

# CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION

## STAFF REPORT

### CERTIFICATE OF APPROPRIATENESS

PZ- 21-00024

Address: 213 N Kendrick

DATE: March 8, 2021

MEETING DATE: March 17, 2021

REPORT BY: Mark Reavis, AICP, NCARB

### BACKGROUND

The residential building is located at 213 N Kendrick and was constructed in 1956. The building is located within the Townsite Overlay Zone with design review requirements. The building is located immediately west of a channelized segment of the Rio de Flag with Kendrick St as a one-way heading north. Though the property is address on Kendrick St it is only accessible via an "L" shaped alley via Dale Ave or Sitgreaves St with a dead-end at the Rio. The Townsite Historic Residential District and overlay mandated review when a building permit was applied for after window replacement was underway.

### PREVIOUS HPC DECISIONS

This property has not had previous HPC review.

### REQUEST

This is a request for a Certificate of Appropriateness for a window replacement project at a property that is located within the Townsite Overlay Zone. The project proposes to mitigate the replaced variety of existing windows with appropriate trim-out with 1 x 6 face trim detailing. The windows were replaced with new hollow component vinyl windows with the intention to improve comfort and operation requirements. Though some windows were changed out over time the original windows were single pane with some as divided-light units (casement out-swing). These original windows were flat metal with no defining reveals or depth. The vinyl windows do not seem to meet the current interpretation of the US Secretary of the Interior Standards for Rehabilitation as noted in the design intent of the established Townsite Overlay Zone. The Commission review will need to determine if the replacement windows will or will not adversely affect the integrity of the home or the adjacent Townsite properties. The Heritage Preservation Commission has the sole authority to approve exemptions to the Secretary of the Interior Standards for Historic Properties (Rehabilitation).

### STAFF RECOMMENDATION

Staff recommends approval of the Certificate of Appropriateness if the Commission determines that the submission by the applicant shows that the window replacement project has no significant adverse effect on the integrity of the residential structure and neighboring properties.

The HPO finds that the changes to this simple vernacular home did not significantly impact the integrity of the design. The HPO recommends a Certificate of Appropriateness based upon the following:

- That the replacement vinyl windows have no defining detailing and are flat and very similar to the thin flat metal original windows. Though the vinyl face of the sash is slightly wider, it is a flat profile matching the metal. NOTE: Review of wood windows would have been significantly different in meeting profile and detailing.
- That documentation has noted that adjacent properties have had window replacements and that this replacement window project will not adversely impact adjacent properties or the

district with the remote location of the home set within a dead-end alley, buffered by the Rio de Flag and foliage and is not exposed to a primary neighborhood street frontage.

- That the proposed 1x6 face trim is appropriate mitigation for the window replacement that will add to the compatibility of the home that has a more recent application of T-1-11 siding that apparently removed the original window face trim.

### **INTENT**

The purpose of the Townsite Overlay is to address “many concerns of property owners with regard to construction of homes that are significantly larger than surrounding historic homes, designs not in keeping with the neighborhood, and siting that intrudes upon privacy or blocks the light and views of existing homes.” The Townsite Overlay is a hybrid of a historic and character overlay that “allows preservation, restoration, new construction, remodeling and demolition. The Secretary of the Interior’s Standards are incorporated into this document by reference.”

10-30.30.060 Development of a Landmark Property and Property within a Historic Overlay Zone, Process “C”: “Prior to the granting of any required approvals or permits and prior to the commencement of any work on a landmark property or within a historic overlay zone, the Heritage Preservation Commission or the Historic Preservation Officer shall review all work proposed and approve or conditionally approve the work in the form of a certificate of no effect, certificate of appropriateness, or certificate of economic hardship”.

### **Scope of Work**

The Certificate of Appropriateness is applicable (Flagstaff Zoning Code 10-30.30.060E.) in the case of this property. The impact to the significance and integrity of surrounding historic properties and the compatibility with the approved design guidelines for the zone and nearby adjacent structures are a consideration for this level of review.

### **Required Findings for:**

E. Certification of Appropriateness.

1. Applicability. This approval is appropriate if the proposed work alters a cultural resource, but does so in such a way that is compatible with the historic or archaeological character of the resource and all major impacts are mitigated such that the work does not diminish, eliminate, or adversely affect the significance or integrity of the resource.

2. Criteria for Approval. When approving a certification of appropriateness, the Heritage Preservation Commission shall find that:

a. The proposed work is consistent with the purpose and intent of this division;

b. The proposed work is compatible with its context:

(1) The appropriate context for a landmark or a historic property is the property itself and, to a much lesser extent, the surrounding properties and neighborhood;

2) The appropriate context of work in a historic overlay zone is the significant portions of the property itself, the surrounding properties, and the neighborhood;

- c. The cultural resources associated with the proposed work have been sufficiently sought, identified, and evaluated;
- d. Major impacts on cultural resources are sufficiently mitigated; and
- e. The proposed work is consistent with applicable development standards and design guidelines. See also subsection (G) of this section, Development Standards and Guidelines.

