutting new openings that damage or destroy significant features.

Not Recommended Guideline: Replacing a window that contributes to the historic character of the building with a new window that is different in design (such as glass divisions or muntin profiles), dimensions, materials (wood, metal, or glass), finish or color, or location that will have a noticeably different appearance from the historic windows, which may negatively impact the character of the building.

Finding: The new window opening will occur on a rear elevation that is less visible and is not a prominent elevation with character-defining features. The area of the window alteration is located in an area of the structure that is not specifically referenced in the statement of historical significance in the Historic Resources Inventory sheet for the structure. The new window opening also does not duplicate any historic fenestration pattern that exists on the structure. Due to the location of the proposed window alteration, and the fact that the alteration would not substantially impact any primary building elevation, the proposed relocation of the existing window and addition of a new window immediately adjacent to the two existing vinyl windows is not found to detract from the historic character of the historic resource. However, in order to be compatible with the overall design of the building and not be noticeably different in appearance from the historic windows, a condition of approval is included to require that the new window and the relocated window be wood. Photographs provided by the applicant show that there are still some wood windows in existence on the house, so a wood window would not be inconsistent

with this pattern. The new wood windows could be designed to be of the same size, form, and function as the adjacent vinyl window to not be inconsistent in design or appearance.

17.65.060(B)(3). The economic use of the historic resource and the reasonableness of the proposed alteration and their relationship to the public interest in the historic resource's preservation or renovation;

APPLICANT'S RESPONSE: The project proposed is quite reasonable in the context of homeownership of a single family dwelling bearing historic significance. The kitchen remodel, which involves the relocation of and addition of a window, along with the replacement of a roof at the end of its useful life are items that are within reasonable tolerance. Within the context of reasonableness and economic use, the decision in the re-roofing to pursue standing-seam metal is being made in recognition of metal's longer-term viability, durability, usefulness and impact on the environment, an issue the owners are passionate about making a positive impact. Metal roofing can outlast asphalt by two-to-three times (~60 years versus ~20 years in some cases). These two alterations are only a small piece of the financial investment intended to be made in this house during this remodel project which includes a large scale remodel of the existing kitchen and adjacent areas and an overall commitment to taking care of this property as their home long into the future.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City partially concurs with the applicant's findings. The City agrees that the investment in the structure is a commitment to the continued use and preservation of the historic resource. However, the City finds that the reroofing of the structure using a standing seam metal roofing material is not reasonable due to the material not being compatible with the historic resource. As described in more detail above, other applicable review criteria and the Secretary of the Interior Standards provide guidance for other options of alternative roofing materials that may be more cost-effective and reasonable for the specific application than the historic cedar shingle roofing, but that are also more compatible with the historic resource than the proposed standing seam metal roofing material. In regards to the window material, the new window being installed as a vinyl window was primarily argued by the applicant as reasonable because other windows have already been replaced with vinyl. However, the City finds that the new window and the relocated window could be a wood material, but still be designed to be similar in appearance and function to the adjacent windows. In the future, all of the vinyl windows and vinyl siding could again be replaced with a more historically compatible wood window and siding material, which would better preserve the historic character of the building. Conditions of approval are included to address the roofing and window materials, and are addressed in more detail in findings for other applicable review criteria above.

17.65.060(B)(4). The value and significance of the historic resource; and

APPLICANT'S RESPONSE: The current value and significance of the historic resource, as outlined in the resource inventory sheet are still intact. The house stood out for its roots in rural vernacular architecture - well built and timeless as well as its cross gable roof profiles and charming front porch. A solid and thoughtful home, nestled amongst a neighborhood (Saylor's Addition) of similar-yet-different homes, all equally as valuable for their quaintness.

These factors contributing to the value and significance of the historic resource will remain intact with the scope of work of the proposed project.

FINDING: SATISFIED WITH CONDITIONS #1 AND #2. The City finds that the proposal generally protects the character-defining structural components of the historic resource, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the cross-gabled roof with eave returns, foundation, and front porch with

columns. However, the City finds that the proposed alteration, particularly the proposed standing seam metal roofing material, is not compatible with the historic resource and that the use of the material would detract from the value and significance of the historic resource. Conditions of approval are included to address the roofing and window materials and allow the alterations in a manner that does not detract from the value and significance of the historic resource. These conditions of approval are addressed in more detail in findings for other applicable review criteria above.

17.65.060(B)(5). The physical condition of the historical resource.

APPLICANT'S RESPONSE: The physical condition of the house is great. There are no signs of concern in the physical health of the building. Overall this house is fairing well for one of its age. The only thing relative to physical health needing addressing is the roof, which a material change is being requested as part of this project.

FINDING: SATISFIED. The City partially concurs with the applicant's findings in that a reroofing may be necessary to further protect the physical condition of the historic resource. However, the City finds that the proposed material for the re-roofing did not satisfy other applicable review criteria, as described in more detail above.

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