The Secretary of the Interior's Standards for Rehabilitation

The Standards (Department of Interior regulations, 36 CFR 67) pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features and the building's site and environment as well as attached, adjacent, or related new construction. The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

1. A property shall be used for its <u>historic purpose</u> or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Analysis #1: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were residential in use. That prior use should be respected and be the basis for approving a new project that is primarily residential in use.

2. The <u>historic character</u> of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Analysis #2: I agree that this standard is not applicable.

3. Each property shall be recognized as a <u>physical record of its time</u>, <u>place</u>, <u>and use</u>. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Analysis #3: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were consistent with the overall character and residential use of the surrounding area. Requiring a return of strictly residential use does not create a false sense of historical development, but supports the character of the district. While a mixed use response across the street from the University may be appropriate, this does imply approval of a radically different character to the edge of the residentially zoned historic district.

4. Most properties <u>change over time</u>; those changes that have acquired historic significance in their own right shall be retained and preserved.

Analysis #4: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were residential in use. That prior use should be respected and be the basis for approving a new project that is primarily residential in use.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that <u>characterize a property</u> shall be preserved.

Analysis #5: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were residential in use. That prior use should be respected and be the basis for approving a new project that is compatible in material, scale, and treatment to the original residential use.

6. Deteriorated historic features shall be <u>repaired rather than replaced</u>. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Analysis #6: I agree that this standard is not applicable.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the <u>gentlest means possible</u>.

Analysis #7: I agree that this standard is not applicable.

8. Significant <u>archeological resources</u> affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Analysis #8: I agree in that no evidence of archeological resources have been found on the site.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The <u>new work shall be differentiated</u> from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Analysis #9: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were residential in use. That prior massing, size, scale, and architectural features should be respected and be the basis for approving a new project that does not diminish the historic integrity of the historic district.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. [Reversibility]

Analysis #10: The Project does NOT comply with this standard. Although the site is now vacant, it is only vacant because the prior developer demolished contributing structures that were residential in use. A structure of the proposed massing, size, and scale is INCOMPATIBLE and is irreversible in its impact on the future integrity of the surrounding historic district.