**Townsite Historic Overlay Design Guidelines**

“The Townsite Overlay (TO) zone applies to areas of the City subject to the Townsite Historic Design Review Overlay District Design Standards and Guidelines and design review by the Heritage Preservation Commission for the development of properties located within the boundaries of the zone.” (Flagstaff Zoning Code 10-40.50.030 Overlay Zones).

The Townsite Historic Design Review Overlay District Design Standards and Guidelines and Historic Preservation Resources states “New construction, additions, or alterations shall follow the design of the district's certain recognizable qualities.”

The following design guidelines apply to this case:

Architecture, Materials, Details, and Colors

*Standards*

Architectural styles and building materials are not limited to the existing neighborhood examples, but new work shall be compatible with the neighborhood and maintain high quality of design.

- 1. Materials, details, and colors shall be compatible with historic structures on an individual property and compatible with the surrounding neighborhood.

*Guidelines*

- 3. Architectural details that are typical can be seen on existing historic homes and these homes can be used as models for future designs.

6c. Windows at street-side are to scale with neighborhood character in order to maintain visual continuity with respect to size, style and height.

Requirements for Posted Notices

- 1. For any new construction, addition, or other exterior alteration, the City of Flagstaff shall prepare, and the Applicant shall post for a minimum of 15 days, a Notice of Public Hearing for any application subject to review before the Historic Preservation Commission within the district. Such notices shall be conspicuously posted at the back of sidewalk on the subject site and on property line at the alley. In a case of multiple street frontages or alley frontages, additional notices shall be similarly posted on each additional street or alley.

## **Secretary of the Interior Standards for the Treatment of Historic Properties and Preservation Briefs**

As this building has diminished integrity for its era but was constructed within the period of historic significance Heritage Preservation program typically applies the Secretary's standards and guidelines for rehabilitation in design review. This is done to ensure compatibility with nearby historic structures and to prevent existing buildings from deteriorating the historic character of adjacent structures within the district. Designing and installing a new window or its components, such as frames, sash, and glazing, 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.

### **Relevant Preservation Briefs**

*Preservation Brief 16: The Use of Substitute Materials on Historic Building Exteriors* lists three possible substitute materials that are modern and can provide improved protection from moisture and increased energy efficiency: fiberglass, aluminum and composite (plastic wood).

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## **DISCUSSION**

### **COMMUNICATION BACKGROUND**

This property was not able to be approved by the HPO as a Certificate of No Effect application or for Certificate of Appropriateness because the replacement was undertaken initially without a building permit and that hollow vinyl replacement windows were selected. 13 windows were changed out prior to work being stopped on the project. The contractor submitted a building permit and that permit was pending HPO review for compliance with Townsite requirements. The window replacement contractor has indicated that he was not familiar with either the permitting requirements for window replacement of the same size without structural changes (permitting required since January 2020) or the design review for the Townsite. The HPO implemented extended efforts to work with the contractor to explain the difference between existing window condition with design review and preservation requirement standards. Full documentation of the project and the potential impacts to the Townsite district was required. With a total of 13 windows out of 15 replaced the HPO recently determined that the 2 remaining windows should be replaced so the home could be occupied and that mitigation for Townsite compliance should take the form of appropriate window trim detailing.

The Certificate of Appropriateness is the correct review for the installation of vinyl windows within the Townsite historic overlay with the stated circumstances. In the Townsite Overlay, the HPC retains the sole authority to approve modifications to nonconforming buildings that do not meet the National Park Service and City of Flagstaff's standards and guidelines.

### **HISTORIC ERA INTEGRITY**

The Heritage Preservation Officer Mark Reavis, AICP, NCARB has reviewed the property and has determined the residential building has compromised integrity in design with its added siding. Constructed in 1956 the home exhibits a simple vernacular form.

ARCHITECTURAL DISCRPTION: The residential home is a one-story simple "L" plan with a gable roof and non-descript detailing. The majority of the windows were steel window casement outswing operations,

flat metal detailing applied flush to the structural sheeting. There was no evidence of the original face trim out of the window because of the addition of a more recent (from 1956 construct date) T-1-11 siding application.

### **PROPOSED CHANGES**

The proposed changes to the building consist of window replacement only. This is regards to the removal of the deteriorated windows and replacing with hollow frame vinyl slider units.

### **DESIGN CRITERA**

Though the use of vinyl windows, does not appear to meet the findings for criteria (b)2 and (e) of a Certificate of Appropriateness based on the Secretary of the Interiors Guidelines and technical guidance provided in *Preservation Brief 16: The Use of Substitute Materials on Historic Building Exteriors*. The Overlay Zone guidance is meant to limit adverse impacts to adjacent properties as well as those qualified historic structures of 50 plus years. Complicating this issue is the adopted energy code (Jan 2020) that requires appropriate performance requirements and heritage review that did not previously require HPO review. The Heritage Preservation Officer fully acknowledges the performance problems with single-pane units that have operation problems as well as condensing and sweating issues that cause interior damage. It is in the best interest for the survival of the building that rehabilitation efforts are undertaken for the long-term viability of a building. It is also in the best interest that the replacement of windows are of the highest quality and that long-term durability issues associated with vinyl windows be addressed. According to the Townsite Overlay standards, only the Heritage Preservation Commission may use its discretion to allow for exceptions to the design criteria.

### **Basis of Report:**

The information in this summary report was derived from the application to the Heritage Preservation Commission, requests for additional information from the Contractor, the Flagstaff Zoning Code, and the Townsite Historic Design Review Overlay District Design Standards and Guidelines and Historic Preservation Resources.

### **Evaluation of Effects**

The window replacement change-outs of the original windows with vinyl units had the intent of meeting energy conservation and comfort requirements to allow for the unit to be occupied as a viable rental. The poor condition of the windows (not able to fully determine if original or not) was not a positive presence within the neighborhood. The window replacement did not significantly impact with appearance of the property because of the flat metal windows and the latter addition of the T-1-11 siding that appears to have modified the original window trim detailing.

**Windows per SOI Standards:** The Townsite Overlay states that new and replacement “Materials, details, and colors” should be compatible with the surrounding properties and that “future designs” should be based on the details of surrounding historic properties. The Secretary of the Interior’s guidelines state that “a new design that is compatible with the size, scale, material, and color of the historic building” may be considered appropriate for the rehabilitation guidelines. Compatibility is then defined in terms of material in Preservation Brief 16. The brief does not include vinyl as an appropriate material. Vinyl cannot mimic the profile and form of historic windows in the manner that aluminum, fiberglass and composite can. Because of the nature of the material, it cannot have the relief and details that the other materials offer to historic

properties. Vinyl tends to look flatter and have wider window frames that make it appear as if it is not a historic window. Aluminum, fiberglass and composite can all be used to “clad” or cover wood windows for additional energy efficiency and weather protection or can be strong enough to mimic the appearance of wood because they are a more malleable and durable material. All these materials also resist the yellowing or weathering to which vinyl is prone. For these reasons, the Secretary of the Interior does not consider vinyl a compatible material for windows within a historic district. It is important to note that the Preservation Brief was generally written in regard to historic wood windows. It is essential that the proposed window replacement acknowledges visual design impacts and that compatibility is a significant component of the review along with durability.

### **Vinyl Window Replacement Installation**

The Historic Preservation Commission may consider alternate material and form of the windows and the mitigating aspects of the addition of wide window face trim to the vinyl window installation that intends to match that of adjacent neighboring property windows. The installation may be determined to be appropriate under the Townsite Overlay by Heritage Preservation Commission because none of the windows are street-facing under Standard 6c. After full consideration of findings by the HPC this proposal may be considered for the granting of a Certificate of Appropriateness.

### **Consideration of past window approvals in the Townsite Overlay**

Staff has reviewed the past approvals in the Townsite Overlay and specific situation and property conditions, level of integrity and age of the property requires evaluation of each property individually. Changes in the energy code has greatly increased HPO reviews of window replacements and complexities and interpretation of design review intent.

### **Posting Notices**

Hearing Notices have been posted on site 15 days prior to the public hearing, meeting information for review are posted electronically.

### **OPTIONS FOR COMMISSION DECISION-MAKING:**

- 1) The Commission could approve a Certificate of Appropriateness. In this case, the Commission should go over how they are making each of the required findings and whether the situation in this case would be applicable to other similar properties in the district.
- 2) The Commission could request modifications to the proposal and include them as conditions of approval – or –
- 3) Deny the Certificate of Appropriateness and request that the applicant return for a Certificate of Economic Hardship.

### **ATTACHMENTS:**

Heritage Preservation Commission application and extensive supplemental information included on Agenda Quick.

- *Window details and replacements installed without recommended mitigation 1 x 6 trim.*
- *Notices*
- *Overview aerial of property*



**Vinyl Replacements – slider operation**



**Original metal window hardware detail out-swing casement**



**2- removed metal window**

Notices



Notice on east side of building



Posting at the west end of the Alley



South-facing Notices

Aerial view of property

